

7 February 2019

Our Ref: P18-292

Director, Sydney Central Urban Renewal
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

RE: ST LEONARDS AND CROWS NEST 2036 - SUBMISSION

1. BACKGROUND

This submission has been prepared by City Plan on behalf of Eastern Property Alliance in relation to the Fiveways Triangle site, which is a group of lots bound by Pacific Highway, Falcon Street and Alexander Street ('Fiveways Triangle site' or the 'subject site'). The subject site is illustrated as Figure 1.



Figure 1 Fiveways Triangle site location

The subject site is approximately 3,200m² in area. It is comprised of 19 lots, 18 of which are either owned or under contract by Eastern Property Alliance.

The Fiveways Triangle site is included in the St Leonards and Crows Nest 2036 Plan (the Plan), currently under exhibition by the DPE. The Plan applies to identified land in the St Leonards and Crows Nest 'Planned Precinct' and responds to planned infrastructure upgrades associated with the Sydney Metro, with a new station due to be operational at Crows Nest in 2024. This will create new opportunities for urban revitalisation and will accommodate new jobs, open space, infrastructure and dwellings in walking distance to 'turn up and go' rail services. The Plan seeks to establish new schools, community facilities and housing in the locality as well as to protect and improve employment opportunities.

The Plan is supported by the following documents:

- Draft Local Character Statement;
- Draft Green Plan;
- Draft Special Infrastructure Contribution Scheme; and
- Various Technical Studies including but not limited to SJB's Stage 2 Urban Design Study (v14).

The subject site has been identified as a 'Significant Site' under the Plan, which is reflective of the site's prominent and well-connected gateway location. The Plan recognises that 'Significant Sites' may be appropriate for additional height subject to further assessment, community consultation and rigorous design excellence. The Plan recommends that 'Significant Sites' undergo a 'Council-led' Planning Proposal process in order to determine the appropriate development controls (i.e. maximum building height and floor space ratio) for these sites.

The draft Special Infrastructure Contributions Plan (SIC) provides for a raft of key infrastructure initiatives and needs associated with the projected growth of this 'Planned Precinct'. In the immediate vicinity of the subject site the Plan seeks to facilitate improvements to intersection of Pacific Highway, Shirley Road, Willoughby Road and Falcon Street. This will include signalised pedestrian crossing as well as improvement and alteration of the five-ways intersection to support vehicular traffic movements. It is noted that the SIC would not override future potential for North Sydney Council to negotiate Voluntary Planning Agreements via the Planning Proposal process.

2. SUBMISSION

Eastern Property Alliance is generally supportive of the St Leonards and Crows Nest 2036 Plan and commends the DPE for undertaking necessary comprehensive planning in strategically located centres such as Crows Nest, which is essential to catering for the ongoing and substantial growth occurring in the Sydney metropolitan area. Planning of this nature will greatly assist in making the best use of strategically located land in walking distance to major employment centres and railway/metro stations.

While the Plan is generally supportable, the following identified matters require further consideration and clarification during refinement stages to ensure that intended outcomes can be effectively delivered within efficient timeframes as part of subsequent implementation phases.

In considering this submission it is important for the DPE to note that, as a majority landowner of the Fiveways Triangle Site, Eastern Property Alliance will be instrumental in the future delivery of high quality residential, commercial and mixed-use development for this key gateway site.

2.1. Significant Sites

Page 62 of the Plan states that for 'Significant Sites' such as the subject site:

"Any revised development controls for these sites would be established through a Council-led planning proposal and further community consultation. Any revised development controls for these sites would be established through a Council-led planning proposal and further community consultation."

The above is subsequently iterated on page 65 as a key step in the implementation process.

The wording of the above phrase would suggest that all stages of a Planning Proposal for land in the St Leonards and Crows Nest Planned Precinct would be initiated and prepared by Council. It is not clear as to whether this is intended to stipulate that Council would be designated as the Relevant Planning Authority (RPA) or if Council would be charged with the responsibility of preparing, initiating and leading the planning proposal process. While Eastern Property Alliance does not object to a process where Council is designated as the RPA, a Council initiated planning proposal process would be problematic and likely to lead to significant delays in achieving intended planning outcomes for the Fiveways Triangle site and other identified 'Significant Sites' in this 'Planned Precinct'.

