

Environmental Impact Statement

SSD-86270706 - Mixed-use development at 5 Blue St, North Sydney

5 Blue Street, North Sydney

Submitted to Department of Planning, Housing and Infrastructure
on behalf of Zurich Australian Insurance Properties Pty Ltd

Prepared by Colliers Urban Planning

29 June 2026 | 2210740



'Gura Bulga'

Liz Belanjee Cameron



'Dagura Buumarri'

Liz Belanjee Cameron



'Gadalung Djarri'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Colliers Urban Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past and present.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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C. Statutory Compliance Table	Colliers Urban Planning
D. Consolidated Mitigation Measures	Colliers Urban Planning
E. Architectural Plans	fjcstudio
F. Architectural Design Report	fjcstudio
G. First Nations Co-Design Values Report	JMP Aboriginal Consultancy
H. Landscape Plans	fjcstudio
I. Landscape Design Report	fjcstudio
J. Structural Memorandum	Arcadis
K. Structural Report	Arcadis
L. Integrated Water Management Plan	Arcadis
M. Transport Impact Assessment	JMT Consulting
N. Waste Management Plan	MRA Consulting Group
O. Ecologically Sustainable Development Report	SLR Consulting
P. Draft Construction Methodology	Multiplex
Q. Biodiversity Development Assessment Report Waiver	SLR Consulting
R. Preliminary Site Investigation	Douglas Partners
S. Heritage Impact Statement	Curio Projects
T. Community Engagement Report	Polymer
U. Geotechnical Assessment	Douglas Partners
V. Economic Impact Assessment	Colliers
W. View and Visual Impact Assessment	Colliers Urban Planning
X. Pedestrian Wind Assessment	CPP Wind Engineering
Y. Noise and Vibration Impact Assessment	Renzo Toning & Associates
Z. Preliminary Social Impact Assessment Memo	Patch Planning
AA. Social Infrastructure Needs Assessment	Patch Planning
BB. Aboriginal Due Diligence	Curio Projects
CC. Detailed Survey Plans and Cross Sectional Drawings	veris

Under Separate Cover

1. Estimated Development Cost Report
MBM
2. Letter of Commitment from Community Housing Provider
Bridge Housing

Signed Declaration

Project Details	
Project Name	Mixed-use development at 5 Blue St, North Sydney
Application Number	SSD-86270706
Land to be Developed	5 Blue Street, North Sydney identified as Lot 4 DP1134234
Applicant Details	
Applicant Name	Zurich Australian Insurance Properties Pty Ltd
Applicant Address	118 Mount Street, North Sydney, NSW 2060
Prepared By	
Name	Renee Stavroulakis
Qualifications	BCP (Hons1)
Address	Level 4, 180 George Street, Sydney NSW 2000
Declaration	
Name	Alexis Cella
Qualifications	BRTP (Hons) MPIA
Registration Number	44842
Organisation Registered With	PIA
The undersigned declares that this EIS:	
• Has been prepared in accordance with the <i>Environmental Planning and Assessment Regulation 2021</i>; • Contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; • Does not contain information that is false or misleading; • Addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; • Identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; • Has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement; • Contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; • Contains a consolidated description of the project in a single chapter of the EIS; • Contains an accurate summary of the findings of any community engagement; and • Contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.	
Signature	
Date	29 June 2026

Executive Summary

Purpose of this Report

This Environmental Impact Statement (EIS) (the Report) has been prepared on behalf of Zurich Australian Insurance Properties Pty Ltd (the Applicant) in support of a State Significant Development Application (SSDA) identified as SSD-86270706. The application seeks consent for a mixed-use development comprising residential accommodation, commercial premises and public domain works at 5 Blue Street, North Sydney (the site).

The Department of Planning, Housing and Infrastructure (DPHI) issued Project-Specific Secretary's Environmental Assessment Requirements (SEARs) for the proposal on 16 July 2025. This proposal is prepared in accordance with the guidance provided by the Housing Delivery Authority (HDA) for Concurrent Rezoning reports, the requirements as prescribed by Part 8 of the *Environmental Planning and Assessment Regulation 2021*, and the State Significant Development Guidelines, and addresses the issues raised in the SEARs.

The Site and Context

The site is located at 5 Blue Street, North Sydney, on a prominent corner of Blue Street and Miller Street and sitting in a freehold stratum directly above North Sydney Train Station. The site is situated approximately 2km to the north of the Sydney Central Business District (CBD) within the North Sydney Local Government Area (LGA).

The site is legally identified as Lot 4 in DP1134234. The site is regular in shape and has a total area of approximately 3,051m², with frontages to Blue Street to the north, and to Miller Street to the west. Phillips Lane is located within the site along its southern boundary.

Proposal Overview

This proposal seeks the following:

- **Approval of a rezoning request:** to support the proposed mixed-use development, a rezoning request is being sought concurrently with the SSD application under the Housing Delivery Authority (HDA) pathway. The rezoning request seeks to amend the *North Sydney Local Environmental Plan 2013* by amending the land use zone and maximum building height controls applicable to the site. These changes will enable a built form that facilitates additional housing supply, and supports a vibrant mix of uses in line with the aims of the National Housing Accord.
- **Development consent for the proposed development:** the SSD application seeks concurrent consent for the proposed development, which comprises a high-quality, adaptive reuse mixed-use scheme. The design incorporates a large publicly accessible plaza, and landscaping to enhance amenity and permeability. The built form is shaped by generous setbacks, active frontages, and upper-level articulation to ensure a sensitive transition to the surrounding context while delivering a high level of sustainability, residential amenity, and urban design.

Social and Economic Benefits

The proposal will deliver a range of social and economic benefits by providing new housing supply in a well connected urban centre, including a mix of apartment types and a commitment to affordable housing. It will activate North Sydney through enhanced retail and public domain offerings, creating local jobs during both construction and operation. The development supports walkability, enhances public amenity through the enhanced public plaza, and contributes to the area's long-term economic vitality by increasing foot traffic, improving service offerings, and supporting local business growth.

Environmental Benefits

The adaptive reuse nature of the development offers significant environmental and sustainable benefits by retaining and repurposing the existing structure rather than demolishing and constructing a new one. This approach reduces construction and demolition waste, which is a major contributor to landfill, while also conserving the embodied energy already invested in the original building materials. Reusing existing structures also reduces the overall energy consumption linked to construction processes and often encourages integration of modern, energy efficient systems within older buildings. As a result, adaptive reuse supports circular economy principles, reduces carbon footprints and promotes a more sustainable urban development by extending the life cycle of built assets.

Strategic Context

Accordingly, the proposal will assist in alleviating the pressure of the current housing affordability and crisis in NSW by providing additional apartment dwellings that are in need within the locality. This approach is in alignment with the vision and objectives set out within key State and Federal government policies.

Statutory Context

The proposal is governed by the *Environmental Planning and Assessment Act 1979* (EP&A Act), which sets out the statutory framework for land use planning and development in New South Wales. As a State Significant Development (SSD), the project is assessed under Part 4, Division 4.7 of the EP&A Act, which applies to developments of state importance due to their scale, economic value or strategic significance. The proposal has been declared SSD by Ministerial Order (No 4) of 2025, following a recommendation by the Housing Delivery Authority (HDA), and is subject to assessment in accordance with the Secretary's Environmental Assessment Requirements (SEARs) issued under section 4.12(8) of the EP&A Act.

The concurrent rezoning request is facilitated under Part 3, Division 3.4 of the EP&A Act and is being progressed in line with the LEP Making Guideline. It seeks amendments to the North Sydney Local Environmental Plan 2013, specifically to the Land Use Zone and Height of Buildings maps. The proposal must also demonstrate consistency with relevant State Environmental Planning Policies (SEPPs), including the Housing SEPP, Sustainable Buildings SEPP, and Transport and Infrastructure SEPP.

Community Engagement and Stakeholder Communication

The outcomes of the consultation process have been considered in the design of the project as detailed in **Section 6.0**.

Environmental Impacts and Mitigation Measures

This Report provides an assessment of the proposal's environmental impacts in accordance with the SEARs, including an assessment of the below mentioned matters.

- Built form and urban design;
- Wind impacts;
- Visual impact;
- Residential amenity;
- Overshadowing;
- Traffic, transport, and accessibility;
- Noise and vibration;
- Biodiversity;
- Safety and security;
- Ecologically sustainable development;
- Flooding;
- Contamination and remediation;
- Ground and water conditions;
- Waste management;
- Aboriginal cultural heritage;
- Environmental heritage;
- Building Code compliance;
- Utilities and services;
- Social and economic impacts;
- Site suitability; and
- Public interest.

The proposed measures to manage and minimise potential impacts arising from the development are also set out in this Report. In doing so, this Report confirms that the proposed development will not give rise to unacceptable environmental impacts and is supportable from a planning perspective. A number of specialist consultant inputs appended to this Report have informed this analysis (refer to the **Table of Contents**).

Conclusion and Justification

Having regard to the biophysical, economic and social considerations, the carrying out of the proposal is justified for the following reasons:

- It provides an outcome that is consistent with the North Sydney LEP 2013 (subject to rezoning amendments), the relevant SEPPs and the Apartment Design Guide;
- It will facilitate the delivery of a diverse housing supply and a mix of non-residential uses within a desirable location, close to existing transport options and amenities;
- It will enable the delivery of much needed housing supply that will contribute to achieving the recent NSW Housing targets of 5,900 for North Sydney;
- It will support the provision of over 130 direct and 15 indirect FTE jobs on site during the construction stage;
- It sets the parameters to facilitate a high-quality built form outcome that will be accompanied by significant public benefits through the delivery of an enhanced public plaza;
- The scale, massing, height, and bulk of the proposed development is appropriate for the site and its context;
- Supporting technical studies which accompany this SSDA confirm that the environmental impacts associated with the proposal are acceptable and will not give rise to any adverse impacts; and
- The proposed development is suitable for the site and is in the public interest.

On balance, the proposed development is considered to be in the public interest and will not result in any unacceptable social, economic or environmental impacts that cannot be appropriately managed through the identified mitigation measures and conditions of consent.

1.0 Introduction

This Environmental Impact Statement (EIS) has been prepared by Colliers Urban Planning on behalf of Zurich Australian Insurance Properties Pty Ltd (the applicant) in support of a State Significant Development Application (SSDA) identified as SSD-86270706. This application seeks consent for a mixed-use development comprising residential accommodation, commercial premises and public domain works at 5 Blue Street, North Sydney (the site).

The site was declared State Significant Development (SSD) pursuant to *State Significant Declaration Order (No 4) 2025* (Order) issued on 3 April 2025, which specifies development in Expression of Interest (EOI) application 233741 dated 22 January 2025, including development for the purpose of residential flat building with provision of affordable housing at 5 Blue Street, North Sydney, as SSD.

This order enables SSD-86270706 to be undertaken through the Housing Delivery Authority (HDA) pathway with a Concurrent Rezoning to the *North Sydney Local Environmental Plan 2013* (North Sydney LEP 2013). Accordingly, this Report sets out the development sought under SSD-86270706, the amendments sought to the North Sydney LEP 2013, and the relevant matters for consideration under Division 4.7 and Section 3.33 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

On 16 July 2025, the Department of Planning, Housing and Infrastructure (DPHI) issued industry-specific Secretary's Environmental Assessment Requirements (SEARs) and Concurrent Rezoning requirements for the project (SSD-86270706), described as '*mixed-use development at 5 Blue Street, North Sydney*'.

The proposed above station adaptive reuse seeks to transform the landmark site into a vibrant mixed-use development that integrates residential, retail and public domain enhancements into the broader North Sydney CBD. Specifically, the proposal seeks approval for:

- Adaptive reuse and conversion of an existing commercial building to a mixed-use development, comprising residential and non-residential ground floor uses, including:
 - Two levels of basement car parking, comprising plant, bicycle storage areas and car parking spaces;
 - Ground floor retail and residential lobbies;
 - Co-living on Levels 1-3, to be operated as affordable housing by a Community Housing Provider in perpetuity; and
 - Residential dwellings on Levels 4-14.
- Public domain and landscaping improvements, including the retention and enhancement of Blue Street Plaza at the eastern portion of the site;
- Extension and augmentation of services and infrastructure as required; and
- Concurrent amendments to the *North Sydney Local Environmental Plan 2013* to facilitate the SSDA.

This Report is in accordance with Section 3.33 of the EP&A Act, in reference to the Local Environmental Plan Making Guideline, Part 8 of the *Environmental Planning and Assessment Regulation 2021*, and the State Significant Development Guidelines. The purpose of this Report is to document the urban planning, design, environmental investigations and technical analysis undertaken in support of the proposal. The Report provides an assessment of the proposed approach sought to manage development, environmental and technical considerations, and confirm the suitability and necessity of any additional infrastructure required to support the intent of the proposal. It also evaluates the potential impacts of the development and outlines mitigation strategies to ensure sustainable outcomes. It serves as a critical tool for informed decision making by the consent authority, stakeholders and the community.

This Report is set out as follows:

- **Section 2.0** outlines the existing strategic and statutory context, including the details of the site;
- **Section 3.0** provides a description of the proposed development;
- **Section 4.0** provides a description of the proposed amendments to the North Sydney LEP 2013;
- **Section 5.0** documents the project's consistency with the relevant statutory framework;
- **Section 6.0** describes the stakeholder engagement undertaken in relation to the proposed development;
- **Section 7.0** provides an assessment of the relevant environmental planning matters;
- **Section 8.0** sets out the justification for the project as a whole; and

- **Section 9.0** concludes this Report.

This Report should be read in conjunction with the Rezoning Report prepared by Colliers Urban Planning which provides a justification of the strategic and site-specific merit of the proposed amendments to the North Sydney LEP 2013.

This Report should also be read in conjunction with the Architectural Plans prepared by fjstudio, accompanying Architectural Design Report prepared by fjstudio, and other documentation appended to this Report (refer to **Table of Contents**).

1.1 The Applicant

The Applicant's details are presented in **Table 1** below.

Table 1 *Applicants Details*

Applicant	Zurich Australian Insurance Properties Pty Ltd
Address	118 Mount Street, North Sydney, NSW 2060
ABN	79 002 463 292

1.2 Background

Since 2021, the applicant has been engaging with DPHI and Transport for NSW (TfNSW) in relation to potential planning pathways for the proposed development. Discussions have included opportunities for enhancements to the public domain surrounding North Sydney Station, to be delivered at the applicant's cost.

An EOI was lodged with the HDA on 22 January 2025. On 3 April 2025, the HDA recommended the proposal be declared SSD.

1.3 Housing Delivery Authority and National Housing Accord

The NSW State Government has agreed to a National Housing Accord (Accord) with other states and territories, local government, institutional investors and the construction sector. The Accord includes an initial aspirational target agreed by all parties to build 1.2 million new well-located homes over 5 years from mid-2024. NSW has a target to deliver 377,000 new homes over five years by July 2029 under the Accord.

To accelerate the delivery of much needed homes and help meet NSW's target under the Accord, the NSW Government has established the HDA. The HDA offers a clear planning pathway for large residential and mixed-use developments to be assessed as SSD or SSD with a Concurrent Rezoning. This process aims to improve consistency in planning decisions and speed up assessment, without sacrificing housing quality.

The proposed development is well placed to deliver additional uplift to help achieve these housing goals, being a large, consolidated land holding under single ownership in an accessible location with exceptional public transport connections.

1.4 Overview of Proposed Development and Rezoning

1.4.1 SSD-86270706

In recognition of the opportunity that the site provides to deliver housing in an exceptional location with access to public transport and a high level of amenity, the site was declared to be SSD under the HDA, specifically pursuant to the Order issued on 3 April 2025. The Order establishes specified development on the specific land to be declared SSD.

The Order states development specified in EOI application 233741 dated 22 January 2025, including development for the purpose of residential flat building with provision of affordable housing at 5 Blue Street, North Sydney, as SSD.

A detailed description of the development is provided in **Section 3.0** below.

1.4.2 Proposed Amendments to North Sydney LEP 2013

To facilitate the proposed built form sought under SSD-86270706, concurrent amendments are sought to the North Sydney LEP 2013 pursuant to the Concurrent Rezoning process facilitated by the HDA planning pathway.

Specifically, consent is sought to:

- Amend the Land Zoning for the site from E2 Commercial Centre to MU1 Mixed Use; and
- Amend the height of buildings from 65m (RL) and 115m (RL) to 116m (RL) across the site.

Further detail regarding the proposed North Sydney LEP 2013 amendments is provided in **Section 4.0**.

1.5 Objectives of the Development

SSD-86270706 and its Concurrent Rezoning respond to the NSW Government's dwelling targets under the National Housing Accord. Specifically, the proposed development will:

- Deliver residential housing at the site enabling it to meet its highest and best use and respond to the aims and objectives of the HDA with 148 dwellings, comprising 62 market residential dwellings and 86 affordable co-living dwellings to be delivered in perpetuity;
- Deliver a diverse mix of residential apartments, including market housing and co-living dwellings that will enjoy excellent amenity, taking advantage of the site's strategic location, proximity to services and employment opportunities;
- A planning envelope with setbacks to respect the local context and capable of achieving acceptable levels of solar access, wind comfort and daylight 17in adjoining public places;
- Inclusion of an enhanced publicly accessible plaza and retail offerings, contributing to the enhancement of pedestrian amenity, site permeability and access to and around North Sydney Station; and
- Enable the development of high-performance buildings in terms of amenity and sustainability.

1.6 Related Development

Within the site locality, this application for SSD-86270706 is occurring in proximity with two other SSDAs, being:

- 'Mixed-use Mackenzie St, Lavender Bay' at 1-19 Mackenzie Street and 211 Blue Points Road, Lavender Bay (SSD-88702457); and
- 'Mixed use development at 15 Blue St, North Sydney' (SSD-86299960).

Whilst these applications are in proximity, they remain at the EIS preparation stage and are progressing independently. The timing and potential cumulative impacts of these applications will be appropriately considered as part of future assessment. Further discussion is provided in **Section 2.8**.

2.0 Strategic and Statutory Context

2.1 Site Location and Context

The site is located at 5 Blue Street, North Sydney, on a prominent corner of Blue Street and Miller Street and sitting directly above North Sydney Train Station. The site is situated approximately 2km to the north of the Sydney Central Business District (CBD) within the North Sydney Local Government Area (LGA).

The site is located on the periphery of the North Sydney CBD (being the portion of North Sydney located within the E3 Commercial Centre zone), and is surrounded by a range of commercial, retail and residential land uses. The North Sydney CBD is an evolving precinct, with the opening of the Victoria Cross Metro Station approximately 600m north of the site being a catalyst for increased interest in commercial development around the site. This investment in commercial development around Victoria Cross Metro Station aims to shift the position of the North Sydney CBD northwards and facilitate urban renewal in support of a reimagined CBD.

The site's locational context is illustrated at **Figure 1** below.

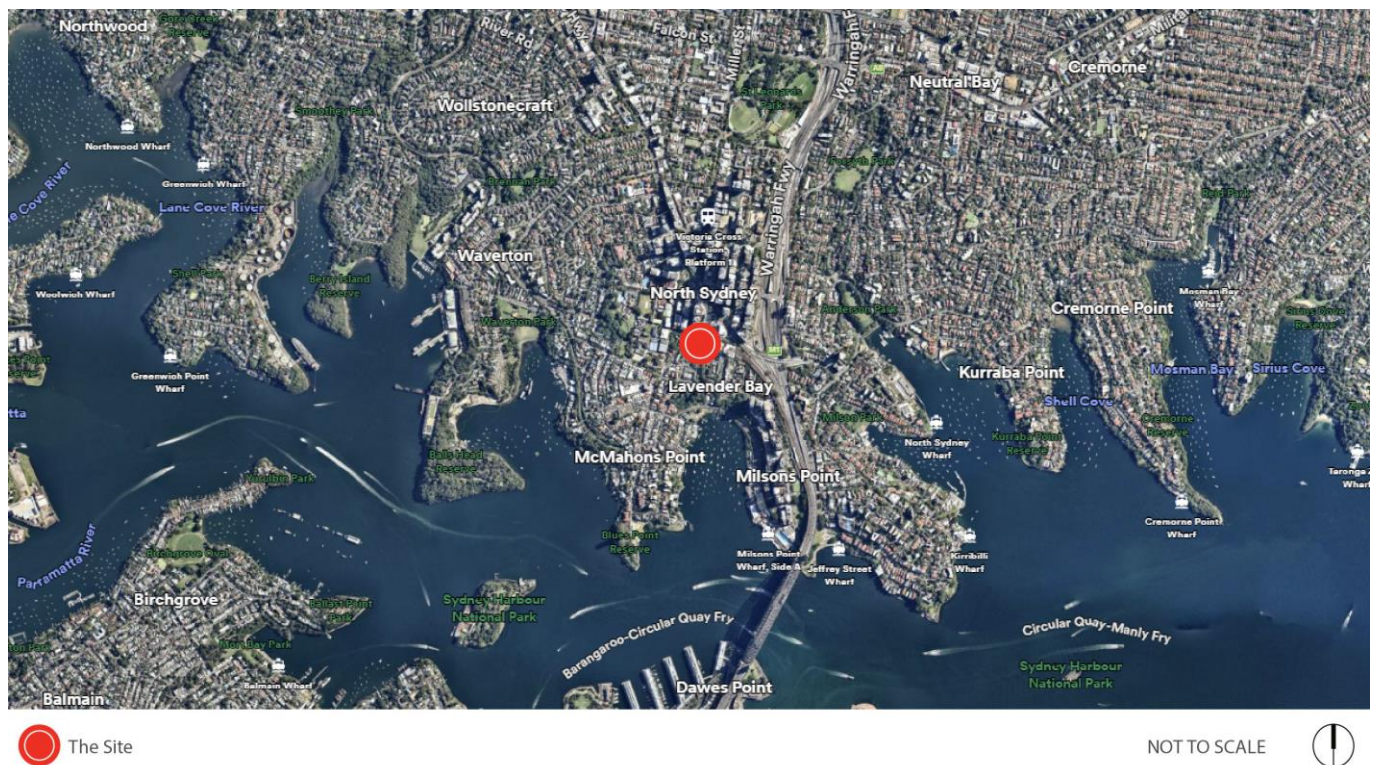


Figure 1 Site Context Map

Source: Nearmap edited by Colliers Urban Planning

2.2 Site Description

2.2.1 Legal Description and Restrictions

The site is legally identified as Lot 4 in DP1134234. The site is regular in shape and has a total area of approximately 3,051m², with a frontage of approximately 84m to Blue Street in the north, and a frontage of approximately 36m to Miller Street to the west. Phillips Lane is located within the site and is directly adjacent to the site's southern boundary. An aerial site map is provided in **Figure 2**.

By virtue of its location above North Sydney Train Station, the site has a complex titling arrangement. The site is a freehold stratum above North Sydney Train Station and is identified as Lot 4 in a stratum (refer to **Figure 3**). An axonometric representation of the Transport Asset Manager stratum is illustrated in **Figure 4**. The particulars of the stratum plan are as follows:

- Lot 4 is a stratum lot above Lot 2 DP713944 and above Lot 3, and is restricted in depth to horizontal and inclined planes, as illustrated in the sections in the DP. Lot 4 is unlimited in height;
- Lot 2 DP 713944 is a stratum lot below Lots 3 and 4 and is unlimited in depth. This lot is owned by Transport Asset Manager (TAM); and
- Lot 3 is a stratum lot limited in depth to a horizontal plane at RL 63.75 and limited in height to a horizontal plane at RL 66.45. This lot is also owned by TAM.

There are various restrictions on title that benefit/burden the site, including (but not limited to) easements to drain water, easements to drain sewage, right of footway, right of carriageway and easements for support. These easements will remain, or will seek to be improved (right of way) with the redevelopment of the site.

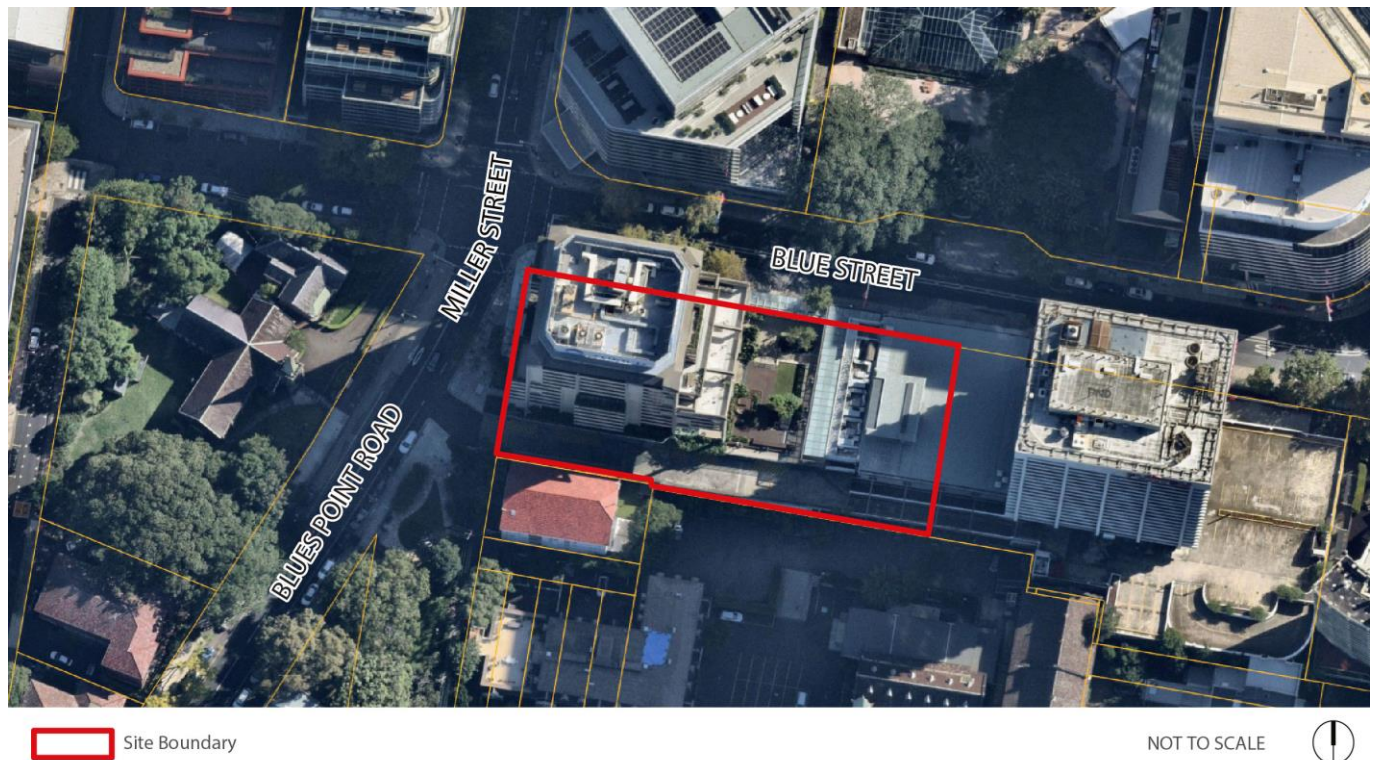


Figure 2 Site Aerial Map

Source: Nearmap edited by Colliers Urban Planning

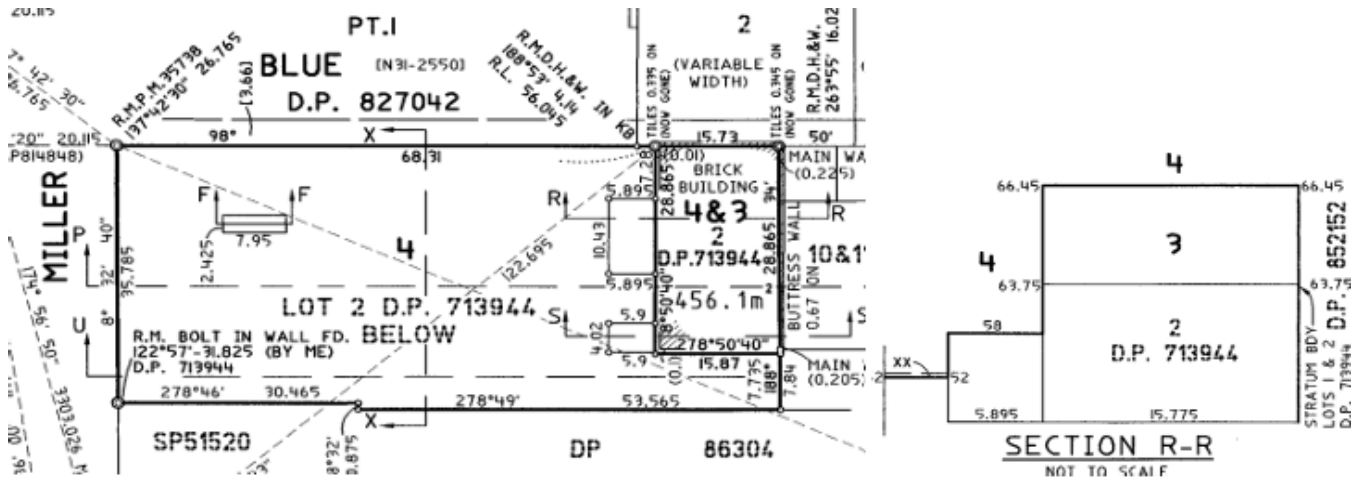


Figure 3 Extracts of the Deposited Plan

Source: Infotrack

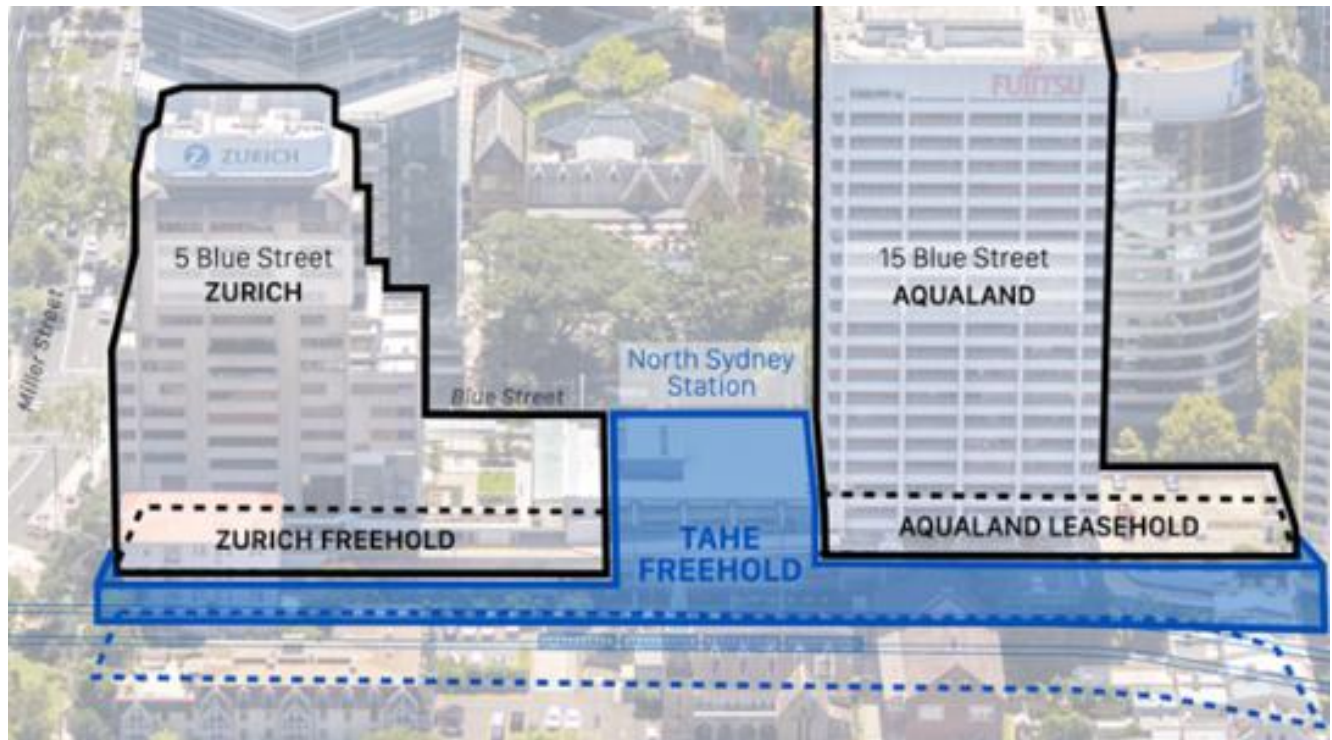


Figure 4 Illustrative axonometric view of TAM stratum (black outline showing existing built form)

Source: fjstudio

2.3 Existing Development

Currently, the site comprises the Zurich building, which is an ageing commercial building 12 storeys in height (RL 109.25) with floor-to-floor heights of 3.33 metres and a total gross building area of 11,723m². Recent fitout and refurbishment works were undertaken to the lobby as a short term measure to the building's ageing nature.

The site also comprises the Blue Street Plaza, which is a privately-owned, publicly accessible plaza. The Plaza has an area of 700m², with a length of 32 metres and width of 20 metres. Iconic views to the Sydney Harbour and Sydney CBD are available at the Plaza. The Plaza was previously listed as a 'Special Area' under the *North Sydney Local Environmental Plan 2013* (North Sydney LEP 2013) to protecting solar access to the Plaza, however, this listing was removed in October 2018.

Existing development on the site is illustrated in **Figure 5**.



