



Rezoning Report

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

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



'Dagura Buumarri'

Liz Belanjee Cameron

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



'Gadalung Djarri'

Liz Belanjee Cameron

'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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1.0 Introduction

This Rezoning Report (the Report) 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).

Specifically, SSD-86270706 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* (North Sydney LEP 2013) and exclusion of a section within *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) to facilitate the SSDA.

The concurrent amendments to the North Sydney LEP 2013 sought to facilitate the proposed development are detailed in **Table 1** below.

Table 1 *Proposed amendments to the North Sydney LEP 2013 and exclusion of Housing SEPP standard*

Standard	Existing Control	Proposed Control
Amendments to North Sydney LEP 2013		
Land use zoning	E2 Commercial Centre	MU1 Mixed Use
Height of buildings	65m (RL) and 115m (RL)	116 (RL)
Exclusion of section within Housing SEPP		
Standards for co-living housing	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	-

This Report has been prepared to support the Environmental Impact Statement (EIS) prepared for SSD-86270706. The purpose of this Report is to document the strategic and site-specific merit of the proposed amendments to the North Sydney LEP 2013 and Housing SEPP, in accordance with the relevant matters for consideration within the '*Local Environmental Plan Making Guideline*' prepared by DPHI.

The SSDA is recommended for approval given the proposed development will significantly contribute to the enhancement of the North Sydney locality. The proposed development represents a unique opportunity to deliver significant public, environmental and social benefit, having regard to the upgrades that it will provide to Blue St Plaza, the adaptive reuse nature of the proposed development, and the delivery of much needed housing. Collectively, the proposal's strategic and site-specific qualities demonstrate significant merit for the proposed development.

2.0 The Site

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.

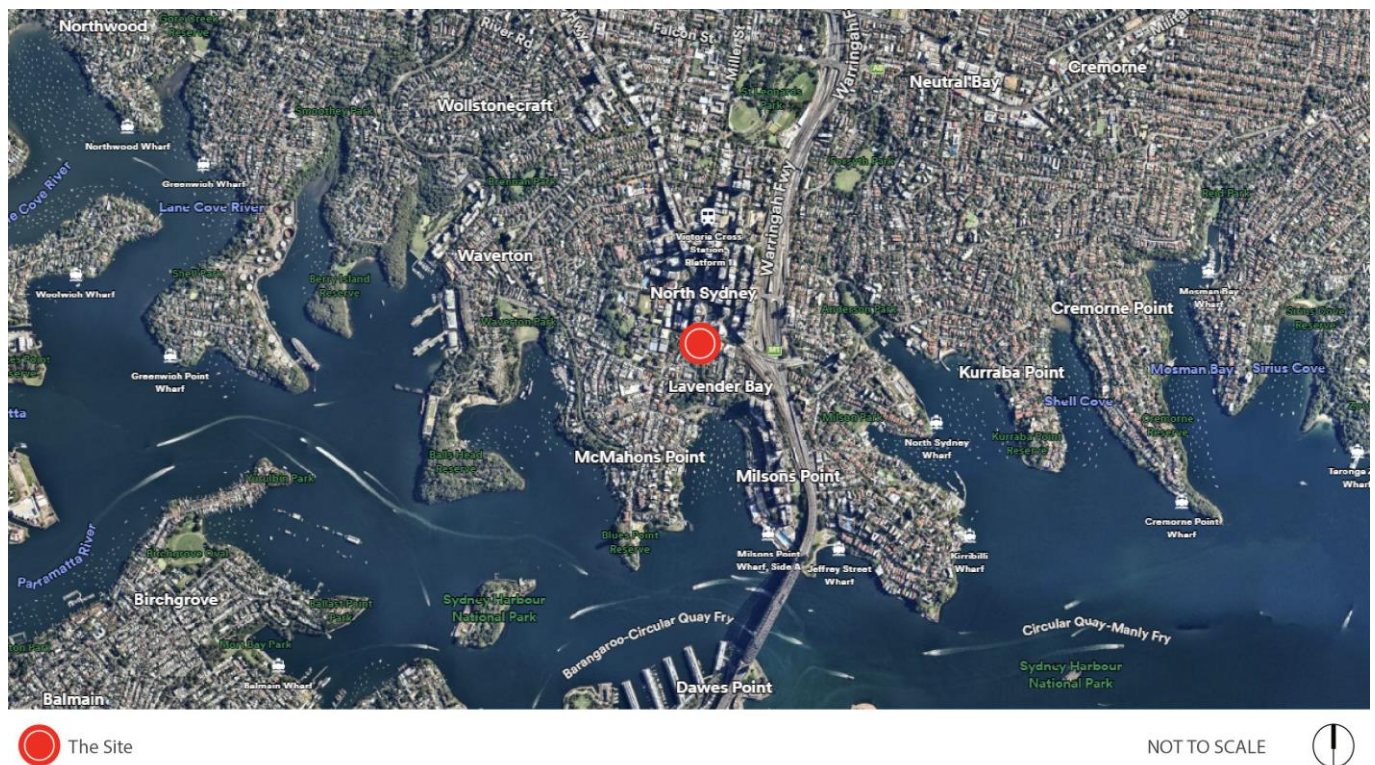


Figure 1 Site Context Map

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**.

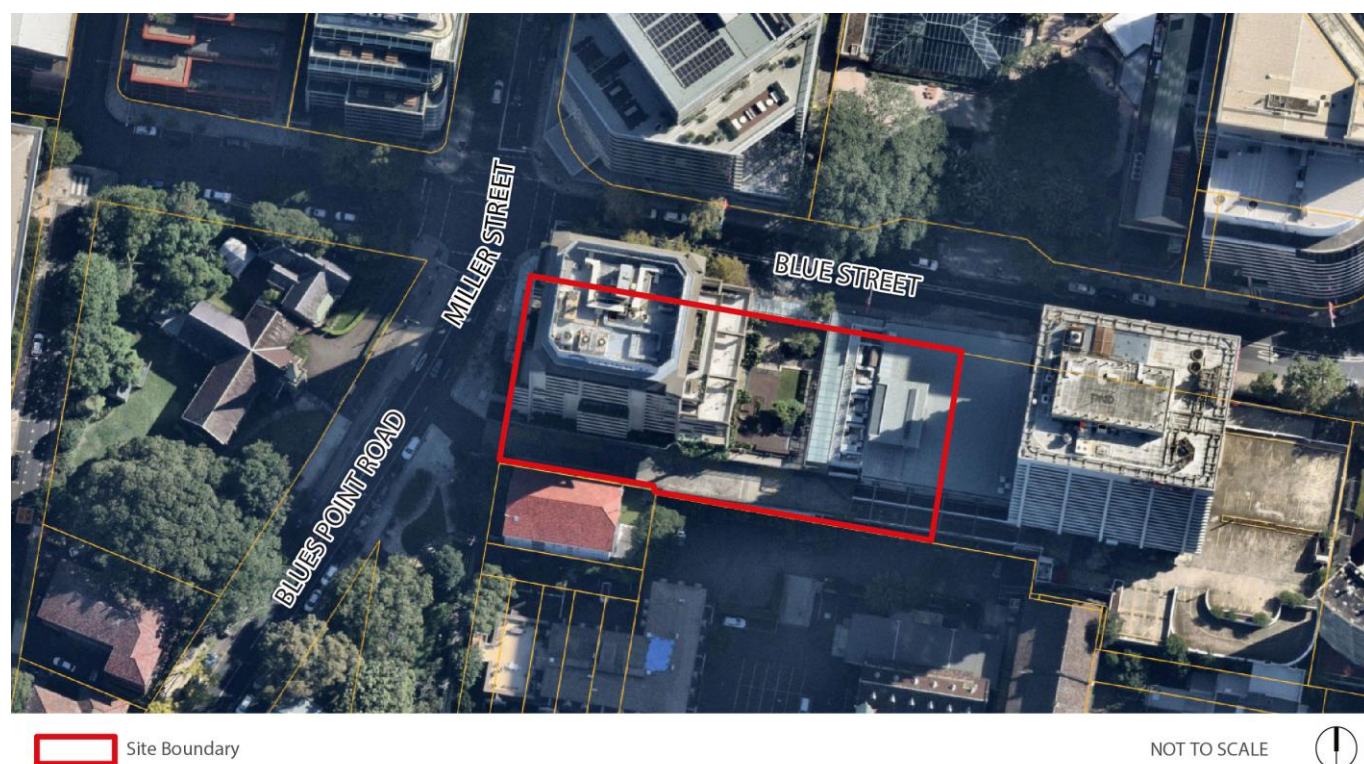


Figure 2 Site Aerial Map

Source: Nearmap edited by Colliers Urban Planning

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 3**.



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 3 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 sites 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 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 4 Surrounding Development – North of the Site

Source: Google Streetview

2.4.2 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 5 Surrounding Development – East of the Site

Source: Google Streetview

2.4.3 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 6 **Surrounding Development – South of the Site**

Source: Google Streetview

2.4.4 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 7 **Surrounding Development – West of the Site**

Source: Google Streetview

3.0 Proposed Rezoning Amendments

This Rezoning Report has been prepared in accordance with the ‘Local Environmental Plan Making Guideline’ prepared by the NSW Department of Planning and Environment.

