

19 January 2026

Paul Sartor
Department of Planning, Housing and Infrastructure
Locked Bag 5022,
Parramatta NSW 2124

Dear Paul,

275 Alfred Street, North Sydney SSD-86992219 - Public Exhibition Submission - Objection

This letter has been prepared by CASA, the owners of 45 McLaren Street, North Sydney, in response to the proposed shop-top housing development at 275 Alfred Street, which is currently on public exhibition until 20 January 2026.

The proposal seeks approval for the demolition of the existing 20-storey commercial building and the construction of a 39-storey tower, facilitated by a concurrent rezoning to MU1 Mixed Use and the introduction of site-specific height and FSR controls to enable the scale of development sought. The current planning framework applying to the site permits a maximum height of 13 metres and an FSR of 3.5:1. We acknowledge this is well below the current building on the site.

This submission provides a formal objection to State Significant Development Application (SSDA) SSD-86992219, on the basis that the proposed scale and intensity are incompatible with the established and desired future character of the area, are inconsistent with the North Sydney DCP and the North District Plan and would result in unacceptable impacts on the surrounding development, public domain and open space network. The reasons for the objection are detailed below:

1. Future Character of the Area

The site is currently occupied by a 20-storey commercial building, which is proposed to be demolished. While this building represents the upper extent of scale within the locality, the immediate surrounding area is predominantly characterised by low-density residential development and 3–4 storey commercial buildings. The proposal to replace the existing building with a 39-storey shop-top housing tower represents a near doubling of height and a substantial escalation in density that is wholly disproportionate to the surrounding context. This level of intensity is incompatible with the established and desired future character of the area and far exceeds that contemplated by the existing planning controls of 13 metres in height and a 3.5:1 FSR. This outcome is inconsistent with the North Sydney DCP's character objectives for the North Sydney planning area, which seek high-quality built form that responds to local scale, maintains human scale at street level, and protects amenity, daylight and sky views. The proposed development would introduce an over-scaled and isolated tower that is not supported by the existing or desired future character of the area and should not be supported.

The desired future character for North Sydney, as reflected in Council's strategic plans and the North District Plan, is for growth that is infrastructure-aligned, context-responsive and maintains a human-scaled public realm. While the District Plan allows for taller buildings in appropriate locations, this must occur through coordinated, place-based planning - not isolated site-specific uplifts. An increase from 3.5:1 to 16.45:1 represents an over-intensification that is not supported by demonstrated precinct planning. Rather than contributing to a planned skyline, the proposal would create an isolated, oversized tower out of proportion with development east of the Warringah Expressway. This outcome is inconsistent with both the existing and desired future character of North Sydney.

Accordingly, it is requested that the application not be supported unless amended to deliver a scale and intensity consistent with the surrounding context and strategic planning framework.

2. Overshadow Impacts

The overshadowing analysis submitted with the proposal acknowledges that the development will result in additional overshadowing of Little Alfred Park. Section 5.2 of the DCP states -

"New development should not overshadow existing or proposed public open spaces located outside of the North Sydney Centre between 11.30am and 2.30pm or any alternative specified timeframes for particular spaces identified in Part F of the DCP".

However, the shadow analysis contained within the Design Report is inconsistent and misleading. Figure 1 below (as extracted from page 42 of the Design Report) indicates that, under existing conditions, the majority of Little Alfred Park receives less than four hours of solar access. This outcome is not reflected in the shadow diagrams in Figure 2 below (as extracted from page 78 – 84 of submitted Design Report), which show the park as only partially overshadowed at 9.00am and 10.00am and fully overshadowed at 3.00pm by existing buildings. Based on Figure 2, the majority of the park in fact appears to receive approximately five hours of solar access under existing conditions, with only minor impacts at 9.00am and 10.00am. These inconsistencies call into question the accuracy and reliability of the submitted overshadowing analysis.

Notwithstanding these discrepancies, Figure 2 below clearly demonstrates that the proposed development would result in additional overshadowing of Little Alfred Park between approximately 11.00am and 1.00pm, with the majority of the park overshadowed at 12.00pm. Figure 1 below further identifies that, under the proposed scenario, 9% of the park would receive no solar access during the winter solstice. These impacts directly conflict with Section 5.2 of the DCP and highlight the excessive scale and bulk of the proposed development.

Whilst we acknowledge the State Governments mandate to increase housing supply in well located places, development must be of a reasonable nature. Increased density places significant demand on local infrastructure, include our local open spaces which are to be enjoyed by all. Retaining solar access to public open space is a key consideration and any development must demonstrate that it does not result in additional overshadowing during core periods of the day. The proposed overshadowing is in direct conflict with the need to protect open space for the broader enjoyment of the community. Overshadowing of open spaces to the degree proposed sets an undesirable precedent and will erode the quality of public open spaces.

Little Alfred Park is located approximately 1 kilometre, or a 13-minute walk, from our development at 45 McLaren Street and forms part of the wider open space network available to local residents. The additional loss of solar access to this park would therefore have a direct and adverse impact on the

amenity and usability of public open space relied upon by current and future residents in the area, including residents of our development. Accordingly, the proposal is inconsistent with the North Sydney DCP and demonstrates that the scale of development is not appropriate for its location, resulting in unacceptable overshadowing impacts.

We request that the proposal be amended to prevent further loss of solar access to Little Alfred Park, consistent with the DCP.