As outlined in Section 1.2 of the DPE 'Guide to Preparing Planning Proposals 2016', the *Environmental Planning and Assessment Act 1979* (EP&A Act) does not specify who can prepare the information required to support and initiate a Planning Proposal. In practice, the Planning Proposal document can be prepared by a Council, a landowner or developer seeking to change the planning controls relating to a particular site, or by a third party on behalf of a landowner or Council.

It is recognised that for sites identified by the Plan for specific changes to land use zoning, maximum building height and/or floor space ratio controls, a Planning Proposal initiated by Council is likely to be the most expeditious means of establishing the necessary development controls to implement the recommendations and intended outcomes of the Plan.

However, this would not be the case for 'Significant Sites', which are not subject to specific recommendations associated with land use zoning, maximum building height and/or floor space ratio controls. We anticipate that it is not the Department's intent to set out a process that could potentially result in unnecessary delays. For these significant sites, a Planning Proposal initiated and prepared by landowners would be the most effective and efficient means of establishing the necessary development controls in response to a comprehensive development vision underpinned by design excellence. It will also enable site-specific technical issues, some which may impact on development feasibility, to be thoroughly addressed via supporting technical studies. This approach would still enable Council to input into the planning proposal process as the RPA.

We wish to emphasise that there are numerous landowners in the St Leonards and Crows Nest Planned Precinct, including Eastern Property Alliance, who have been ready to proceed with renewal and revitalisation of their landholdings for over three years. Paradoxically, the 'Planned Precinct' process, which is intended to facilitate outcomes within this and other 'Planned Precincts', has instead led to unacceptable and drawn-out delays in achieving the planning framework required to facilitate urban renewal. This is particularly the case for Planning Proposals, which have recently been prevented from proceeding to Gateway pending outcomes of this current strategic planning process in 'Planned Precincts'. It is noted that a Planning Proposal for the Fiveways Triangle site was recently withdrawn for the primary reason that there was lack of clarity in relation to the future context of the planning outcomes associated with this 'Planned Precinct'.

It would be unreasonable for the development of this major opportunity site and defining gateway to Crows Nest and St Leonards to be further delayed. Given that the comprehensive LEP review process must be completed by June 2020 and the considerable supporting strategic planning required to support

this process, the limited capacity for Council to undertake site-specific planning associated with 'Significant Sites' may lead to indefinite delays due to the potential de-prioritisation of site-specific strategic planning. This would lead to unacceptable delays and significant impost with respect to holding costs.

In order to provide a more appropriate level of certainty for landowners in terms of process and timeframes, it is requested that pages 62 and 65 of the Plan be amended to stipulate the following:

"Any revised development controls for 'Significant Sites' would be established through a planning proposal prepared by or on behalf of the relevant council."

The above would enable North Sydney Council to retain responsibility as the RPA for any future Planning Proposals associated with 'Significant Sites'. This process as outlined above, would be the most logical, efficient and expeditious means of implementing the intended outcomes of the Plan and would provide landowners with sufficient certainty regarding timeframes for achieving the intended outcomes of the Plan and to establish design vision that aligns appropriately with landowner values, and achieves the desired level of design excellence.

In Council's assessment report of the recently withdrawn Planning Proposal for the Fiveways Triangle site, Council noted that a key reason it did not support the Planning Proposal was that "The applicant has not obtained owners consent from all affected property owners". City Plan notes that gaining landowners' consent is not a legislative requirement of the process of making an environmental planning instrument via Planning Proposals. Considerable ongoing holding costs associated with these delays have resulted in major financial burden on landowners in the St Leonards and Crows Nest Planned Precinct, including Eastern Property Alliance, which has acquired or entered into binding contracts over 18 of the 19 lots comprising the Fiveways Triangle site area (representing approximately 98% of the land area of the subject site).

Page 63 of SJB's urban design study states that a key criterion for significant sites is that they must be over 1,500m² in area. At approximately 3,200m², the Fiveways Triangle site is certainly consistent with this criterion. As the majority landowner for this significant site, Eastern Property Alliance strongly believes that in order to remove potential barriers to lodgment of a Planning Proposal for a significant site that is not wholly under single ownership, the Plan must state the basis on which a Planning Proposal may be lodged. A statement to support lodgment of a Planning Proposal for any site or group of sites that is 1,500m² or greater should be inserted on page 62 of the Planned Precinct document as follows to ensure that a Planning Proposal may be lodged for major portions of 'significant sites' that are comprised of multiple lots.