The following section outlines the objectives and intended outcomes of this rezoning request and an explanation of provisions in order to achieve those outcomes. The justification and evaluation of impacts is set out in **Section 4.0** and **5.0** of this Report.

3.1 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. 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.

3.2 Explanation of Provisions

3.2.1 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 2**, compared with the existing controls.

Table 2 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)

3.2.2 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.

4.0 Justification of Strategic and Site-Specific Merit

4.1 Strategic Merit

This section outlines the strategic justification for the proposed rezoning. It demonstrates how environmental impacts arising from the rezoning are justified within the context of government priorities and the NSW strategic planning framework.

4.1.1 Section A – Need for the Planning Proposal

Q1. Is the Planning Proposal a result of an endorsed local strategic planning statement, strategic study or report?

The proposed development is a direct response to the designation of the site as SSD under the HDA, specifically pursuant to *State Significant Declaration Order (No 4) 2025* (Order) issued on 3 April 2025. It directly responds to the objectives of the HDA and National Housing Accord to build new, well-located homes to alleviate the housing crisis.

The proposed amendments give effect to the North Sydney LSPS, which was endorsed by the Planning Secretary in accordance with Section 3.9 of the EP&A Act. The LSPS envisions the existing and future residents of North Sydney as capable of enjoying high levels of amenity and liveability, particularly with good access to transport and areas of unique scenic and recreational quality. As the proposed amendments seek to enable an adaptive reuse development on the site, this constitutes a 'careful managing' of growth by optimising the 'unique natural and built form character, amenity and appeal' of the site's locality.

In addition, the proposed amendments give effect to the following objectives of the North Sydney 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;
- Planning Priority P6: Support walkable centres and a connected, vibrant and sustainable North Sydney;
- Planning Priority S2: Provide a high quality, well-connected and integrated urban greenspace system; and
- Planning Priority S3: Reduce greenhouse gas emissions, energy, water and waste.

Q2. Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

The intended outcome is to facilitate the orderly renewal and adaptive reuse of an underutilised building in a highly accessible CBD location, enabling additional housing, complementary non-residential uses, an improved public domain and a more sustainable built form outcome. Importantly, the proposed amendments maintain consistency with and would not undermine the objectives of the existing E2 Commercial Centre zone, as the site would continue to support a vibrant and accessible centre, particularly for pedestrians, while accommodating non-residential uses that activate street frontages and attract pedestrian traffic, consistent with its strategic CBD context. These outcomes require amendments to the applicable planning controls to permit the proposed land use mix and built form parameters. Retaining the existing planning controls would likely perpetuate the current underutilisation of the site and would not support the delivery of additional housing, improved public domain outcomes or the sustainability benefits associated with reusing the existing structure.

The proposed amendments represent the best means of achieving the intended outcomes for the site and broader North Sydney site locality. To achieve the realisation of a transit-oriented city with an improved street network and buildings with optimised sustainability, functionality and capacity, the development controls under the North Sydney LEP 2013 must be amended to facilitate renewal of the site in a manner that will achieve desirable outcomes and maximise public

benefit, while continuing to deliver on the strategic intent of the E2 zone. Ultimately, these amendments respond to the key criteria prescribed under the HDA process to support a greater quantum of housing in highly accessible locations.

The proposed rezoning also represents a preferable sustainability outcome when compared with wholesale redevelopment. By enabling adaptive reuse of the existing building, the Planning Proposal supports the retention of existing built fabric, reduces demolition waste, conserves embodied carbon and promotes more efficient use of existing infrastructure. This aligns with broader sustainability and circular economy principles and supports compact, transit-oriented development in a location directly served by public transport.

Importantly, the rezoning also enables a clear public benefit. The proposed amendments would facilitate the delivery of an upgraded publicly accessible plaza, improved pedestrian amenity, enhanced landscaping, activation at ground level and better integration with North Sydney's public domain and transport network. These benefits would extend beyond future residents to workers, visitors, commuters and the broader community.

4.1.2 **Section B – Relationship to the Strategic Planning Framework**

Q3. Will the Planning Proposal give effect to the objectives and actions of the applicable regional, or district plan or strategy (including any exhibited draft plans or strategies)?

[Draft Sydney Plan](#)

Released in December 2025, the draft Sydney Plan (Plan) establishes a strategic land use plan to guide management of growth in the Sydney region over the next 20 years. Covering 33 LGAs, the Plan sets out how Sydney will accommodate a growing population whilst ensuring communities have access to housing, infrastructure, jobs, sustainability and vibrant places to live and work.

The Plan is framed around seven priorities, being ‘Aboriginal outcomes’, ‘housed’, ‘prosperous’, ‘connected’, ‘resilient’, ‘liveable’ and ‘coordinated’. An assessment of the consistency of proposed development’s consistency with these priorities as applicable is set out in **Table 3** below.

Table 3 *Consistency with draft Sydney Plan*

Principle	Consistency with Principle
Aboriginal outcomes	• The proposed development, through redevelopment of the existing site, enables new opportunities to incorporate Aboriginal outcomes, being ‘Caring for Country’ values in design and planning; and • The proposed development delivers a unique opportunity to improve the relationship of an iconic landscape, being the view of the Sydney Harbour from the site’s public plaza, with connections to Country through the embedding of Country in planning. This co-design will facilitate culturally respectful development that increases understanding of Country.
Housed	• The Plan aims to give all existing and future residents of Sydney access to diverse, well-located and affordable homes whilst recognising that housing supply has not kept up with demand. The site’s location directly above North Sydney Train Station which provides exceptional access to Sydney CBD and beyond, and the high quality of market and affordable housing delivers the type of housing contemplated by the draft Sydney Plan; • The Plan mandates the 5-year housing targets established for each council in NSW, including North Sydney’s housing target of 5,900 new homes completed by 2029. Through the delivery of 148 new residential dwellings, the proposal contributes to achieving the targets envisioned by the Plan for both North Sydney Council and NSW more broadly; • The proposed development would deliver housing that supplements the existing commercial and retail land uses around the site. This would improve housing diversity and choice in the local area whilst providing a workforce that is capable of supporting surrounding land uses; • Affordability is recognised as a significant issue related to housing supply. The residential development proposed, being apartments and co-living dwellings, is recognised in the Plan as the housing typology which represents the most affordable entry point into the housing market; and • The proposed development will deliver 86 affordable co-living dwellings. Co-living dwellings represent a more affordable market offering. The proposed development therefore contributes to improved housing affordability and security.

Principle	Consistency with Principle
Connected	- The Plan emphasises the ability of land use planning to create ‘a compact, transport oriented city where new housing and jobs are delivered alongside existing planning public transport’. North Sydney Train Station is a key public transport station and public transport corridor. The site therefore presents a unique opportunity to improve the diversity of land use planning at this location; - The site’s location above North Sydney Train Station represents development that focuses housing within a 30-minute public transport journey from surrounding centres such as Sydney CBD; and - The proposed development delivers land use planning and infill development that contributes to an attractive, convenient and safe urban environment through upgrades to the public domain, improvements to walkability and connectivity by a through-site link, and upgrades to the streetscape and visual amenity.
Resilient	- The proposed development is an adaptive reuse project. Given the scale of the structure that will be preserved on the site, the proposal represents highly sustainable development that positively contributes to the reduction of embodied emissions; - Landscaping, particularly of public open space, represents urban design that reduces the impact of heat and strengthens resilience to climate change; and - The site’s proximity to public transport, including the rail line and bus routes, means the proposed development is a form which encourages sustainable transport modes, reduces reliance on private vehicles, and reduces emissions.
Liveable	- The site is located in an area with exceptional health, education and employment opportunities, public transport accessibility, services and residential amenity. The proposed development therefore supports development located where people ‘genuinely want to live’ through the development of well-designed communities; - Through the delivery of market housing and affordable co-living dwellings, the proposed development contributes to increased dwelling diversity. This enables the North Sydney locality to better meet the needs of a diverse population; and - As the proposed development includes ground floor activation through retail offerings, land use planning on the site presents the opportunity to improve the vibrancy and liveability of the area around North Sydney Train Station.
Coordinated	- Recognising the complexity of an over-station development, the proposed development is the product of much consultation with relevant government agencies and local government. These have been undertaken in a preliminary manner to ensure the proposed development is capable of delivering growth in a coordinated, well-managed and planned manner; and - The site’s proximity to public transport including the rail line and bus routes means the proposal delivers on the NSW Government’s objectives to drive housing and growth around existing infrastructure.

Greater Sydney Region Plan – A Metropolis of Three Cities

The *Greater Sydney Region Plan – A Metropolis of Three Cities* (Region Plan) prepared by the then-Greater Sydney Commission is the overarching strategic plan to manage change and growth in the Greater Sydney Region. It sets a 40-year vision where most residents live within 30-minutes of their jobs, education and health facilities, services and great places. The Region Plan provides 10 high level policy directions supported by 40 objectives that inform the District Plans, Local Plans and Planning Proposals which follow in the planning hierarchy.