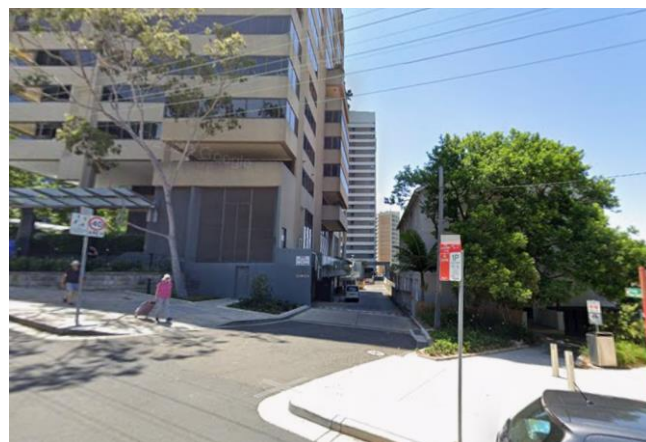
View of the Site from Blue Street, to the Site's West



View of the Site from Blues Point Road, to the Site's South



View of the Site from Blue Street, to the Site's North



View of the Site from Miller Street, to the Site's West

Figure 5 Existing Development on the Site

Source: Google Streetview

2.4 Surrounding Development

The site is located at the southern edge of the North Sydney CBD. While in a CBD context, the site's immediate context also possesses a civic nature, noting the site's adjacency to public transport stations, publicly accessible open space and places of public worship. Surrounding context to the site is identified below.

2.4.1 Beneath the Site

The North Sydney Train Station is located beneath the site within a stratum lot owned by TAM. The site is therefore located within the Sydney Trains Corridor Protection Zone and partially within the Sydney Trains Infrastructure Protection Zone. Refer to **Figure 6**.

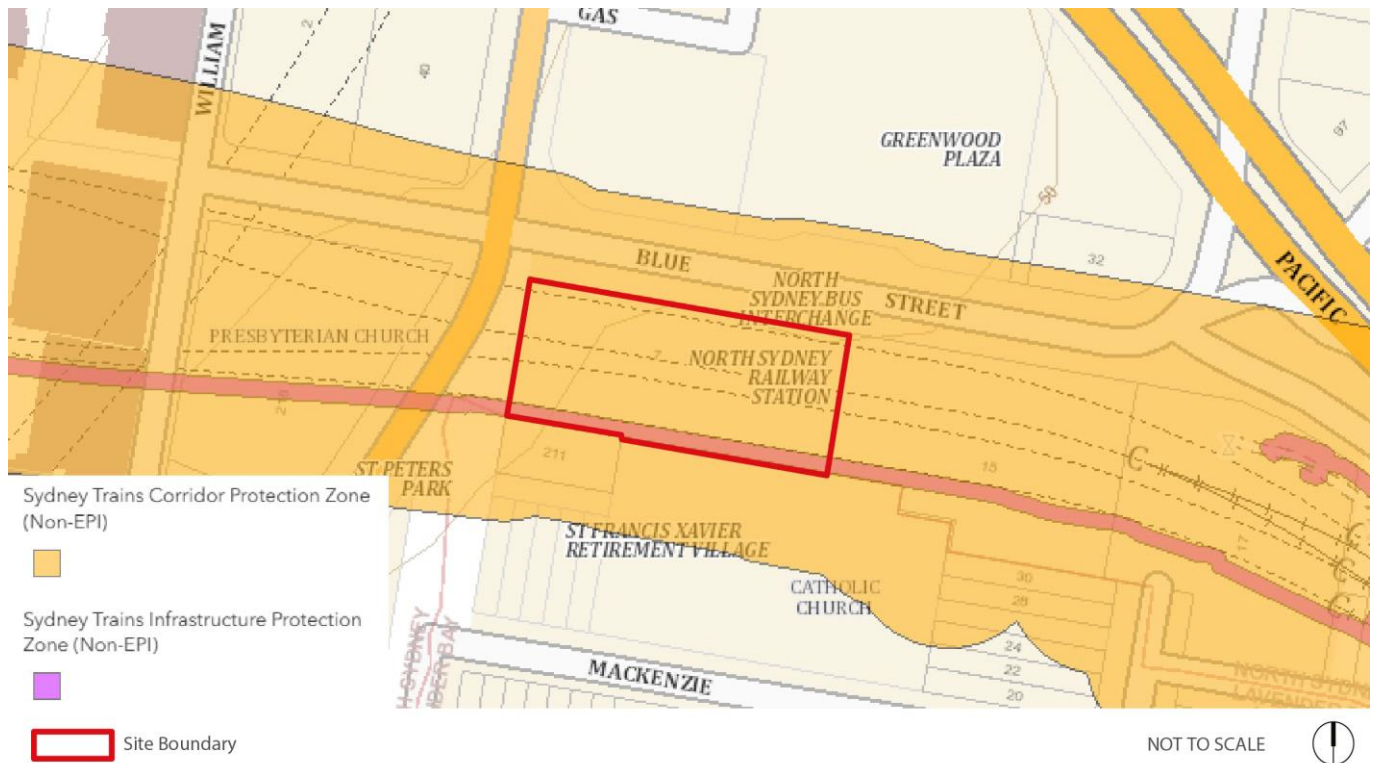


Figure 6 Sydney Trains Corridor Protection Zone and Sydney Trains Infrastructure Protection Zone

Source: NSW Planning Portal Spatial Viewer

2.4.2 North

The site is bound to the north by Blue Street. Directly north of the site is 73 Miller Street, North Sydney, which is a 13-storey commercial office building. Greenwood Plaza is located to the site's north and north-west, being a three-level shopping centre located at the base of a 28-storey commercial office building at 101-103 Miller Street.

Surrounding development further north of the site predominantly consists of high-density commercial office buildings. These commercial land uses, of which the site is included, comprise part of the North Sydney CBD, being the land zoned E2 Commercial Core under the North Sydney LEP 2013.



North of the Site – 101-103 Miller Street, North Sydney as viewed from Cnr Blue Street and Miller Street



North of the Site – Greenwood Plaza as viewed from Blue Street

Figure 7 Surrounding Development – North of the Site

Source: Google Streetview

2.4.3 East

Directly east of the site is the North Sydney Train Station, a two-storey station building with which the site has nil setbacks. East of North Sydney Train Station is 15 Blue Street, an 18-storey commercial office tower that also sits directly above North Sydney Train Station. The building is a leasehold site owned by Aqualand.

Further east of the site is the Warringah Freeway, which signals the end of the North Sydney CBD. A variety of residential building typologies are located further east of the Warringah Freeway.



East of the Site – North Sydney Train Station entry and 15 Blue Street as viewed from Blue Street

Figure 8 Surrounding Development – East of the Site

Source: Google Streetview

2.4.4 South

Adjoining the site to the south is St Francis Xavier Catholic Church (buildings and car park) and St Francis Xavier Retirement Village, which is owned by the Archdiocese of Sydney. These buildings are identified as containing two local heritage items being, 'St Francis Xavier Church' and 'St Francis Xavier School Hall', which are partially located in the Lavender Bay Heritage Conservation Area. Also adjoining the site to the south (adjacent to Blues Point Road) is a three-storey residential flat building, with St Peter's Park to its west.

Further south, development transitions to low and medium density housing, education and commercial land uses, and places of public worship.



South of the Site – St Francis Xavier Catholic Church and St Francis Xavier Retirement Village as viewed from MacKenzie Street



South of the Site – Residential Flat Building and St Peter's Park as viewed from Blues Point Road

Figure 9 **Surrounding Development – South of the Site**

Source: Google Streetview

2.4.5 West

To the west of the site is land zoned RE1 Public Recreation along Miller Street / Blues Point Road. Directly across Blues Point Road is St Peter's Presbyterian Church, which contains two (2) local heritage items, St Peter's Presbyterian Church Manse (item no. I0792) and St Peter's Presbyterian Church and grounds (item no. I0793) at 218 Blues Point Road.

Further west is the Sydney Church of England Grammar School (Shore) which comprises the 'Shore Sydney Church of England Grammar School' local heritage item (item no. I0782) located along William Street.



West of the Site – RE1 Public Recreation-zoned land directly adjoining the site



West of the Site – St Peter's Presbyterian Church as viewed from Miller Street

Figure 10 **Surrounding Development – West of the Site**

Source: Google Streetview

2.5 Heritage

The site is not identified as comprising a heritage item, nor is the site located within a heritage conservation area. However, the site adjoins and is in close proximity to various heritage items and conservation areas, including:

- **'St Francis Xavier Church'** at 19 Mackenzie Street, Lavender Bay (local heritage item I0349);
- **'St Francis Xavier Parish Centre'** at 19 Mackenzie Street, Lavender Bay (local heritage item I0350);
- **'St Peter's Presbyterian Church Manse'** at 218 Blues Point Road, North Sydney (local heritage item I0792);
- **'St Peter's Presbyterian Church and grounds'** at 218 Blues Point Road, North Sydney (local heritage item I0793);
- **'Greenwood (former North Sydney Technical High School)'** at 101-103 Miller Street (36 Blue Street) (local heritage item I0892); and
- **'Lavender Bay'** Conservation Area (conservation area CA12).

A heritage map illustrating surrounding heritage items to the site is provided in **Figure 11** below.

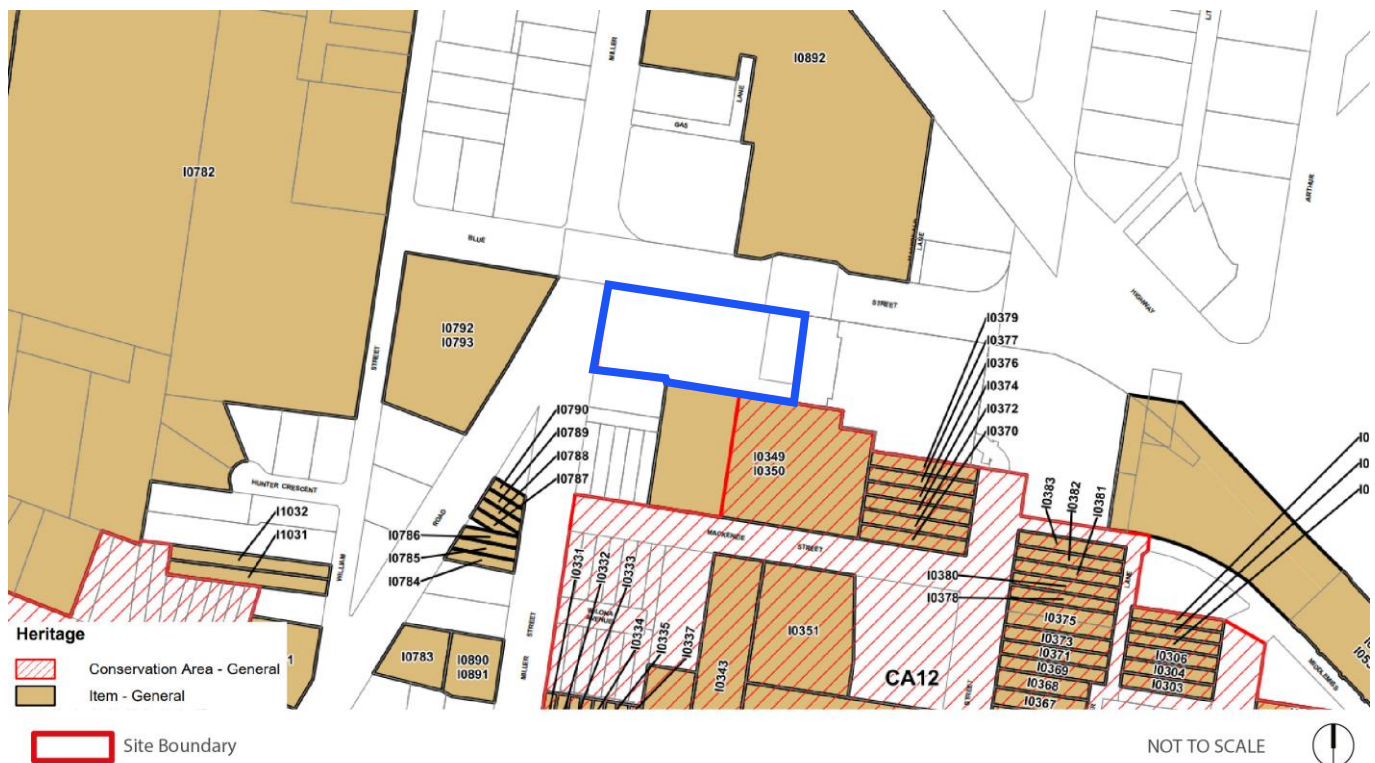


Figure 11 Heritage map (outline in blue)

Source: North Sydney LEP 2013

2.6 Flooding

Under the North Sydney LGA-wide Floodplain Risk Management Study and Plan, the site is not directly affected by flood controls, nor is the site located within the Category A or Category B flood areas, which are defined as:

- Category A: land located on/in the proximity of an identified/designated floodway; and
- Category B: land located on/adjacent to a localised flood with significant flood depth or flow (that is not part of the identified/designated floodway).

As such, the site does not comprise part of the flood planning area and no Flood Impact and Risk Assessment is required.

For completeness, it is noted that Miller Street to the site's west is minorly flood affected in the 1% Annual Exceedance Probability (AEP) event (refer to **Figure 12**) and the Probable Maximum Flood (PMF) (refer to **Figure 13**), with a peak flood depth of 0 to 0.15 metres in both design events.



Figure 12 Flood Map – 1% AEP Event

Source: North Sydney LGA-wide Floodplain Risk Management Study and Plan



Figure 13 Flood Map – PMF Event

Source: North Sydney LGA-wide Floodplain Risk Management Study and Plan

2.7 Strategic Planning Context

This section demonstrates how the vision and intended outcomes for the site are consistent with a range of strategic planning objectives established by both North Sydney Council and the NSW State Government. Specifically, the proposed development supports the strategic planning frameworks relating to the following themes.



2.7.1 Housing Supply and Affordability

Sydney is experiencing a significant shortfall in housing supply and affordability. To meet the needs of a growing population, there is a critical need for more diverse and accessible housing options. This SSDA will facilitate a mixed-use development that will deliver an increased number of dwellings in a well-established and connected area.

The National Housing Accord (2022) and NSW Housing Strategy (2023) sets an ambitious target for NSW to deliver 377,000 new homes by July 2029, equating to an additional 25,000 new dwellings per year. Of this, North Sydney LGA has been allocated a housing target of 5,900 new homes completed by 2029. The proposed development will contribute to this target through the delivery of 148 dwellings, comprising 62 market residential dwellings and 86 affordable co-living dwellings. Of these, 86 co-living dwellings will be affordable housing in perpetuity. The variety of standard residential and co-living dwellings will assist housing diversity which the needs and demands of the site's demographic. The proposal therefore supports both housing diversity and affordability.

The Greater Sydney Region Plan – A Metropolis of Three Cities (Region Plan) (Objectives 10 and 11) and the North District Plan (District Plan) emphasise the importance of increasing housing supply and diversity of tenure in a sustainable manner. Priority N5 of the District Plan identifies the need for diverse and affordable housing close to jobs, services and public transport. The District Plan focuses on enhancing the role of the Eastern Economic Corridor comprised of strategic centres at, amongst others, North Sydney, whereby North Sydney is identified as an important element of the Harbour CBD to support population growth through housing affordability and diversity measures. This is identified as requiring more compact and affordable housing models that support moderate-income households.

Additionally, the District Plan focuses on supporting urban renewal and infill development to accommodate population growth while ensuring accessibility and high amenity. The proposed development aligns with those priorities by facilitating the delivery of 86 affordable co-living dwellings above North Sydney Train Station, upgrades to the existing public plaza and enabling future retail offerings.

Affordable and social rental housing is recognised as critical social infrastructure which is heavily required to support the very low- and low-income households within North Sydney LGA (North Sydney Local Housing Strategy 2019). The proposed development will help to meet those local housing needs in perpetuity through the provision of 86 co-living affordable dwellings to be provided in perpetuity.

2.7.2 Integrated Transport and Connectivity

The site is strategically located within an area of exceptional transport connectivity. In addition to being located directly above North Sydney Train Station, the site is in close proximity to high-frequency bus services providing access to North Sydney CBD and the Train Station. The site is therefore capable of delivering residential and retail land uses with excellent public transport connections to surrounding areas and Sydney CBD.

The Region Plan and District Plan highlight the importance of integrated land use and transport planning to support the '30-minute city' concept. This ensures residents can access jobs, services and amenities within a short travel time. Specifically, Priority N1 highlights the benefit of aligning land use and infrastructure planning to maximise the use of existing infrastructure and positive outcomes for the community. This will enable the further consolidation of North Sydney CBD within the hierarchy of centres as identified by Priorities N7 and N10. The proposed development delivers on these objectives by creating a mixed-use and highly public-facing neighbourhood centre which contributes strongly to public amenity around transport hubs. More broadly, this reduces the need for private vehicle use and enhances overall accessibility and mobility within Sydney.

The proposed development also prioritises active transport and pedestrian permeability through the delivery of a public plaza which also comprises a through-site link providing access from Blue Street to the publicly accessible Phillips Lane (noting that Phillips Lane comprises part of the site). These initiatives are consistent with the NSW Future Transport Strategy 2056 and Active Transport Strategy 2056, which aim to deliver connected walking and cycling networks and the creation of 15-minute neighbourhoods.

2.7.3 Social and Community Vibrancy

The proposed development establishes the framework necessary to accommodate future community uses, gathering places and activation opportunities that foster a sense of local identity and belonging. The configuration of the site and proposed through-site links through the public plaza have been designed to support, having regard to the site constraints (eg, topography) and site opportunities (eg, iconic views available), inclusive movement, future civic and cultural infrastructure, and a public realm that invites passive recreation and social participation consistent with high density residential development objectives. These elements align with Planning Priority N4 of the District Plan, which seeks to foster healthy, creative, culturally rich and socially connected communities through place-based planning and high-quality public spaces.

The proposal also supports the following Planning Priorities of the North Sydney Local Strategic Planning Statement 2020 (LSPS):

- Planning Priority I1: Provide infrastructure and assets that support growth and change;
- Planning Priority L1: Diverse housing options that meet the needs of the North Sydney community;
- Planning Priority L2: Provide a range of community facilities and services to support a healthy, creative, diverse and socially connected North Sydney community;
- Planning Priority L3: Create great places that recognise and preserve North Sydney's distinct local character and heritage; and
- Planning Priority P6: Support walkable centres and a connected, vibrant and sustainable North Sydney.

The proposed development supports these Planning Priorities through delivering a public domain that supports everyday social encounters, opportunities to promote art and connection to Country. Future ground floor uses, such as fine-grain retail venues adjacent to the public plaza and fronting Blue Street will activate the site's ground floor interface, enhance vibrancy and contribute to a livelier precinct around North Sydney Train Station. These outcomes additionally align with the Strategic Directions of the North Sydney Culture and Creativity Strategy, being:

- Strategic Direction 2: Preserve and celebrate North Sydney's heritage; and
- Strategic Direction 4: Increase the number of places and spaces that are available for cultural and creative participation and production.

In line with the design objectives of Better Placed (GANSW), specifically Objective 3: Better for community and Objective 4: Better for people, which advocate for places that are inclusive, liveable and socially engaging, the proposed urban design promotes permeability, human-scale streetscapes and active frontages.

2.7.4 Environmental Sustainability and Resilience

Environmental sustainability and resilience are critical considerations in the shaping of mixed-use developments, ensuring that the outcome responds to ecological values, climate adaptation, and long-term resource efficiency.

As an adaptive reuse project, the proposed development strongly supports sustainability objectives through the preservation of the building structure in redevelopment. This represents a strong environmental outcome by significantly reducing embodied carbon and construction waste associated with demolition and new build activities. The retaining of structural elements conserves the energy and materials already invested in the building, avoiding the substantial emissions generated through demolition and early works to extend the functional life of the existing structure and enable, effectively, a new building lifecycle.

The built form has been carefully configured to maximise solar access, facilitate cross-ventilation, and protect the amenity of surrounding public and private domains, consistent with Objectives 34 and 35 of the Region Plan, which promote energy and water efficiency in buildings. The layout supports North Sydney LSPS's focus on sustainability which includes adopting an integrated water sensitive urban design and reducing greenhouse gas emissions, energy, water and waste by actions and behaviours at a local level.

The proposed development supports these objectives by embedding sustainability principles throughout the design, including the retention and addition of deep soil zones to support significant canopy planting, contributing to improved urban cooling, biodiversity, and urban amenity. These outcomes directly support Objective 33 of the Region Plan and Planning Priority E17 of the District Plan, which seek to increase urban tree canopy cover and deliver Green Grid connections to promote liveability and urban cooling.

2.7.5 Employment and Productivity

Employment and productivity relate to supporting economic vitality through the strategic provision of employment generating retail activities. The proposed development facilitates the delivery of future retail tenancies at ground level. These spaces will accommodate a diverse range of businesses and services, enabling the creation of ongoing employment opportunities.

This approach is aligned with the Region Plan, which encourages the creation of 30-minute cities where most people can access jobs and services within 30 minutes of where they live. In particular, Objective 23 of the Region Plan and Priority E5 of the District Plan seeks to strengthen the economic self-sufficiency of strategic centres through the co-location of housing, jobs, and services.

The proposed development is also aligned with the North Sydney LSPS's focus on productivity by enhancing the amenity and viability of North Sydney's local centres. It supports mixed-use precincts that combine living, working, and leisure in walkable and vibrant neighbourhoods.

2.7.6 Urban Design and Placemaking

Urban design and placemaking are central to shaping a high-quality urban environment in North Sydney. Built form, public space, movement and landscape must operate together to support amenity, reinforce local character and respond to the area's distinctive harbour-edge setting and transport-oriented function.

The retention and enhancement of Blue Street Plaza strengthens an established public place that provides publicly accessible harbour and CBD views, reinforcing its civic role within the North Sydney centre. The proposal improves the quality, accessibility and usability of the plaza, supporting everyday social interaction, informal gathering and passive recreation in a highly accessible, station-adjacent location. It also enhances pedestrian amenity, legibility and connectivity around North Sydney Train Station through improved ground-level interfaces, clear access to and through the plaza, and strong integration with surrounding pedestrian routes, contributing to improved walkability.

The adaptive reuse of the existing building structure, together with substantial public domain upgrades delivered as part of the proposed development, extends the functional life of existing assets while accommodating growth and change.

Accordingly, the proposal aligns with the following LSPS Planning Priorities:

- Planning Priority I1 – Provide infrastructure and assets that support growth and change;
- Planning Priority L2 – Provide a range of community facilities and services to support a healthy, creative, diverse and socially connected North Sydney community;
- Planning Priority L3 – Create great places that recognise and preserve North Sydney's distinct local character and heritage; and
- Planning Priority P6 – Support walkable centres and a connected, vibrant and sustainable North Sydney.

At the district level, the proposal is consistent with the North District Plan, particularly the following Planning Priorities:

- Planning Priority N6 – Creating and renewing great places and local centres, and respecting the District's heritage; and
- Planning Priority N4 – Fostering healthy, creative, culturally rich and socially connected communities.

2.8 Cumulative Impacts

The proposed development will facilitate the delivery of necessary market and affordable housing in North Sydney and is not expected to give rise to any unacceptable or cumulative environmental impacts (as a consequence of the development of the site) that cannot be appropriately managed. The nearby relevant approved and recently constructed developments that have the potential to result in cumulative impacts is identified in **Table 2**.

Of note are the Aqualand (Mixed use development at 15 Blue St, North Sydney) and the Catholic Archdiocese of Sydney (Mixed-use Mackenzie St, Lavender Bay) projects as identified in **Table 2**, due to their proximity to the site. As this application is the first to be lodged and the other applications remain at the EIS preparation stage, consideration of cumulative impacts will be further progressed at the Response to Submissions stage once all applications have been formally submitted.

Table 2 Surrounding Future Development

Development	Description	Status
Mixed use development at 15 Blue St, North Sydney (SSD-86299960)	Construction of a 30-storey mixed use development, comprising retail floor space and 200 residential apartments. A new entry to North Sydney train station, public domain improvements and a new publicly accessible plaza is also proposed.	Preparation of documentation (EIS)
Mixed-use Mackenzie St, Lavender Bay (SSD-88702457)	Demolition of the existing residential buildings, retention of the St Francis Xavier Church, adaptive reuse of former school building and construction of three mixed-use buildings up to 20 storeys and a station through site link and Church forecourt.	Preparation of documentation (EIS)
173-179 Walker Street and 11-17 Hampden Street, North Sydney (SSD-67175465)	Construction of two residential flat buildings with five shared basement levels, comprising of 239 dwellings including infill affordable housing and ancillary residential building.	Under construction
105-153 Miller Street, North Sydney (SSD-83956216)	New University Campus – Adaptive reuse of the existing commercial building including alterations and additions for the purpose of accommodating a tertiary institution (university).	Under assessment
105-153 Miller Street, North Sydney	Integrated Development of the State heritage listed building at 105-153 Miller Street, North Sydney including refurbishment, alterations and additions for the purpose of a commercial office building with ground level retail and associated works.	Approved 29 September 2025
100 Walker Street, North Sydney	Demolition of an existing commercial building and construction of a 48-storey commercial building with rooftop plant and architectural feature (RL 239m) and a basement of 6 levels, comprising office and retail uses with public domain works including provision of an east-west pedestrian connection between Walker Street and Little Spring Street.	Approved 26 August 2022

Development	Description	Status
153-157 Walker Street, North Sydney (SSD-82599709)	51-storey mixed use building containing ancillary retail premises, hotel and 296 residential apartments.	Under assessment
132 Arthur Street, North Sydney – Build to Rent (SSD-72980712)	Demolition of the existing building and construction of a mixed use BTR and hotel accommodation development consisting of 225 BTR units, 240 hotel rooms and retail with 3 levels of basement car parking.	Preparation of documentation (EIS)
146 Arthur Street, North Sydney – Build to Rent (SSD-61000021)	Construction of a 46-storey built to rent (BTR) building with a maximum height of 155m consisting of 390 units and ground floor retail, vehicular access from Arthur Street to 4 level basement with 66 car spaces and from Little Walker Street to a porte cochere.	Approved 9 October 2025

An assessment of the cumulative impacts associated with these proposals are considered under the relevant issue in **Section 7.0**.

3.0 Project Description

This section of the Report provides a detailed description of the proposal. The applicant seeks development consent under *Division 4.7 – Stage Significant Development* of the EP&A Act to develop the site as a mixed-use development comprising a diversity of residential and ground floor commercial uses. The SSDA seeks to deliver additional residential uplift to help tackle the Sydney housing crisis and achieve the goals of the NSW Housing Delivery Authority and National Housing Accord, providing 148 dwellings, comprising 62 market residential dwellings and 86 affordable co-living dwellings.

The proposed above station adaptive reuse seeks to transform the landmark site into a vibrant mixed-use development that integrates residential, retail and public domain enhancements into the broader North Sydney CBD. Specifically, the proposal seeks approval for:

- Adaptive reuse and conversion of an existing commercial building to a mixed-use development, comprising residential and non-residential ground floor uses, including:
 - Two levels of basement car parking, comprising plant, bicycle storage areas and car parking spaces;
 - Ground floor retail and residential lobbies;
 - Co-living on Levels 1-3, to be operated as affordable housing by a Community Housing Provider in perpetuity; and
 - Residential dwellings on Levels 4-14.
- Public domain and landscaping improvements, including the retention and enhancement of Blue Street Plaza at the eastern portion of the site;
- Extension and augmentation of services and infrastructure as required; and
- Concurrent amendments to the *North Sydney Local Environmental Plan 2013* to facilitate the SSDA.

The proposed development is discussed further in the following subsections and detailed on the Architectural Plans prepared by fjcstudio and included at **Appendix E** as well as the Landscape Plans prepared by fjcstudio and included at **Appendix H**.

Photomontages of the proposed development are provided in **Figure 14** and **Figure 15** below.



Figure 14 Proposed Development – East-facing Render

Source: fjcstudio



Figure 15 *Proposed Development – West-facing Render*

Source: fjstudio

3.1 Key Project Information

3.1.1 Project Area

The project area includes the land at 5 Blue Street, North Sydney, being Lot 4 in DP1134234. This site is a freehold stratum above North Sydney Train Station which is restricted in depth but unlimited in height. For further detail, refer to **Section 2.4.1**. In addition, some public domain works will be required in the Council road reserve to facilitate the proposal.

For the avoidance of doubt, the proposal will not protrude into any land owned or managed by TAM or TfNSW and will not impact the operations of the North Sydney Train Station.

3.1.2 Project Details

The key project details are summarised in **Table 3** below.

Table 3 *Key Project Details*

Component	Proposal
Proposed Land Use	MU1 Mixed Use
Legal Description	Lot 4 in DP1134234
Site Area	3,051m ²
GFA	- Residential: 13,992m² - Co-living: 2,860m² - Commercial: 410m² Total: 14,402m ²
FSR	4.72:1
Landscaping	Total deep soil: 0 (0%) Canopy coverage: 397m ² (13%)
Communal Open Space	413m ² at Level 09 (15%) and 314m ² external plaza (10%)
Car Spaces	73 spaces
Bicycle Spaces	97 spaces
Motorcycle Spaces	6 spaces
Maximum Height	RL 116m
Dwellings	148 dwellings (comprising 62 residential dwellings and 86 co-living dwellings)
Estimated Development Cost	\$157,964,615 (excluding GST)

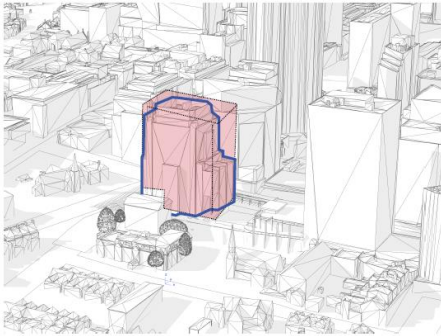
3.2 Design Principles

As detailed in the Architectural Design Report prepared by the fjstudio at **Appendix F**, the following design principles have been adopted to ensure the overall vision and objectives of the development are achieved:

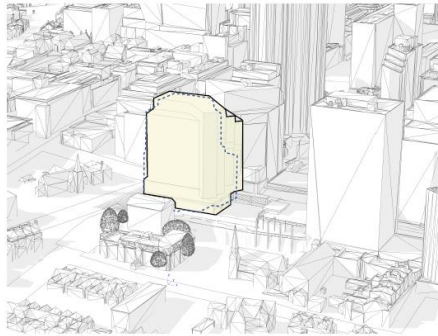
- **Existing development:** realise the site's strategic potential within the evolving North Sydney Centre, particularly through strengthening the site's ground-level interface to Blue Street;
- **Adaptive reuse:** deliver an adaptive reuse outcome incorporating retail, co-living and residential uses that respond sensitively to the site context, surrounding built form and public domain interface while achieving an appropriate balance between density, amenity and urban design outcomes. This should remain consistent with the anticipated scale and character of the evolving North Sydney Centre;
- **Form articulation:** establish a contemporary architectural expression defined by a podium and tower composition with articulated built form elements that reduce perceived bulk and enhance visual interest. Key design elements, including extended cantilevers orientated toward the harbour view corridor, will contribute to a distinctive skyline presence and a refined built form outcome;
- **Activated edge and public domain:** deliver an activated ground floor interface comprising retail uses and publicly accessible landscaped plaza that enhances pedestrian activity and amenity along Blue Street. The ground plane should also strengthen connectivity to the broader North Sydney CBD by improving pedestrian permeability and contributing to the evolving network of active public spaces within the precinct;
- **Green connections:** incorporate a landscaped public plaza and viewing deck oriented toward harbour views, contributing to the network of green links and public domain spaces emerging across the North Sydney Centre; and

- **Views:** maximise opportunities for views and outlook through articulation and orientation of built form, taking advantage of the site's elevated position within the North Sydney Centre, enabling an expansive outlook towards Sydney Harbour and the broader metropolitan skyline.

