

14 October 21

Charlene Nelson  
Manager, Place and Infrastructure, North District  
Department of Planning, Industry and Environment (DPIE)  
Level 18, 12 Darcy Street  
Parramatta NSW 2150

Email: [Charlene.nelson@planning.nsw.gov.au](mailto:Charlene.nelson@planning.nsw.gov.au)

Dear Charlene,

**Re: Alfred Street Precinct Planning Proposal (RP\_2019\_NORTH\_003\_00) - Response to Supplementary submissions**

**Introduction**

This letter has been prepared by Mecone on behalf of Benmill Pty Ltd and JB No. 3 Pty Ltd in relation to the Alfred Street Precinct Rezoning Review (RR\_2019\_NORTH\_003\_00). The Planning Proposal was exhibited from 10 December 2020 to 19 February 2021. A response to the submissions report was issued to DPIE on 5 May 2021 and furthermore an additional response was issued to DPIE on 8 September 2021 in relation to the submission lodged on behalf of the owners of 271 and 273 Alfred Street, North Sydney (Site C of the Alfred Street Precinct).

Since our last response, DPIE emailed across additional submissions on 7 October 2021 that were previously lost on the Planning Portal until recently. We have reviewed these additional submissions and believe that they mostly raise issues which were addressed in our previous correspondence dated 5 May and 8 September 2021. This is consistent with DPIE's assessment of the neighbour's objections and Council's submissions in that they do not raise any new issues. Please refer to the previous correspondence for further information on our responses.

However, the TfNSW submission (dated 30 September 2021) included in the package, requests a cap on the retail floor component and we wish to oppose this restriction for the reasons detailed below.

**Transport for NSW (TfNSW) submission**

We are generally supportive of the recommendations outline in the TfNSW submission, with the exception of the request to cap retail floor area to 1,200m<sup>2</sup> to ensure trip generation and impacts are managed. We believe that providing a cap on the retail component would restrict the redevelopment of the site and it would be difficult to control given the sites are in fragmented ownership and likely to be developed separately.

We therefore submit that a more manageable provision with the same effect would be to limit the retail uses to the ground floor. The retail component has been introduced as a public amenity to activate the ground floor plane and is unlikely to be commercially viable

on upper levels. In addition, the site specific Development Control Plan which accompanies the Planning Proposal incorporates setback provisions for the ground floor which would restrict the extent of the ground floor plane built form.

We will address the other recommendations at Development Application stage as outlined in the TfNSW submission which include:

- Consideration of the construction coordination/management of the Western Harbour Tunnel and Beaches Link (WHTBL) and DPIE's *Development near Rail Corridors and Busy Roads – Interim Guidelines*;
- Consideration of travel development management measures including the provisions of a residential and workplace travel plan;
- The public benefits as detailed in the Planning Proposal are to be detailed in a future Voluntary Planning Agreement for individual sites;
- Consideration of pedestrian amenity / public transport accessibility of the development in the locality, and provide a contribution and/or works in kind towards infrastructure improvements within the locality commensurate with their impact.

### **Council's submission**

Council's submission (18 February 2021) was included in the email package. However our response to submissions report (dated 5 May 2021) has already provided a response to the issues raised by Council.

### **Conclusion**

We appreciate the opportunity to respond to the additional submissions emailed on 7 October 2021. We believe that they generally raise the same issues that were originally addressed in our correspondence dated 5 May and 8 September 2021.

We are concerned about the practicality of implementing the retail cap requested in the TfNSW submission and submit that a control limiting retail uses to the ground floor would, in conjunction with the setback controls in the site specific DCP achieve the desired cap on retail uses and associated traffic generation.

If you have any questions or would like to discuss this letter further, please do not hesitate to contact me on [icady@mecone.com.au](mailto:icady@mecone.com.au) or 0411 857 292.

Yours sincerely,



Ian Cady  
**Director**