Whilst the Region Plan has since been superseded by the Draft Sydney Plan, an assessment of the proposal’s consistency with the following directions under the Region Plan to govern growth and development in Sydney is nevertheless set out in **Table 4** below.

Table 4 *Consistency with Region Plan*

Direction	Consistency of the Proposal with the Direction
A city supported by infrastructure	- The site is strategically located above North Sydney Train Station. The proposal will facilitate urban renewal that optimises use of existing heavy rail infrastructure, supports efficient use of nearby public transport, and contributes to ongoing revitalisation of the site's locality in a manner that improves sustainability and utilisation of transport corridors; and - The proposal will contribute to the long-term enhancement of infrastructure to the site capable of supporting both the proposed development and future growth in the local area. Through the adaptive reuse strategy, the proposal also provides the opportunity for built form upgrades that enable a transition with technological change for sustainable, innovative technologies.
A city for people	- A city for people presents opportunities to build social and cultural networks, and to enhance individual and community health outcomes; - The proposal will improve opportunities and deliver environments suitable for people to walk, cycle and use public transport through improved pedestrian connections, activation of the streetscape, upgrades to a public plaza, and urban renewal providing housing and retail directly above North Sydney Train Station; and - The proposal additionally capitalises on local identity, heritage and cultural values through leveraging the unique views offered at the site. This enables increased access and use of public spaces and social infrastructure, which will be enlivened by foot traffic from retail and residential uses.
Housing the city	- The site is ideally located to accommodate the 148 proposed residential dwellings within an existing dense, urban context above North Sydney Train Station; - The proposed quantum of housing and non-residential floor space will activate the streets and public domain to create a vibrant and successful mixed use development; and - The rezoning will increase housing diversity by facilitating the provision of residential dwellings across a range of sizes and typologies in a manner that unlocks the site's full adaptive reuse potential.
A city of great places	- The proposal will transform a large, ageing and impermeable site into a new, high-quality residential development with an activated streetscape and public domain. This supports a well-integrated development that is designed to be a focal point for the North Sydney community, comprised of both existing and future residents, as well as those employed in the site's surrounds. Visitors and residents alike will be brought together through active and passive options achieved by the upgraded public plaza and through-site link, and retail opportunities; - The format of the upgraded public realm has been designed to recognise the importance of movement and engagement with the site and surrounds. This includes the fine grain urban form and high pedestrian amenity; and - Through the incorporation of thoughtful Connecting with Country principles, the proposal will contribute to redevelopment of Greater Sydney in a manner that celebrates Country.
A well-connected city	- The proposal will facilitate better integration of land use within existing transport infrastructure to help achieve the 30-minute city vision. The proposed development represents a unique integration with the rail network; and - The site is located at the interface of residential and commercial uses. As such, the proposal will deliver development that has significant access to amenity and convenience within a 30-minute radius.
A city in its landscape	- The public plaza contained on the site includes an iconic view to the Sydney Harbour, including the Harbour Bridge and Sydney CBD skyline. Strategic planning is identified as necessary to manage the effects of urban development to protect, restore and enhance landscapes, natural areas and open spaces; - The proposal maintains views to the scenic foreshore from public places through retaining and upgrading the public plaza and also looks over a significant heritage area. By enabling development that fosters distinctive local character and appreciation of Greater Sydney's landscape, the proposal contributes to the preservation of Greater Sydney's identity as shaped by its landscape; - This direction recognises that public open space must be accessible, protected and enhanced. Given the site's location within the established and development-dense North Sydney CBD, the

Direction	Consistency of the Proposal with the Direction
	plaza represents a highly unique public offering. The proposal, through public domain upgrades, will enhance the existing open space offering through better landscaping, more durable and high quality facilities, and better integration with the retail plaza offerings. This enhances the site's natural environment thereby improving liveability, creating healthy places and mitigating the effects of climate change; and The proposal does not affect any protected biodiversity or remnant or significant vegetation. A Biodiversity Development Assessment Report Waiver has been prepared by SLR Consulting at Appendix Q to the EIS.
An efficient city	- The Region Plan recognises energy used in buildings, transport and waste as the three sectors contributing most significantly to greenhouse gas emissions. The proposed development, as enabled by the Planning Proposal, seeks to improve the efficiency of the site in all three sectors. This is sought to be achieved through: - Buildings: the existing development is an ageing commercial development which is incapable of optimising energy efficiency. The proposal will enable the site to adopt environmentally sustainable development (ESD) technologies of a significantly higher efficiency; - Transport: the site's proximity to public transport represents development which aligns land use with transport planning. This slows emissions growth, helps to better manage congestion, improves air quality and increases resident mobility throughout Sydney; and - Waste: as the proposal relates to an adaptive reuse of the existing building structure, the proposal represents a unique redevelopment opportunity that delivers residential development with significant environmental efficiencies from avoiding waste associated with embodied emissions from the existing building structure. - The proposed development is supported by an Ecologically Sustainable Development Report prepared by SLR Consulting and is included at Appendix O to the EIS. The ESD Report outlines the proposed sustainability strategies, imperatives and priorities to be incorporated into the future development.
A resilient city	- Through enabling significant improvements in environmental efficiency and sustainability, the proposal is capable of contributing to a reduction in the amount of carbon and greenhouse gasses in the atmosphere. The proposal therefore represents a step in the right direction by enabling adaptation to climate change and future shocks and stresses; - The Region Plan recognise that 'growth and change need to be considered at a local level when making structural decisions about the region's growth'. At a local scale, the proposal therefore cumulatively contributes to the betterment of built form resilience to environmental challenges; and - Through incorporation of landscaping and materials that better mitigate the urban heat island effect, the proposal will assist in management of vulnerability to extreme heat.

Our Greater Sydney 2056 – North District Plan

The *Our Greater Sydney 2056 – North District Plan* (District Plan) underpins the Region Plan by establishing a 20-year vision for the North District. The District Plan echoes the role of the North Sydney CBD and its contribution to the broader Harbour CBD as part of the Eastern Economic Corridor, identifying the need for an additional 92,000 dwellings with suitable access to jobs, services and public transport to be provided in the North District by 2036.

The key Planning Priorities under the District Plan which relate to the proposed amendments, and the proposal's consistency with such, are described in **Table 5** below.

Table 5 Consistency with District Plan

Planning Priority	Consistency of the Proposal with the Planning Priority
Infrastructure and Collaboration	
N1. Planning for a city supported by infrastructure	- With the site being located directly above North Sydney Train Station, the proposal delivers development that aligns intensifying land uses with infrastructure, such that the use of existing infrastructure is optimised; and - As the proposed development includes upgrades to the existing public plaza located on the site and delivery of a through-site link, the proposal improves access and connection to public

Planning Priority	Consistency of the Proposal with the Planning Priority
	transport services. This contributes to the alignment of infrastructure with growth by providing future land uses amongst a strong public transport and pedestrianised area.
Liveability	
N4. Fostering healthy, creative, culturally rich and socially connected communities	- The proposed development will deliver a healthy, resilient and socially connected community with 148 dwellings comprised of 62 market residential units and 86 co-living dwellings, co-located with retail opportunities, residential amenities and a public plaza. By virtue of the site's location over North Sydney Train Station, the proposal will enable the creation of a community linked to other surrounding communities accessible by rail; and - The proposal will create a generous and well-integrated public domain, featuring public plaza areas and activated retail frontages designed to encourage social cohesion and a sense of community, establishing a key hub for the area.
N5. Providing housing supply, choice and affordability with access to jobs, services and public transport	- This priority emphasises the need for diverse and affordable housing options in proximity to employment hubs, services, and public transportation. It provides urban renewal through infill development to accommodate a growing population while ensuring accessibility and affordability within a high amenity area; - The proposed quantum of housing and non-residential floor space will activate the streets and public domain to create a vibrant and successful mixed-use development directly above North Sydney Train Station and in close proximity to surrounding retail and commercial land uses; and - The redevelopment of the site to deliver housing presents the opportunity to improve housing diversity through various apartment sizes across both build-to-sell and co-living dwelling typologies. The proposed development will enable the delivery of much-needed housing that will assist in alleviating the pressure on the NSW housing crisis.
N6. Creating and renewing great places and local centres, and respecting the District's heritage	- Redevelopment of the site presents an opportunity to revitalise a key site above North Sydney Train Station. Through place-based planning, improving liveability and making the site more attractive for residential development, the proposal enables regeneration of the site which emphasises the site's natural characteristics. Most significantly, this includes its distinctive identity with an iconic view of the Sydney Harbour, as viewed from the plaza located on the site. Under this proposal, the plaza will be upgraded and continue to be publicly accessible; - Shaped by the site's urban morphology, heritage context and iconic views, the proposal will facilitate social cohesion and celebration of community through the delivery of the upgraded public plaza and adjoining ground floor retail offerings. The proposed through-site link will contribute to further activation of the ground plane; and - The proposal will facilitate social cohesion and the celebration of community through the delivery of the new public plaza areas and improved public transport connections. This will include an active ground plane with the opportunity to respond to the community's social and recreational needs.
N7. Growing a stronger and more competitive Harbour CBD	- The District Plan recognises that the success of the Harbour CBD is underpinned by, amongst others, 'high accessibility, supported by an established transport network' and 'safe and high-amenity residential precincts'; and - The proposal, through delivering residential and retail land uses around North Sydney Train Station and delivering an upgraded public plaza, will support the competitiveness and strength of the Harbour CBD and deliver vibrancy to areas of residential growth.
Productivity	
N12. Delivering integrated land use and transport planning and a 30-minute city	- The District Plan recognises that as Sydney grows, convenient and reliable access for customers and residents to public transport is increasingly important for liveability, productivity and sustainability. The proposal achieves each of these as: - Liveability: by delivering residential development directly above North Sydney Train Station, the need for long commutes is decreased; - Productivity: as above, the proposal reduces the time people need to spend travelling, increasing access to jobs and services; and - Sustainability: the proposal improves opportunities for active transport and public transport reliance generally, thereby reducing emissions.
Sustainability	