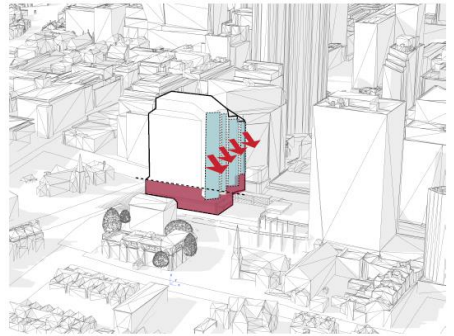
Existing Development



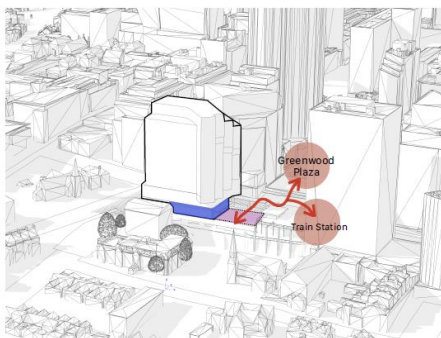
Adaptive Reuse



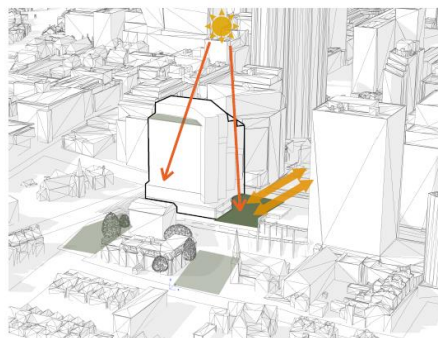
Form Articulation



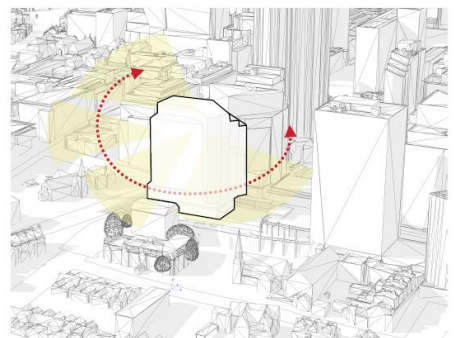
Activated Edge and Public Domain



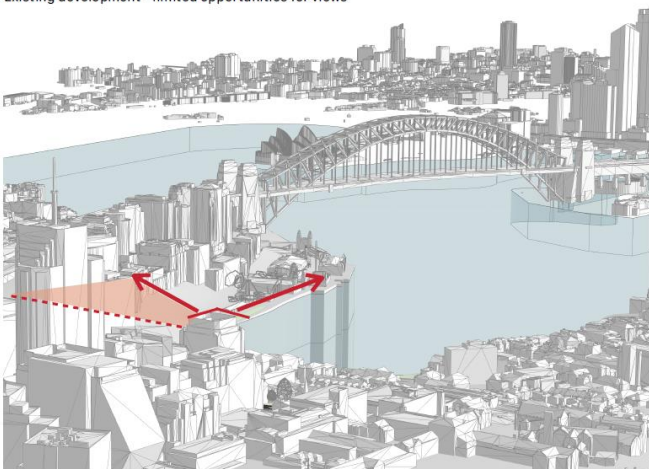
Green Connections



Views



Existing development - limited opportunities for views



Proposed Massing - Maximize views to Harbour and city skyline

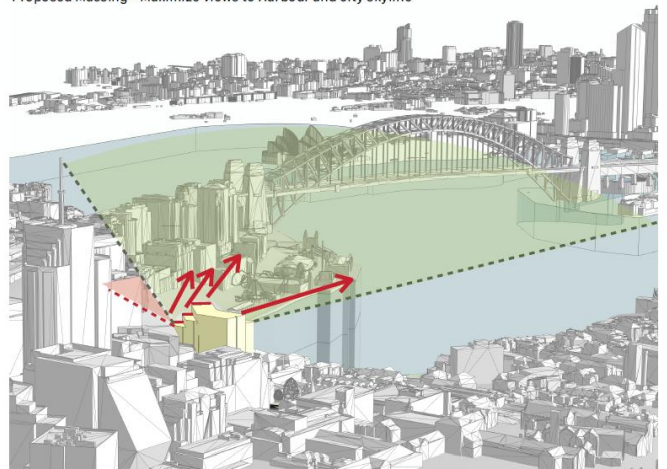


Figure 16 Key design principles

Source: Colliers

3.3 Designing with Country

The site is located on the land of the Cammeraygal people. Throughout the design process, fjcstudio's design has carefully and thoughtfully incorporated Designing with Country principles to embed Aboriginal stories and culture into the proposed development, as provided within the First Nations Co-Design Values Report prepared by JMP Aboriginal Consultancy (**Appendix G**). This has regard to both detailed design elements and landscape design opportunities as shaped by the site's interaction with surrounding Country.

The Designing with Country vision for the proposed development is to celebrate the connection and custodianship that the Cammeraygal people have with the land, sea and sky, particularly given the site's relationship to surrounding Salt Water Country, Aboriginal Rock Engravings and the Sydney Harbour. Across the development, all aspects of the architecture, urban realm, landscape and public art will be informed and influenced by the stories and knowledge of local Country to reflect the site's coastal character, colours and patterns of stone which have been shaped and carved by water over thousands of years.

A Designing with Country framework has been prepared by fjcstudio and is embedded within the Architectural Design Report at **Appendix F** and the Landscape Design Report prepared by fjcstudio at **Appendix I**. This has shaped the materials and construction techniques, and colours, patterns and shapes adopted in the proposal as identified in **Figure 17**.

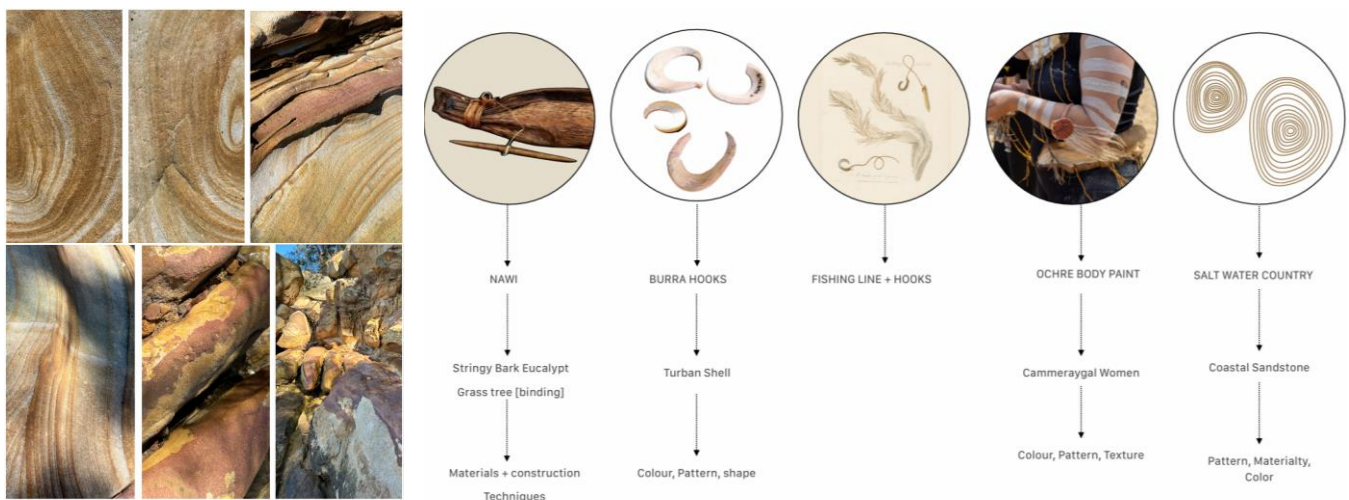


Figure 17 *Designing with Country – Design Opportunities*

Source: fjcstudio

The design of the site's public plaza seeks to mirror the geometry of Sydney's shoreline through layout and placement of physical elements (eg, planter boxes and seating), and pavement patterns that define circulation paths, gathering areas and moments of pause throughout the public domain. These follow curved inlays and flowing geometries that reinforce relationship of the site to the broader environment.

A native terrace fronting Blue Street creates a planted threshold between Blue Street and the public plaza environment beyond. Combining native grasses, low planting and canopied trees associated with Sydney's coastal sandstone landscape, layered planting softens the streetscape whilst maintaining a natural openness of the space and passive surveillance across the plaza. This design draws from the shoreline geometries and escarpment conditions naturally characteristic of Sydney Harbour, using soft and flowing forms to guide movement into the site and soften an otherwise highly urbanised street edge.

Raised planter and seating elements create informal gathering spaces within the centre of the plaza, supporting pause with short-term seating and everyday use within the active public domain environment. The design uses soft and organic curved forms inspired by Bara fish hooks, referencing local cultural patterns associated with Cammeraygal Country and the Sydney Harbour edge. These forms introduce a more fluid landscape language within the surrounding urban setting and are particularly evident in the curved seating edges which maintain openness across the plaza and enable flexible pedestrian movement throughout the plaza.

Lookout seating along the edge of the plaza facing Blue Street creates a destination space along the edge of the plaza, providing a relaxed setting for rest and enjoyment of the harbour outlook. This design draws from the form and materiality of Nawi watercraft traditionally associated with Cammeraygal Country. Timber seating and decking materials introduce warmth and texture to the space whilst maintaining an openness towards the harbour view.

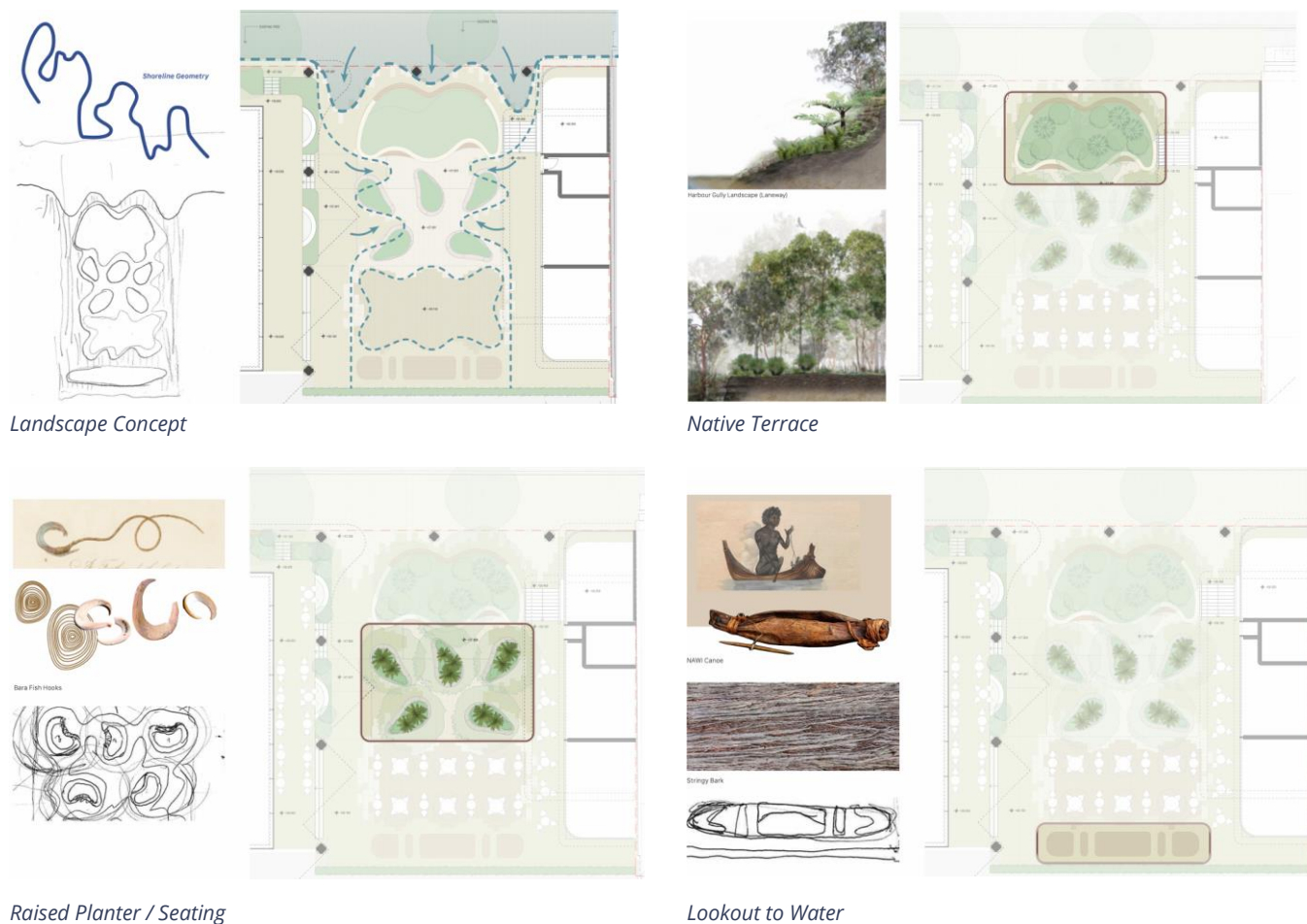


Figure 18 Designing with Country – Landscape Design Opportunities

Source: fjcstudio

3.4 Site Preparation

The proposal includes site preparation works to facilitate the adaptive reuse development. The proposal seeks to retain most of the reinforced concrete structure, with minor additions and alternations to the tower for new balconies and service risers.

As detailed in the Structural Memorandum and the Structural Report prepared by Arcadis at **Appendix J** and **Appendix K** respectively, the proposed design has adopted a ‘reverse engineering approach’. whereby the overall development scale and size is determined by the inherent capacity of the columns and foundations within North Sydney Station rail corridor. There is no significant increase to the overall building load within the capacity of the site’s existing structural elements, and the scheme does not exceed the vertical load capacity of columns and footings in the rail corridor.

3.4.1 Demolition

The proposed development seeks to retain approximately 95% of the existing building structure, with no basement excavation required. Demolition works for the proposed development are minimal, but nevertheless include site establishment, demolition of existing retail pavilion at Blue Street Plaza, demolition enabling drop chutes and access, existing façade removal, and soft and hard demolition. No trees are proposed to be removed.

The proposed demolition works are shown in **Figure 19** and illustrated in the Architectural Plans prepared by fjcstudio at **Appendix E**.



Figure 19 Demolition Plan

Source: fjcstudio

3.4.2 Structural Works

New structural works will be undertaken to create balconies and service penetrations, with some localised strengthening of tower columns and slabs to evenly disperse building loads across existing foundations.

3.5 Site Servicing and Utilities

An assessment has been undertaken to determine the capacity of the site to be serviced by relevant infrastructure and utilities. All relevant utility and service providers and authorities have confirmed the site can be service. Utility connections and services will include:

- **Electricity:** the site presently contains electrical substations to service the site's commercial land use. The existing electrical capacity of the site is considered sufficient to accommodate the proposed development,
- **Water and sewerage:** the site contains existing water and sewer connections which are considered adequately sized to service the proposed development. This is described in the Integrated Water Management Plan prepared by Arcadis and included at **Appendix L**.
- **Stormwater:** the stormwater quality and Water Sensitive Urban Design (WSUD) approach for the proposed development focuses on sustainable stormwater management and environmental projection. In line with relevant Council stormwater requirements, the proposed treatment methods are considered sufficient to achieve the Annual Load Reduction percentages required for the site. Refer to the Integrated Water Management Plan prepared by Arcadis and included at **Appendix L**.
- **Telecommunications:** the existing surrounding telecommunications network is sufficient to accommodate the proposed development with internal site connections to the network.

3.6 Layout and Built Form

The proposed development is comprised of a 15-storey building on the western portion of the site containing ground floor retail, and co-living and market housing residential uses, and a separate row of single-storey retail uses on the eastern portion of the site containing three (3) food and beverage tenancies. The location of these buildings is illustrated in the Site Plan extracted in **Figure 20**. Cumulatively, the proposed built form on the site will deliver 14,402m² of Gross Floor Area (GFA) including 11,132m² GFA for market housing, 2,860m² GFA for co-living, and 410m² GFA for retail uses.

The built form adopts a clear podium and building composition that responds to the surrounding North Sydney CBD context by reinforcing the emerging built form character of the station precinct, balancing increasing density with appropriate articulation, setbacks and building proportions to reduce perceived bulk and maintain visual permeability. The lower levels dedicated to active uses will support activation, pedestrian movement and integration with the surrounding station environment. Upper levels accommodating residential uses have been organised to maximise outlook, daylight access and residential amenity within the constraints of the CBD setting.

Servicing and back-of-house functions are consolidated towards the southern edge of the site containing Phillips Drive and will be otherwise accessed from Miller Street / Blues Point Road. Such a configuration will ensure minimal disruption to the activated Blue Street frontage to maintain a high-quality pedestrian environment.

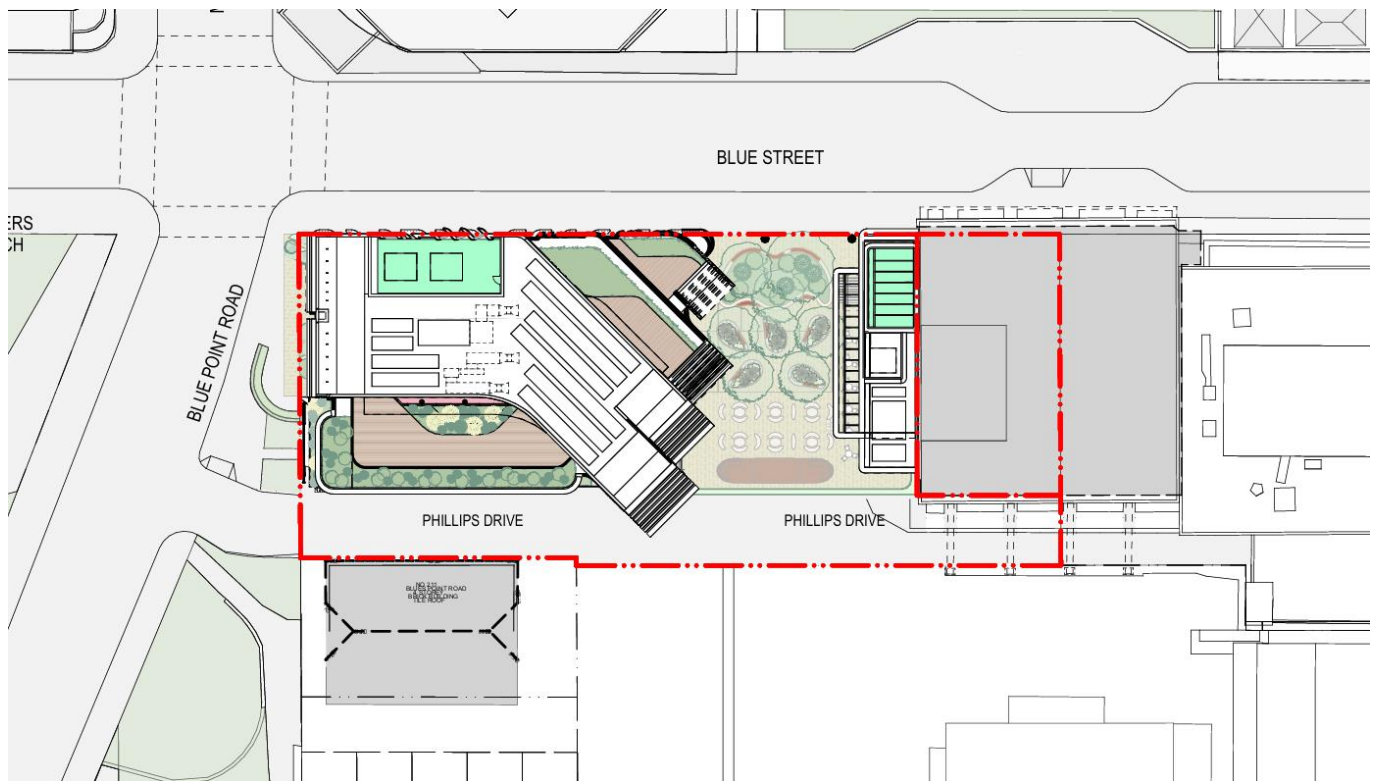


Figure 20 Site Plan

Source: fjcstudio

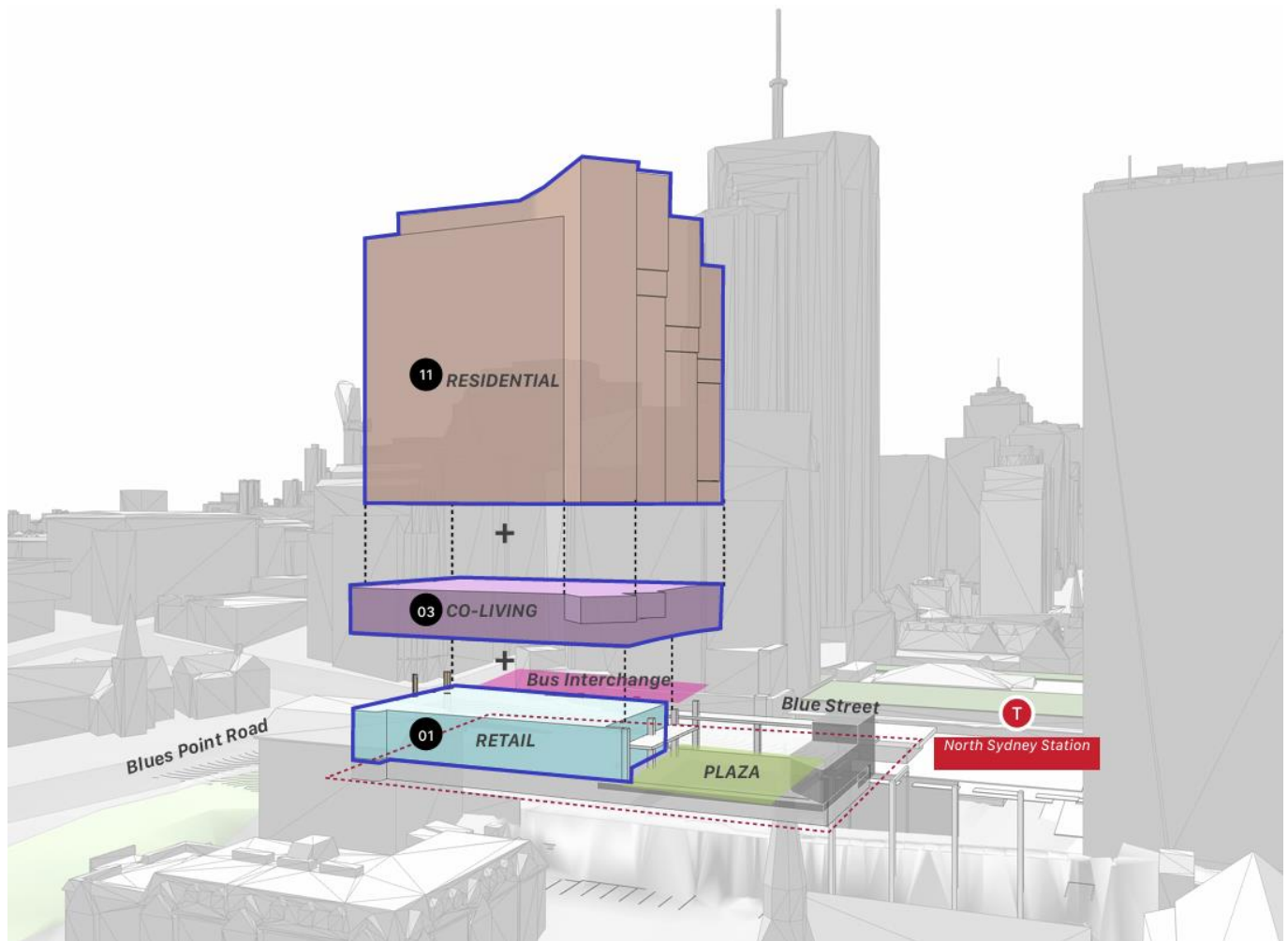


Figure 21 Diagrammatic functions within the building

Source: fjstudio

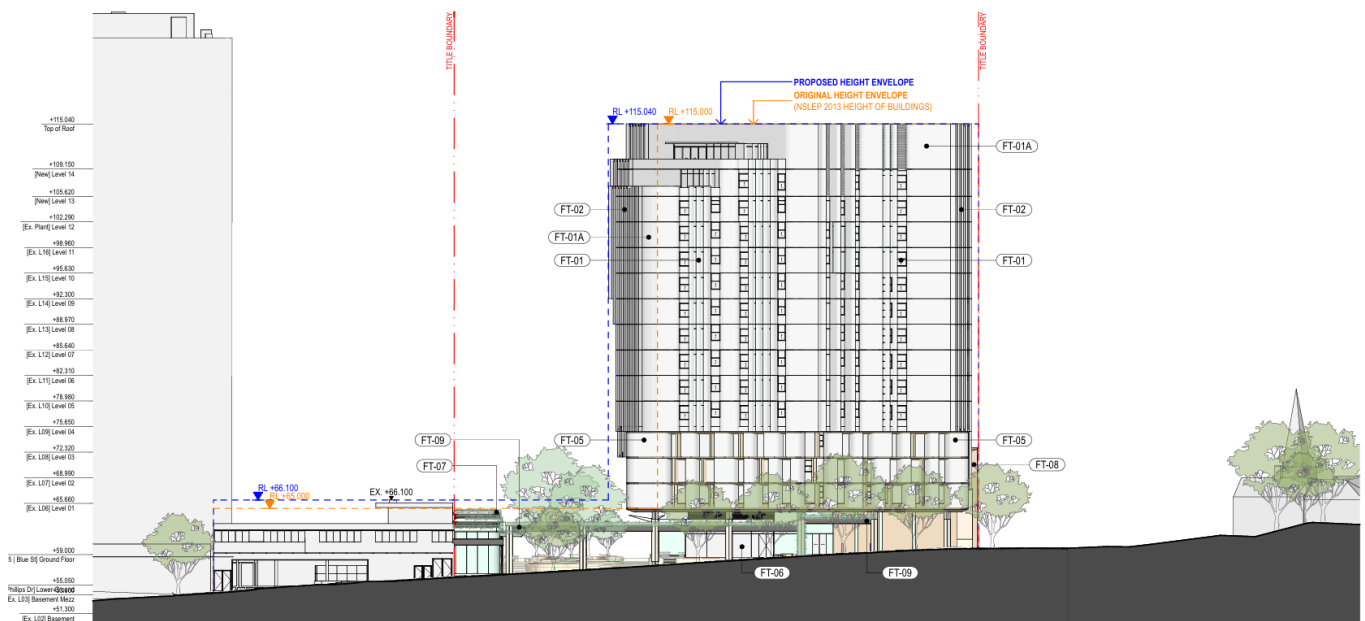


Figure 22 North Elevation

Source: fjstudio

3.6.1 Mixed-use Building

The mixed-use building is proposed to be a 14-storeys in height, with a maximum height of RL 116m (approx. 60m). It is proposed to comprise one (1) floor of non-residential uses (including co-living and residential lobbies, mailbox and services areas, and a food and beverage tenancy) to activate the ground plane, three (3) storeys of co-living, 11 storeys of standard market housing, and associated plant and equipment.

Recognising the adaptive reuse nature of the development, the proposal seeks to extend the existing built form along the eastern edge and increase its height to meet the RL 115m maximum building height standard under the North Sydney LEP 2013. This includes eastward extensions to the upper seven (7) storeys of the existing building to create cantilevered floorplates, and a vertical addition of two (2) additional storeys. This is demonstrated in **Figure 23**, which illustrates the existing building envelope and the proposed extensions.

The building has been designed to relate to varying surrounding interfaces. To Miller Street / Blues Point Road, the building presents as a refined and identifiable residential address within the broader North Sydney CBD context. This is achieved particularly through the location of the main residential entry along this street frontage, which creates a clear focus point and quieter arrival experience, as distinct from the higher intensity movement associated with the bus stop/train station entry environment of Blue Street. This interface also adopts a landscape-led approach that shapes movement patterns to align with subtle changes in height, creating a calm and cohesive edge condition that complements surrounding urban fabric, heritage and open space. Refer to **Figure 24**.

Alternatively, the building's interface with Blue Street has been designed to reinforce the site's role within the highly active North Sydney CBD with a ground plane strategy focused on activation, permeability and clear wayfinding. The proposal's active uses along the Blue Street frontage and plaza edge contribute to a vibrant public realm at all hours of the day. Although separate entries for residential and co-living dwellings are integrated into the frontage, legible access does not compromise activation. Façade articulation, glazing, fine-grain detailing and landscaping along this frontage enhances pedestrian scale and visual interest within the site context to create a visually and physically permeable environment. Refer to **Figure 25**.

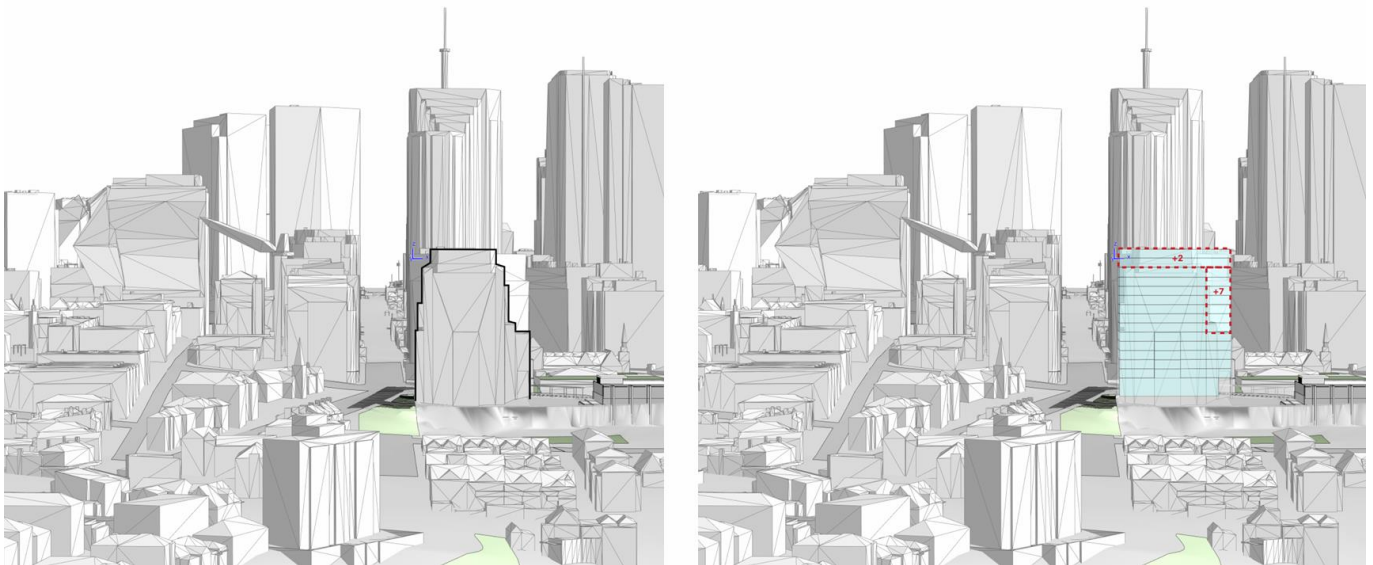


Figure 23 Existing commercial building (left) and proposed development illustrating extensions (right)

Source: fjcstudio

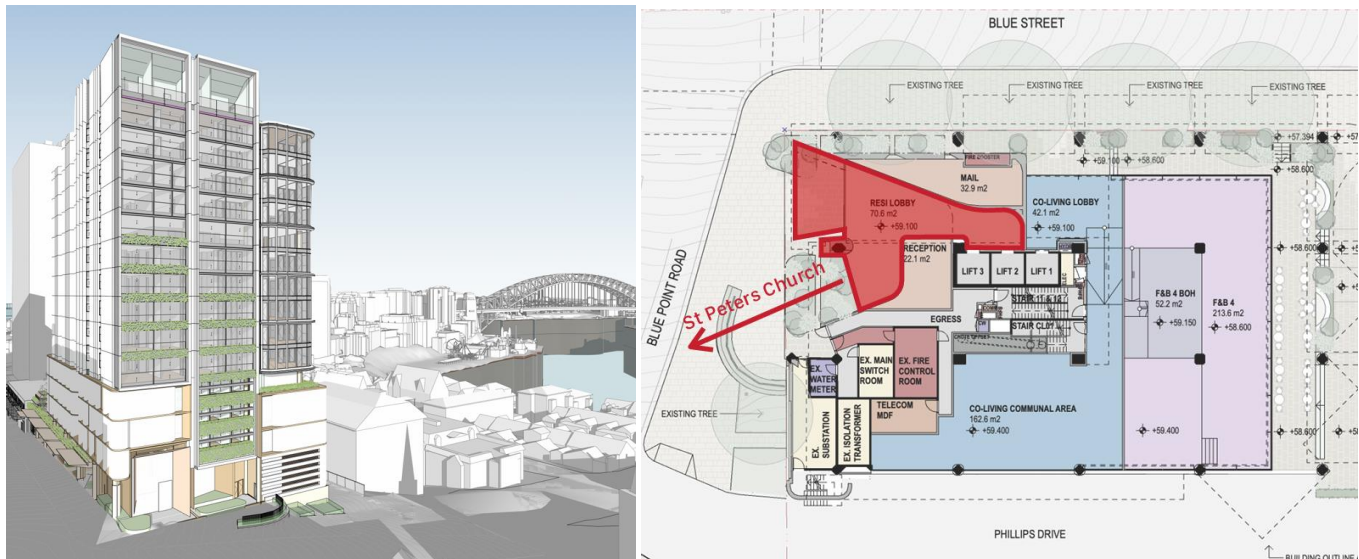


Figure 24 Proposed Miller Street / Blues Point Road interface

Source: fjcstudio

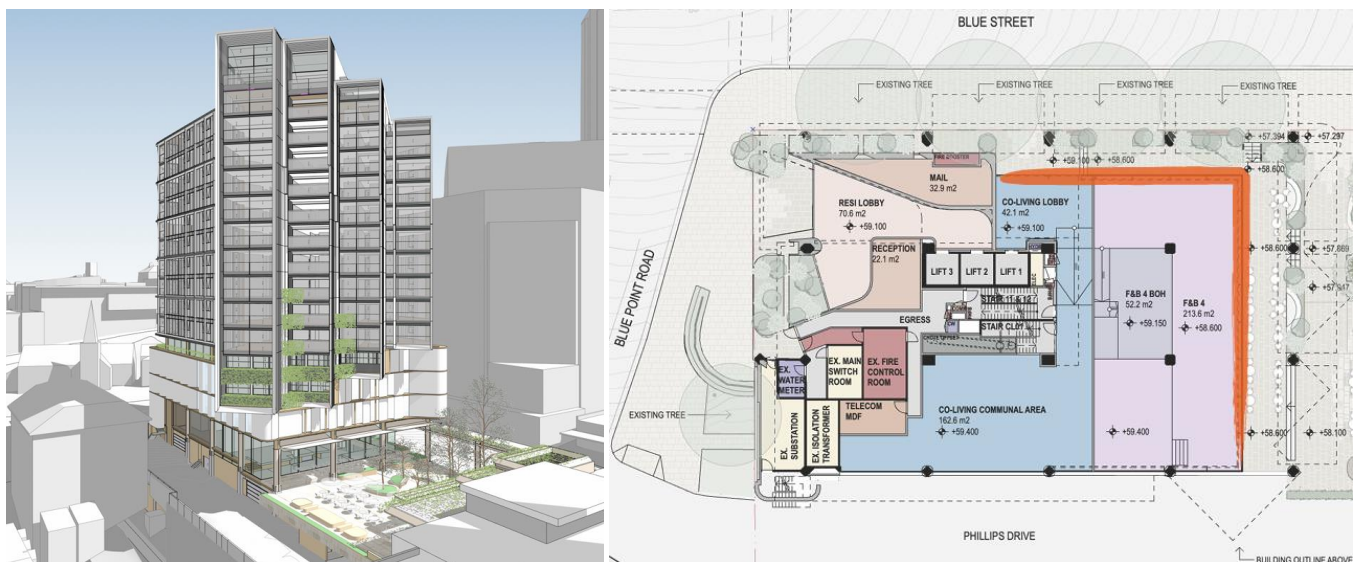


Figure 25 Proposed Blue Street interface

Source: fjcstudio

3.6.2 Single Storey Retail

The single storey retail building located along the eastern edge of the site is proposed to deliver three (3) distinct retail tenancies of approximately 42m², 37m² and 47m² in area. Collectively, this will deliver 126m² of retail GFA, though a staff Disability Discrimination Act (DDA) bathroom 16m² in area is also proposed adjoining these retail tenancies. Above the retail tenancies, a heat pump 51m² in area is proposed above the tenancy closest to Blue Street, with landscaping proposed on other portions of the roof.