A planning proposal may be lodged for major portions of 'significant sites' that are comprised of multiple lots, where the total land area is 1,500m² or greater.

Further, the draft Plan states the following in regard to significant sites:

"These significant sites will be subject to a rigorous design excellence process to determine the appropriate height, floor space ratio and other design details. Proposals for significant sites would need to demonstrate consistency with the vision, design criteria and area wide design principles in this Plan (page 4, 10 & 11) and significant site design principles. Significant sites are expected to meet the highest design standards and provide additional community benefits to ensure their overall impact is a positive one."

The Significant Sites Design Criteria are well founded. In recognition that some flexibility may be required in design an approval stages, the draft Plan also notes:

“Subject to further detailed urban design analysis, the site specific design criteria may be varied in circumstances where a proposal clearly demonstrates a better design outcome and the proposal demonstrates consistency with the vision and area wide planning principles identified in the Plan.”

For clarity, we believe that the Plan should explain what constitutes a rigorous design excellence process. The design excellence criteria have been outlined in the draft Plan, however the draft Plan is silent on the assessment process that would apply. We submit that due to the regional significance of the Fiveways Triangle site in walking distance to the future Crows Nest metro station, the design excellence process in the case of significant sites should involve review by the NSW State Design Review Panel or by Government Architect NSW to complement and indeed dovetail with the standard Planning Proposal process.

2.2. Building Envelope

In identifying strategic opportunity sites as 'Significant Sites', maximum building height and density would be determined through the preparation and approval of a Planning Proposal. As previously submitted, this process should be led by landowners in consultation/collaboration with local government.

Defining building envelope (i.e. maximum building height and floor space ratio) for 'Significant Sites' via the Planning Proposal process is supported as it enables potential development controls to be prepared with appropriate consideration for a raft of site and precinct specific visioning, design, technical and economic considerations as well as to respond appropriately to the design and overshadowing guidance provided for within the St Leonards and Crows Nest 2036 Plan.

In order to support this approach and ensure sufficient clarity in the interpretation of the intent of Figure 24 (page 50) and Figure 25 (page 51) of the Plan, the following statement should be included under the section heading 'Significant Sites' on Page 62 of the Plan:

For identified Significant Sites, maximum building height and floor space ratio will be defined via the Planning Proposal process, which requires appropriate consideration for State Environmental Planning Policies and Section 9.1 Ministerial Directions. Any Planning Proposal is to reflect the desired future character outlined in the Plan and is to satisfy the 'Significant Site Design Criteria'.

Figure 1.1.36 (Page 63 of SJB's Stage 2 Urban Design Study (v14)) identifies the site as suitable for 8 storeys. This is considered insufficient for a consolidated whole of block gateway opportunity. This recommendation for the site fails to consider the Fiveways Triangle site's prominent gateway location and the opportunity afforded by the site's largely consolidated land tenure. Given the building heights for the subject site reflected in the SJB Urban Design Study is not proposed to be implemented directly through the St Leonards and Crows Nest 2036 Plan, and instead identifies the site as a 'Significant Site' subject to the outcomes of a Planning Proposal, the SJB Urban Design Study should not be the determining factor for future height on the subject site. The Government Architect NSW has subsequently reviewed the Plan and provided advice with regard to 'Significant Sites', which is discussed in Section 2.2.1 of this submission.

It is also noted that building heights in Figure 24 (Page 50) of the Plan are represented in storeys. At a later stage when proposed heights are incorporated into a Local Environmental Plan, building height will need to be expressed as a maximum height in metres. The Plan and North Sydney LEP 2013 provides for minimum non-residential FSR effectively mandating a minimum number of non-residential floors. Therefore, the difference in height requirements for residential and non-residential floors will need to be taken into account when determining overall maximum height in metres. In general, commercial floor to floor height are typically 3.5m while residential floor to floor height are typically 3.1m.