Planning Priority	Consistency of the Proposal with the Planning Priority
N17. Protecting and enhancing scenic and cultural landscapes	- Scenic and cultural landscapes of the North District contribute to the identity and international profile of Greater Sydney, encouraging an appreciation of the natural environment. A key asset of the North District has been identified as Sydney Harbour and the coastline, with views to the Harbour identified as being of particular importance; and - The proposal, which seeks to retain and upgrade the public plaza, recognise the significance of this public offering and seek to enhance the relationship of the site with scenic and cultural landscapes.
N20. Delivering high quality open space	- The proposal incorporates significant communal and public open space, including residential amenities and a public plaza which adjoins the ground floor. Collectively, these provide spaces for residents to gather and socialise; and - Given the site's location in the North Sydney CBD, the site presents a unique offering with natural characteristics, being the iconic view and highly accessible location, which establishes a unique sense of community gathered around a place of strong local identity and heritage.
N21. Reducing carbon emissions and managing energy, water and waste efficiently	- The proposed development is an adaptive reuse project which seeks to retain the building's foundations and concrete slab structure. This contributes directly to the reduction of carbon emissions, improving the efficient management of energy, water and waste by avoiding significant embodied carbon associated with demolition of existing structures and new construction; and - Adaptive reuse additionally enables the integration of contemporary energy and water-efficient systems to support lower operational energy use and efficient water management over the building's ongoing lifecycle. In all, this approach promotes a more resource-efficient development outcome by improving sustainability outcomes associated with urban renewal projects.

Q4. Is the Planning Proposal consistent with a council LSPS that has been endorsed by the Planning Secretary or GCC, or another endorsed local strategy or strategic plan?

[North Sydney Local Strategic Planning Statement \(2020\)](#)

The North Sydney Local Strategic Planning statement (LSPS) sets out Council's 20-year land use vision, planning principles, priorities and actions until 2040. Endorsed in March 2020, the LSPS outlines the desired future direction for housing, employment, transport, recreation, environment and infrastructure for the North Sydney LGA. The key planning priorities relevant to the proposal are set out in **Table 6** below.

Table 6 *Consistency with LSPS*

Planning Priority	Consistency of the Proposal with the Planning Priority
Infrastructure and Collaboration	
I1. Provide infrastructure and assets that support growth and change	- The LSPS recognises that the anticipated population growth in the LGA must be accompanied by adequate provision of public infrastructure, such as parks, stormwater drains, footpaths and general maintenance of existing assets and infrastructure. The proposed development will deliver, at the developers cost, improvements to the public domain and existing plaza in a critical and prominent location around North Sydney Train Station; and - Through upgrading the building's interface with the ground floor, the proposal delivers long-term infrastructure benefits to the site at no cost to Council. These include improvements to pedestrian, cyclist and public transport user safety and amenity.
Liveability	
L1 – Diverse housing options that meet the needs of the North Sydney community	- Residential density in North Sydney has historically comprised units, townhouses, semi-detached dwellings and terraces. In line with anticipated population growth, an additional 11,450 dwellings are identified as being required in North Sydney. This growth must be supported by delivering a diversity of housing, both in line and in addition to existing common typologies; - A shortfall of 7,800 studio and one-bedroom dwellings have been identified in the LGA. Through delivering both standard units and co-living dwellings, the proposal assists in addressing the demand for small dwellings, including those for single or older-person households; and - Affordable housing is also a focus on the LSPS. The proposal addresses affordability through the delivery of 86 affordable co-living dwellings in perpetuity.

Planning Priority	Consistency of the Proposal with the Planning Priority
L2 – Provide a range of community facilities and services to support a healthy, creative, diverse and socially connected North Sydney community	- Enhancing public open space and increasing access of these is a key objective of the LSPS. The proposal achieves this by providing upgrades to the public plaza and a through-site link which will comprise an additional access to the plaza, thereby improving the relationship of the site with the public domain. This enables optimisation of existing assets and public domain improvements at no cost to Council; - The upgraded public plaza will have the capacity to act as a short-term exhibition space, providing spaces with the flexibility to be used for community and cultural activities as suitable; and - The proposed development will be shaped by design that celebrates connection with Country. This will be particularly evident in areas of the proposal with a public facing element, thereby facilitating cultural expression and experiences for both future residents of the site and members of the public.
L3 – Create great places that recognise and preserve North Sydney's distinct local character and heritage	- The LSPS recognises placemaking as the embodiment of practices that develops public spaces which build upon an area's unique history, built form and natural features to create a sense of place that reflect shared community values and culture; - The site, and the public views of the Sydney Harbour available from the site, have long been recognised as comprising an iconic element of North Sydney. Through enhancements to the area from which this view is accessed, the proposal directly delivers on this planning priority through '[improving] public domain via high quality new and embellished public spaces that prioritise pedestrians'. This element of the proposal also supports the residential amenity of surrounding residents, as well as future residents of the site; and - Given the site's proximity to North Sydney Train Station, the proposal will also enhance the use of the site as a community facility.
Productivity	
P6 – Support walkable centres and a connected, vibrant and sustainable North Sydney	- A 30-minute city is identified in the LSPS as 'where people have access to jobs, services and public transport close to where they live'. This requires both density and a diversity of land uses around centres. For North Sydney specifically, this vision is centred around opportunities for walking, cycling and public transport; - The proposal, as urban infill development, represents optimisation of existing built form within North Sydney to deliver residential land uses in addition to the prevailing commercial land around the site. This is necessary so that 'people' can live close to their jobs and/or live close to public transport that is centrally located within the Sydney CBD to access their jobs elsewhere in the city; and - The site's location above North Sydney Train Station also supports reliance on public transport. The provision of through-site links through the public plaza which is in a key location around the North Sydney centre also improves pedestrian amenity. As such, the proposal supports walking, cycling and public transport use to reduce traffic congestion and demand for parking to enhance the amenity and vibrancy of the North Sydney centre.
Sustainability	
S2 – Provide a high quality, well-connected and integrated urban greenspace system	- Although the site is heavily developed, having regard to its centrally-located nature in the North Sydney centre, the proposal will nevertheless contribute to the greening of the site through increased landscaping and canopy cover; and - Through incorporating high quality Water Sensitive Urban Design, the proposal will also improve the health of waterways by reducing runoff in a highly urbanised area.
S2 – Provide a high quality, well-connected and integrated urban greenspace system	The LGA's open space network is comprised of sites which provide 'excellent viewing points of Sydney Harbour'. These visual connections are identified as 'crucial to North Sydney's sense of place and the cultural experience of living and working in North Sydney'. The protection and preservation of these spaces has comprised a core element of the proposed development, the in-fill nature of which both supplements ongoing viability and adaptive reuse of the site including the public plaza.
S3 – Reduce greenhouse gas emissions, energy, water and waste	- The proposed development delivers significant benefits for sustainability outcomes in the North Sydney LGA in three primary ways: - Recognising that embodied emissions from development contribute significantly to overall carbon emissions, the proposal is, uniquely, an adaptive reuse project. Through the retaining of structural elements on the site, the proposal conserves a significant amount of energy and

Planning Priority	Consistency of the Proposal with the Planning Priority
	materials invested in the building and avoids substantial emissions generated through demolition and re-construction; - The existing development on the site is an ageing and increasingly dilapidated building, with limited energy efficient systems. Through upgrades to the built form, the proposal will enable the incorporation of highly energy-efficient measures through fitouts, building design and use of efficient appliances; and - Given the site's key location in a transport node, the proposal will increase access and reliance on public transport, thereby contributing to decreased emissions from private transport methods in the long-term.

North Sydney Local Housing Strategy (2019)

The North Sydney Local Housing Strategy (NSLHS) details the approach to delivering housing in the North Sydney LGA to 2036. It is informed by Regional and District Plan directions, objectives and actioned for housing in metropolitan Sydney, and aligns with local needs and context for the location and typology of new housing.