At its highest point, this building is proposed to be RL 65m in height.

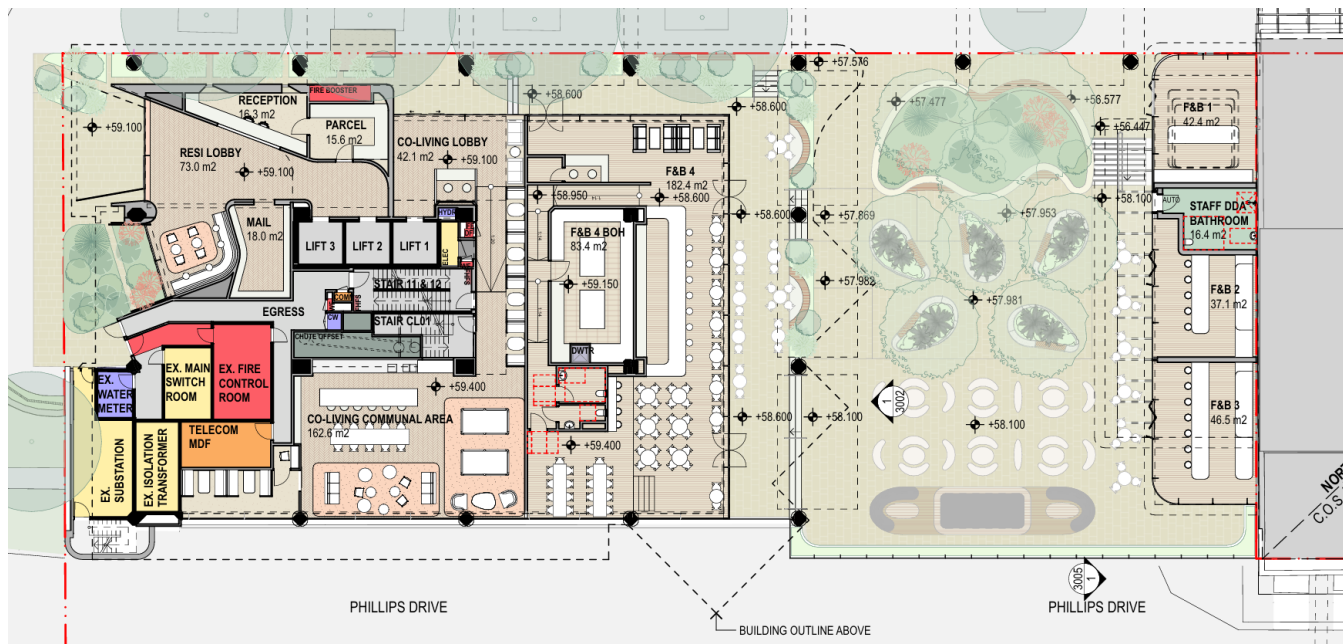


Figure 26 Ground Floor Plan

Source: fjcstudio

3.7 Façade, Materiality and Finishes

The colours and materiality of the proposed development have largely been inspired by cultural connection to Country to create a design that blends natural materials, flowing architectural forms and shared gathering spaces to reflect community, storytelling and belonging. Collectively, these play an important role in expressing the stories, landscapes and cultural knowledge of Cammeraygal Country.

The proposal will also respond to the evolving North Sydney skyline with a contemporary architectural expression that reduces perceived bulk, improves visual interest and supports skyline diversity. High quality materials, landscaping and detailed finishes will contribute to a quality, refined environment.

The palette is described in greater detail below and within the Architectural Design Report prepared by fjcstudio at **Appendix F**.

3.7.1 Mixed-use Building

The façade composition for the proposal generally is defined by a layered and vertically articulated expression that combines ceramic tile cladding, aluminium elements and large format glazing to create depth, rhythm and visual refinement across the built form. The building is differentiated into two ‘forms’, being the podium and upper form, through adopting a layered design palette featuring variation in materiality, articulation and form.

The podium form includes both ground floor non-residential and above co-living uses. At podium levels, solid wall elements are articulated with expressed blades and projecting profiles clad in ceramic tiles, incorporating glazed slots that introduce lightness and variation within the façade articulation. Expressed slab edges further reinforce the horizontal modulation of the building, and are clad in contemporary ceramic tile and aluminium finishes. Particularly on the ground floor, extensive glazing differentiates the non-residential uses from the rest of the building, promoting visual permeability and increased passive surveillance and activation of the ground floor with surrounding street configurations. While the co-living portion of the proposed development is distinguished by a lighter colour palette with distinctive screening oriented to both maximise privacy from the streetscape and optimise surrounding views, consistency in colour scheme and materiality retains visual continuity throughout the podium.

The mixed-use building includes a vertical aluminium louvre blades are integrated throughout the façade to provide solar shading, privacy and depth while strengthening the vertical emphasis of the tower. Large-format aluminium framed sliding windows and full-height glazing systems maximise daylight access and outlook. Upper-level façade elements incorporate solid spandrel panels clad in sloping rectilinear and curved aluminium forms, which integrated louvre infill panels that support building servicing and environmental performance. These elements will collectively create a refined

and cohesive façade outcome that balances solidity, transparency and articulation for residential amenity and maximising of harbour views.

3.7.2 Single Storey Retail

The single storey retail component of the proposal at the eastern portion of the site will mirror the facade, materiality and finishes of the mixed-use building form, particularly the ground floor retail frontage. This will provide visual continuity across the site, noting that the height and articulation of single-storey retail tenancies have also been designed to align with the adjoining building and land uses to the east of the site, being the North Sydney Train Station building.

3.8 Site Access, Parking and Loading

Pedestrian Access

Pedestrian access will be available from both Blue Street and Miller Street / Blues Point Road. In particular, the public plaza will retain its access from Blue Street. The lobby for the co-living component of the proposal will be accessed from Blue Street, and the market residential lobby will be accessed from Miller Street / Blues Point Road.

Retail tenancies and publicly accessible uses on the site are oriented towards the plaza interface, strengthening activation and engagement with the public domain. The retail tenancy located on the ground floor of the mixed-use building will open to both Blue Street and the public plaza, and the retail tenancies in the single-storey retail building will open to the public plaza but promote visual continuity through highly glazed frontages to Blue Street where applicable.

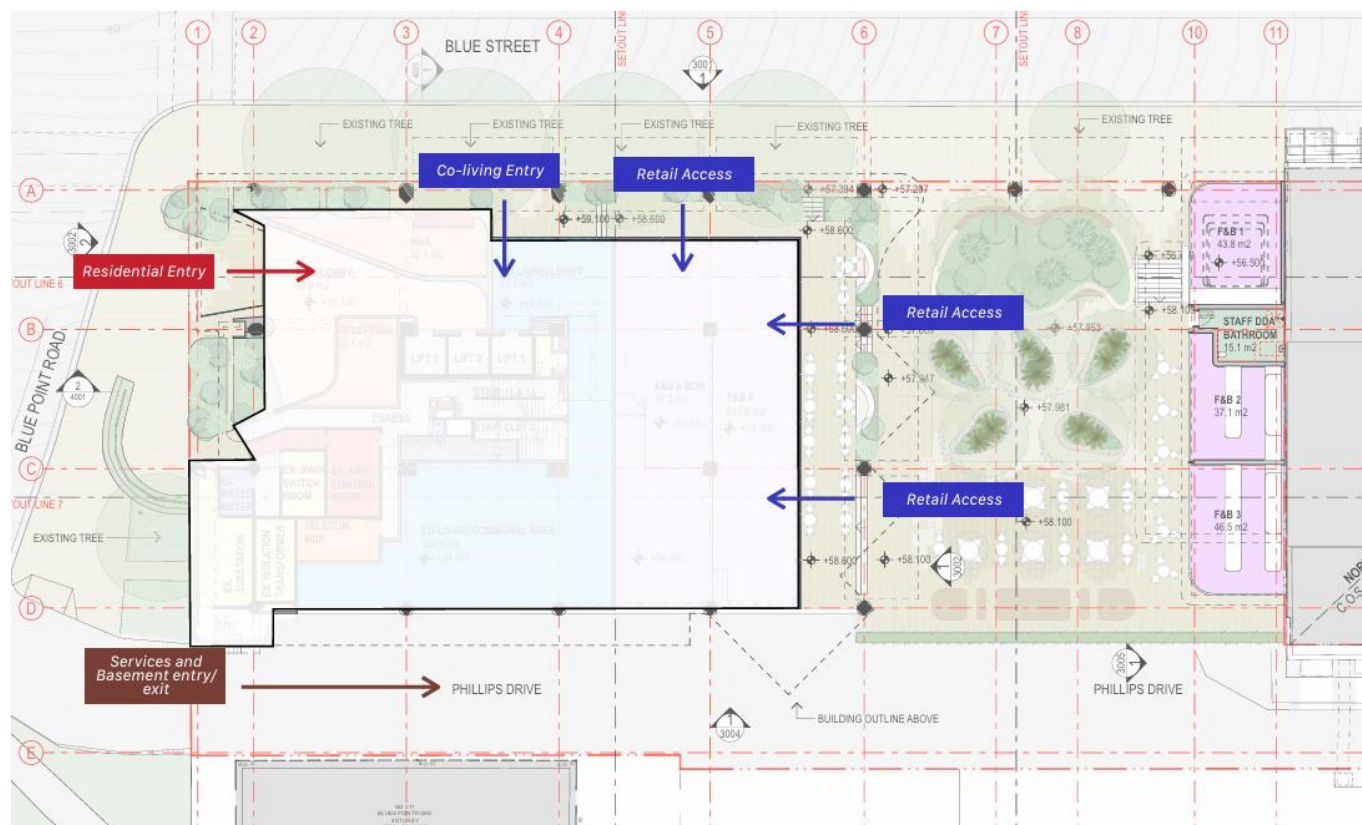


Figure 27 Site Access Points

Source: fjstudio

Vehicular Access and Parking

The proposed vehicular access arrangements will largely reflect the current environment of the site. This includes retention of three (3) individual access points connecting the building with the rear service laneway, Phillips Drive, which will provide access to ground level, mezzanine and basement level parking. The location of these is demonstrated in **Figure 28**.

Parking will be located across the existing two (4) basement levels, which will be reconfigured to provide the parking allocation set out in **Table 4**. In order to facilitate cycling as a travel mode, the proposal will also include a large bike storage room totalling approximately 172m² which will be capable of accommodating the proposed bicycle spaces on the Lower Ground floor.

For further information, parking provisions are outlined in detail in the Architectural Plans prepared by fjstudio at **Appendix E** and the Transport Impact Assessment prepared by JMT Consulting at **Appendix M**.

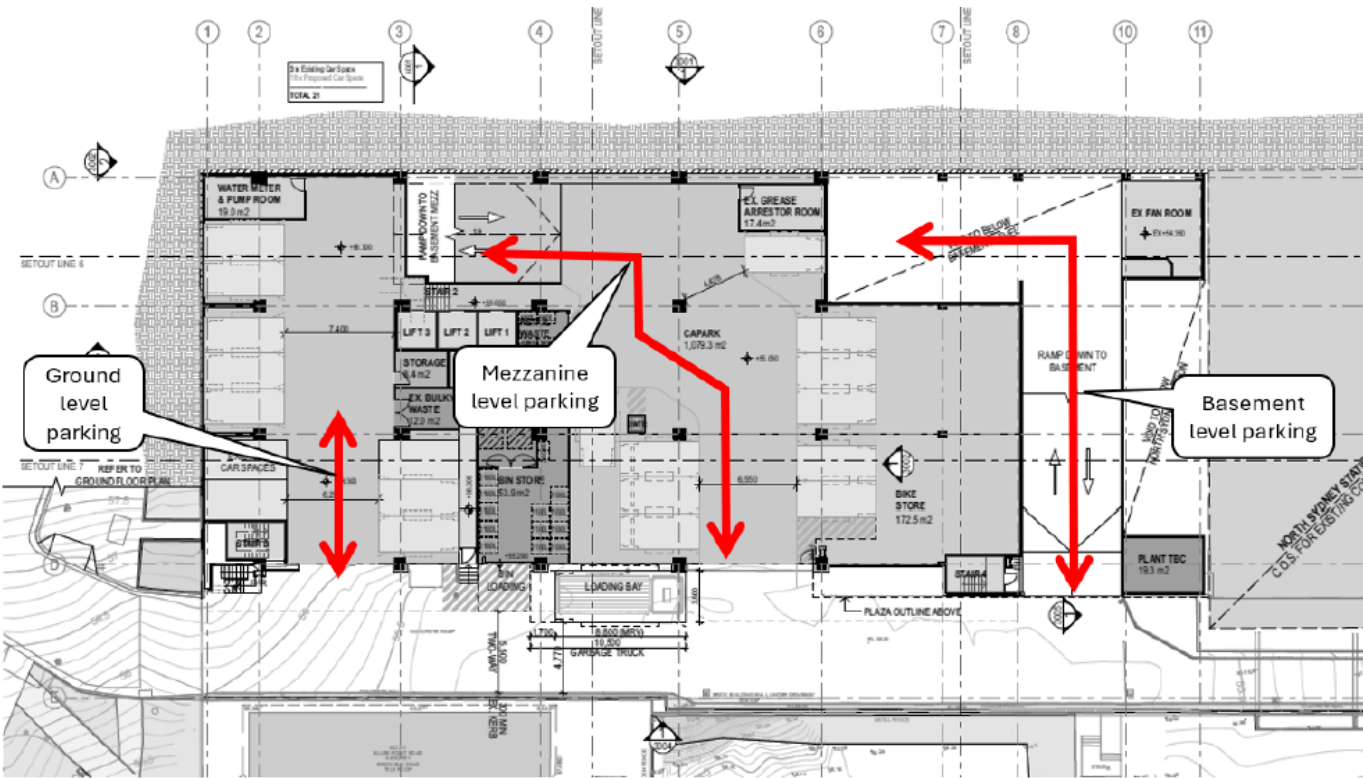


Figure 28 Vehicle Access Arrangements

Source: JMT Consulting

Table 4 Parking Schedule

Type	Number of spaces
Car spaces	- Residential: 73 spaces - Co-living: 0 spaces Total: 73 spaces
Loading	1 space
Bicycle	- Residential: 62 spaces - Residential visitors: 6 spaces - Co-living spaces: 29 spaces Total: 97 spaces

Loading and Services Facilities

Loading, servicing and back-of-house functions will be accessed via the rear service lane, Phillips Drive, which is connected to Blues Point Road. This seeks to remove conflicts with the primary pedestrian frontages and ensure the Blue Street interface remains focused on activation, landscape and movement.

Given the topography of the site whereby Phillips Drive is located on the Lower Ground Floor below the public plaza, Phillips Drive will contain a loading bay and loading area capable of accommodating a medium rigid vehicle adjacent to a two-way access lane. The loading bay will be 3.5 metres in length and 10.5 metres in width. All servicing is proposed to occur within the site, with no loading across the footpath or on adjoining streets.

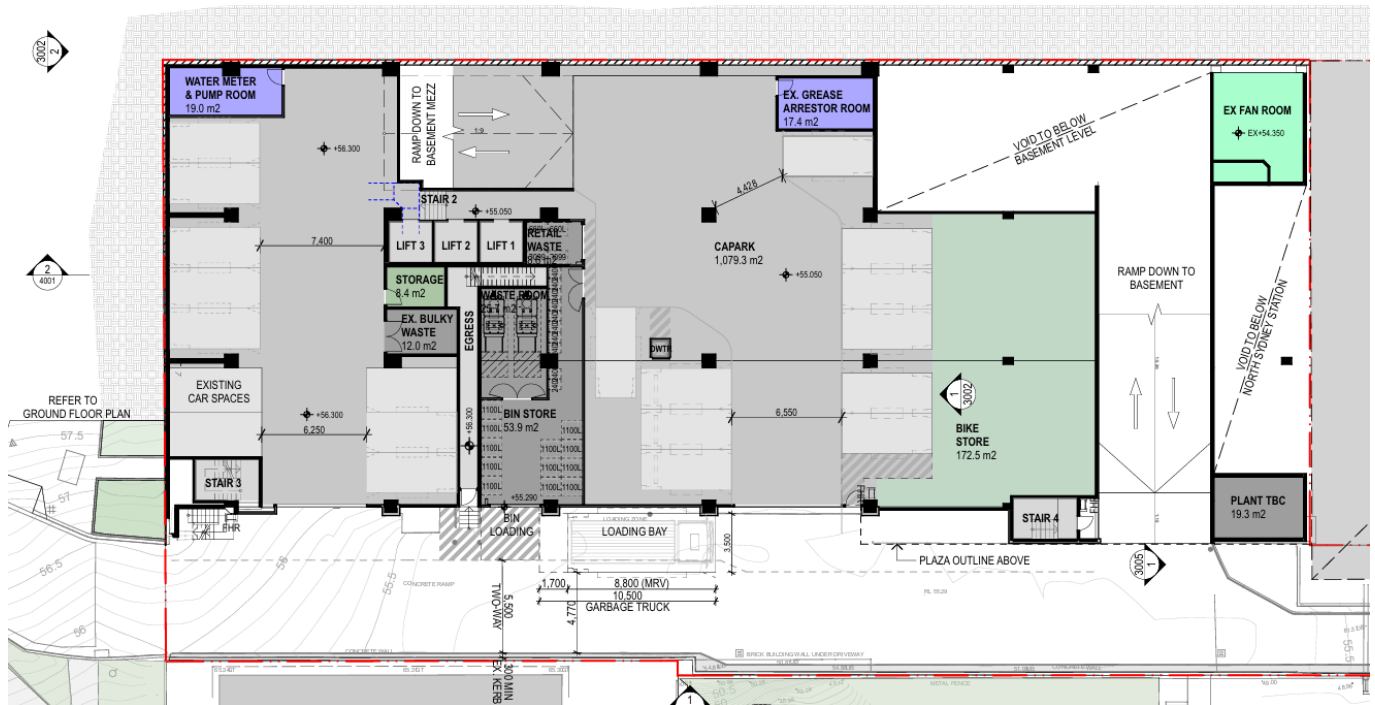


Figure 29 Lower Ground Plan

Source: fjcstudio

3.9 Waste Management

The proposed development includes waste management facilities within the Lower Ground Floor basement including:

- Bulky waste room: 12m² in area;
- Retail waste room: 8.6m² in area with capacity to hold 4 x 660L bins;
- Residential waste room: 25.7m² in area; and
- Bin store room 53.9m² in area, with capacity to hold 12x 1,100L bins and 10 x 240L bins.

Waste will be collected in these bins through a dual-chute system for general waste and commingled recycling which will be located on every floor. Residents will deposit waste at each level, with bins receiving chute discharge directly into the relevant bins in the Lower Ground Floor waste rooms. These waste rooms will be in close proximity to a bin loading area and loading bay 10.5m in length and 3.5m wide along Phillips Drive, which will be capable of accommodating a medium rigid vehicle (MRV).

Waste collection will occur daily for general waste, though less frequent collection will apply to bulky waste. Further detail on the generation, collection, storage, transfer and disposal of waste during both the construction and operational stages of the proposed development is provided in the Waste Management Plan prepared by MRA Consulting Group at **Appendix N** and is also discussed in **Section 7.10** below.

An extract of the Lower Ground Floor Plan is extracted in **Figure 30** below.

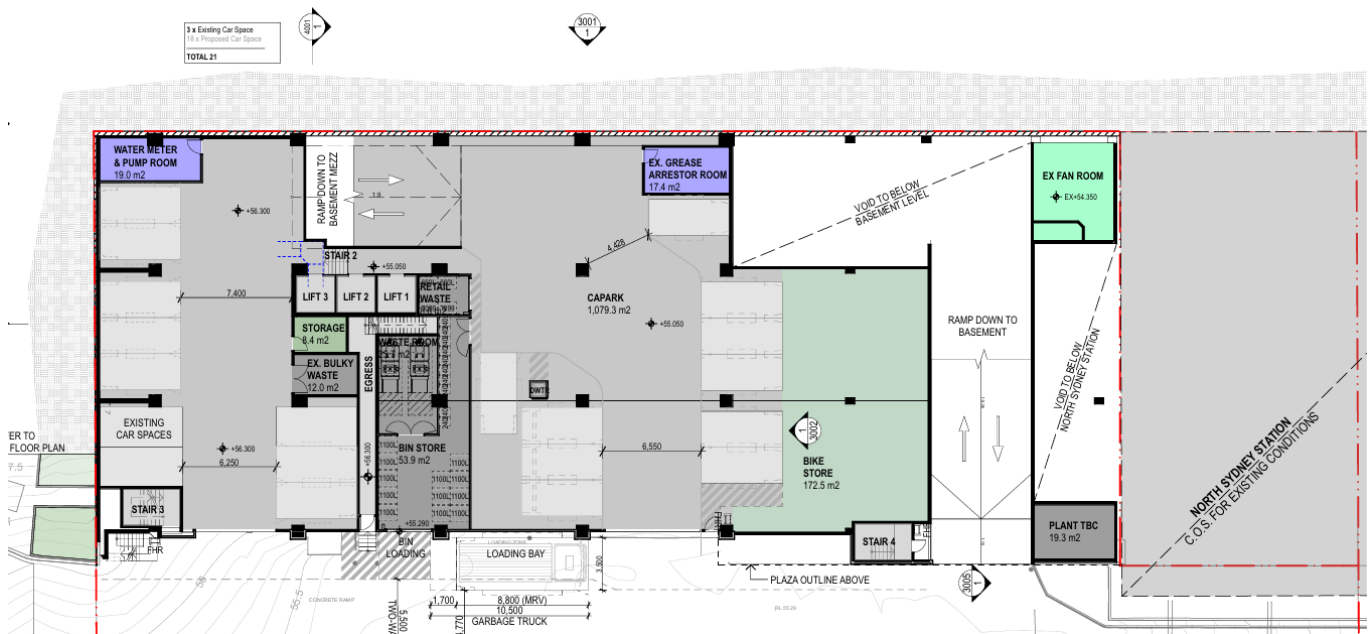


Figure 30 Lower Ground Floor – Floor Plan

Source: fjcstudio

3.10 Landscaping and Public Domain

A conceptual public domain and landscape scheme has been prepared by fjcstudio and is set out in the Landscape Plans at **Appendix H** and the Architectural Design Report at **Appendix F**.

Given the significance of the public plaza located on the site, landscaping is a key feature of the proposal and provides a strong opportunity to improve the streetscape, provide a range of active and passive open spaces within the site, and revegetate the site with species that respond to considerations such as Designing with Country. Planting draws from the vegetation qualities associated with Sydney Harbour's edge and coastal sandstone landscapes, introducing texture, shade and seasonal variation into the public realm whilst maintaining openness towards the harbour outlook.

In addition, landscaping and public domain has been designed in accordance with the relevant guidelines, including Biodiversity in Place, Greener Places and Connecting with Country. The proposal's compliance with these guidelines is detailed the Rezoning Report at **Appendix A**.

3.10.1 Public Plaza

The landscape design responds to the site's dual role as a key pedestrian connection and pocket park within the North Sydney CBD, enhancing the existing Blue Street Plaza as one of North Sydney's final remaining public open spaces offering iconic views to Sydney Harbour and the CBD. The proposal strengthens these views by establishing clear sightlines and a direct, legible connection through the site to a generous and accessible harbour outlook.

The ground plane is activated through a network of pedestrian connections linking the retail pavilion, commercial tenancies, residential lobby, surrounding streets and the harbour beyond, as illustrated in **Figure 31** below. Together, these elements create a cohesive and inviting public realm that encourages movement through the site while supporting informal use and everyday activation.

A terraced pocket park along the primary street frontage provides a moment of respite within the dense urban environment. Integrated seating, layered planting, and native grasses soften the street edge, supporting informal gathering, lunchtime use, and spill-out activity associated with adjacent retail frontages, while maintaining openness towards key views.

Planting and materiality draw from the character of Sydney Harbour and its coastal sandstone landscapes, incorporating light granite, sandstone accents, timber elements and native vegetation to introduce texture, shade and seasonal variation. The design reflects the layered topography and shoreline qualities of the harbour, expressing a contemporary interpretation of Cammeraygal Country within the public domain.

The existing Blue Street Plaza on the eastern portion of the site will be retained and enhanced, continuing to function as a key gathering space for the North Sydney community and future residents. Further detail on the proposed landscaping is provided in the Landscape Plans and Landscape Design Report prepared by fjstudio and provided at **Appendix I** and **H** respectively.

It is noted that Blue Street Plaza will be secured as a public benefit through the a public positive covenant, ensuring its ongoing provision, maintenance and accessibility for public use. This mechanism will formalise the delivery of the plaza as a publicly accessible open space, contributing to the amenity of the locality and supporting broader public domain outcomes. The covenant will also provide an enduring framework for the management and upkeep of the space, ensuring that it continues to function as an active, high-quality public asset over the long term.



Figure 31 Landscape concept design

Source: fjstudio



Figure 32 Blue Street Plaza

Source: fjstudio



Figure 33 Entrance from Blue Stret

Source: fjstudio

3.11 Communal Living Areas

Communal living areas are provided throughout the proposed development, particularly to accompany the site's co-living uses. For both market residential and co-living residents, these spaces will provide a variety of uses which will allow for simultaneous use by multiple groups. As illustrated in **Figure 34** below, the communal living areas provided on Level 9 comprise of a golf simulator, communal lounge area, pilates room, gym and changing room, as well as a dining area. These internal communal living areas deliver approximately 449m² of GFA, representing 15% of the total site area. Additionally, there is a communal living area on the ground floor for exclusive use by co-living tenants, comprising 163m² of GFA.

It is noted that, in addition to the communal living areas provided throughout the proposed development, residents will also have access to the Ground Floor public plaza which comprises 314m² of communal open space, representing 10% of the total site area. This plaza space is described in detail at **Section 3.10**.

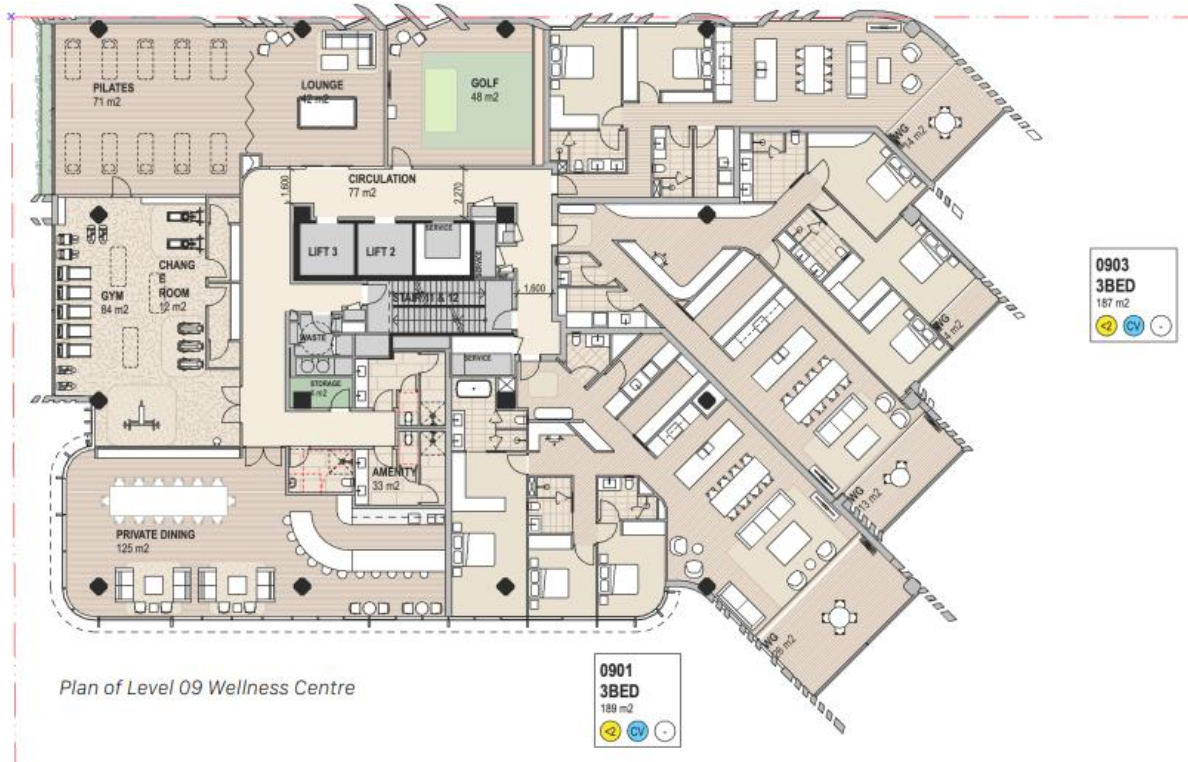


Figure 34 Plan of Level 09 communal open spaces

Source: fjcstudio

3.12 ESD Principles

As an adaptive reuse project, a key driver in the detailed design, construction and operation of the proposal is the achievement of best practice ecologically sustainable development (ESD) principles to minimise the consumption of resources and guide sustainable operation in the future.

Compared to both the existing development and generally as a residential development, the proposal incorporates various ESD and energy efficient features within the design including but not limited to:

- Passive and active energy-saving measures such as operable windows to enhance natural ventilation;
- Configuration of dwellings to maximise residential amenity through solar access;
- Preservation of foundations and concrete slab structure;
- LED energy-efficient lighting;
- Centralised energy-efficient electric air sourced heat pump hot water systems;
- Gearless traction with variable voltage variable frequency motor lifts;
- Provision of bicycle storage spaces; and
- Extensive landscaped areas.

For further information, refer to the Ecologically Sustainable Development Report has been prepared by SLR Consulting and is included at **Appendix O**.

3.13 Station Integration and Works

As detailed in **Section 2.2**, the site is a freehold stratum located above North Sydney Train Station. For the avoidance of doubt, the proposed development does not include any station integration works and will not impact lots relating to North Sydney Train Station, nor the operation of the station. For further detail, refer to the Architectural Plans prepared by fjstudio at **Appendix E** and **Section 6.0** of this Report, which details the discussions and consultation with relevant government agencies relating to the potential impact of the proposed development.

3.14 Affordable Housing

The affordable housing component of the proposed development will comprise 20% of the total residential GFA, equating to 2,860m². This will facilitate the delivery of 86 affordable co-living dwellings, to be managed by a registered Community Housing Provider. A Letter of Commitment from a Community Housing Provider is provided under separate cover. The affordable co-living dwellings will remain affordable dwellings in perpetuity and will be regulated under the terms of the conditions of consent.

Rent will be set based upon the definition of affordable housing under the *Environmental Planning and Assessment Act 1979*. Regular reporting to North Sydney Council will be provided to ensure that the housing is provided in an ongoing manner.

3.15 Non-Residential Uses

Approval is sought for the use of all retail tenancies indicated in the Architectural Plans prepared by fjstudio and included at **Appendix E**. These tenancies are proposed to be food and beverage tenancies, contributing to the activation and livelihood of the site and surrounding streetscape. Tenants are expected to utilise the Complying Development provisions of *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008* to undertake their fitout works.

3.16 Staging and Delivery

The proposed development will be delivered in a single stage. However, a Draft Construction Methodology has been prepared by Multiplex and is included at **Appendix P** to provide an indicative sequence of project phases.

The Principal Contractor for the project will be responsible for developing the final construction phasing sequence prior to the commencement of works. The indicative phases of the project are outlined in **Table 5** below. The development is proposed to be certified under a single Occupation Certificate, including the affordable housing component.

Table 5 *Indicative Project Phasing*

Phase	Works
Demolition	• Site establishment • Demolition enabling (drop chute / access) • Operation of tower crane • Demolition scaffold installation • Soft strip • Hard demolition • Façade removal (excluding hazmat)
Structure	• Tower structural strengthening (if required) • L12-L15 new balcony structure • L06-L09 new balcony structure • L01-L02 new structure
Balconies	• Prep for new balconies

	• Install new balconies
Façade / fitout	• New lifts • Façade and fitout
Completion	• Commissioning • Practical completion

3.17 Construction Details

A detailed Construction Management Plan (CMP) will be prepared by the appointed contractor prior to the commencement of works. The CMP will address the following matters:

- Material management;
- Construction traffic management;
- Health and safety;
- Equipment/materials staging and parking;
- Dust control measures; and
- Methods for disposal of demolition waste.