Figure 1 – Solar Access Assessment – little Alfred Part (as extracted from page 42 of the Design Report)

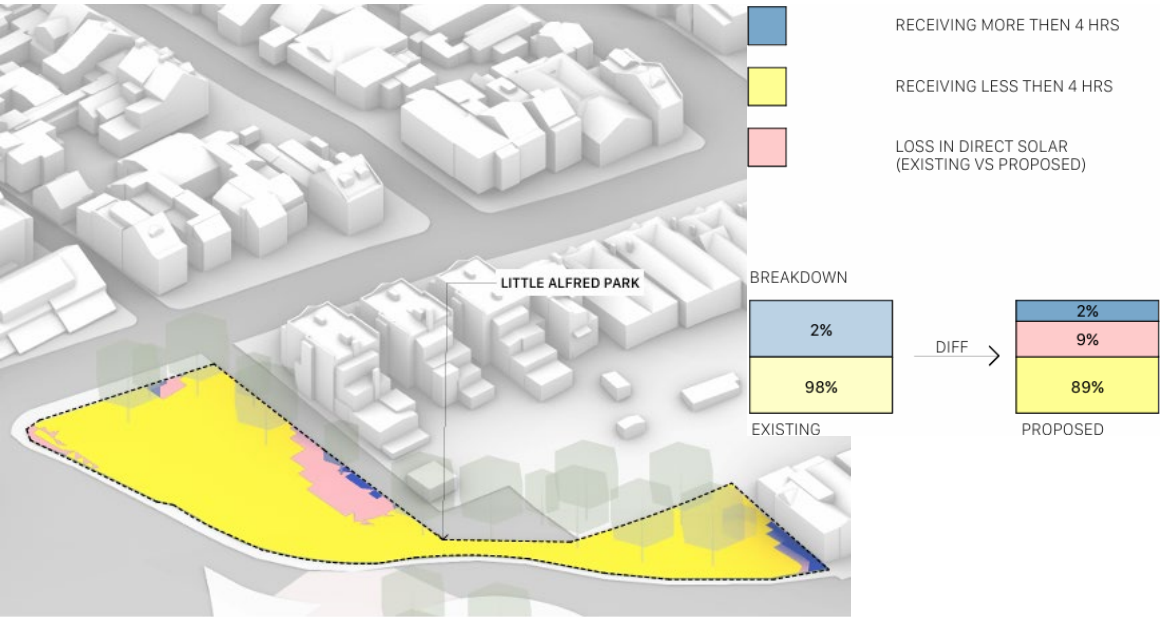


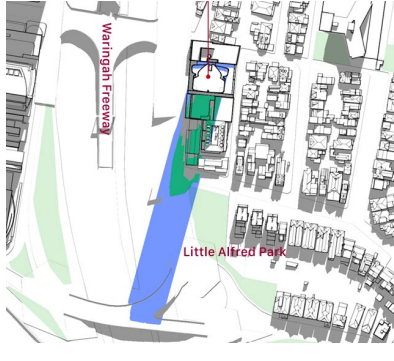
Figure 2 Shadow Diagrams – Little Alfred Park (Page 78 – 84 of submitted Design Report)



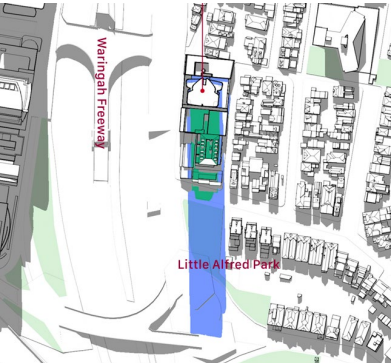
Overshadow at 9am



Overshadow at 10am



Overshadow at 11am



Overshadow at 12pm



Overshadow at 1pm



Overshadow at 2pm



Overshadow at 3pm



3. Podium Setbacks

Figure F-23 of the DCP identifies that an above-podium setback of 5 metres is required along Alfred Street. This control is intended to ensure that the bulk of upper levels is visually recessed from the street, thereby reducing perceived scale, protecting solar access to the public domain, and maintaining a comfortable pedestrian environment.

The proposal provides a 1.5m to 4m setback at podium and above podium along the Alfred Street frontage. As a result, the upper levels sit noticeably closer to the street edge, creating a visually dominant and imposing built form that overwhelms the Alfred Street frontage. By compressing the building envelope toward the street, the development disregards the careful balance between built form, solar access, and public domain quality that the DCP seeks to preserve. Such setbacks are also likely to have adverse wind impacts that will affect the experience and enjoyment within the street.

To ensure an appropriate relationship with Alfred Street and to maintain the intended character and amenity of the public domain, we request that the proposal be amended to provide a fully compliant 5-metre above-podium setback to Alfred Street.

Conclusion

For the reasons outlined in this submission, the proposed development at 275 Alfred Street would result in a scale and intensity of development that is inappropriate for its location when assessed against relevant strategic planning and urban design considerations. The uplift in height and FSR, the non-compliant setbacks, and the additional overshadowing of public open space collectively demonstrate that the proposal does not achieve an appropriate relationship with its context, nor does it align with the outcomes sought in the North Sydney DCP or the North District Plan.

The proposal would introduce an isolated and disproportionate tower form, undermine public domain quality, and generate adverse impacts on the surrounding area, including open space relied upon by residents of 45 McLaren Street and the broader community. On this basis, we respectfully submit that SSD-86992219 should not be supported in its current form. The proposal should be amended to ensure it is proportionate to its context, complies with key DCP controls, protects public open space, and contributes positively to the desired future character of North Sydney.