The NSLHS identifies that the North Sydney LGA has to accommodate an additional 11,450 dwellings by 2036. Planning objectives to aid in this delivery are identified in **Table 7**.

Table 7 Consistency with Local Housing Strategy

Planning Objective	Consistency of the Proposal with the Planning Objective
<i>O1: Achieve the directions, objectives and actions identified in A Metropolis of Three Cities (GSC, 2018) and the North District Plan (GSC, 2018).</i>	• The proposal delivers housing in a strategic, station-adjacent location within the North Sydney centre, consistent with district-level directions that focus growth in accessible centres close to jobs, services and public transport. It supports the North District Plan objectives for compact, well-located housing that strengthens centres while enhancing liveability and amenity.
<i>O2: Delivery of 0-5 and 6-10 year housing supply targets and identify capacity to contribute to the District's 20-year strategic housing target.</i>	• The proposal contributes directly to short- and medium-term housing supply by delivering new dwellings on an underutilised site within an established centre. By enabling redevelopment in a highly accessible location, the proposal assists Council in meeting identified 0-5 and 6-10 year housing targets and contributes to longer-term District housing capacity.
<i>O3: Inform housing diversity and affordability issues in North Sydney.</i>	• The proposal delivers a diversified housing mix, including market housing and co-living accommodation, broadening housing choice for different household types such as essential workers, students and smaller households. This approach responds to identified affordability and diversity challenges within North Sydney's constrained housing market.
<i>O4: Identify the right locations for mandated housing growth, including an understanding of areas that are unsuitable for significant change in the short to medium term and support the role of centres.</i>	• The site's location directly above North Sydney Station within the established centre makes it an appropriate and strategically preferred location for additional housing. The proposal reinforces the centre's role as a focus for growth, while avoiding residential intensification in lower-scale or environmentally constrained neighbourhoods.
<i>O5: Coordinate growth with the planning and delivery of local and State infrastructure and planned precincts.</i>	• The proposal is inherently coordinated with existing State infrastructure, including North Sydney Station, and benefits from established transport, services and utilities capacity. Public domain upgrades and improved pedestrian connectivity further integrate housing growth with surrounding infrastructure and the wider station precinct.
<i>O6: Manage residential development growth to ensure that ad hoc Planning Proposals are rejected if not in line with Council's strategic framework to manage growth.</i>	• The proposal is consistent with Council's strategic framework by delivering housing in a planned, centre-based location rather than through ad hoc or dispersed residential development. Its scale, location and housing mix align with the intent of the Local Housing Strategy to proactively manage growth in appropriate areas.

North Sydney CBD – Public Domain Strategy (2020)

The North Sydney CBD Public Domain Strategy establishes a vision for a pedestrian-focused, connected and high-quality public domain that supports North Sydney's growth as a major transport-oriented centre while enhancing amenity, legibility and civic identity. The Blue Street Sky Terrace (Blue Street Plaza) is specifically noted in the Strategy as a future public domain project to be undertaken by the landowner. Accordingly, the proposal responds cohesively to the Strategy, as outlined below in **Table 8**.

Table 8 Consistency with North Sydney CBD Public Domain Strategy

Public Domain Goal	Consistency of the Proposal with the Public Domain Goal
<i>A better-connected CBD</i>	The proposal improves pedestrian legibility and permeability through enhanced ground-level interfaces, clearer access to and through the plaza, and stronger integration with surrounding pedestrian routes connected to the station and broader CBD network.
<i>A comfortable CBD</i>	The proposal improves the usability and quality of Blue Street Plaza as a comfortable, universally accessible public space suitable for everyday social interaction, informal gathering and passive recreation.
<i>A green and leafy CBD</i>	The proposal's public domain upgrades contribute additional landscaping and improved treatment of the plaza environment, supporting the Strategy's objective to improve urban greening outcomes and microclimatic comfort.
<i>An accessible CBD</i>	- The proposed improvements at Blue Street Plaza include DDA-compliance upgrades; and - Improved ground-level interfaces, clear access to and through the plaza, and stronger integration with surrounding pedestrian routes enhance permeability and ease of movement for all users.

Q5. Is the planning proposal consistent with any other applicable State and regional studies or strategies?

NSW Housing Strategy 2041: Housing 2041 (2023)

The NSW Housing Strategy supports the provision of new housing stock in NSW. Within the Strategy, in-fill housing is identified as a housing typology to support the diversity and affordability of the rental market. This proposal will deliver 148 well located residential dwellings, including 62 market residential and 86 co-living affordable dwellings, that help to meet the four NSW housing system pillars of supply, diversity, affordability and resilience. The location and amenities offered by the proposal will support the health of both environment and community.

National Housing Accord (2022)

The Federal Government announced the National Housing Accord in October 2022, which committed to delivering 1.2 million houses in well-located areas in 5 years starting from July 2024. The Housing Accord lays the groundwork to improving affordability by addressing Australia's housing supply challenges and enabling the delivery of more social and affordable housing. The Housing Accord includes:

- An initial, aspirational national target of delivering a total of one million new, well-located homes over 5 years from 2024; and
- Immediate and longer-term actions for all parties to support the delivery of more affordable homes.

The proposed development is aligned with the National Housing Accord as it seeks to deliver additional in-fill affordable housing dwellings (a total of 86 co-living affordable dwellings) in a well-serviced location within the next 5 years. As a HDA application, the proposal will quickly facilitate housing development with the intent to commence building within one year of the proposal's achievement of development consent.

NSW Housing Targets (2024)

In June 2024, the NSW Government released 5-year housing completion targets for 43 councils across Greater Sydney, Illawarra-Shoalhaven, Central Coast, Lower Hunter and Greater Newcastle and one target for regional NSW.

These targets replace outdated targets reflect NSW's commitment to deliver 377,000 new homes across the state by 2029 under the National Housing Accord. A target of 5,900 new dwellings by June 2029 has been identified for the North Sydney LGA, the achievement of which will be assisted by the proposed development.

Future Transport Strategy 2056 (2022)

The Future Transport Strategy 2056 sets the vision and direction for NSW transport investment by providing a comprehensive plan that “connects customers’ whole lives”, creates “successful places for communities” and “[enables] economic activity”. The Strategy emphasises the creation of connected 30-minute cities and convenient 15-minute neighbourhoods and includes a movement and place framework to ensure that transport supports the increased accessibility and reduced travel time for residents whilst enhancing the character of the places and communities. Key guiding principles for future transport that are relevant to the site include:

- **Connecting customers’ whole lives:** The proposal will enhance the liveability, amenity and economic success of the local community by providing a high level of amenity in the local area, and providing access to the broader integrated public transport network;
- **Successful places for communities:** Through high quality environmental design, the proposal will support the shift towards transport-oriented development and present opportunities to improve the environmental performance of the proposed development to the site; and
- **Enabling economic activity:** The proposal will deliver opportunities for retail land uses adjacent to public transport. This will support deliver strong amenity for both future residents of the site and visitors to the site and generate economic benefits, including employment opportunities.

The proposal will create a high quality and high density mixed-use environment with exceptional amenity and access to services. The proposed development will reinforce the creation of the 30-minute city and 15-minute neighbourhood as described in the Future Transport Strategy.

Active Transport Strategy (2022)

The Active Transport Strategy supports the NSW Government’s Future Transport Strategy 2056 by providing a framework that supports additional walking, bike riding and personal mobility. The Strategy’s vision is to double the number of walking and bike riding trips in NSW in 20 years, from 1.5 billion trips to 3 billion. It is recognised that active transport will help meet the needs of NSW’s growing population and establish social and environmental frameworks necessary to improve liveability and quality of life outcomes in the long term. The key focus areas that are applicable to the site include:

- **Enable 15-minute neighbourhoods:** Creating walkable and connected 15-minute neighbourhoods across all six cities and regional centres involves the delivery of neighbourhoods which have well-designed roads and pathways with safe speeds, canopy cover and shade, quality public spaces and activated high streets;
- **Provide safer and better precincts and main streets:** The proposal will improve the design of roads, streets and precincts to encourage walking and bike riding for people of all abilities. This will be enabled by fair allocation of road space to create safe streets and intersections which prioritise walking and cycling. The delivery of an enhanced public plaza which will incorporate principles of Crime Prevention Through Environmental Design (CPTED) will also improve perceptions of safety, accessibility for people with limited mobility and enhancements to liveability both within the proposal and for the broader site locality; and
- **Promote walking and riding and encourage behaviour change:** The proposal involves the delivery of facilities which support making walking and cycling the first choice for short trips through, for example, the inclusion of bike racks and end-of-trip facilities. Given the site’s proximity to public transport, the proposal will therefore contribute to a shift in active travel behaviour change supported by sustainable patterns across the precinct.

Overall, the proposal will provide for increased pedestrian and active transport connectivity through improving the relationship of the public domain with North Sydney Railway Station. Design elements will improve the walking and cycling user experience, connecting opportunities for active transport to the public transport network.