It is intended that the project is to be constructed in one line without specific stages. Noting that the proposal is an adaptive reuse project which will preserve the building's foundations and concrete slab structure, the sequence of minor demolition and structural works, followed by construction of the mixed-use development activities will occur. Individual fitouts for retail uses will be subject to future applications.

4.0 Proposed Rezoning Amendments

The following section outlines the objectives and intended outcomes of this concurrent rezoning request and an explanation of provisions to achieve these outcomes, including relevant mapping. The justification and evaluation of impacts is set out in **Sections 7.0** of this Report, as well as within the Rezoning Report at **Appendix A**.

4.1 Objectives and Intended Outcomes

Objective

The key objective of the rezoning is to amend the North Sydney LEP 2013 and Housing SEPP to allow residential development and additional height to accommodate the proposed mixed-use development described in **Section 3.0**. The amendments are sought to be consistent with the North Sydney Housing Strategy and the broader strategic objectives of the NSW Government to deliver additional housing to alleviate the housing crisis and meet the targets of the National Housing Accord 2022.

Intended Outcomes

The intended outcomes of the proposed amendments to the North Sydney LEP 2013 are as follows:

- Deliver much-needed housing in a well-located site directly above the North Sydney Railway Station, strengthening North Sydney's contribution to NSW and national housing commitments under the National Housing Accord and the current NSW housing targets;
- Enable delivery of high-quality residential apartments supported by an active ground plane of neighbourhood-serving non-residential land uses that leverage the site's strategic location;
- Contribute to alleviating the NSW housing crisis by integrating an affordable housing contribution and achieving strong residential amenity outcomes consistent with the Apartment Design Guide and Housing SEPP;
- Revitalise an underutilised land parcel located directly above the North Sydney Railway Station with an enhanced public plaza and non-residential land uses. Given the site's strategic location, the proposal will deliver better opportunities for active transport and environmental sustainability in addition to promoting the social and economic betterment of the site;
- Enhance the relationship of the public domain with the site through the provision of a public plaza fronting retail offerings on the site;
- Deliver a sustainable urban development by extending the life cycle of an existing built asset; and
- Contribute to housing diversity within the North Sydney LGA with built-to-sell and affordable co-living housing, supported by necessary social infrastructure and communal facilities.

4.2 Explanation of Provisions

4.2.1 Amendments Proposed to the North Sydney LEP 2013

Amendments to the key development standards are required to facilitate the proposed development. The required amendments to the North Sydney LEP 2013 are detailed in **Table 6**, compared with the existing controls.

Table 6 *Proposed amendments to the North Sydney LEP 2013*

Standard	Existing Control	Proposed Control
North Sydney LEP 2013		
Land use zoning	E2 Commercial Centre	MU1 Mixed Use
Height of buildings	65m (RL) and 115m (RL)	116 (RL)

4.2.2 Exclusion of Clause

In addition to the above amendments to the North Sydney LEP 2013, exclusion from a section within Part 3 of the Housing SEPP relating to co-living is also proposed to facilitate the proposed development:

Section 69(2)(c) Standards for co-living housing

Section 69(2)(c) requires the consent authority to consider if at least 3 hours of direct solar access will be provided between 9am and 3pm at mid-winter in at least one communal living area.

The proposed ground floor communal living area is located on the southern interface, meaning it receives no direct mid-winter solar access. While this does not achieve the requirements of section 69(2)(c), strict application of the standard would not produce the best planning, design or public domain outcome for the site.

The western and eastern building interfaces are more appropriately used for publicly oriented functions including the residential building lobby (west) and ground floor retail tenancies (east). Retaining ground floor space for retail uses facing the plaza allows the plaza to be activated by non-residential uses, improves passive surveillance and supports a more vibrant public domain. This is preferable to placing inward-facing communal residential space along the plaza edge, which could reduce activation, create privacy conflicts for residents and weaken the civic role of the ground plane.

Similarly, a strong corner entrance is an important design and wayfinding element for a mixed-use building in a highly active CBD setting. Locating lobbies at the corner and ground floor interfaces provides direct access, improves visibility, supports safe movement and reinforces the building's relationship with the public domain. Replacing these entry and lobby functions with a communal living area solely to satisfy solar access would compromise the clarity of access and the operational logic of the building.

Additionally, locating the communal living area on the southern interface enables views towards Sydney Harbour, specifically the Sydney Harbour Bridge. This significant view provides a high level of amenity for tenants that could not otherwise be achieved if stringent adherence to solar access requirements was achieved.

Accordingly, exclusion from section 69(2)(c) is justified as it prioritises a superior ground floor arrangement, stronger public domain activation and meaningful public benefit.

5.0 Statutory Context

This section of the Report provides an assessment of the proposal against the relevant sections of EP&A Act and the relevant Environmental Planning Instruments (EPIs). It has been set out in accordance with the *DPE's State significant development guidelines – preparing an environmental impact statement* (July 2022), which identifies the categories to be used to identify the statutory requirements of a project, being that of the following:

- Power to grant approval (**Section 5.1**);
- Permissibility (**Section 5.2**);
- Other approvals (**Section 6.3**);
- Pre-conditions to exercising the power to grant approval (**Section 6.4**); and
- Mandatory matters for consideration (**Section 5.5**).

This section is complemented by a Statutory Compliance Table prepared by Colliers Urban Planning at **Appendix C** that identifies all statutory requirements and where those requirements have been addressed in the Report.

5.1 Power to Grant Approval

Division 4.7 of the EP&A Act establishes a specific system to consider projects classed as State Significant Development (SSD). SSD is development deemed to be of State significance and includes projects of a certain value that are being completed on sites regarded as important to the NSW Government.

Section 4.36(3) of the EP&A Act states that:

The Minister may, by a Ministerial planning order, declare specified development on specified land to be State significant development.

The site was declared to be SSD under the HDA, specifically pursuant to *State Significant Declaration Order (No 4) 2025* (Order) issued on 3 April 2025. The Order states development specified in EOI application 233741 dated 22 January 2025, including development for the purpose of residential with provision of affordable housing at 5 Blue Street, North Sydney, as SSD.

Therefore, the proposed development is SSD by virtue of Ministerial planning order.

5.2 Permissibility

The permissibility of the proposed development considering the proposed land use/s and land zoning is outlined in **Table 7** below.

Table 7 Permissibility

Matter	Consideration
Land Use	The proposed development seeks consent for the purposes of mixed-use development comprising: • Residential flat building; • Co-living housing; and • Commercial premises (retail use).
Land Zoning	The site is located within the E2 Productivity Support zone under the North Sydney LEP 2013. The proposed North Sydney LEP 2013 amendments seek to amend the land use zone to the MU1 Mixed Use zone.
Permissibility	Use of site for 'residential flat building' and 'commercial premises' is explicitly permitted under the MU1 Mixed Use zoning of the site.

5.3 Other Approvals

The other legislative approvals required for the Proposal in addition to a development consent under Division 4.7 of the EP&A Act are outlined in **Table 8** below.

Table 8 Other Approvals

Matter	Consideration																
Approvals not required for SSD	Section 4.41 of the EP&A Act stipulates that certain authorisations are not required for SSD. Table 9 lists the legislative approvals that would otherwise be required if the proposal was not State significant. Table 9 <i>Legislation Not Applicable to SSD</i> <table> <tr> <th>Legislation</th><th>Approval Otherwise Required</th></tr> <tr> <td><i>Fisheries Management Act 1994</i></td><td>No</td></tr> <tr> <td><i>Heritage Act 1977</i></td><td>No</td></tr> <tr> <td><i>National Parks and Wildlife Act 1974</i></td><td>No</td></tr> <tr> <td><i>Rural Fires Act 1997</i></td><td>No</td></tr> <tr> <td><i>Water Management Act 2000</i></td><td>No</td></tr> </table>	Legislation	Approval Otherwise Required	<i>Fisheries Management Act 1994</i>	No	<i>Heritage Act 1977</i>	No	<i>National Parks and Wildlife Act 1974</i>	No	<i>Rural Fires Act 1997</i>	No	<i>Water Management Act 2000</i>	No				
Legislation	Approval Otherwise Required																
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<i>Heritage Act 1977</i>	No																
<i>National Parks and Wildlife Act 1974</i>	No																
<i>Rural Fires Act 1997</i>	No																
<i>Water Management Act 2000</i>	No																
Consistent Approvals	Section 4.42 of the EP&A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out SSD. Table 10 below lists the legislative approvals that are required for the proposal and cannot be refused if the proposal is approved. Table 10 <i>Legislation to be Applied Consistently</i> <table> <tr> <th>Legislation</th><th>Approval Required</th></tr> <tr> <td><i>Fisheries Management Act 1994</i></td><td>No</td></tr> <tr> <td><i>Coal Mine Subsidence Compensation Act 2017</i></td><td>No</td></tr> <tr> <td><i>Mining Act 1992</i></td><td>No</td></tr> <tr> <td><i>Petroleum (Onshore) Act 1991</i></td><td>No</td></tr> <tr> <td><i>Protection of the Environment Operations Act 1997</i></td><td>No</td></tr> <tr> <td><i>Roads Act 1993</i></td><td>No</td></tr> <tr> <td><i>Pipelines Act 1967</i></td><td>No</td></tr> </table>	Legislation	Approval Required	<i>Fisheries Management Act 1994</i>	No	<i>Coal Mine Subsidence Compensation Act 2017</i>	No	<i>Mining Act 1992</i>	No	<i>Petroleum (Onshore) Act 1991</i>	No	<i>Protection of the Environment Operations Act 1997</i>	No	<i>Roads Act 1993</i>	No	<i>Pipelines Act 1967</i>	No
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<i>Protection of the Environment Operations Act 1997</i>	No																
<i>Roads Act 1993</i>	No																
<i>Pipelines Act 1967</i>	No																
EPBC Approval	The <i>Environmental Protection and Biodiversity Act 1999 Act</i> (EPBC Act) provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities, and heritage places. These are known as matters of National Environmental Significance (NES). If the proposed development will, or is likely, to impact a matter of NES, then it is required to be referred to the Federal Department of the Environment for assessment to determine if it constitutes a 'controlled action' requiring EPBC approval. Presently, a bilateral agreement allows the Commonwealth Minister for the Environment to rely on the NSW environmental assessment process when assessing a controlled action under the EPBC Act. The proposed development is not likely to impact a matter of NES. Therefore, the proposed development is not required to be referred to the Federal Department of the Environment to determine if it constitutes a controlled action and the bilateral agreement applies.																

5.4 Pre-Conditions to Exercising the Power to Grant Consent

The pre-conditions to be fulfilled by the consent authority before exercising their power to grant development consent are identified and considered in **Table 11** below.

Table 11 *Pre-Conditions to Exercising the Power to Grant Consent*

Matter	Consideration
<i>Biodiversity Conservation Act 2016</i>	In accordance with Section 7.9 of the <i>Biodiversity Conservation Act 2016</i>, an assessment of any State Significant proposal's biodiversity impacts must be undertaken as part of the provision of any SSDA, including the provision of a Biodiversity Development Assessment Report (BDAR) in instances where it is required. Section 7.14 requires the consent authority to take into consideration the likely impact of the proposed development on biodiversity values as assessed in the BDAR. Given the site's location within an urban context, the proposed development is not considered to result in any adverse impacts to biodiversity on the site or within the site's surrounding area. As such, the SSDA is accompanied by a Biodiversity Development Assessment Report Waiver prepared by SLR Consulting at Appendix Q.
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	The <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (R&H SEPP) aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Section 3.12 outlines mandatory matters for a consent authority to consider when determining an application for potentially hazardous or offensive development. Chapter 3 applies to any proposals which fall under the policy's definition of 'potentially hazardous industry' or 'potentially offensive industry'. The works proposed as part of this application do not fall within these definitions, and as such a Preliminary Hazard Analysis is not required. The site is also not adjacent to or on land in a pipeline corridor. Section 4.6 stipulates that a consent authority must not consent to the carrying out of development unless: • It has considered whether the land is contaminated, and if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out; and • If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is suitable that the land will be remediated before the land is used for that purpose. The Preliminary Site Investigation prepared by Douglas Partners at Appendix R confirm that the site is suitable for the proposed development.
<i>State Environmental Planning Policy (Transport and Infrastructure) 2021 section 2.100</i>	The <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (Transport and Infrastructure SEPP) aims to facilitate the effective delivery of infrastructure of the State. Section 2.48 requires the consent authority to give written notice to the electricity supply authority for the area and take into consideration any response to that notice before granting consent to a development likely to affect an electrical transmission or distribution network. The application will be referred to the relevant utility providers during the assessment. As the proposal is development adjacent to a rail corridor and involves the use of a crane space above the rail corridor, Section 2.98 requires the consent authority to refer the proposal to the rail authority and take into consideration any responses. The proposal will be referred to the rail authority, being TfNSW, accordingly. As the proposal involves excavation above a rail corridor to a depth of at least 2 metres, Section 2.99 requires the consent authority to refer the proposal to the rail authority and take into consideration any responses. Concurrence for the proposal will be obtained from the rail authority, being TfNSW, to consider the potential effects of the development on the safety or structural integrity of the rail corridor and the ability to undertake safe and effective operation of rail infrastructure facilities. As the proposal involves delivery of residential accommodation above a rail corridor, the amenity of the proposed development in relation to rail noise or vibration has been considered in accordance with Section 2.100. Refer to Section 7.6 for an assessment of the future residential amenity on the site, particularly in relation to noise and vibration. Section 2.120 requires a consent authority to consider the impacts of road noise and vibration on residential development when adjacent to a road corridor with an annual average traffic volume of

more than 20,000 vehicles. It is noted that Blue Street is not identified as a road corridor with an annual average traffic volume of more than 20,000 vehicles.

Section 2.121 requires, for excavation in or immediately adjacent to road corridors, the consent authority to provide the RMS with written notice of the development application for developments considered a 'traffic generating activity'. The proposal does not involve the penetration of ground to a depth of at least 3m below ground level on land that is the road corridor of any of the roads or road projects identified in the section.

5.5 Mandatory Matters for Consideration

The matters that the consent authority is required to consider in deciding whether to grant consent to any development application are identified and considered in the sections below.

5.5.1 Environmental Planning and Assessment Act

An assessment of the proposal against the mandatory matters for consideration in the EP&A Act is provided in **Table 12** below.

Table 12 *Mandatory Matters for Consideration – EP&A Act*

Legislation	Matters for Consideration
<i>Environmental Planning and Assessment Act 1979</i>	The proposed development is consistent with the objectives of the EP&A Act for the following reasons: • It will promote the social and economic welfare of the community by providing development uplift to an ageing and dilapidated site. Through improvements to the existing public plaza on the site, the proposal will enable increased social cohesion through enabling increased public amenity. The development will additionally generate substantial economic benefits in both the construction and operational stages; • As an adaptive reuse project, the development both conserves environmental resources and promotes ecologically sustainable development. This is achieved in the short-term through preservation of the building structure, as well as in the long-term operational phases of the development as the building is retrofitted with technologies of a significantly higher efficiency. These design and operational upgrades to the built form will improve the resilience of the site and future users of the site to climate change and natural disasters; • The proposal will not adversely affect any threatened species, ecological communities or their habitats; • The proposal will promote the sustainable management of built and cultural heritage through delivering on increased opportunities to promote Aboriginal cultural heritage in design. This will be particularly evident in the design of the public plaza; • The proposal represents orderly and economic use and redevelopment of land to enable the delivery of 148 in-fill apartments including 62 market residential units and 86 affordable co-living dwellings; • It promotes good design, with the built form, layout and landscaping presenting a positive contribution to the North Sydney locality; and • The assessment of the proposed development through this EIS and appended Rezoning Report concludes that the proposal is not expected to have unreasonable environmental impacts following the implementation of key mitigation measures. The proposed development is consistent with Division 4.7 of the EP&A Act, particularly for the following reasons: • It has been declared to have State significance; • it is not prohibited by an environmental planning instrument; and • It has been evaluated and assessed against the relevant heads of consideration under Section 4.15(1)).
<i>Environmental Planning and Assessment Regulation 2021</i>	Part 8, Divisions 2 and 5 of the <i>Environmental Planning and Assessment Regulation 2021</i> (EP&A Regulation) sets out procedures which relate to the preparation and submission of an EIS. This Report has been prepared in accordance with Sections 190 and 192 of Division 5, which relate to the form and content of the EIS. Similarly, this Report addresses the principles of ecologically sustainable

development through the precautionary principle (and other considerations), which assesses the threats of any serious and irreversible environmental damage (refer to **Section 8.0**).

5.5.2 State Environmental Planning Policies

The relevant state environmental planning policies (SEPPs) are assessed in **Table 13** below.

Table 13 *Mandatory Matters for Consideration – SEPPs*

SEPP	Matter for Consideration
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	The Preliminary Site Investigation prepared by Douglas Partners at Appendix R demonstrates that the site is suitable for the proposed development.
<i>State Environmental Planning Policy (Housing) 2021</i>	The following parts of the <i>State Environmental Planning Policy (Housing) 2021</i> (Housing SEPP) applies to this development: • Chapter 3, Part 3 for the purposes of ‘co-living housing’; and • Chapter 4, for the purposes of residential apartment development. An assessment of the consistency of the proposed development with the relevant provisions of the Housing SEPP is provided in Section 7.0 below. This is supported by an assessment of the proposal’s consistency with the Apartment Design Guide (ADG) in the Architectural Design Report prepared by fjcstudio included at Appendix F. It is noted that the co-living affordable is not being proposed under the Housing SEPP, and will be compliant with EP&A Act.
<i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i>	Chapter 2 of the <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> (Biodiversity and Conservation SEPP) aims to protect the biodiversity value of trees and other vegetation in non-rural areas. Given the site’s location within an urban context and the absence of vegetation on the site, the proposed development is not considered to result in any adverse impacts to biodiversity on the site or within the surrounding area. As such, this SSDA is accompanied by a Biodiversity Development Assessment Report Waiver prepared by SLR Consulting at Appendix Q. The Biodiversity and Conservation SEPP implements a series of general controls on development situated within regulated water catchments. The site is located within the Sydney Harbour Catchment. Part 6.2 ‘Development on regulated catchments’ Biodiversity Conservation SEPP will apply. No significant adverse impact on the Sydney Harbour Catchment is anticipated. Further detail pertaining to stormwater run-off, sediment and erosion control, and water quality is discussed in greater detail at Section 7.0.
<i>State Environmental Planning Policy (Sustainable Buildings) 2022</i>	The <i>State Environmental Planning Policy (Sustainable Buildings) 2022</i> (Sustainable Buildings SEPP) encourages the design and delivery of more sustainable buildings across NSW. It sets sustainability standards for residential and non-residential development and starts the process of measuring and reporting on the embodied emissions of construction materials. Chapter 2 ‘Standards for residential development – BASIX’ applies to the proposal, with the relevant standards for BASIX buildings relating to energy and water use and thermal performance. An assessment of the proposed development’s consistency with the relevant provisions and controls of the Sustainable Buildings SEPP is provided in the Ecologically Sustainable Development Report prepared by SLR Consulting at Appendix O.

5.5.3 State Environmental Planning Policy (Housing) 2021

Chapter 3, Part 3 of the Housing SEPP applies to development for the purposes of co-living housing and includes a range of development standards including non-discretionary standards that, if complied with, prevent the consent authority from requiring more onerous standards for the matters.

An assessment of the proposed development against the relevant provisions of the Housing SEPP is set out in **Table 14**.

Table 14 Assessment against Chapter 3, Part 3 of the Housing SEPP

Clause	Control	Comment
Chapter 3 – Diverse Housing		
Part 3 – Co-living Housing		
Section 67 – Co-living housing may be carried out on certain land with consent		
<i>Development for the purposes of co-living housing may be carried out with consent on land in a zone in which—</i>	(a) <i>development for the purposes of co-living housing is permitted under another environmental planning instrument, or</i> (b) <i>development for the purposes of residential flat buildings or shop top housing is permitted under Chapter 5, Chapter 6 or another environmental planning instrument.</i>	The proposed development includes an SSDA and Concurrent Rezoning. The Concurrent Rezoning seeks to amend the land use zoning under the North Sydney LEP 2013 from the E2 Commercial Centre to MU1 Mixed Use zone. Development for the purposes of residential flat buildings are permissible under the MU1 Mixed Use zone.
Section 68 – Non-discretionary development standards—the Act, s 4.15		
<i>(2) The following are non-discretionary development standards in relation to development for the purposes of co-living housing—</i>	(a) <i>for development in a zone in which residential flat buildings are permitted—a floor space ratio that is not more than—</i> (i) <i>the maximum permissible floor space ratio for residential accommodation on the land, and</i> (ii) <i>an additional 10% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of co-living housing,</i>	No floor space ratio applies to the site.
	(b) <i>for co-living housing containing 6 private rooms—</i> (i) <i>a total of at least 30m² of communal living area, and</i> (ii) <i>minimum dimensions of 3m for each communal living area,</i>	Not applicable.
	(c) <i>for co-living housing containing more than 6 private rooms—</i> (i) <i>a total of at least 30m² of communal living area plus at least a further 2m² for each private room in excess of 6 private rooms, and</i> (ii) <i>minimum dimensions of 3m for each communal living area,</i>	The proposed development delivers a total of 612m ² of communal living area. All communal areas will have minimum dimensions of at least 3 metres.
	(d) <i>communal open spaces—</i> (i) <i>with a total area of at least 20% of the site area, and</i> (ii) <i>each with minimum dimensions of 3m,</i>	The site area is 3,051m ² and proposed development delivers a total of 926m ² of communal living areas for co-living housing, which includes 314m ² of communal open space (10.3% of site area). For the reasons outlined in Section 7.6 , this is considered suitable for the proposed development.
	(e) <i>unless a relevant planning instrument specifies a lower number—</i> (i) <i>for development on land in an accessible area—</i> 0.2 parking spaces for each private room, or	The proposed development includes the delivery of nil car parking spaces to service the co-living portion of the site. For the reasons outlined in Section 7.8 , this is considered suitable for the proposed development.

(ii) otherwise—0.5 parking spaces for each private room,

Section 69 – Standards for co-living housing

(1) Development consent must not be granted for development for the purposes of co-living housing unless the consent authority is satisfied that—

(a) each private room has a floor area, excluding an area, if any, used for the purposes of private kitchen or bathroom facilities, that is not more than 25m² and not less than—

- (i) for a private room intended to be used by a single occupant—12m², or
- (ii) otherwise—16m², and

The proposed co-living units range from 17m² to 30m² in size. Regardless of whether units are used for single occupancy or otherwise, all residential units exceed the minimum requirements.

(b) the minimum lot size for the co-living housing is not less than—

- (i) for development on land in Zone R2 Low Density Residential—600m², or
- (ii) for development on other land—800m², and

The proposed uses on the site include co-living and market housing. The site area is 3,051m². The proposal complies with the minimum lot sizes.

(d) the co-living housing will contain an appropriate workspace for the manager, either within the communal living area or in a separate space, and

The proposal will deliver workspaces for the manager on the Ground Floor within the lobby, communal living areas and separate spaces.

(e) for co-living housing on land in a business zone—no part of the ground floor of the co-living housing that fronts a street will be used for residential purposes unless another environmental planning instrument permits the use, and

Not applicable. In any case, no part of the Ground Floor of the proposed development which fronts the street will be used for residential purposes.

(f) adequate bathroom, laundry and kitchen facilities will be available within the co-living housing for the use of each occupant, and

All residential units will contain a kitchen and bathroom. Sufficient laundry facilities will be provided on the Ground Floor.

(g) each private room will be used by no more than 2 occupants, and

All residential units will either be used by one (1) or two (2) occupants only.

(h) the co-living housing will include adequate bicycle and motorcycle parking spaces.

The proposal involves six (6) motorcycle spaces and a 170m² bicycle storage room which is capable of housing 97 bicycles. Refer to **Section 7.8.2**.

(2) Development consent must not be granted for development for the purposes of co-living housing unless the consent authority considers whether—

(b) if the co-living housing has at least 3 storeys—the building will comply with the minimum building separation distances specified in the Apartment Design Guide, and

The co-living component is proposed to comprise three (3) storeys on Levels 1-3. For buildings up to four (4) storeys, the Apartment Design Guide stipulates a minimum separation of 12m between habitable rooms and balconies.

The current separation between the proposed development and 211 Blues Point Road to the south is 7.6m. However, it is noted that 221 Blues Point Road is proposed to be demolished under SSD-88702457. As such, the proposal is compliant.

(c) at least 3 hours of direct solar access will be provided between 9am and 3pm at mid-winter in at least 1 communal living area, and

As described in **Section 4.2** and in the Rezoning Report at **Appendix A**, exclusion from this section is proposed.

(f) the design of the building will be compatible with—

- (i) the desirable elements of the character of the local area, or
- (ii) for precincts undergoing transition—the desired future character of the precinct.

The design of the proposal is compatible with the site's local area, having regard to the character of the site and the desired future character of the North Sydney area. Refer to the Architectural Design Report prepared by fjcstudio included at **Appendix F** and **Section 7.1** for further discussion.

Section 70 – No subdivision

Development consent must not be granted for the subdivision of co-living housing into separate lots.

Not applicable.

The *North Sydney Local Environmental Plan 2013* (North Sydney LEP 2013) is the principal guiding EPI relevant to the site and establishes the key parameters and standards for new development. The proposal's consistency with the relevant clauses of the North Sydney LEP 2013 is assessed below in **Table 15**.

Clause	Assessment
	S , which concludes that the proposed development will have an acceptable heritage impact on the surrounding heritage items. Refer also to Section 2.5 .
Clause 5.11 Bush fire hazard reduction	The site is not identified as comprising bushfire prone land.
Clause 5.21 Flood planning	The site is not located within flood planning area.
Part 6 Additional local provisions North Sydney Centre	The site is located on the southern edge of the North Sydney Centre.
Clause 6.3 Building heights and massing	The proposed development comprises a design which: • Will not result in a net increase in overshadowing between 12pm and 2pm from the March equinox to the September equinox on land that is within the RE1 Public Recreation zone; and • Will not result in a net increase in overshadowing between 10am and 2pm from the March equinox to the September equinox of the Don Bank Museum. In addition, the site does not have an area of less than 1,000m².
Clause 6.10 Earthworks	The Geotechnical Assessment prepared by Douglas Partners and included at Appendix U assesses the proposed design based on earthworks. The assessment demonstrates that, subject to adopting appropriate methods and equipment, the proposal will not have a detrimental impact on environmental functions and processes of surrounding areas.
Clause 6.12 Residential flat buildings	Not applicable. The site is proposed to be rezoned to MU1 Mixed Use, not R4 High Density Residential.
Clause 6.12A Residential flat buildings in Zone MU1 Mixed Use	The proposed development includes a residential flat buildings development, however there are no residential dwellings proposed to be located on the ground floor. The proposal is therefore a mixed use development which will deliver, compared to existing site conditions, activation of street frontages through commercial tenancies adjoining the site's public plaza.
Clause 6.13 Vehicular access	Vehicular access to the site, including driveway and vehicular crossing. Subject to the concurrent amendment, residential flat buildings are permitted with consent in the MU1 Mixed Use zone. Any vehicular access works will therefore be associated with this permissible use and may be carried out with development consent.
Clause 6.15 Airspace operations	The proposed development will not penetrate the Obstacle Limitation Surface, which is 156m AHD over the site.

6.0 Stakeholder Engagement (for Rezoning and State Significant Development)

This section describes consultation undertaken and feedback received prior to the lodgement of the Report for the proposal, and engagement to be carried out following lodgement of the Report. It is supported by a Community Engagement Report prepared by Polymer Studios, included at **Appendix T**.

6.1 Engagement Carried Out

Full consideration has been given to DPHI Secretary's Environmental Assessment Requirements (SEARs) during the consultation for this project, including observance of the *Undertaking Engagement Guidelines for State Significant Projects* (October 2022).

6.1.1 Identified Stakeholders

A comprehensive list of community members and stakeholders to consult throughout during the preparation of the EIS process was developed through:

- The identification of neighbours who would be impacted by the proposal unless mitigation measures were implemented;
- The identification of stakeholders who would have a particular interest in the proposal;
- The identification of stakeholders who would have information of value to the proposal; and
- Consultation with DPHI.

As a result of the above process, a number of stakeholders were identified for consultation, including:

- Zurich Insurance
 - Zurich Australia (Zurich Financial Services Australia Pty Ltd) employees
 - Group Real Estate (GRE) Regional
 - Front of house
 - Zurich IM Regional – Asia Pacific
 - Zurich GRE Global – Switzerland
 - Zurich Investment Management local
- 5 Blue Street stakeholders
 - Existing retail tenants
 - Existing commercial tenants
 - JLL – Head of Asset Management
 - JLL Facility Manager (onsite)
- Neighbouring landowners
 - Aqualand – 15 Blue Street
 - CAS – St Francis Xavier Catholic Church
 - View Hotel - owner
 - Mirvac and Greenwood Plaza
- Neighbouring community and local business
 - Neighbouring residents – particularly south of site on Mackenzie Street, Wilona Avenue and Blues Point Road
 - All businesses located in 73, 40 and 32 Miller Street
- Neighbouring businesses in adjacent commercial office towers, station precinct and Greenwood Plaza
- St Francis Xavier Parishioners
- St Peter's Presbyterian Church, immediately west of the site
- Government stakeholders
 - North Sydney Council – local government
 - Department of Premier and Cabinet
 - State and Federal local MPs
 - Housing, transport and property ministers
 - HDA – approval authority
 - Department of Planning
 - Transport NSW and Sydney Trains
- Advocacy groups specifically related to housing
 - Sydney YIMBY
 - Faith Housing Alliance
 - Sydney Alliance
 - National Affordable Housing Alliance
 - Housing Now!
- Local area bodies and advocacy groups
 - North Sydney Business Chamber
 - North Sydney Innovation Network

- Committee for North Sydney
- North Sydney's Upside (local retailers' group)
- Resident action groups
 - Precinct committees – Central
 - Business District + Lavendar Bay Precinct committee
 - Residents Opposing Lavender Bay Overdevelopment (ROLBO)
- North Sydney Action Group
- Key worker + affordable housing stakeholders
 - Health Services Union NSW
 - NSW Nurses and Midwives Association
 - Community Housing Provider(s) – initial discussions occurring

6.1.2 Consultation Methods

As detailed in the Community Engagement Report prepared by Polymer and included at **Appendix T**, a variety of community and stakeholder engagement activities have been undertaken to support the proposed development. This included activities completed prior to lodgement, through the preparation of the Report and associated technical studies.

These activities were aimed at understanding local values and identifying key concerns, with the insights from this process helping shape the design response and informing refinements to the scheme prior to formal lodgement of this application. A summary of the early and ongoing consultation methods is provided in **Table 16** below.

Table 16 Consultation Methods

Activity / Tool	Description	How engagement will inform the project	Targeted Stakeholder
Tools and Collateral			
Project Engagement Website (Inform)	A dedicated project engagement website was launched at 5bluestreet.com.au on 4 May 2026. The website provided community members with accessible information about the project, the engagement process and how to participate in the online sessions.	Provided accessible project information, available to all community members and stakeholders.	All stakeholders
Community Email (Inform)	A dedicated project email address was made available throughout the engagement period for community members and stakeholders to submit questions or feedback directly to the project team.	Enabled ongoing two-way communication between stakeholders and the project team.	All stakeholders
Letterbox Drop – Project Flyer (Inform)	A project flyer was produced as an A4 tri-fold (DL panel) leaflet and distributed to residents and commercial properties surrounding the site.	Provided an overview of the proposed development and invited community members to register for the online engagement sessions.	Local residents and businesses within the engagement catchment.
Letter to Building Tenants (5 Blue Street) (Inform)	A formal letter was issued to all commercial tenants of 5 Blue Street, North Sydney, on behalf of Zurich Financial Services Australia.	Ensured that existing building tenants are aware of future redevelopment, and provided information on how to further engage with the project.	5 Blue Street building tenants
Activities			
In-Person Engagement – Residents Opposing Lavender Bay Overdevelopment (ROLBO) (Consult)	Hosted an in-person engagement session with members of ROLBO, prior to online community sessions.	Provided ROLBO members with a dedicated briefing on the project, including the adaptive re-use approach, proposed design, plaza improvements and planning process.	Members of ROLBO

Activity / Tool	Description	How engagement will inform the project	Targeted Stakeholder
Online Community Engagement Sessions (Consult)	Two online community engagement sessions were held via Zoom on Thursday 14 May 2026, providing community members with an opportunity to hear from the project team and ask questions.	Created an open dialogue between community members to ask questions and provide feedback to inform the EIS and Rezoning Statement.	Local community
Reporting			
Community Engagement Report	A detailed summary of the activities undertaken, stakeholder and community reached, the feedback provided and how this has been reflected in the SSDA.	Identified key themes of interest by stakeholders and the community to help inform the planning, design and construction process.	All stakeholders

This approach follows the Undertaking Engagement Guidelines for State Significant Projects (2021) by:

- Engaging with relevant NSW Government agencies, service providers, Council, close neighbours and targeted members of the community who are most likely impacted or interested in the proposal;
- Informing the surrounding community to the site about the proposal and providing opportunities to engage directly with the project team;
- Explaining how community feedback will be considered and documented;
- Providing relevant information in plain English so that potential impacts and implications can be readily understood; and
- Providing channels of communication to gather feedback.

6.2 Stakeholder Views

The key issues and matters raised by the community and stakeholders during the preparation of the Report are outlined in **Table 17** below.