State Infrastructure Strategy 2022-2042

The State Infrastructure Strategy 2022-2042 sets out Infrastructure NSW’s vision to deliver infrastructure growth throughout the State over the next 20 years, focusing on aligning investment with sustainable growth. The Strategy sets out 9 long-term objectives underpinning the Strategy, including the following that are relevant to the site:

- **Service growing communities:** Fund and deliver enabling infrastructure to support approved or pending housing supply and a prioritised active transport infrastructure program to support liveability and 15-minute neighbourhoods, including a connected metropolitan cycling network for Greater Sydney and major residential centres. The proposal

directly delivers on the objective to provide ‘additional homes in convenient locations’, enabling ‘well-planned and high amenity neighbourhoods’; and

- **Integrate infrastructure and land use service planning:** Coordinate infrastructure, land use and service planning to meet future housing, employment, industry and community needs. It is recognised that the state should leverage ‘spare capacity created in existing and planned infrastructure, such as in major transport corridors’. The proposal represents renewal of the site to provide that realises the site’s potential for a higher and better use.

The proposal will leverage existing transport infrastructure to integrate a high-density land use with integrated transport systems. This results in place-based planning which enables Sydney to meet existing and future community needs.

Better Placed (2017)

Introduced in 2017, Better Placed is the Government Architect of NSW’s (GANSW) integrated baseline policy for ‘good design’. ‘Good design’ encapsulates aspirations for useable, user-friendly, enjoyable and attractive places and spaces, which contributes value and benefits to people, the place and the natural environment in the long term. Seven objectives have been prepared to define key considerations in the design of the built environment. **Table 9** demonstrates the proposal’s consistency with the design objectives of the policy.

Table 9 Consistency with Better Placed

Objective	Consistency of the Proposal with the Objectives
<i>Objective 1: Better fit</i>	Contextual / local: The proposal’s commitment to good design has devised the optimal urban design arrangement for local use, including through considerations of materiality, built form massing and bulk and scale. Collectively, these considerations strengthen the relationship of the upgraded public plaza with the future use of the site, enabling the site to function as an anchor for the wider precinct. Of its Place: The proposed development presents a place-based outcome which responds to the site’s public transport accessibility and public offering. Through delivering enhancements to the site’s public plaza and ground floor domain, the proposal enhances spaces for social connectivity and improves the relationship of the site to local character and surrounding heritage. Collectively, these contribute to the evolving character of the site as a core component of a highly urbanised CBD.
<i>Objective 2: Better performance</i>	Sustainable: The proposal will deliver a high standard of sustainability and ecologically sustainable development (ESD) across both residential and non-residential components. By virtue of the site’s location and quality of existing built form, the proposal adopts unique opportunities to promote ESD initiatives including: • Enabling improved access to active transport; • Incorporating sustainability into a functional, whole of life design; and • Conservation of embodied emissions as the proposal is an adaptive reuse project. Adaptable and durable: Having regard to the site opportunities, conditions and constraints, the proposal has been designed to deliver the highest performance standards for living and working, and for resilience to increasing natural hazards. The proposed development will seek to provide for the needs of future residents and patrons of the site for decades to come.
<i>Objective 3: Better for community</i>	Inclusive and diverse: The proposal encourages social diversity within the city through the provision of affordable co-living dwellings, providing a range of dwelling typologies. This mix supports a diverse community, enabling residents from varying socio-economic backgrounds to have equitable access to the employment, services and opportunities offered by the site. Connected: The design of the built environment, which includes a publicly accessible plaza with magnificent views of the Sydney Harbour, addresses growing economic and social disparity and inequity by retaining public access to highly significant views. The proposed upgrades seek to create inclusive, welcoming and equitable environments to support engaging places and resilient communities.
<i>Objective 4: Better for people</i>	Safe: CPTED considerations have informed the proposed design, with clear sight lines and legible links throughout the site. Pedestrians, cyclists and vehicular relationships within and around the site have all been accommodated within the public realm with safety and amenity in mind.

Objective	Consistency of the Proposal with the Objectives
	Comfortable: The public plaza and retail areas will encourage people to stay and interact with the area, fostering a sense of community. Liveable: The urban design principles for the site will enhance public spaces and social connectivity of residents, workers and visitors – with a strong focus on active and public transport.
Objective 5: Better working	Functional: Pedestrian and vehicular access points to the site are well defined and convenient. The proposed public spaces will deliver improved public utility and improved site connectivity when compared to existing conditions. The existing design of the public plaza, which has worked well as a public space, will be retained. The relationship of the existing built form with the ground floor public domain will be improved through minor adjustments to building access, landscaping and materiality. Efficient and fit for purpose: The layout for the proposal is efficient in its arrangement, particularly in improving connectivity and permeability within and around the site.
Objective 6: Better value	Creating value: The provision of a new retail land uses is co-located with significant housing delivery and the upgraded public domain. This will increase the site's service offering and contribute to shared value for the local community. Adding value: The proposal delivers well-located adaptive reuse development which provides exceptional access to public transport, infrastructure, employment and amenity. This will deliver ongoing value for people and communities. The sustainability element of the proposed development will also improve environmental outcomes, minimising ongoing operational costs of the site over time, and raising the standard and quality of life for users in the long-term.
Objective 7: Better look and feel	Engaging and inviting: The proposal incorporates and improved public domain and will also deliver communal residential amenities which provide additional opportunities for gathering and respite for future residents. Attractive: The proposal will exhibit design excellence through a high standard of architectural design, materiality and detailing appropriate to its urban context. This enhances the public domain via activated street frontages, integrated landscaping and improved pedestrian experience of the site and permeability. Collectively, these upgrades will increase the aesthetic quality of the site, contribute to positive engagement and further encourage communities to use and enjoy the site's public offering.

Greener Places (2020)

Greener Places is a Green Infrastructure policy released by GANSW in October 2020. The policy seeks to create a healthier, more liveable and sustainable urban environment by improving community access to recreation and exercise, supporting walking and cycling connections, and improving the resilience of urban areas. Greener Places is structured around four key principles. The proposal's consistency with the principles of the policy is set out in **Table 10** below.

Table 10 Consistency with Greener Places

Principle	Consistency of the Proposal with the Principles
Principle 1: Integration	Through landscaping and implementation of sustainable urban design principles, the proposal will upgrade the existing grey infrastructure with high-quality, green infrastructure that enhances the experience of the public plaza on the site. Integration of increased green infrastructure with the existing grey infrastructure will improve the quality of life for future residents and users of the site. As the site contains a public space with strong visual connections to the Sydney Harbour, the proposed development therefore contributes to visual linkages of green and public spaces. The proximity of the site to the North Sydney Train Station will indirectly deliver physical and functional synergies between iconic public views and transport infrastructure.
Principle 2: Connectivity	The existing public plaza represents an informal place for people to visit, interact and gather, generating social capital. The proposed through-site link, which will intersect through the public plaza, will improve local connectivity. This will anchor sustainable development whilst maximising local walkability, health and wellbeing, and access to North Sydney Train Station.
Principle 3: Multifunctionality	Through adaptive reuse urban renewal, the proposal will deliver a multifunctional landscape that offers ecological, socio-cultural and economic benefits to the locality. The variety of land uses which comprise the proposed development additionally contribute to the site's anticipated

Principle	Consistency of the Proposal with the Principles
	multifunctionality. Through considered design, the site will act as a canvas for the incorporation of public art and connection with Country.
<i>Principle 4: Participation</i>	The proposed design layout has been carefully selected as a result of consultation with members of the public. The proposal is therefore able to facilitate access for all members of the community, representing a significant improvement over existing conditions. In addition, through offering a range of housing typologies, the proposed development will increase social diversity of residents and users of the site.

Connecting with Country Framework (2023)

Connecting with Country is a framework prepared by the Government Architect in 2023 to support the development of connections with Country through informing the planning, design and delivery of built-environment projects in NSW. A Connecting with Country framework has been prepared by JMP and is embedded within the Architectural Design Report prepared by fjcstudio and included at **Appendix F** to the EIS.

Recognising that 'Country' encompasses everything – the living and non-living elements of the landscape, people, animals, plans and stories that connect them, the proposal incorporates Country-centred design elements that, in accordance with the framework:

- Provide physical and visual connections to external spaces that respond to cultural landscapes and understanding of Country;
- Retains existing ground contours and minimises excavation to reduce alteration of existing topography;
- Creates public spaces so the community as a whole can come together;
- Where possible, provide multiple ways to approach a building so that individuals or groups have options for how they would prefer to enter the site;
- Select materials for projects that have a low impact on Country, are renewable, and where possible, locally sourced;
- Adopts materiality, textures and colours that are inspired by the history of the site's Country; and
- Collectively, the built form seeks to nurture cultural awareness through detailed design that combines experiences of sensing Country, being on Country and communing with Country.

NSW Net Zero Plan – Stage 1: 2020-2030

The development will incorporate high-performance building design, meet BASIX and NABERS benchmarks, and promote energy efficiency through embedded infrastructure and sustainability initiatives, contributing to reduced operational emissions.

As an adaptive reuse urban renewal project, the proposal delivers unique opportunities to efficiently deliver housing which incorporates the following net zero priorities:

- Drives update of proven emission reduction technologies:
 - The proposed development directly contributes to this priority through incorporation of modern, energy-efficient fitouts on a site which contains an ageing built form and inefficient technologies; and
 - This will enable future residents and businesses operating on the site to transition to low emission systems and to use energy from renewable sources.
- Empowers consumers and businesses to make sustainable choices:
 - Given the site's proximity to public transport options, the proposed development will empower future consumers and businesses on the site to leverage foot traffic from active and public transport options; and
 - Fitouts for the proposed development will allow consumers to use technologies with the best efficiency performance.
- Invest in the next wave of emissions reduction innovation:
 - Adaptive reuse projects represent an innovative and highly sustainable method to efficiently deliver land uses that align with evolving needs.

Q6. Is the Planning Proposal consistent with applicable State Environment Planning Policies?

State Environmental Planning Policies (SEPPs) directly applicable to the Planning Proposal are identified in **Table 11**.

Table 11 Consistency with State Environmental Planning Policies

State Environmental Planning Policy	Consistent			Assessment
	Yes	No	N/A	
State Environmental Planning Policy (Biodiversity and Conservation) 2021			✓	Not applicable. A Biodiversity Development Assessment Report Waiver Request has been submitted and is included at Appendix Q to the EIS.
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008			✓	Not relevant to the concurrent rezoning. However, it may apply to the future development of the site.
State Environmental Planning Policy (Housing) 2021	✓			The proposal has been designed to meet the relevant requirements of this SEPP, including Chapter 3 Part 4 'Co-living housing' and Chapter 4 'Design of residential apartment development'. Detailed consideration of key principles have been undertaken such as apartment size, layout, typology, solar access, natural cross ventilation, communal open space and the like, which is suitable for this stage of the Planning Proposal.
State Environmental Planning Policy (Industry and Employment) 2021			✓	Not relevant to the concurrent rezoning. However, future DAs where signage is proposed will be assessed under Chapter 3 of the SEPP.
State Environmental Planning Policy (Planning Systems) 2021			✓	Not relevant to the proposed LEP amendments. The proposal has been declared SSD under a Ministerial Order.
State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021			✓	Not applicable.
State Environmental Planning Policy (Precincts—Regional) 2021			✓	Not applicable.
State Environmental Planning Policy (Precincts—Western Parkland City) 2021			✓	Not applicable.
State Environmental Planning Policy (Primary Production) 2021			✓	Not applicable.
State Environmental Planning Policy (Resilience and Hazards) 2021			✓	Not relevant to the concurrent rezoning. Notwithstanding, investigations into contamination and remediation for the site have been undertaken in the Preliminary Site Investigation prepared by Douglas Partners and included at Appendix R to the EIS.
State Environmental Planning Policy (Resources and Energy) 2021			✓	Not applicable.
State Environmental Planning Policy (Sustainable Buildings) 2022			✓	Not relevant to the concurrent rezoning. An assessment of the proposed development's consistency with the relevant provisions of this SEPP is provided in the Ecologically Sustainable Development Report prepared by SLR Consulting and included at Appendix O to the EIS.
State Environmental Planning Policy (Transport and Infrastructure) 2021			✓	Not relevant to the concurrent rezoning. Nevertheless, the proposal relates to 'residential accommodation' and 'commercial premises' located 'wholly or partly above a railway station'. The proposed rezoning will have regard to suitable

conditions. TfNSW will also be consulted with respect to the proposal.

Q7. Is the Planning Proposal consistent with the applicable Ministerial Directions (Section 9.1 Directions) or key government priority?

The Planning Proposal's consistency with applicable Section 9.1 Directions is assessed in **Table 12**.

Table 12 Assessment of Section 9.1 Directions

Ministerial Direction	Consistent			Assessment
	Yes	No	N/A	
Focus area 1: Planning Systems				
1.1 Implementation of Regional Plans	✓			The concurrent rezoning is consistent with the Regional and District Plans as discussed at Section 4.1.2 .
1.2 Development of Aboriginal Land Council land			✓	Not applicable.
1.3 Approval and Referral Requirements	✓			This direction aims to ensure that LEP provisions encourage the efficient and appropriate assessment of development. The relevant requirements of this direction have been considered in the preparation of this concurrent state-led rezoning.
1.4 Site Specific Provisions	✓			A particular development scenario is envisaged for the site. The proposed provisions will allow for the envisaged development to be carried out on the site.
1.4A Exclusion of Development Standards and Variation	✓			The concurrent rezoning does not propose to exclude any development standards from variation.
Focus area 1: Planning Systems – Place-based				
1.5 Parramatta Road Corridor Urban Transformation Strategy			✓	Not applicable.
1.6 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan			✓	Not applicable.
1.7 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan			✓	Not applicable.
1.8 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan			✓	Not applicable.
1.9 Implementation of Glenfield to Macarthur Urban Renewal Corridor			✓	Not applicable.
1.10 Implementation of Western Sydney Aerotropolis Plan			✓	Not applicable.
1.11 Implementation of Bayside West Precincts 2036 Plan			✓	Not applicable.
1.12 Implementation of Planning Principles for the Cooks Cove Precinct			✓	Not applicable.
1.13 Implementation of St Leonards and Crows Nest 2036 Plan			✓	Not applicable.
1.14 Implementation of Greater Macarthur 2040			✓	Not applicable.

1.15 Implementation of the Pyrmont Peninsula Place Strategy	✓	Not applicable.
1.16 North West Rail Link Corridor Strategy	✓	Not applicable.
1.17 Implementation of the Bays West Place Strategy	✓	Not applicable.
1.18 Implementation of the Macquarie Park Innovation Precinct	✓	Not applicable.
1.19 Implementation of the Westmead Place Strategy	✓	Not applicable.
1.20 Implementation of the Camellia-Rosehill Place Strategy	✓	Not applicable.
1.21 Implementation of South West Growth Area Structure Plan	✓	Not applicable.
1.22 Implementation of the Cherrybrook Station Place Strategy	✓	Not applicable.
Focus area 2: Design and Place		
Focus area 3: Biodiversity and Conservation		
3.1 Conservation Zones	✓	Not applicable.
3.2 Heritage Conservation	✓	The site does not comprise a heritage item, nor is the site located within a heritage conservation area. However, the site is located in close proximity to various heritage items and conservation items as identified in Section 2.5 to the EIS. The proposed SSDA considers the surrounding heritage items and does not propose works that will adversely impact the significance of the surrounding heritage items. Refer to the Heritage Impact Statement prepared by Curio Projects at Appendix S to the EIS.
3.3 Sydney Drinking Water Catchments	✓	Not applicable.
3.4 Application of C2 and C3 Zones and Environmental Overlays in Far North Coast LEPs	✓	Not applicable.
3.5 Recreation Vehicle Areas	✓	Not applicable.
3.6 Strategic Conservation Planning	✓	Not applicable.
3.7 Public Bushland	✓	Not applicable.
3.8 Willandra Lakes Region	✓	Not applicable.
3.9 Sydney Harbour Foreshores and Waterways Area	✓	Not applicable.
3.10 Water Catchment Protection	✓	Not applicable.
Focus area 4: Resilience and Hazards		
4.1 Flooding	✓	Not applicable.
4.2 Coastal Management	✓	Not applicable.
4.3 Planning for Bushfire Protection	✓	Not applicable.
4.4 Remediation of Contaminated Land	✓	The concurrent rezoning has considered the suitability of the site for the purposes of the proposal, refer to Section 4.2 and the Preliminary Site

Investigation prepared by Douglas Partners at Appendix R to the EIS.		
4.5 Acid Sulfate Soils	✓	Acid Sulfate Soil Risk Mapping indicates that the site is not mapped in an area of known acid sulfate soil risk. Refer to the Geotechnical Assessment at Appendix U to the EIS for further detail.
4.6 Mine Subsidence and Unstable Land	✓	Not applicable.
Focus area 5: Transport and Infrastructure		
5.1 Integrating Land Use and Transport	✓	The proposed development is consistent with the guidelines identified within this Direction in that it will • Improve access to housing by walking, cycling and public transport; • Reduce dependence on cars; • By virtue of the site's location relative to public transport, reduce dependence on cars and reduce travel demand including the number of trips generated by development and distances travelled especially by car; • Provide housing proximate to numerous high capacity transport links; and • Deliver improved pedestrian amenity by enabling new through site links, thereby supporting opportunities for walking, cycling and public transport.
5.2 Reserving Land for Public Purposes	✓	Not applicable. No land is proposed to be acquired by the relevant authorities.
5.3 Development Near Regulated Airports and Defence Airfields	✓	Not applicable. The maximum height of the proposed development does not exceed the Obstacle Limitation Surface (OLS) for Sydney Airport.
5.4 Shooting Ranges	✓	Not applicable.
5.5 High Pressure Dangerous Goods Pipelines	✓	Not applicable.
Focus area 6: Housing		
6.1 Residential Zones	✓	The proposal is consistent with this Direction as it broadens housing choice by delivering a diversity of typologies, making efficient use of existing infrastructure in an established centre and concentrating growth within the existing urban footprint.
6.2 Caravan Parks and Manufactured Home Estates	✓	Not applicable.
Focus area 7: Industry and Employment		
7.1 Employment Zones	✓	The site is located within the E3 Productivity Support zone. Although the proposal reduces the total floor space area for employment uses, the proposal may be inconsistent with the terms of this Direction for the following reasons: • The proposal has been declared SSD with a concurrent rezoning under a Ministerial Order which identifies the land comprising the site specifically; and

		The proposal aligns with the Region Plan and District Plan as detailed in Section 4.1.2.
7.2 Reduction in non-hosted short-term rental accommodation period	✓	Not applicable.
7.3 Commercial and Retail Development along the Pacific Highway, North Coast	✓	Not applicable.
Focus area 8: Resources and Energy		
8.1 Mining, Petroleum Production and Extractive Industries	✓	Not applicable.
Focus area 9: Primary Production		
9.1 Rural Zones	✓	Not applicable.
9.2 Rural Lands	✓	Not applicable.
9.3 Oyster Aquaculture	✓	Not applicable.
9.4 Farmland of State and Regional Significance on the NSW Far North Coast	✓	Not applicable.