Table 17 Stakeholder Views

Key issues	Project Response
Strategic Context	
No relevant feedback received.	
Proposal and Alternatives Considered	
Stakeholders questioned the proposed building height, scale and design, including the visual effect of the additional floors, the relationship of the development to surrounding low-rise residential properties, and the extent of the south-east extension.	The two additional floors will bring the building to 15 storeys, remaining within the current LEP height limit. The south-east extension is approximately two metres proud of the existing column line. The design has been significantly reduced in scale from the original SEARs request.
Relevant Statutory Issues	
Stakeholders raised questions about solar access impacts, particularly for properties south of the site on Wilona Avenue and Mackenzie Street, and queried how the proposal would be assessed against relevant solar access requirements.	Extensive solar modelling has been undertaken in accordance with controls set out within the North Sydney LEP. The 'solar honed tower' design was specifically developed to minimise overshadowing impacts.
Community Engagement	
Community members requested access to detailed design drawings and presentation slides following the engagement sessions, with interest in reviewing design material before the formal SSDA submission.	The complete design information will be released as part of the formal SSDA public exhibition, to ensure the community has access to the most accurate and finalised material.
A community member at 61 Lavender Street requested that view impacts from that property toward the CBD be assessed.	This specific view impact has not been assessed, however and a comprehensive view impact analysis has been prepared and is included

Key issues	Project Response
Economic, Environmental and Social Impacts	
Community members raised questions about traffic management and car parking, including the number of parking spaces to be retained, the traffic modelling methodology, whether modelling would be undertaken marginally or holistically, and how increased resident numbers would affect local streets.	The existing 2.5 levels of basement car parking (approx. 80-90 spaces) will be retained. No additional parking will be created due to the building being physically constrained by railway lines running underneath.
A question was raised about noise, including construction noise and operational noise from future residents compared with the existing commercial building.	A residential use would generate more noise than the existing commercial building; however, mechanical systems will be concealed within the building envelope and winter gardens will be enclosed rather than open balconies, reducing noise emanating from residents.
Justification and Evaluation of Project as a Whole	
Community members raised concern that the proposal should not be assessed in isolation from other nearby SSD projects, particularly 15 Blue Street and the St Francis Xavier Church site. Stakeholders sought confirmation that cumulative impacts, including overshadowing and traffic, would be considered across the broader North Sydney Station precinct rather than on a site-by-site basis.	Whilst the proposed development is to be assessed on its individual merits, cumulative impacts will be appropriately considered at the Response to Submissions stage once all applications have been formally lodged.
Issues Beyond Scope or Not Relevant to Project	
No relevant feedback received.	

6.3 Consultation with Transport for NSW

The applicant and the project team have been engaging with TfNSW and TAM since 2022 in relation to the redevelopment potential of the site, and how a future project can adequately manage interference with rail assets and operations.

Specific consultation for the proposed redevelopment subject to this application began in August 2025 and have continued throughout the planning phase of development (refer **Table 18**). Plans for station works have subsequently evolved in response to feedback from TfNSW and culminated in the scope of works the subject of this SSDA. The project team remain committed to ongoing engagement with TfNSW as the project progresses through the planning phase and then the detailed design and delivery phase.

Table 18 *Record of meetings with Sydney Trains and TAM*

Meeting Date	Description and attendees
6 August 2025	Introduction meeting to discuss project at 5 Blue Street, North Sydney. Attended by Sydney Trains, Zurich, Lighthouse Project Management and Arcadis.
21 August 2025	Consultation meeting with TAM. Attended by TAM, Zurich, Lighthouse Project Management and Arcadis.
27 November 2025	Discussion of updated project design. Attended by Sydney Trains, Lighthouse Project Management and Arcadis.
23 March 2026	Update on current architectural and engineering design. Attended by Sydney Trains, Lighthouse Project Management and Arcadis.

The Structural Report prepared by Arcadis (refer **Appendix K**) outlines how the proposed development interacts with rail assets. The detailed engagement and feedback to date in preparing this HDA SSDA from TfNSW since has given the project team confidence with the design and a level of in principle support.

6.4 Consultation with North Sydney Council

The project team met with Council on 11 February 2026 to discuss the project's evolution to an adaptive reuse scheme following the previous demolition proposal. This design approach responded directly to key concerns raised by Council in previous discussions, including issues relating to bulk and scale, view impacts to commercial properties, and overshadowing of nearby residential properties and key public open spaces. Council expressed general support for the revised approach, however maintained a preference for the site to retain a wholly commercial land use.

6.5 Engagement to be Carried Out

6.5.1 Exhibition and Assessment

Following its submission, DPHI will exhibit the Report on the Major Projects NSW Website and invite submissions from government agencies and the public. Once the exhibition period is complete, DPHI may require the applicant to prepare a Submissions Report in response to issues raised. The project team will continue to liaise with the DPHI and stakeholders during the proposal's assessment to address queries that may arise.

6.5.2 Post Approval

The Applicant will implement post-approval stakeholder consultation strategies in addition to the Condition of Consent requirements. This will include continual liaison with and advisement of construction activities to adjoining landowners as required.

7.0 Assessment of Impacts

This section of the Report assesses and responds to the environmental impacts of the proposed SSD. It addresses the matters for consideration set out in the SEARs dated 16 July 2025 (see **Appendix B**). The Consolidated Mitigation Measures proposed to mitigate any environmental impacts are provided at **Appendix D** and complement the findings of this section.

7.1 Built Form and Urban Design

The proposed development seeks to deliver a built form outcome that provides a unique, high-quality contribution to North Sydney, and one that is highly responsive to the site's unique opportunities and constraints. The design and layout of the proposed mixed-use development and public domain is a response to the features of the site and its evolving surroundings, being the ongoing renewal of the North Sydney CBD driven by the opening of the Victoria Cross Metro Station. The following sections detail the proposal's key built form and massing principles and how they have appropriately responded to the site's surrounding context.

The intended outcome for the proposal is to deliver additional housing (including affordable housing) by providing an urban design response that supports community connections and a higher and better use of land in accordance with state-wide policies as outlined in the Rezoning Report at **Appendix A**.

As discussed in **Section 4.0**, the proposal seeks a concurrent rezoning to facilitate the proposed residential land use on the site. It seeks to provide a better use of land which responds to the site's strategic location above a train station, which is a prime location within both the North Sydney CBD and Greater Sydney.

7.1.1 Massing, Bulk and Scale

The proposed massing, bulk and scale has evolved from an interrogation of the North Sydney LEP 2013 and the Housing SEPP, having regard to the site's location within the North Sydney CBD and environmental opportunities. The envisaged configuration of the site is considered to achieve a high-quality built form and urban design outcome that best maximises the development potential of the site having regard to ESD considerations and adaptive reuse opportunities.

Given the massing, bulk and scale of the proposal primarily relates to 'filling out' the existing building envelope in height and through the extension of floorplates on the eastern portion of the building, the proposal optimises the site's development potential whilst delivering development of a form commensurate with existing towers north of the site within the North Sydney CBD. There are no amendments to the existing building footprint, no changes to the ground level setback, and therefore minimal changes in perception of bulk and scale from the streetscape.

Having regard to the site's well established and dense built form environment, the proposal has also been designed to reduce perceived bulk and enhance visual interest. A key design feature of this is the extended cantilevered mass oriented towards the harbour view corridor, which response to the site's prominent urban context while maximising outlook and residential amenity. This design feature contributes to a distinctive skyline presence and reinforces the vertical expression of the tower. Modulation, material variation and recessed elements provide further articulation across the façade. Together, these design moves create a refined built form outcome that response to both the immediate streetscape and the broader character of the North Sydney CBD.

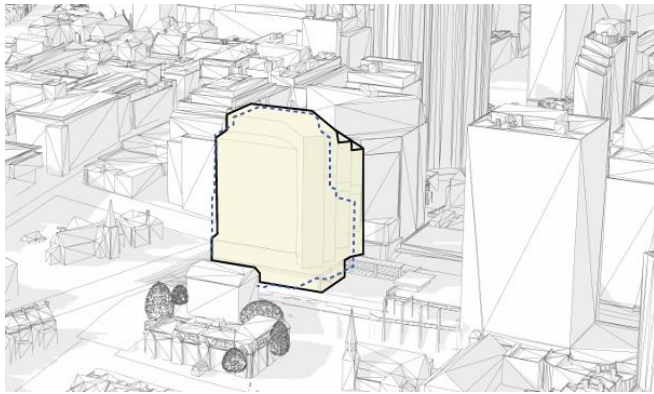
The design strategy undertaken to inform the proposal creates a calm and coherent massing that responds to the site's urban and topographic context. In particular, the proposal aligns with the stepped massing of the North Sydney CBD more broadly, with height concentrated in the central towers stepped downwards towards the outskirts of the CBD. This involves incorporation of the tower building strategy, with key principles identified in **Table 19**.

Modelling and testing have been undertaken to inform various design iterations for the proposed development. This analysis demonstrates that the site can functionally and physically support development uplift, whilst being commensurate to future development in the North Sydney locality. These have ultimately informed the proposal's built form and urban design response.

Refer to further details in the Architectural Design Report prepared by the fjstudio at **Appendix F**. A photomontage of the proposed development in its existing built form context is provided in **Figure 14**.

Table 19 *Key Tower Building Strategy Principles*

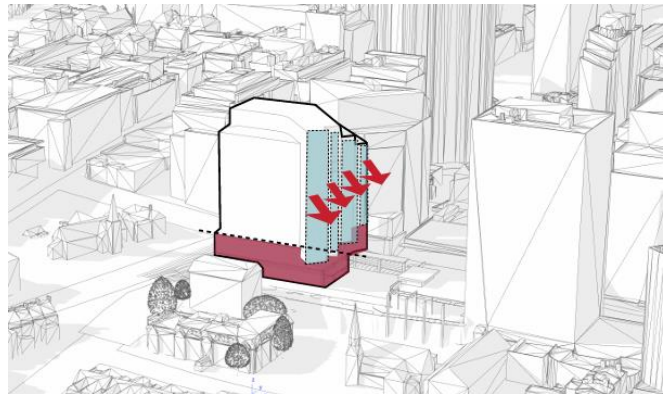
Adaptive Reuse



The development envelope has been carefully designed to respond to the site context, surrounding built form, and public domain interface, while achieving an appropriate balance between density, amenity, and urban design outcomes.

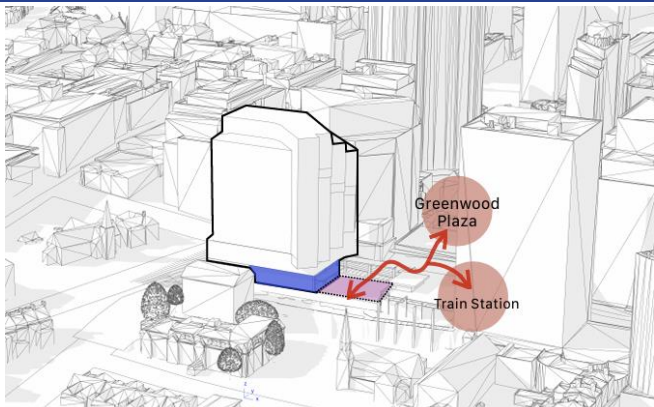
The proposal sits within the applicable maximum building height control of RL 115m under the relevant planning framework, ensuring consistency with the anticipated scale and character of the evolving North Sydney Centre.

Form Articulation



A key architectural design feature is the extended cantilevered mass oriented toward the harbour view corridor, which responds to the site's prominent urban context while maximising outlook and residential amenity. This element contributes to a distinctive skyline presence and reinforces the vertical expression of the tower, while modulation, material variation, and recessed elements provide further articulation across the façade.

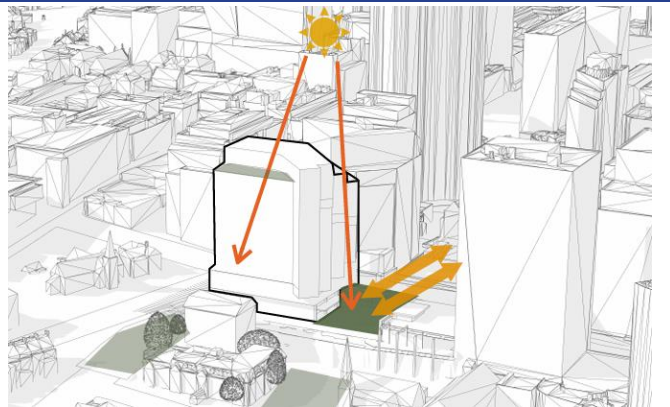
Activated Edge and Public Domain



The proposal delivers an activated ground floor interface comprising retail uses and a publicly accessible landscaped plaza that enhances pedestrian activity and amenity along Blue Street.

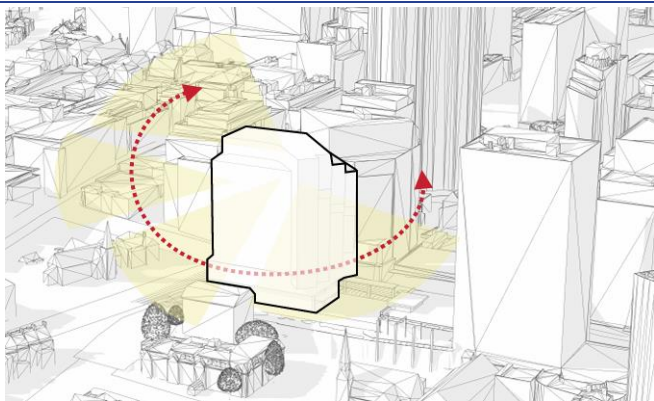
The ground plane strengthens connectivity to the broader North Sydney CBD core by improving pedestrian permeability and contributing to the evolving network of active public spaces within the North Sydney CBD.

Green Connections



The proposal incorporates a landscaped public plaza and viewing deck oriented toward harbour views, contributing to the network of green links and public domain spaces emerging across the North Sydney Centre.

Views



The proposal has been designed to maximise opportunities for views and outlook through the articulation and orientation of the built form. The tower configuration and cantilevered elements take advantage of the site's elevated position within the North Sydney Centre, enabling expansive outlook toward Sydney Harbour and the broader metropolitan skyline.

The development also maintains strong visual connections to the surrounding urban context through appropriately scaled setbacks, façade articulation, and carefully positioned communal and residential spaces. These design measures contribute to a high level of amenity for future occupants while reinforcing the building's relationship with the evolving CBD skyline.



Figure 36 *Proposed Development – North Sydney Context*

Source: fjcstudio

7.1.2 Public Space

The proposed development delivers a significant enhancement to the Blue Street public plaza, establishing a high quality, publicly accessible open space that will function as a key focal point within the broader North Sydney CBD. The design of the plaza prioritises activation, amenity and connectivity, transforming the space into a vibrant and welcoming destination for a broad range of users, including workers, residents, commuters and visitors.

Active retail frontages are provided along the edges of the plaza, ensuring continuous passive surveillance and contributing to an engaging public domain. Opportunities for outdoor dining, informal seating and landscaped areas further support a diverse range of uses, encouraging use of the space.

The stepped built form minimises the scale and visual impact on surrounding streets and land uses, and the articulated, rounded massing of buildings enables the proposal to better incorporate into its site context. The variation in height across buildings creates a welcoming human-scale neighbourhood centre grounded by the public plaza and North Sydney Train Station entry portal. The overall bulk and scale of the proposal is commensurate to development in North Sydney and consistent with the desired future character of the area, as well as the varying types of built form within the site's locality.

7.1.3 Building Setbacks

Given the preservation of the existing building structure, the setbacks for the proposed development remain largely consistent with the existing built form. Where eastern extensions to the floorplates are introduced, setbacks have been carefully designed to maintain a consistent architectural expression across the building and within the surrounding streetscape.

As illustrated in **Figure 14**, the following setbacks to the site's boundary are as follows:

- **Blue Street (north):** 0m
- **Miller Street / Blues Point Road (west):** 1.8-2.2m
- **Philips Drive (south):** 4.8-7.6m
- **Eastern boundary:** 37.9m

At the lower levels, setback and articulation create opportunities for landscaping, pedestrian circulation and active uses, balancing the intensity of the urban environment with improved amenity and spatial generosity. Although the proposal introduces cantilevers in the upper levels, articulation of these floors provides variation in the building's shape and orientation, such that residential amenity outcomes such as privacy, solar access, wind comfort and natural ventilation are enhanced.

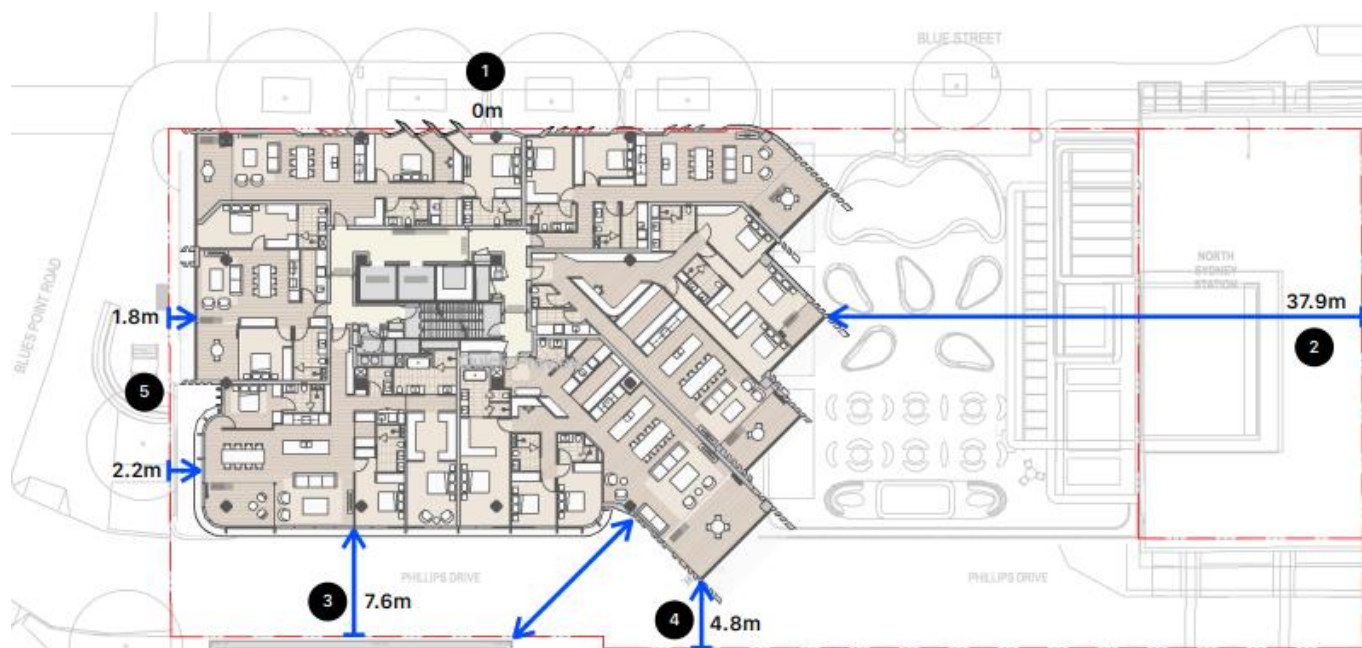


Figure 37 Proposed Setbacks

Source: fjcstudio

7.1.4 Building Height

The proposed development will have a maximum height of RL 116m, being the maximum height of the mixed-use building located on the western portion of the site. The separate retail tenancies on the eastern portion of the site will have a maximum height of 66.1m RL.

As described in **Section 4.0**, a concurrent rezoning is proposed to amend the height to reflect the maximum building height, noting that separate height controls under the North Sydney LEP 2013 apply to different portions of the site, being RL 116m on the western portion of the site and RL 65m on the eastern portion. This is demonstrated in **Figure 39**.

Building height has been designed to appropriately respond to the existing and future surrounding context, within the constraints of preserving the adaptive reuse potential of the built form. In particular, there are several design principles that have been adopted to demonstrate a coherent and holistic design approach, including:

- The addition of two storeys on the existing built form provides a sympathetic response to the surrounding North Sydney CBD urban context by largely aligning the proposal's height with the stepped height transition from the CBD centre outwards to the CBD fringe, along which the site is located. This improves the function of the site in delivering the highest and best use in an environmentally sustainable manner, whilst reinforcing the transitional nature of the site from the dense land uses in the north, to the residential land uses to the south;
- The proposed built form is considered to provide opportunities to promote good vertical and horizontal articulation of buildings, thereby enhancing the architectural quality and visual appearance of development when viewed across the Sydney Harbour and as part of the North Sydney foreshore. This delivers a balance between maximising views for future dwellings on the site and preserving the character of the site, and is demonstrated in **Figure 38**; and
- The use of carefully sculpted built form through minor additions to height and existing building floorplates delivers an outcome that does not result in unacceptable adverse overshadowing impacts. In association, the sculpted and tapered form enhances the sense of diversity achieved across the proposed development.

The proposal is therefore considered to support an appropriate scale relative to the existing area.



Figure 38 *Proposed Development in Surrounding Context*

Source: fjcstudio

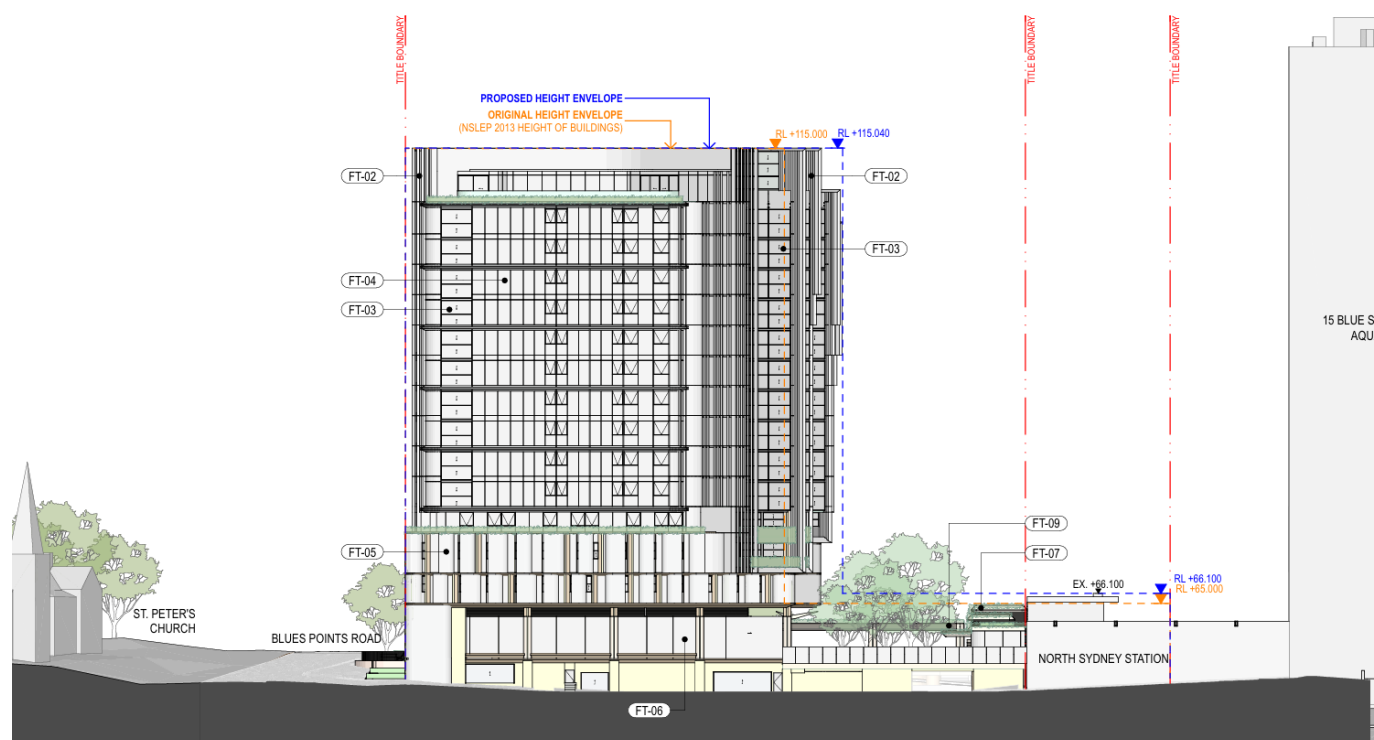


Figure 39 *Proposed Development – South Elevation*

Source: fjcstudio

7.2 Land Use

Acknowledging the targets and objectives of the National Housing Accord and the NSW Housing Delivery Authority, the proposal has been designed to prioritise housing delivery by adapting an existing building framework within a highly accessible area, and delivering a diverse apartment mix that accommodates individuals and families at a range of income levels.

Colliers have undertaken an Economic Impact Assessment (**Appendix V**) which demonstrates that the proposed uses are highly appropriate with regard to the existing and future context of North Sydney. The proposal also aligns with strategic government objectives to accommodate an increase in diversified housing supply and population serving employment in suitable locations. The adaptive reuse of an existing commercial building will not have an adverse impact on employment opportunities due to the high commercial vacancy rate in the North Sydney CBD, and the delivery of housing on the site represents a unique opportunity to achieve a number of strategic objectives whilst delivering a range of benefits to the local community within this part of Sydney.

7.2.1 Commercial Impact

There is a limited need for additional commercial office development within North Sydney. High existing vacancy rates and subdued market conditions within the commercial office market overall are likely to continue to remain. These factors, combined with an already extensive potential future supply pipeline (within the surrounding region and more broadly in key commercial office markets) and the non-core commercial office location of the site, suggest existing or proposed commercial office floorspace on the site will be at a competitive disadvantage. This is supported through a review of the commercial office market context which indicates:

- Within North Sydney CBD vacancy rates are 25.9% as at January 2026, among the highest across Sydney commercial office markets. This implies some 251,100m² of vacant commercial office floorspace across North Sydney CBD;
- Assuming 15m² of commercial office floorspace per worker, this implies capacity to support some 16,740 commercial office jobs across existing vacancies within North Sydney CBD; and
- Within the broader Regional Catchment (that encompasses North Sydney CBD) there is some 292,210m² of commercial office floorspace within the development pipeline that could support some 19,480 commercial office jobs.

Accordingly, the removal of commercial office floorspace at the Subject Site will not impact ongoing viability or continued operation of existing commercial office uses but rather support the ongoing viability of commercial office market within North Sydney. Existing tenancies and workers at the Subject Site will be able to relocate within a commercial office market facing high levels of vacancies. Any impacts to workers and businesses are anticipated to be temporary.

7.2.2 Residential Impact

The delivery of new housing supply is recognised as an important objective in addressing the housing crisis at all levels of government, and the proposed development presents a significant opportunity to deliver new housing supply in a timely manner. Importantly, the project has the potential to contribute to the 5-year housing target for North Sydney LGA where +5,900 new dwellings are expected to be completed by 2029, in line with the timeframe outlined by the National Housing Accord. This is supported through a review of the residential market context which indicates:

- Applying the average household size to the projected population, the result is an implied need for an additional +7,550 dwellings between 2026 and 2041 across the Regional Catchment;
- A review of headline demand and supply found a need for additional housing within this part of Sydney with the known pipeline of residential developments only able to satisfy 42.0% of implied dwelling demand required over the period to 2041. This is the equivalent of the future supply pipeline only satisfying up to 6 years of implied dwelling demand, and as such highlights the need to identify and secure additional residential development to support existing and future residents; and
- The availability of affordable rental stock is extremely limited. Only 0.7% of rental properties are affordable to very low-income households and 7.1% to low-income households. This is well below the Greater Sydney averages of 3.4% and 17.3%, highlighting a severe shortage of affordable homes in the area.

Accordingly, the proposed 148 dwellings will not impact on the ongoing viability or continued operation of any residential use but rather the proposed residential dwellings will help provide much needed housing supply in North Sydney. The

provision of affordable co-living will also ensure that accommodation is available across a range of price points within the North Sydney LGA more broadly, supporting a range of occupiers including key workers.

7.3 Overshadowing

This Report is accompanied by shadow diagrams contained in the Architectural Design Report prepared by fjcstudio and included at **Appendix F**. The analysis includes overshadowing from the proposed development on adjoining properties associated with the proposal at hourly intervals between 9am and 3pm on the winter solstice, therefore demonstrating the worst-case scenario throughout the year.

Whilst clause 6.3(3A) of the North Sydney LEP 2013 is not relevant to this proposal as it seeks a concurrent rezoning to amend the maximum height of building control, it has been used to establish an appropriate solar access benchmark for private open space and windows to living areas located outside the North Sydney Centre. This clause specifies that where a proposal exceeds the maximum height of buildings development standard, any additional overshadowing must not result in:

- A property currently receiving 2 hours or more of direct sunlight between 9am and 3pm on 21 June receiving less than 2 hours; or
- A property currently receiving less than 2 hours of direct sunlight on 21 June receiving any further reduction in sunlight.

To identify relevant residential receivers for detailed overshadowing analysis, sun eye views were prepared at hourly intervals between 9am and 3pm on the winter solstice. All residential property (identified in brown) falling within the shadow path of the proposed building at 5 Blue Street were included in the analysis, as illustrated in **Figure 40** below.

This initial analysis produced two outputs, being a threshold test identifying areas receiving above or below two hours of direct sunlight. As shown in **Figure 41** below, the blue signifies below two hours of solar access, and the yellow is greater than two hours of solar access, as well as a heat map showing cumulative sun exposure across the six hour period. Refer to the Architectural Design Report at **Appendix F** for greater detail.

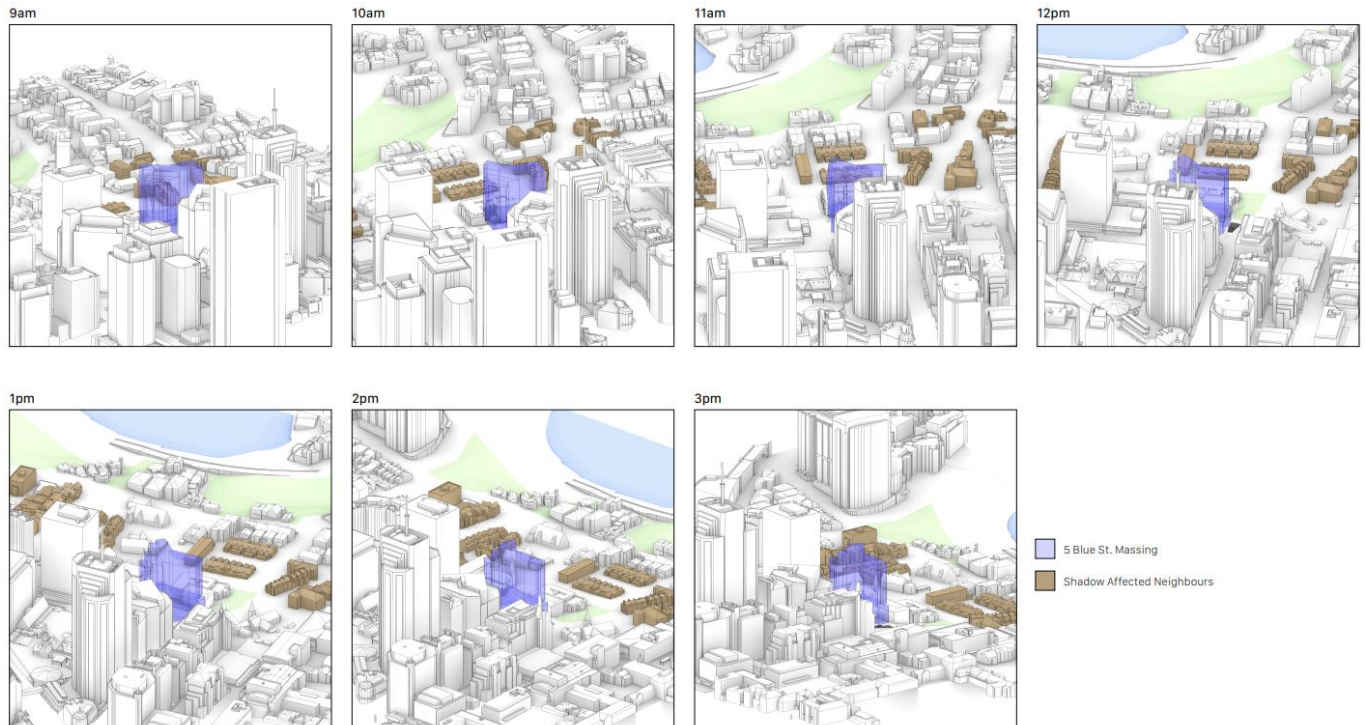


Figure 40 Sun eye views identifying potentially overshadowed properties

Source: fjcstudio



Figure 41 Overshadowing studies – comparison of scenarios

Source: fjcstudio

7.3.1 Properties identified experiencing solar reduction

The proposed development results in three (3) dwellings across two (2) buildings experiencing a reduction in solar access to private open spaces or window to a living area between 9am and 3pm during the winter solstice when compared to the existing context. These properties are both townhouses, identified as 11-21 Walker Street and 22 MacKenzie Street, as shown in **Figure 42** below. This figure shows parts of buildings receiving less than two hours of sunlight when compared to the existing scenario in red, in which they receive two hours or more of direct sunlight. The parts of buildings highlighted in orange currently receive less than two hours of sunlight, and the proposal will further reduce access to sunlight.



Figure 42 Overshadowing studies – solar reduction

Source: fjcstudio

11-21 Walker Street Townhouses

The properties at 11-21 Walker Street include one detached dwelling and six townhouses along Walker Street. All properties are not impacted, however there is a minor impact to 19 Walker Street, as described in greater detail below.

- **9 Walker Street:** overshadowed area is limited to the garage.
- **11 Walker Street:** minor impact to the ground floor front room, as well as the primary living space to the rear of the property.
- **11a Walker Street:** no impact to living areas.
- **15 Walker Street:** no impact to living areas.
- **17 Walker Street:** no impact to living areas.
- **21 Walker Street:** no impact to living areas.

As identified by fjstudio, the proposed development results in overshadowing to a living room within the **19 Walker Street** property. This living room currently receives less than two hours of direct sunlight on 21 June, with the proposal reducing its solar access by approximately 20 minutes. As detailed in **Figure 44** below, the property at 19 Walker Street will receive more solar access than what would theoretically be achieved under a built form that was designed to the existing LEP height plane (shown in green). Further detail is provided within the Architectural Design Report at **Appendix F**.



Figure 43 Overshadowing studies – impact to 11-21 Walker Street townhouses

Source: fjstudio

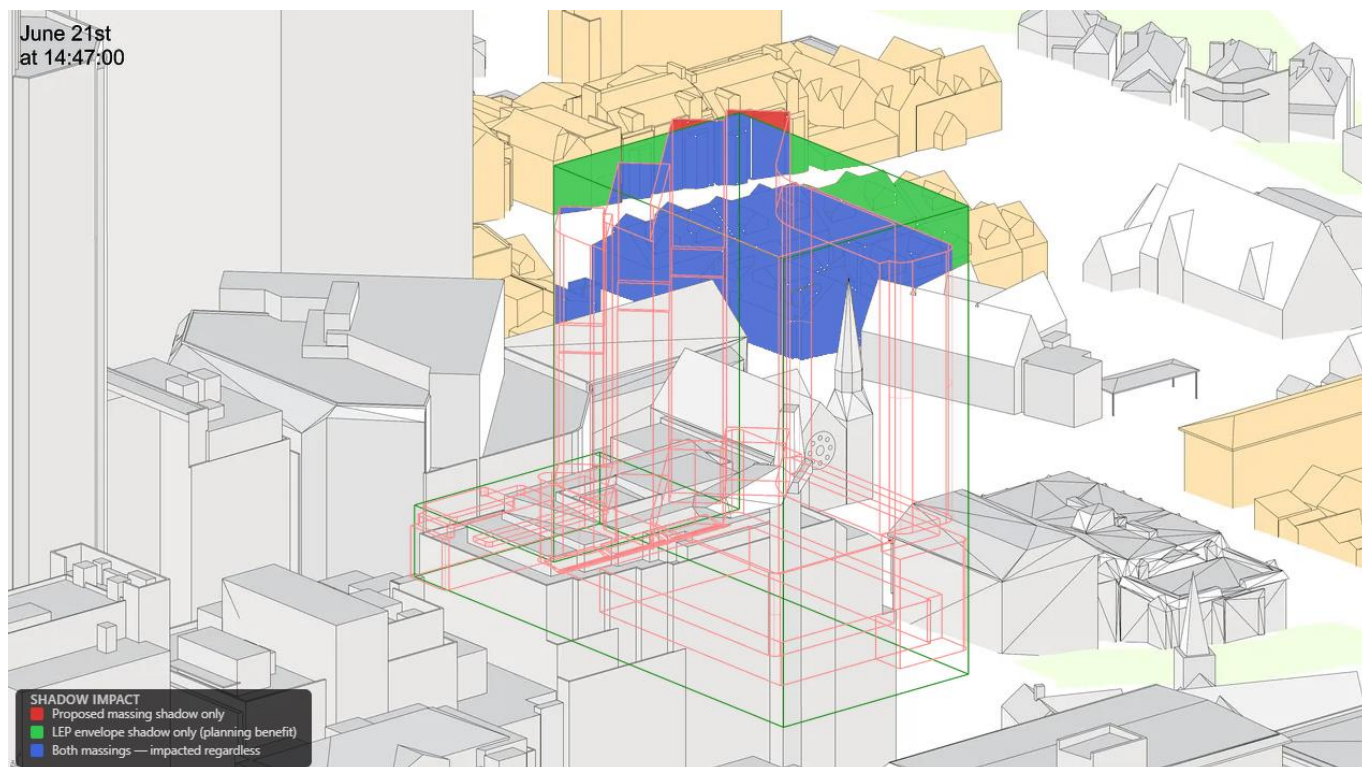


Figure 44 Overshadowing studies – impact to 11-21 Walker Street townhouses

Source: fjstudio

22 MacKenzie Street Townhouses

22 MacKenzie Street comprises 15 three storey townhouses. The overshadowing analysis provided by fjstudio indicates that the majority of shadow impacts are limited to roofs or blank walls. Four areas are identified as being affected by overshadowing from the proposal, as shown in **Figure 45** below. Areas 1 and 2 relate to bedroom windows, while Areas 3 and 4 comprise private open spaces accessed from the kitchens of the respective dwellings. As illustrated in **Figure 45**, the property at 22 MacKenzie Street is affected by overshadowing generated by the proposed development (shown in red). Further detail is provided within the Architectural Design Report at **Appendix I**.



Figure 45 Overshadowing studies – impact to 22 MacKenzie Street townhouses

Source: fjstudio

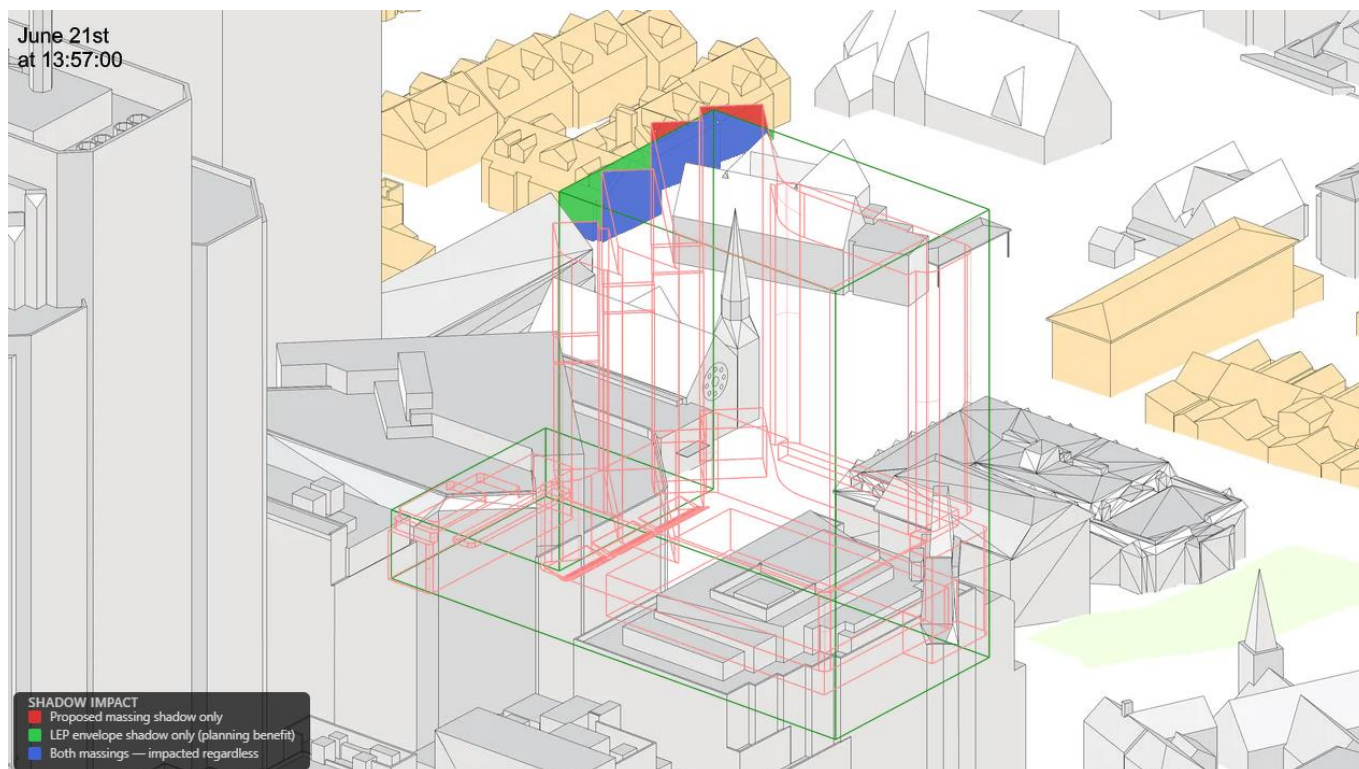


Figure 46 Overshadowing studies – impact to impact to 22 MacKenzie Street townhouses

Source: fjcstudio

While the proposed development will result in some overshadowing impacts to the three dwellings within the properties identified as 19 Walker Street and 22 MacKenzie Street, these impacts are considered acceptable as the proposed massing achieves an improved solar access outcome, as it does not fully occupy the permissible LEP envelope, as demonstrated in the diagrams above.

Public Open Spaces

A range of public open spaces are located in proximity to the site, most notably Clark Park and the Lavender Bay Parklands. Overshadowing analysis prepared by fjcstudio confirms that the proposed development will not introduce any additional overshadowing to these public open spaces.

7.4 View and Visual Impact

A View and Visual Impact Assessment has been prepared by Colliers Urban Planning and is included at **Appendix W**. The report assesses the impact of the proposal on visual amenity, view loss and compatibility with existing planning controls. The assessment utilises photomontages prepared by Virtual Ideas in accordance with the Land and Environment Court of NSW Photomontage Policy.

Key viewpoints analysed for the view impact assessment include:

- 73 Miller Street (severe extent of impact).
- 40 Miller Street (moderate extent of impact).
- 101 Miller Street (minor extent of impact).
- 80 Pacific Highway (minor extent of impact).

Key viewpoints analysed for the view impact assessment include:

- Blue Street Plaza (low significance of visual impact).
- Greenwood Plaza (low significance of visual impact).
- Mackenzie Street (Miller Street bend) (moderate significance of visual impact).
- Mackenzie Street (east) (high significance of visual impact).
- Blue Street (east) (low significance of visual impact).
- Clark Park (low significance of visual impact).

The key viewpoints exist within the context of the North Sydney CBD which is highly urban characterised by existing larger scale commercial and low scale residential built elements.

View corridors, view loss and sharing

Views from nearby commercial office buildings, including 73 Miller Street, 40 Miller Street, 101 Miller Street and 80 Pacific Highway, constitute the key private views in close proximity to the site. These views are considered less sensitive than those from residential developments, reflecting the differing nature of use. In particular, the internal amenity of residential living spaces is generally regarded as more sensitive than that of commercial office environments.

Furthermore, as the concurrent rezoning seeks to amend the existing planning controls, they have less relevance and weight than would otherwise be the case. Instead, merit assessment should be undertaken guided by the strategic planning framework with regard given as appropriate to the aims and objectives of the North Sydney LSPS, LEP, DCP and other planning guidance.

The proposal is consistent with relevant planning priorities to support the growth and development of the North Sydney CBD, whilst ensuring an appropriate scale and density of development through skilful design, promoting the retention and sharing of existing views where reasonably possible. Noting that view sharing becomes increasingly difficult within an area of existing or anticipated high density.

While the proposal introduces a change to built form within a number of private view corridors, the assessment demonstrates that iconic elements, including Sydney Harbour, the Sydney Harbour Bridge, the Sydney CBD skyline generally remain visible from these commercial properties. The proposal therefore retains views to these iconic elements.

Other design measures such as retaining appropriate lower level setbacks to Blue Street Plaza, continue to allow for building separation that ensures private views from surrounding commercial developments to the harbour are retained.

In this regard, the proposal is considered to represent a reasonable planning outcome within the context of an evolving high-density area.

Visual Character and Scale

The proposal has the potential for a high significance of visual impact, however this is not determinative of an unacceptable visual impact. Rather, this is determined by having regard to the planning framework and mitigation measures.

On the balance of relevant matters, the proposal has an acceptable visual impact for the following key reasons:

- The proposal has a scale, form, and architecture that is visually compatible with the existing and desired future character of its North Sydney CBD context;
- Although the proposal introduces a change to built form around the Blue Street Plaza and podium levels, the stepped design of upper levels retain visual permeability at a pedestrian level, with the open public plaza and glazing continuing to panoramic views toward Sydney Harbour and the CBD skyline from the Plaza; and
- The proposal continues to be read within the established North Sydney skyline context, where taller commercial buildings already form a prominent urban backdrop.

As such the proposal can be supported on visual impact grounds.

Mitigation Measures

There are a number of stages in the development process when mitigation measures should be considered. Of relevance to this proposal are the following:

- primary measures: considered as part of design development; and
- secondary measures: considered as part of conditioning a development consent.

Visual impact was a key consideration of the design process, which has resulted in the incorporation of a number of primary measures which avoid and minimise potential adverse visual impacts.. As a result, it is consider not necessary to make further large-scale amendments to the development or implement further mitigation measures.

7.5 Wind Impact

A Pedestrian Wind Assessment has been prepared by CPP Wind Engineering and is included at **Appendix X**. It provides an assessment of the proposed development's impact on the pedestrian wind environment and recommendations to ensure a high standard of pedestrian comfort and amenity is achieved.

The assessment of the pedestrian wind environment at the site has been based off a 1:400 scale model of the project site and surrounds, including existing and approved buildings, which was used to conduct wind tunnel test for the existing, proposed, and proposed (with mitigation) development of the site.

Wind tunnel testing was undertaken in accordance with the best practice methodology outlined in the Australasian Wind Engineering Society (2019), and the American Society of Civil Engineers (1999, 2021).

Pedestrian Wind Safety

The assessment of wind impacts for the existing and proposed configurations are summarised below:

- Existing configuration: Wind speeds exceeding comfort limits at the site noted at six (6) locations, and exceeding safety limits at one (1) location around the site; and
- Proposed Configuration: Wind speeds exceeding comfort limits at the site noted at six (6) locations, and exceeding safety limits at three (3) locations around the site.

In general, most pedestrian-accessible areas around the site are assessed as suitable for Pedestrian Standing or Pedestrian Walking under the Lawson comfort criteria. Conditions around the site perimeter are generally suitable for Pedestrian Standing or Pedestrian Walking. No significant adverse wind conditions as a result of the proposed development are foreseen, and all public domain areas satisfied the safety criterion.

7.6 Residential Amenity

The proposed development seeks to provide a high standard of residential amenity, consistent with the proposal's vision to deliver a high-quality, contemporary mixed-use development that embodies quality residential dwellings. A Design Verification Statement has been prepared by fjstudio and is appended to the Architectural Design Report (**Appendix F**), demonstrating compliance with the Design Objectives as per Schedule 9 of the Housing SEPP.

The proposed development has been designed to accommodate appropriate residential amenity for occupants of the future development as demonstrated in the Architectural Plans prepared by fjstudio at **Appendix E**. Refer also to the Architectural Design Report at **Appendix F**, which sets out the underlying design intent with regards to housing diversity, affordability, and placemaking while delivering a high level of residential amenity to which this section of the report should be read in conjunction with.

7.6.1 Apartment Design Guide

Development for the purposes of residential flat buildings is required to consider Chapter 4 'Design of residential apartment development' of the Housing SEPP, which outlines design principles for new development. The Apartment Design Guide provides guidance for the development of new apartments within residential flat buildings, specifically in relation to these design principles. Within the separate parts of the ADG are several objectives, some of which contain design criteria and design guidance.

Where provided, design criteria are the first step in ensuring consistency with an objective. Essentially, if a proposal numerically adheres with the criteria, it therefore satisfactorily achieves the objective. There is an acknowledgment in the ADG that rigid numerical controls (the criteria) are not always able to be achieved. As such, a set of design guidance are provided as a starting point for an alternative solution to achieve the objective. The guidance is assessed on merit and importantly are not intended to be an exhaustive list of alternative solutions for achieving consistency with the objective.

The ADG reinforces the validity in this method of implementation by stating:

'The design criteria set a clear measurable benchmark for how the objective can be practically achieved. If it is not possible to satisfy the design criteria, applications must demonstrate what other design responses are used to achieve the objective and the design guidance be used to assist in this'.

The (then) Department of Planning and Environment's publication, 'Better Apartment Design Frequently Asked Questions' (June 2015), also reinforces this method of implementation:

'It may not be possible in all instances to satisfy the design criteria in the Guide, so it gives designers the flexibility to innovate and demonstrate they will achieve the same result with a different approach.'

The proposed development seeks to provide a holistic approach to residential amenity across the site, for all its future residents and tenants. It is acknowledged that there are numerical inconsistencies with ADG Design Criteria for some metrics, however these are offset by the significant amenity proposition across the site in the form of public amenity, the site's highly accessible public transport location, and integrated land-uses delivered for the project above and beyond ADG requirements. These facilitate, on balance, an appropriate amenity outcome for the site tailored towards both standard market residential and co-living housing demographics.

7.6.2 Co-living housing

It is noted that the Apartment Design Guide does not apply to co-living housing as it is not considered a residential flat building for the purposes of Chapter 4 of the Housing SEPP. Design principles for co-living housing are instead provided within Chapter 3 Part 3 'Co-living housing' of the Housing SEPP. Section 68 establishes non-discretionary development standards that, if complied with, prevent the consent authority from requiring more onerous standards for the matters. Non-compliance with non-discretionary development standards does not prevent development consent from being granted.

Where the proposed development varies from the relevant non-discretionary development standard, the variation is justified in the following sections.

7.6.3 Communal Open Space and Residential Amenities

Communal open spaces are provided throughout the site, both internally within the proposed building and externally within landscaped communal open spaces. A detailed breakdown of these spaces is provided in **Section 3.11**.

Communal Open Space for Residential Apartments

The ADG establishes a design criteria requiring a minimum of 25% of site area to be communal open space. The proposed development provides 314m² of communal open space which is below the 25% minimum criteria. Notwithstanding, this shortfall is justified for the following reasons.

Overall, the communal spaces available to residents provide a selection of subspaces with varying uses to allow for simultaneous use by multiple groups. The communal facilities will be available to all residents of the proposed development and includes the 449m² of internal space on Level 9 and 314m² of external open space, being the Blue Street Plaza. As described in **Section 3.11**, the amenities offered in the Level 9 communal open spaces will deliver premium and unique amenities to service the recreational and functional needs of future residents. Collectively, this delivers a total of 763m² of communal spaces, which represents 25% of the total site area. Accordingly, the combination of internal communal space and communal open space at Blue Street Plaza is considered appropriate in achieving the design guidance principle given the plaza's contribution to public open space and the constrained urban context of the site.

Communal Open Space for Co-living Housing

Section 68 of the Housing SEPP requires that co-living housing development provides communal open spaces with a total area of at least 20% of the site area. The proposed development provides 314m² of communal open space which is below the 20% minimum criteria.

Tenants within the co-living housing component of the development have access to the 449m² internal communal living area on Level 9 and the 314m² of external open space at Blue Street Plaza, in addition to a 163m² internal communal area exclusive to co-living tenants at the ground level. Collectively, this delivers a total of 926m² of communal spaces, which represents 30% of the total site area. As described above, the shortfall in communal open space is offset by the development's provision of public open space at Blue Street Plaza, which provides both a significant public benefit and a high-quality open space for residents and tenants.

Summary

Overall, the proposed development seeks to provide a holistic approach to residential amenity across the site. Given its strategic location above North Sydney Train Station, the proposal most significantly focuses on delivering quality open space which provides a wide public benefit, being the Blue Street Plaza.

7.6.4 Solar Access and Cross Ventilation for Residential Apartments

The proposed development has sought to maximise solar access and natural cross-ventilation across the built form. It is noted that:

- 62.9% of apartments in the proposal receive more than 2 hours of direct sunlight between 9am and 3pm during the winter solstice. Whilst this is not consistent with the ADG minimum of 70%, it is considered acceptable for the following reasons:
 - Floorplates of the built form have been orientated in the optimum direction and layout to maximise solar access and views as required by ADG Design Objective A4-1 having regard to the constraints of the site, being an adaptive reuse project;
 - The development is located in a dense urban environment, and solar access is challenging to achieve for such developments;
 - Residents will have access to a variety of communal open spaces that will receive solar access; and
 - Solar outlook has been maximised in the design of apartment layouts, with 50% of apartments offering at least a double aspect.
- Throughout the proposed development, a total of 71.4% of apartments will achieve natural cross ventilation, in excess of the ADG's minimum 60% requirement.

Refer to the Architectural Design Report prepared by fjcstudio at **Appendix F** for further detail and assessment.

7.6.5 Private Open Space for Residential Apartments

All balconies either meet or exceed the ADG minimum area requirements. Specifically, units will deliver the following private open space:

- 1-bedroom dwellings: 8m² external area;
- 2-bedroom dwellings: 10m² external area; and
- 3-bedroom dwellings: 12m² external area.

Each balcony has been positioned to maximise outlook and be directly accessible from the living room or a bedroom. Balconies have generally been enclosed to provide wind and acoustic amenity for each private open space.

In addition, façade design, balcony location and screens have been adopted as strategies to provide privacy to balconies and terraces. These, however, have been designed to be free of climbable hazards. For greater detail, refer to the Architectural Design Report prepared by fjcstudio at **Appendix F**.

7.6.6 Visual Privacy and Building Separation

The proposed development has been designed to achieve adequate building separation and visual privacy between the proposed dwellings and future surrounding built form. Building separation is illustrated in the Architectural Design Report prepared by fjcstudio at **Appendix F** and extracted in **Figure 47** below.

It is noted that building separation between the proposed built form and 211 Blues Point Road is proposed to be 7.6 metres. However, 211 Blues Point Road is proposed to be demolished under SSD-88702457, being a SSDA for adaptive reuse of existing built form and construction of three mixed-use buildings up to 20 storeys. As such, this non-compliance is considered to be inconsequential to the assessment of environmental impacts of the proposed development in relation to residential amenity.

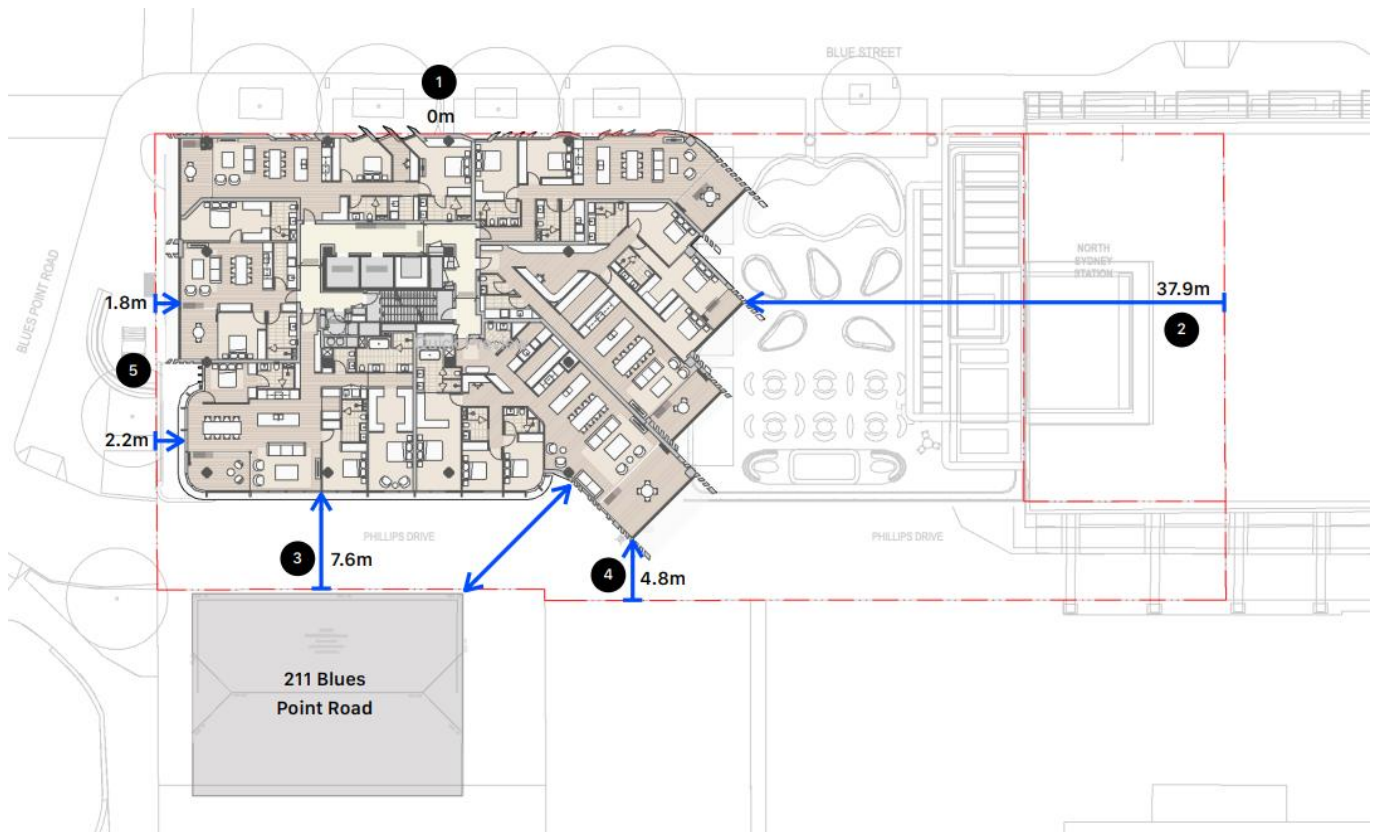


Figure 47 Building Separation Diagram

Source: fjcstudio

7.7 Structure

A Structural Report has been prepared by Arcadis and is provided at **Appendix K**. This report assesses the proposed design of the adaptive reuse against the structural capacity of the existing building at 5 Blue Street. It also considers the suitability of the existing structure to support the proposed new works, and provides mitigation measures and recommendations to ensure that there are no impacts on the rail corridor as a result of the proposed adaptive reuse, as outlined in Section 7.0 of the Structural Report (**Appendix K**).

7.8 Traffic and Transport

A Transport Impact Assessment (TIA) has been prepared by JMT Consulting and is included at **Appendix M**. It provides a forecast traffic generation of the proposed development given the proposed access and parking arrangements, and presents a preliminary construction traffic management plan.

The traffic generation created by the proposed development has been anticipated using the total number of proposed car parking spaces, being 73 spaces, and the application of a vehicle traffic generation survey. This has determined that the proposed development will generate approximately 11 vehicle trips in the AM peak period and 9 in the PM peak period, which is 14 and 13 trips less than the existing scenario respectively, reflecting a net reduction in peak hour traffic movements and an overall benefit to the surrounding road network. These results are provided in **Table 20**.

Table 20 Traffic modelling results – existing scenario

Scenario	Number	Unit	Traffic Generation Rate		Peak Hour Vehicle Trips	
			AM peak hour	PM peak hour	AM peak hour	PM peak hour
Existing (commercial building)	85	Parking spaces	Based on surveyed data		24	23
Future (residential uses)	73	Parking spaces	0.15	0.12	11	9
Net traffic movements (future minus existing)					-13	-14

Cumulative Traffic Impacts

A cumulative traffic impact assessment has been undertaken as part of the TIA, which includes the development subject to this application, and the future development of 15 Blue Street, North Sydney, and 1-13 Mackenzie Street, North Sydney.

The development of 15 Blue Street is similarly a conversion of an existing commercial building to a residential use. Hence, it is anticipated that a similar reduction in trip generation would be achieved compared to existing conditions. Vehicle access to 1-13 Mackenzie Street is physically separated from 5 Blue Street, and the overall increase in trip generation resulting from future development is expected to have a minor impact on traffic conditions due to the site's location adjacent to the North Sydney CBD and its public transport accessibility.

Therefore, the cumulative impacts arising from the proposed development are considered minor and would not result in adverse impacts to the surrounding transport network. It is noted that this cumulative traffic impact assessment does not take away from the justification provided above for the proposed development as a standalone SSDA.

7.8.1 Access and Loading

The proposed vehicle access arrangement largely reflects the current environment. This includes retention of three individual access points connecting to the rear service laneway (Phillips Lane) accessed via Miller Street, which connect to ground level, mezzanine level and basement level parking respectively.

Loading and servicing will continue to be undertaken along Phillips Lane. The adaptive reuse nature of the proposal does not facilitate the building structure being accommodated to fit a large waste collection vehicle within the confines of the building. The bin holding room is located directly adjacent to the loading bay, providing efficient access for waste collection. A Loading Dock Manager will be present during regular servicing hours to oversee the operation of the loading dock, including for retail and residential deliveries.

7.8.2 Parking

Car Parking

Car parking rates applicable to the site have been derived from the TfNSW Guide to Transport Impact Assessment (Chapter 8) for residential developments – Category A accessibility, and Section 68 of the Housing SEPP for co-living car parking requirements. The provision of parking is summarised below at

Table 21. As the proposed development provides 73 spaces for the residential apartments, it is consistent with the relevant documents.

Table 21 *Traffic modelling results – existing scenario*

Type	No. of units	Parking Rate		No. spaces provided
		Parking rate	No. of spaces required	
Residential Apartments	1	12	0.4	5
	2	19	0.7	13
	3/4	31	1.2	38
	Sub-total	62		56
Co-living	86	0.2	17	17
Total				73

Source: JMT Consulting

A number of car parking spaces are not designed in accordance with the requirements of AS2890.1. This is due to the spaces being designed and installed prior to the implementation of the most recent Australian Standard. The arrangement is considered acceptable given access and manoeuvrability of these spaces are not impacted, the available height clearance is unchanged, and the users of the car parking spaces will be familiar users with no public / visitor parking provided.

Bicycle Parking

The bicycle parking rates applicable to the residential apartment component of the development is found within the North Sydney DCP, being 1 space per unit for resident parking and 1 space per 10 units for visitor parking. The bicycle parking rate for the co-living component is derived from Section 69 of the Housing SEPP which states that an “adequate” number of bicycle spaces are to be provided. This rate is deemed to be 1 space per 3 units. Hence, 62 resident parking spaces, 6 visitor spaces and 29 co-living spaces (97 total spaces) are required. The proposed bicycle storage room is 170m², which is capable of housing 97 bicycles.

7.8.3 Construction Traffic Management

A Preliminary Construction Traffic Management Plan has been prepared as part of the Transport Impact Assessment. The construction will require a variety of 12.5m HRVs, 8.8m HRVs, 6.4HRVs and smaller utes and vans to access the site. A typical workday will generate 10 vehicles per day (1-2 vehicles per hour), and a busy workday will generate 20 vehicles per day (2-4 vehicles per hour), accessing the site via Miller Street. No construction worker parking is proposed given the site's location on top of a railway station and in close proximity to other public transport options.

Mitigation Measures

JMT Consulting concludes that the proposed development will not result in unreasonable traffic and transport impacts following the implementation of the following mitigation measures:

- Vehicles to enter and exit the site in a forward direction unless under the supervision of strict traffic control.
- Restrict heavy vehicle activity to designated routes.
- Construction access driveways to be managed and controlled by certified site personnel.
- Pedestrian movements across construction access driveways will be managed and controlled by site personnel where required.
- Pedestrian warning signs and construction safety signs/devices to be utilised in the vicinity of the site and to be provided in accordance with WorkCover requirements.
- Construction activity to be carried out in accordance with the approved hours of work.
- Vehicle loads would be covered during transportation off-site.
- Activities related to the works would not impede traffic flow along local roads.
- Materials would be delivered during approved construction hours.
- During site induction, workers will be informed of the public transport network servicing the site.
- Construction vehicles not to queue on public roads and be wholly accommodated within the site or the approved loading zones.

- Construction traffic movements to/from the site to be minimised in peak periods to reduce the impact on the wider road network.
- Seven (7) days notification would be provided to adjoining property owners prior to the implementation of any temporary traffic control measures.

7.9 Noise and Vibration

A Noise and Vibration Impact Assessment has been prepared by Renzo Tonin & Associates and is included at **Appendix Y**. It provides an assessment of construction and operational noise and vibration associated with the proposed development, with a specific focus on the vibration impacts of railway operations underneath the building.

7.9.1 Railway Impact Assessment

Vibration

Vibration measurements were undertaken on the basement level (RL 56.3) and on Level 2 (RL 68.99) with the station platforms located at RL 46.74. The threshold of tactile vibration perception was equated to 103 decibel units (dBv). At both levels, the 95th percentile vertical vibration level in the worst-case direction was below this threshold, as detailed in **Table 22** below.

Table 22 Summary of overall vibration levels

Measurement Location	Direction	L _{max, slow} vibration level, dB _v re 1nm/s			
		Perception Threshold	Measured vibration level (background)	Measured vibration level (median)	Measured vibration level 95 th percentile
Foundation column Basement Level	Vertical	103	68	80	82
	Lateral	103	63	81	83
	Longitudinal	103	62	81	83
Level 2	Vertical	103	84	84	88
	Lateral	103	78	78	83
	Longitudinal	103	85	84	88

Source: Renzo Tonin & Associates

Noise

Noise measurements were undertaken on Levels 1 and 2. The applicable criteria relating to ground-borne noise experienced by building occupants are based on the *Development near Rail Corridors & Busy Roads – Interim Guideline* (2008) as per the Transport and Infrastructure SEPP, being 40dB(A) during the day and 35dB(A) during the night. A summary of the measured noise levels is detailed at **Table 23** below. The minor exceedance in maximum train noise level observed at Level 2 night-time can be attributed to the sensor being located within a narrow width corridor adding approximately 1dB(A) to the measured result.

The Transport and Infrastructure also requires an assessment to be undertaken that confirms L_{Aeq} levels are not exceed in any bedroom in the residential accommodation above 35 dB(A) at any time between 10pm and 7am, as well as anywhere else in the residential accommodation (other than a garage, kitchen, bathroom or hallway) at 40 dB(A) at any time. A summary of the measured noise levels is detailed at **Table 24** below, which confirms that the measured L_{Aeq(period)} noise levels are well below the applicable criteria during the relevant periods.