4.2 Site-Specific Merit

This section details the environmental impacts of the proposed rezoning. It demonstrates how the proposed development facilitated by the rezoning results in acceptable environmental impacts and is in the public interest, given the context of the site.

4.2.1 Section C – Environmental, Social and Economic Impact

Q8. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

The site contains existing development and is located in a highly urbanised location. The proposed development will not result in any impact on critical habitat or threatened species, populations or ecological communities or their habitats as confirmed by the Biodiversity Development Assessment Report Waiver Request included at **Appendix Q** to the EIS.

No approvals are required to facilitate the proposed development under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) and *Biodiversity Conservation Act 2016*.

Q9. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

A detailed assessment of the environmental effects as a result of this proposal is identified in **Section 7.0** to the EIS and includes:

- A comprehensive suite of technical assessments to assess traffic, noise, contamination, waste, wind, overshadowing, stormwater, and other key impacts;
- Technical assessments to confirm that all impacts are manageable and can be addressed through design responses and identified mitigation strategies;
- Technical assessments to demonstrate that the proposed built form is appropriately scaled and sited, consistent with strategic planning intent; and
- Supporting studies to confirm that amenity, traffic, acoustic, and servicing impacts will remain within acceptable thresholds.

Relevant management measures are identified where appropriate. On the basis of the above, no unacceptable impacts are likely to result from this rezoning request or future development on the site.

Q10. Has the planning proposal adequately addressed any social and economic effects?

The concurrent rezoning will contribute to a number of positive social and economic effects, including:

- Enabling the SSDA to facilitate a high-quality, mixed-use development that supports housing diversity, employment, and public benefit;
- Delivery of 148 residential dwellings, including 86 co-living affordable housing to be managed by a CHP in perpetuity. This will significantly contribute to social inclusion and housing accessibility within the site's locality into the long term;
- 410m² of non-residential GFA will support retail land uses;
- The project is estimated to directly support employment of 130 job-years during construction, and 15 FTE operational jobs to support local economic growth;
- Significant upgrades to the existing public plaza located on the site and improvements to the relationship of the site with the public domain to improve public access, amenity and pedestrian connectivity in a central location around North Sydney Train Station;
- The proposal contributes positively to the identity and function of the North Sydney locality.

The economic and social impacts arising from concurrent rezoning have been fully identified and addressed by specialised reports which are discussed at **Section 7.0** to the EIS.

4.2.2 Section D – Infrastructure (Local, State and Commonwealth)

Q11. Is there adequate public infrastructure for the planning proposal?

The site is located in a fully serviced urban environment with strong access to public transport, being located directly above North Sydney Train Station and in close proximity to surrounding major bus routes.

Servicing and infrastructure reports confirm that existing utilities can accommodate the proposed development with suitable augmentation. Traffic and access studies support the proposed parking, loading and circulation arrangements as consistent with local road capacity and design standards. Where upgrades of existing infrastructure are necessary, the proposal will deliver these upgrades.

4.2.3 Section E – State and Commonwealth Interests

Q12. What are the views of state and federal public authorities and government agencies consulted in order to inform the Gateway determination?

Redevelopment of the site has been the subject of significant consultation to date, including with state government agencies. As part of this application, a Community Engagement Report has been prepared by Polymer at **Appendix T** to the EIS, which provides further detail on engagement with community. Specifically,

- The concurrent rezoning and detailed development has been the subject of extensive agency consultation, particularly with TfNSW in relation to North Sydney Train Station located beneath the site;
- The HDA assessed and recommended the project be declared SSD; the Minister subsequently issued the formal *State Significant Declaration Order (No 4) 2025* on 3 April 2025; and
- No significant issues have been raised by State agencies to date.

Where necessary, further consultation with relevant authorities will be undertaken as required in during exhibition and response to submissions phase. State and Commonwealth authorities will have the opportunity to provide comment on this application throughout its formal exhibition process.

5.0 Environmental Assessment

This section provides an assessment of environmental impacts arising from an intensification of residential land use on the site. A detailed assessment relating to all environmental impacts arising from the proposed development is provided within **Section 7.0** of the EIS.

Table 13 *Assessment of Environmental Impacts*

Matter	Summary of Assessment	Section within EIS
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. Massing, Bulk and Scale 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. 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. 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. Active retail frontages are provided along the edges of the plaza, ensuring continuous passive surveillance and contributing to an engaging public domain. 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. Building Setbacks Given the preservation of the existing building structure, the setbacks for the proposed development remain largely consistent with the existing built form. 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. 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 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. This delivers a balance between maximising views for future dwellings on the site and preserving the character of the site.	Section 7.1

Land Use / Economic Impact	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. 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. 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. Residential Impact 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. 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.	Section 7.2 Section 7.13
Overshadowing	Overshadowing modelling was undertaken at hourly intervals between 9am and 3pm on the winter solstice for the existing development, maximum permissible building envelope and proposed development scenarios. 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. 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. Additionally, the proposed development will not introduce any additional overshadowing to public open spaces at Clark Park and Lavender Bay Parklands.	Section 7.3
View and Visual Impact	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. While the proposal introduces a change to built form within a number of private view corridors, 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. 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. 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	Section 7.4

	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.	
Residential Amenity	The proposal strips the building back to its basements, essential services (substation and associated plant spaces) the central core's load-bearing walls, primary columns and slabs. It retains a 3.33m floor to floor height, compatible with the 2.7m clear habitable space requirement within the ADG. Existing slab depths are suitable for contemporary residential acoustic and fire separation, and the perimeter columns and central core allow flexible, column-free apartment planning. No current ADG separation challenges are presented by neighbouring developments. Apartments are organised around the central adaptive reuse core, giving all residents equitable access to natural light, ventilation and outlook. The plan geometry supports a balanced distribution across the floor plate, with careful orientation to maximise view amenity while maintaining privacy and solar protection in a CBD setting. Apartment sizes are calibrated to view amenity. The largest apartments face south and southeast, where the greatest plate depth to core naturally occurs. All dwellings offer generously sized bedrooms and wider living rooms suited to the premium market. The proposed mix reflects this positioning, with 50% of dwellings comprising three bedrooms.	Section 7.6
Traffic and Transport	Traffic Generation 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. 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. As the proposed development provides 73 spaces for the residential apartments, it is consistent with the relevant documents. In accordance with relevant bicycle parking requirements, 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.	Section 7.8
Social Impact	Social Impact The assessment of potential social impacts of the proposed development adopts a mixed methods approach by considering the site's physical and strategic context to apply both a quantitative and qualitative analysis. It was concluded that existing social infrastructure in areas including education, health care and community facilities are capable of absorbing the expected increase in demand associated with the proposed development. It is noted that 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. 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.	Section 7.13

6.0 Conclusion

The proposed development will significantly enhance the North Sydney locality. The proposed amendments to the North Sydney LEP 2013 and Housing SEPP will enable scale of development that aligns with the strategic vision set forth both locally and across the broader State. Specifically, the proposal will enable significant public benefit through revitalisation of an ageing and increasingly dilapidated site and public plaza with built form that no longer operates efficiently and sustainably. The character of the proposed development as an adaptive reuse project enabled by the concurrent rezoning will pioneer sustainability initiatives in the site's locality, both in the short and long-term.

The proposal will also contribute to the delivery of 148 residential dwellings, of which 86 co-living dwellings will be affordable in perpetuity. The proposal is therefore a direct response to the identified need for increased housing supply and affordability.

By directly addressing key planning priorities and objectives, the proposed amendments to the North Sydney LEP 2013 and Housing SEPP will strengthen the site's residential functions and enable public domain upgrades at no cost to Council. On balance, the proposed amendments to the North Sydney LEP 2013 will deliver meaningful contributions to housing supply and affordability, while enhancing the character of the site's locality and sustainability initiatives.