Table 23 Summary of measured noise levels

Measurement Position	Residential $L_{A5max, 95\%}$ noise limit, dB(A) Daytime / Night-time	$L_{max, slow}$ vibration level, dB _v re 1nm/s		
		Background L_{A90} noise level, dB(A)	Train noise level, median L_{A5max} dB(A)	Train noise level, typical maximum $L_{A5max, 95\%}$ dB(A)
Level 1	40 / 35	26	31	34
Level 2	40 / 35	32-34	35(33)	40(36)

Source: Renzo Tonin & Associates

Table 24 Summary of measured noise levels from train passbys

Measurement Position	Residential $L_{Aeq(period)}$ noise limit, dB(A) Daytime / Night-time	$L_{max} L_{Aeq(period)}$ vibration level, dB _v re 1nm/s
Level 1	40 / 35	21 / 15
Level 2	40 / 35	25 / 19

Source: Renzo Tonin & Associates

Mitigation Measures

Based on the vibration monitoring results, there is a negligible risk of vibration levels within the refurbished building exceeding the relevant preferred continuous vibration levels. Notwithstanding this, a range of mitigation measures has been included in the Noise and Vibration Impact Assessment at **Appendix Y** to further minimise potential impacts. These include reducing reverberation within internal spaces and incorporating absorptive finishes such as carpet and soft furnishings in place of harder materials like timber flooring or tiles, amongst other treatments.

7.10 Waste Management

A Waste Management Plan (WMP) has been prepared by MRA Consulting Group and is included at **Appendix N**. The WMP outlines demolition and construction waste arrangements and the operational waste arrangements for the proposed development including anticipated waste generation estimates. Based on this assessment, the WMP provides strategies relating to waste management practices in accordance with relevant legislation and guidance.

7.10.1 Demolition and Construction Waste Management

The WMP identifies the type, volume and disposal methods for all waste material during the demolition and construction phase. It also provides site-specific operational methods around training and inductions, materials selection and ordering, waste avoidance opportunities, and relevant site procedures to ensure waste is appropriately disposed. The report also recommends the location and design of waste management facilities on site.

Waste Streams and Separation

The estimated volumes of demolition and construction waste by material stream are summarised below at **Table 25** and respectively.

Table 25 Demolition waste volumes and management

Material	Estimated volume (m ³)	Estimated % Landfill	Estimated % of landfill diversion
Concrete	30 – 45	<5%	>95%
Glass	5 – 10	<10%	>90%
Bricks/pavers	15 – 25	<5%	>95%
Tiles	>5	<5%	>95%
Timber (Clean)	5 – 15	0%	100%
Timber (Treated)	5 – 15	50%	50%

Plasterboard	10 – 20	<10%	>90%
Metals (ferrous and non-ferrous)	5 – 15	<10%	>90%
Floor covering	5 – 15	50%	50%
Residual waste	10 – 20	100%	-
Hazardous waste	Unknown	100%	-
Estimated Total % Diversion from Landfill			>80%

Source: MRA Consulting Group

Table 26 *Construction waste volumes and management*

Material	Estimated volume (m ³)	Estimated % Landfill	Estimated % of landfill diversion
Bricks/pavers	5 – 10	<10%	>90%
Concrete	10 – 15	<10%	>90%
Tiles	<5	<5%	>95%
Timber (Clean)	5 – 10	<10%	>90%
Timber (Treated)	5 – 10	50%	50%
Plasterboard	5 – 10	<10%	>90%
Glass	<5	<10%	>90%
Metals (ferrous and non-ferrous)	5 – 10	<10%	>90%
Floor covering	5 – 10	<10%	>90%
Fixtures and fittings	<5	50%	50%
Electronic waste	Minor	<10%	>90%
Packaging materials (pallets, wrap, cardboard, etc.)	20 – 50	<10%	>90%
Residual waste	5 – 15	100%	-
Estimated Total % Diversion from Landfill			>90%

Source: MRA Consulting Group

7.10.2 Operational Waste Management

Residential

Each habitable level of the proposed development is fitted with a waste chute room for general waste and recycling. A waste chute room is located on the lower ground floor capable of efficiently storing and managing residential waste. The waste chute room contains 2 x linear tracks to appropriately manage general waste and recycling chute discharge. Waste generated from the proposed residential component of the building will be collected weekly or twice weekly by Council collection via the loading dock.

Approximately 12m² of bulky waste storage is expected to provide appropriate capacity for the proposed development. It is anticipated that co-living units are to be pre furnished and thus are not expected to generate a high proportion of bulky waste.

Weekly residential waste generation rates are provided below in

Table 27. A residential bin storage room has been provided on the lower ground floor and is sufficient to provide space for bins and bulky waste in accordance with the table.

Table 27 Residential waste generation

Dwelling units	Waste Stream	Weekly Volumes (L)	Bin allocation and collection frequency	Spatial requirements
Co living (86 units)	General waste	2,610	-	-
	Recycling	2,610	-	-
	FOGO	696	-	-
Residential apartments (62 units)	General waste	5,040	-	-
	Recycling	2,100	-	-
	FOGO	1,575	-	-
148 total units	General waste	7,650	12 x 660L bins, or 7 x 1,100 bins / collected weekly	19
			(6 x 660L bins, or 4 x 1,100L bins / collected twice per week)	(10.5)
	Recycling	4,710	8 x 660L bins, or 5 x 1,100L bins / collected weekly	14
			(4 x 660L bins, or 3 x 1,100L bins / collected twice per week)	(8)
	FOGO	2,271	10 x 240L bins / collected once per week	7
			(5 x 240L bins / collected twice per week)	(4)
Total Bin Storage Area				40 (~23)

Source: MRA Consulting Group

Commercial

The retail component of the development will be serviced via private collection in a separate waste area to the residential portion of the development.

Weekly commercial waste generation rates are provided in **Table 28** below. A commercial bin storage room has been provided on the lower ground floor to accommodate waste management infrastructure detailed in the table.

Table 28 Commercial waste generation

Use type & area	Waste Stream	Waste generation (weekly)	Bin allocation and collection frequency	Spatial requirements
Retail 400m ²	General waste	1,400L	2 x 660L bins collected twice per week	8m ²
	Recycling	1,400L	2 x 660L bins collected twice per week	

Source: MRA Consulting Group

7.11 Ground and Water Conditions

A Geotechnical Assessment and Preliminary Site Investigation (PSI) have been prepared by Douglas Partners and are included at **Appendix U** and **Appendix R** respectively. These assessments define the site's underlying geological profile, groundwater conditions, and potential contamination risks resulting from development activities.

7.11.1 Geotechnical Conditions

The site is located on the Hawkesbury Sandstone formation with GyMEA erosional soils. The subsurface profile from natural ground level consists of firm to stiff clay/clayey silt topsoil and fill between 1.5m and 3.0m below natural ground level, low to medium plasticity / firm to stiff sandy clay/clay residual soils between 1.5m and 3.0m below natural ground level and sandstone of typically medium strength. As most of the site has already been excavated down to rail level, it is expected that the platforms are sitting on fill, possibly consisting of ripped sandstone.

As no excavation works are proposed, the recommendations within the geotechnical study relate to assessing the structural integrity of the existing building foundations, retaining walls, and other supporting structures, which has been assessed separately in the Structural Report (**Appendix K**). As such, the soil conditions do not pose risk to proposed construction activities.

7.11.2 Surface and Groundwater

No free groundwater was observed in the station excavation during the site inspection with the station being a drained excavation. Nearby projects suggest the groundwater could be located approximately 2m to 3 m below the existing station platforms, however this is unlikely to be the regional groundwater table. The regional groundwater table is likely to be well below excavation level due to drained (building) basements in the vicinity of the site and the sloping topography down towards Lavender Bay to the south.

As the proposed development is located over the existing drained station excavation, the redevelopment of the site will have no further potential impact on soil resources and related infrastructure and riparian land on or near the site. It will also have no further impact on groundwater than that of the existing site.

7.12 Water Cycle Management

An Integrated Water Management Plan (IWMP) has been prepared by Arcadis and is included at **Appendix L**. The assessment identifies the stormwater, drainage, water quality, and integrated water management measures incorporated into the proposal to ensure performance under relevant requirements.

7.12.1 Stormwater Drainage

The site is fully developed with an existing stormwater management system. The proposed adaptive re-use does not alter existing internal flow paths, and it is expected that internal drainage system will be re-used subject to review during the detailed design phase.

Stormwater Quantity

North Sydney Council requires that post-development stormwater discharge rates should be less than predevelopment stormwater discharge rates. As the proposed adaptive re-use does not increase the existing impervious area of the site (100% as existing), the post-development stormwater discharge rates will not exceed that of the current site conditions.

Stormwater Quality

A range of water quality devices and measures have been proposed to minimise the impacts of the development upon the water cycle and promote sustainability. Specifically, a combination of a gross pollutant trap, filter chamber and filtration cartridges reduce pollutant loads to the required reduction target established within the North Sydney DCP. This is detailed in **Table 29** below.

Table 29 *MUSIC Modelling water quality results*

Pollutant	Source	Residual	% Reduction	% Reduction Targets
Gross Pollutants	104	0	100%	90%
Total Suspended Solids (TSS)	486	45.3	90.7%	85%
Total Phosphorous (TP)	1.07	0.257	76.1%	65%
Total Nitrogen (TN)	9.5	5.14	45.9%	45%

Source: Arcadis

Erosion and Sediment Control

As the proposed development consists of adaptive reuse of the existing building structure, it is not expected that significant erosion and sediment controls will be required, however, it is suggested that this should be reviewed during the detailed design and construction phase to ensure compliance with the relevant standards and guidelines.

7.12.2 Water and Wastewater

Existing utility connections to existing lot are proposed to be reused for the proposed development subject to their size and location and any boundary adjustment or proposed boundary location coordinating with existing service connections.

The feasibility advice requested from Sydney Water (Appendix D of the IWMP) confirms the existing servicing noted above and confirms that pressure, headloss and velocities are within acceptable limits to service the proposed development and confirmed the networks has sufficient capacity for the proposal.

Sydney Water have confirmed that the connection for the proposed development would be the 225mm sewer main within the site and confirmed that it is adequately sized to service the proposed development. Additionally, they confirmed that the wastewater network has sufficient capacity to service the proposed development.

7.13 Social and Economic Impacts

7.13.1 Social Impact

To understand the potential social impact of the proposed development in accordance with the specific requirement of the SEARs, a Preliminary Social Impact Assessment Memo and Social Infrastructure Needs Assessment have been prepared by Patch Planning and are included at **Appendix Z** and **Appendix AA**, respectively. Together, the reports assess the likely need for social infrastructure generated by the proposal directly, as well as more broadly, the cumulative impacts on social infrastructure from housing projects in the site's locality.

Adopting a mixed methods approach by considering the site's physical and strategic context to apply both a quantitative and qualitative analysis, the proposed development is likely to result in the following social impacts:

- The proposal is likely to generate demand for approximately 8-12 long day care / preschool places and approximately 7 out of school hours (OOSH) places. It is likely this demand can be absorbed in the existing childcare services;
- Based on the potential age profile, the development is expected to include approximately 17 primary school aged children (5-11 years) and 13 secondary school aged children (12-17 years). Using the assumption that 62% of children attend government schools, the development is likely to generate demand for approximately 10 public primary school places and 8 public secondary school places;
- The future population anticipated on the site alone is not likely to generate demand for any additional General Practitioners (GPs). Demand is likely to be able to be absorbed into existing service provision;
- The projected population for the proposed development would likely generate demand for around 25m² of community centre space and 11m² of library space. Given the limited demand it is likely this would be absorbed by the existing community facilities; and
- Based on the analysis of existing social infrastructure, the North Sydney suburb is well provided for in terms of proximity to and diversity of sport and recreational spaces as well as open space. However, the CBD is currently not well connected or pedestrian friendly with challenging topography in areas. Council's proposed public domain and

street improvements will be critical to supporting demand for walking, running and cycling which are the most popular physical activities and recreational sports in Australia according to AusPlay Participation Data, particularly for young adults. It will also encourage and enable residents to access the existing open space network more easily.

Overall, the proposed development was considered to present a unique opportunity to coordinate a high-quality public domain outcome, aligning with Council's vision to enhance and reinforce the role of Blue Street Plaza as a key civic space.

7.13.2 Economic Impact

An Economic Impact Assessment (EIA) has been prepared by Colliers and is included at **Appendix V**. The EIA assesses the economic rationale, market need and impacts of the proposed development, particularly in the context of transitioning the site to a residential land use.

Impacts are considered with regard to the local and regional area and through the construction and operational phases of the proposed development. These include:

- **Residential land use:** the proposed 148 dwellings will help provide much needed housing supply in North Sydney and will not impact on the ongoing viability or continued operation of any residential use. The provision of affordable housing will also ensure that accommodation is available across a range of price points within the North Sydney LGA more broadly, supporting a range of occupiers including key workers;
- **Commercial land use:** the removal of commercial office floorspace at the site will not impact ongoing viability or continued operation of existing commercial office uses but rather support the ongoing viability of commercial office market within North Sydney. Existing tenancies and workers at the site will be able to relocate within a commercial office market facing high levels of vacancies. Any impacts to workers and businesses are anticipated to be temporary;
- **Retail land use:** the 410m² of population serving floorspace represents a limited provision of demand requirements within the local area. Accordingly, it is likely that the proposed population serving facilities would have little to no impact on the surrounding businesses or developments and will not impact the ongoing operation or viability of any existing or proposed retail facility once operational; and
- **Employment activity:** the proposed development will deliver the following employment benefits:
 - **Construction employment:** supporting employment of 150 job-years and deliver a direct value-add to the economy of \$28.1 million. When multipliers are taken into account, total state-wide economy effects over the construction program are forecast to be employment of 640 job-years and a total direct value-add to the economy of \$111.6 million;
 - **Ongoing employment:** full-time equivalent (FTE) employment of 12 direct ongoing jobs, and a direct value-add to the economy of \$1.2 million per annum. When the multipliers are taken into account, total ongoing economy-wide effects are estimated at: FTE employment of 15 jobs supported and a total value-add to the economy of \$1.9 million per annum; and
 - **Value added:** once complete and fully occupied, the development will accommodate 290 residents at full occupancy. The proposed development is therefore also anticipated to deliver additional retail expenditure of \$7 million per annum.

7.14 Contributions and Public Benefit

The proposed development will contribute to long lasting and significant public benefits to Sydney, as well as NSW more broadly. These benefits include provision of affordable co-living housing, monetary contributions, and enhancement to the existing Blue Street Plaza.

The following development contributions would apply to the proposed development due to the site's location within the North Sydney LGA and the proposed type of development:

- Section 7.11 Infrastructure Contributions under the North Sydney Local Infrastructure Contributions Plan 2020; and
- Housing and Productivity Contributions in accordance with the *Environmental Planning and Assessment (Housing and Productivity Contribution) Order 2024*.

The proposed development is additionally delivering the following key public benefits:

- Provision of 86 affordable co-living apartments to be operated as affordable housing by a Community Housing Provider in perpetuity;
- Delivery of the enhanced Blue Street Plaza as a high quality, publicly accessible open space secured through a positive covenant to ensure ongoing public access, maintenance and management;
- Significant public domain improvements, including landscaping, seating, lighting and activation measures to enhance amenity, safety and usability for workers, residents and visitors;
- Strengthening of pedestrian connections within the North Sydney CBD, improving permeability between Blue Street, surrounding commercial development and North Sydney Railway Station as key transport infrastructure;
- Supporting the activation of the North Sydney CBD with an Integration of retail uses with an enhanced public domain interface at the ground level; and
- Opportunity for integrated public art and placemaking elements within the plaza, reinforcing local identity and contributing to the character of the North Sydney CBD.

7.15 Assessment of Other Impacts

An assessment of the other impacts of the development has been undertaken by the relevant specialist consultants and are appended to the Report as set out in **Table 30** below.

Table 30 Summary of other technical assessments

SEARs	Issue	Assessment
14	Contamination	A Preliminary Site Investigation has been prepared by Douglas Partners and is included at Appendix R . It identifies that there are no potential pathways for contaminants to reach human or environmental receptors, given that the site is almost exclusively paved / overlies a basement. Accordingly, the PSI concludes that the site is suitable for the proposed development.
17	Biodiversity	The proposed development is in a highly urbanised area without significant vegetation and therefore is not likely to impact a matter of National Environmental Significance. Therefore, the proposed development is not required to be referred to the Federal Department of the Environment to determine if it constitutes a controlled action. A Biodiversity Development Assessment Report Waiver has been prepared and is provided at Appendix Q .
21	Aboriginal Cultural Heritage	An Aboriginal Due Diligence assessment has been undertaken by Curio Projects and is included at Appendix BB . The report addresses potential Aboriginal archaeological considerations for the proposed development. The report concludes that the site contains nil to low Aboriginal potential. This is due to the site's history being subject to extensive urban development and subsurface ground disturbance, significantly reducing the chance of survival of any original archaeological deposits. Notwithstanding the report recommends that an Unexpected Finds Protocol be adopted to mitigate residual risk of encountering subsurface material during any groundworks required for landscaping. Accordingly, and Aboriginal Cultural Heritage Assessment Report is not required.

22	Environmental Heritage	A Heritage Impact Statement (HIS) has been prepared by Curio Projects and is included at Appendix S. It provides an assessment of the potential impacts of the proposed development on any heritage values on or around the site. The site contains no listed heritage items, nor is within a heritage conservation area, in accordance with the North Sydney LEP. There are several heritage items of local and State significance in the vicinity of the site. Notably, it is adjacent to the locally significant St Francis Xavier Church and School Hall, and the Lavender Bay Heritage Conservation Area. The site also falls within the visual catchment of the Sydney Harbour Bridge (approaches and viaducts (road and rail)) (State and National significance) and the Brett Whiteley House and Visual Curtilage (State heritage items). A comprehensive list of surrounding heritage listed items is provided within the HIS. The report identifies that potential impacts associated with the proposed development are limited to changes to setting, views and environmental conditions. Heritage items within the immediate vicinity are situated within a highly urbanised and evolving context, where mid- and high-rise development forms and established backdrop. With specific regard to the St Francis Xavier Church and School Hall, the proposal has been designed to respond to its interface through the proposed setback, building articulation and podium treatment which maintains separation and reduces the perceived bulk adjacent to the heritage item. While the proposal represents an increase in vertical scale relative to the Church, the tower element is set back and will be read as part of the broader skyline, and will not project into or disrupt the primary view corridor along Mackenzie Street. This retains the legibility of the Church as a lower-scale landmark element in a layered urban composition. The proposal results in a limited reduction in direct sunlight to Church windows during mid-winter, largely in the early-afternoon, however this will not impact the functional and experiential qualities of the windows. Overall, the proposal is considered to result in an overall neutral to minor heritage impact, and no specific mitigation measures are required.
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8.0 Project Justification

In general, investment in major projects can only be justified if the benefits of doing so exceed the costs. Such an assessment must consider all costs and benefits, and not simply those that can be easily quantified. As a result, the EP&A Act specifies that such a justification must be made having regard to the biophysical, economic and social considerations, together with principles of ecologically sustainable development. The decision on whether a project can proceed needs to be made in the full knowledge of its effects, both positive and negative, considering impacts both quantifiable and otherwise.

This section provides a comprehensive evaluation of the proposal's impacts and alignment with the objects of the EP&A Act and other applicable statutory instruments. This section concludes that the proposal is justified by reference to Section 4.15 of the EP&A Act, which specifies matters for consideration which a consent authority must consider in determining a development application. As such, the following matters have been considered:

- Design of the proposed development, including actions taken to avoid or minimise the impact of the proposed development while still achieving the objectives of the project;
- Consistency with the strategic context;
- Consistency with the statutory requirements;
- The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality;
- The suitability of the site for the development; and
- The public interest.

8.1 Design of the Proposed Development

The excellence and quality of the proposed built form, and the actions taken to avoid or minimise potential impacts have been set out in the preceding sections of this Report. Consolidated Mitigation Measures have been prepared by Colliers Urban Planning and are set out in **Appendix D**.

Subject to the implementation of these mitigation measures and in addition to the considered and thoughtful design response, any adverse impacts resulting from the proposed development will be effectively managed and/or are minimal and acceptable.

8.2 Consistency with Strategic Context

The strategic context for the proposal discussed at **Section 2.7** of this Report demonstrates that the proposed development is consistent with the relevant strategic context which includes the National Housing Accord, strategic frameworks applicable to the site including the draft Sydney Plan, District Plan and LSPS, amongst others. Overall, the proposal represents a significant contribution to the delivery of housing, including affordable housing, in a well-established urban area which is extraordinarily well-served by public transport.

The proposed development supports key strategic planning moves relating to the following themes:

- Responding to the need for housing availability, affordability and diversity, making a significant contribution to the goals of the Housing Delivery Authority and National Housing Accord programs through providing 148 dwellings comprising 62 market residential units and 86 co-living affordable dwellings on a key strategic site;
- Delivering a healthy, resilient and socially-connected community which improves access to public transport and enhances public spaces such as Blue Street Plaza. This delivers high-quality communal spaces designed to encourage social cohesion, greater public access to iconic views, and a stronger sense of community; and
- Contribute to the ongoing viability of commercial land uses in the North Sydney CBD through the delivery of 148 residential dwellings in the heart of the North Sydney, with future residents likely to use surrounding restaurants, shops and cafes, and contribute to the employment-generating land uses.

8.3 Consistency with the Statutory Requirements

Section 5.0 of this Report demonstrates that the proposed development is consistent with the relevant statutory planning framework, including the EP&A Act, Sydney LEP 2013, and other applicable legislation. **Appendix B** demonstrates that this Report has addressed all relevant matters as specified in the SSD-86270706 SEARs and Sections 190-192 of the EP&A Regulation.

The proposed development is SSD by virtue of a ministerial planning order. The site was declared to be SSD under the HDA, specifically pursuant to *State Significant Declaration Order (No 4) 2025* (Order) issued on 3 April 2025. The Order specifies development in EOI application 233741 dated 22 January 2025, including development for the purpose of residential flat building with provision of affordable housing at 5 Blue Street, North Sydney, as SSD (refer to **Section 5.1**).

Section 6.2 demonstrates that the proposed development is permissible with consent. Use of the site for commercial premises (retail use) is explicitly permitted under the propose MU1 Mixed Use zoning for the site.

The proposal does not trigger the need for an EPBA Act approval and is consistent with the principal planning controls of the Sydney LEP 2013, as demonstrated in **Section 5.0**. The proposal is consistent with the relevant Objects of the Act as listed under Section 1.3 of the EP&A Act, and will not result in any unjust or significant environmental impact. Specifically, the proposal is consistent with the Objects of the EP&A Act as:

- It delivers 148 residential dwellings (of which 86 co-living dwellings will be affordable housing in perpetuity) to accommodate the growing population of the North Sydney LGA and Greater Sydney more broadly. It will positively contribute to housing supply and affordability;
- It promotes the orderly and economic use of land by redeveloping an underutilised site that is currently below its development potential and is increasingly ageing and dilapidated to positively contribute to housing supply and affordability;
- Through the adaptive reuse redevelopment method, the proposal adopts highly innovative design and operational initiatives for demolition and construction which reduce destruction of embodied carbon and existing infrastructure to support ESD initiatives;
- In enabling new fitouts of the existing building with state-of-the-art technologies and systems, the building will achieve better operational efficiency and work towards improved resilience to climate change and natural disasters;
- The proposed development will not result in any adverse impacts to threatened species or ecological communities. This has been demonstrated through obtaining of the BDAR Waiver;
- It will generate employment opportunities in both construction and operational phases;
- The proposal incorporates good design and amenity of the built environment, as demonstrated in the assessment section of this Report;
- The proposal does not adversely impact Aboriginal Cultural Heritage. Connecting with Country has informed the proposal to ensure it is built into and celebrated with the proposal;
- The project team has undertaken consultation and feedback with all relevant stakeholders; and
- The site is suitable for the proposed development and is in the public interest.

8.3.1 Principles of Ecologically Sustainable Development

Section 193 of the EP&A Regulation outlines four principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle;
- Intergenerational equity;
- Conservation of biological diversity and ecological integrity; and
- Improved valuation, pricing and incentive mechanisms.

An analysis of these principles is provided in the following sections.

Precautionary Principle

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This EIS and its supporting reports and studies has not identified any serious threat of irreversible damage to the environment and therefore, the precautionary principle is not relevant to the proposal.

The proposal is being designed in accordance with a wide range of ESD goals that pertain to the design, construction, and operational stages. As an adaptive reuse project, the building presents unique opportunities to both minimise the impact on the environment in the redevelopment and subsequent operational phases in the areas of energy, water, and materials. In addition, the design will incorporate energy efficiency favoured passive design features to minimise severe or irreversible environmental damage. Increasing resilience to natural hazards has been considered in the development so that associated costs are budgeted as necessary.

Intergenerational Equity

Intergenerational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The proposal has been designed to benefit both the existing and future generations by:

- Preserving the building structure through adaptive reuse of the existing built form to extend the building lifecycle;
- Use of sustainable materials with low embodied emissions and VOC values;
- Improving the biodiversity by incorporating native vegetation for landscaping;
- Incorporating water-efficient fixtures and systems to reduce water consumption and protect future water resources;
- Reinvigorating a critical public space, being the Blue St Plaza for improved long-term access for all members of the public; and
- Educating employees and occupants about sustainable practices and the importance of responsible resource use.

The proposal has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long-term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in this EIS and the appended technical reports.

Conservation of biological diversity and ecological integrity

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration. The proposal would not have any significant effect on the biological diversity and ecological integrity of the study area.

A Biodiversity Development Assessment Report Waiver Request is submitted with this Report and states that the development will not be likely to have any significant impacts on biodiversity values. Refer to **Appendix Q**.

Improved valuation, pricing and incentive mechanisms

The principles of improved valuation and pricing of environmental resources require consideration of all environmental resources which may be affected by a proposal, including air, water, land and living things. Mitigation measures for avoiding, reusing, recycling and managing waste during construction and operation would be implemented to ensure resources are used responsibly in the first instance.

8.4 Likely Impacts of Development

Having regard to the natural environment, built environment and economic and social impacts of the proposed development, the likely impacts of development are considered acceptable as outlined in the following sections.

Additionally, the proposed mitigation measures detailed within **Section 7.0** and **Appendix D** outline the mitigation and management measures that will minimise the impact of the proposed development.

Natural and Built Environment

This Report has demonstrated that the proposal adopts appropriate management strategies that will generate acceptable environmental impacts, due to the proposed mitigation measures and the design of the development.

All relevant environmental impacts are addressed within **Section 7.0**, and determined to be acceptable subject to implementation of the proposed mitigation measures set out in **Appendix D**.

Social and Economic

The proposal's social and economic impacts include:

- It will facilitate the delivery of a diverse housing supply supported by suitable commercial uses within a desirable location, close to existing transport options and amenities;
- It will enable the delivery of much needed housing supply that will contribute to achieving the recent NSW Housing target of 5,900 new dwellings for North Sydney Council, as well as address the recognised shortage in housing supply across Greater Sydney, which has accentuated the current housing affordability crisis in NSW;
- It will support the generation of 130 job-years during construction and 15 operational FTE jobs;
- It sets the parameters to facilitate a high-quality built form outcome that will be accompanied by significant public benefits through the delivery of a new public plaza and through-site links;
- It will revitalise an underutilised site containing an inefficiency building with an urban marker development that will help in catalysing the continued evolution of North Sydney with a residential living component that exhibits good design and improvement to the visual amenity of the area; and
- It will contribute to the improvement of public amenities, particularly Blue St Plaza and the interface of the site with the public domain.

8.5 Suitability of the Site

Having regard to the characteristics of the site and its immediate surrounding context, the proposed development is suitable for the site for the following reasons:

- In its current form, the site is underutilised and inefficient and does not represent the highest and best use with the potential to contribute to the vibrancy and affordability of North Sydney;
- It is consistent with the statutory controls under the North Sydney LEP 2013 (as proposed to be amended under the Concurrent Rezoning process) and other relevant legislation;
- Its location directly above North Sydney Station provides high frequency public transport options with direct connectivity to major destinations and employment centres across Sydney such as the Sydney CBD, St Leonards, Chatswood, and Central;
- The local road network and key intersections have been assessed to be able to accommodate the traffic volumes generated by the proposed dwelling yield, without adverse impact on performance or safety. The proposed development will not result in any unacceptable or material environmental impacts in relation to adjoining and surrounding properties, particularly in terms of overshadowing, views, privacy, and solar access;
- The site is located within North Sydney CBD which has a prevailing medium and high-rise built form that will continue to evolve over time as redevelopment occurs. The proposed development remains consistent with this typology whilst being responsive to surrounding site condition;
- It responds to the surrounding context by positioning building mass accordingly with appropriate setbacks and mitigation measures; and
- It will not result in any unacceptable adverse environmental impacts and all identified impacts can be appropriately mitigated.

8.6 Public Interest

Having regard to the public interest, the proposed development is in the public interest for the following reasons:

- It will increase the supply and choice of housing in a highly accessible location which is suitable for increased residential density;
- It will facilitate the renewal of an underutilised site above North Sydney Train Station through development that includes a range of ESD initiatives including adaptive reuse;
- Direct employment opportunities will be created during the construction and operational phases of the proposal;
- It will contribute to a more vibrant and activated North Sydney CBD that provides a range of day to day services and offerings for residents, surrounding employees, visitors, and the local community;
- The development is consistent with planning controls under the North Sydney LEP 2013 (as proposed to be amended under the Concurrent Rezoning process), Housing SEPP and implements the objectives of the ADG. The proposed rezoning addresses the height and zoning variations;
- In accordance with the principles for adaptive reuse established in *Michael Hesse v Parramatta City Council [2003]*, the proposal is visually attractive, and integrates well within its urban design context, particularly given its location within the North Sydney CBD. Importantly, the proposed residential use serves the public interest more effectively than the existing underutilised and inefficient commercial use, by delivering diverse and accessible housing in response to the current housing crisis;
- The proposed development provides improved amenity by revitalising a currently underutilised and inefficient property and remediating it for significant, diverse and affordable housing supply;
- It will deliver major public benefit in the form of an upgraded public plaza and through-site link that will act as a new focal point for North Sydney, increase pedestrian permeability and provide much needed public amenity for the local community;
- The delivery of affordable housing will ensure that residents can access housing that is affordable and in close proximity to jobs, services and education; and
- The proposal will provide for significant improvements to the site, providing improvements in terms of accessibility, visibility, safety and activation.

9.0 Conclusion

This Environmental Impact Statement has been prepared to consider the environmental, social and economic impacts of SSD-86270706 and concurrent amendments to the North Sydney LEP 2013 for a mixed-use development comprising residential accommodation, commercial premises and public domain works at 5 Blue Street, North Sydney (the site).

The proposed above station adaptive reuse seeks to transform the landmark site into a vibrant mixed-use precinct that integrates residential, retail and public domain enhancements into the broader North Sydney CBD. Specifically, the proposal seeks approval for:

- Adaptive reuse and conversion of an existing commercial building to a mixed-use development, comprising residential and non-residential ground floor uses, including:
 - Two levels of basement car parking, comprising plant, bicycle storage areas and car parking spaces;
 - Ground floor retail and residential lobbies;
 - Co-living on Levels 1-3, to be operated as affordable housing by a Community Housing Provider in perpetuity; and
 - Residential dwellings on Levels 4-14.
- Public domain and landscaping improvements, including the retention and enhancement of Blue Street Plaza at the eastern portion of the site;
- Extension and augmentation of services and infrastructure as required; and
- Concurrent amendments to the *North Sydney Local Environmental Plan 2013* to facilitate the SSDA.

The amendments to the North Sydney LEP 2013 under the Concurrent Rezoning process seek to:

- Amend the Land Zoning for the site from E2 Commercial Centre to MU1 Mixed Use; and
- Amend the height of buildings from 65m (RL) and 115m (RL) to 116m (RL) across the site.

Additionally, an amendment to the *State Environmental Planning Policy (Housing) 2021* is sought to exclude section 69(2)(c) from applying to the proposed development.

This Report has assessed the reasons justifying the carrying out of the proposed development, including consideration of natural and built environment and social and economic factors, including the principles of ecologically sustainable development set out Section 193 of the EP&A Regulation. In doing so, this Report confirms that the proposed development will not give rise to unacceptable environmental impacts and is supportable from a planning perspective. The proposal is expected to have a positive impact on the surrounding locality as:

- The proposed development will not result in adverse environmental impacts, with appropriate mitigation measures that will minimise any potential impact;
- The proposal will deliver 148 dwellings comprising 62 market residential units and 86 co-living affordable dwellings to be delivered in perpetuity. This will support the growing population of the North Sydney locality and Greater Sydney more broadly, contributing to housing supply and affordability;
- The proposed development is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including the North Sydney LEP 2013 (where it is not proposed to be amended). Where not compliant, amendments to the North Sydney LEP 2013 are proposed and justified to accommodate the development;
- Direct employment opportunities will be created during the construction and operational phases of the proposal;
- The proposed development provides improved amenity by revitalising a currently underutilised and inefficiently operating property for significant housing supply; and
- The proposed development is suitable for the site and in the public interest.

It is therefore recommended that this SSDA be approved subject to standard conditions of consent, given that the proposed development:

- Is consistent with the relevant strategic planning framework and guidelines;
- Is consistent with the relevant statutory legislation and requirements;
- Will not generate unreasonable environmental impacts; and

- Is suitable for the site, and in the public interest.