This matter can be appropriately resolved as part of future design investigations associated with the preparation of a Planning Proposal for the Fiveways Triangle site and other 'Significant Sites'. However, for any site identified for specific changes to height and FSR across the 'Planned Precinct', maximum building height in metres will need to ensure an optimal relationship between building height and FSR to accommodate the floor to floor height requirements associated with a minimum required provision of non-residential floors. This may require an additional height allowance (in metres) to accommodate required non-residential floor to floor heights.

2.2.1. Government Architect NSW

In October 2018, the Government Architect NSW (GANSW) released its urban design review of the St Leonards and Crows Nest 2036 Plan. The review highlighted the opportunity to improve design quality outcomes through a re-balance of built form attributes, such as height, mass and distribution, across the precinct and for identified 'Significant Sites'.

GANSW's review considered potential development scenarios for 'Significant Sites', including the Fiveways Triangle site, in relation to the following three test scenarios:

1. **Base Case**, which adhered to the planning and urban design principles of the draft St Leonards Crows Nest 2036 Plan, with a particular focus on preventing overshadowing in key areas and height transition from areas proposed to increase in height and those which are not.
2. **Test 1 – 'Current planning principles'**, which also adhered to the planning and urban design principles of the draft St Leonards Crows Nest 2036 Plan, with a focus on minimising overshadowing to Willoughby Road, heritage conservation and open space areas, but assuming that 3 hours of afternoon solar access is sufficient to residential land not proposed for height changes south of the Pacific Highway.
3. **Test 2 – North Sydney Solar Access criteria**, which applied similar principles to Test 1 above but also considered overshadowing based on North Sydney Council's existing DCP, which assumes that 3 hours of solar access to residential land not proposed for height changes south of the Pacific Highway, heritage conservation and public open space areas.

With regard to Test 1, GANSW considered a 10 storey form for the Fiveways Triangle site based on the application of nominated design principles. Advantages identified in this scenario include supporting the new metro station with increased density, height increase to support main street retail and responding to the lower scale of Willoughby Road. However, GANSW emphasised that the variable built form and heights around the Fiveways Triangle site failed to reinforce a 'gateway' or marker of importance.

Test 2 considered a 36 storey form for the Fiveways Triangle site based on the application of nominated design principles. A key advantage of this scenario as outlined by GANSW is that it would optimise the benefits associated with the new Crows Nest metro station as well as providing optimal solar access for residential development on the site. GANSW also emphasised that the increased height on the Fiveways Triangle site (subject to design excellence) would reinforce Fiveways as a place of importance/interest, commensurate with its role as entry to the 'village' retail precinct. GANSW also considered that such an approach would provide an opportunity for high amenity residential development with favorable solar orientation as well as access to transport, district views, retail and services (including multiple schools within 800m).

In testing a 36 storey form for the Five ways Triangle site, GANSW noted the following considerations for managing both physical and visual impacts of building massing:

- [Page 15] Potential gateway marker is offset without dominating view at end of Willoughby Road. Consider envelope so form is appropriate. Requires Design Excellence. It is noted that the 10 storey form investigated under Test 1 would not read as a gateway marker at the end of Willoughby Road.

- [Page 16] Taller built form at the end of Willoughby Road would maintain the existing sky view at the end of Willoughby Road.
- [Page 17] Consideration would need to be given to reducing potential for a tunnel effect as viewed southwards along Pacific Highway.
- [Page 19] Built form on the Fiveways Triangle site should be in the form of slender tower development to act as a visual marker.
- [Page 21] Views from Falcon Street to be considered in terms of building width, noting that the view from this angle could potentially result in a wide and dominant form.

City Plan notes that the above matters, as well as providing an appropriate response to the Significant Sites Design Criteria, can be resolved through a conceptual design process that would be prepared in conjunction with a Planning Proposal for the Fiveways Triangle 'Significant Site'. In order to address such matters, consideration could potentially be given to articulation of the tower or splitting the tower into two slender forms. While we note that the intent of this submission is not to establish or justify the strategic merits of a specific building envelope, which would occur via the Planning Proposal process, Eastern Property Alliance has undertaken preliminary built form testing of a building form that could be accommodated on the site to meet these criteria. Although high level at this point in time, our design testing generally affirms our confidence in the Significant Sites Design Criteria, subject to solar access considerations previously mentioned in this submission.

The GANSW review highlights that there are numerous ways that the subject site could potentially be developed. As such it reinforces the importance in maintaining an open-minded approach to the development of 'Significant Sites' and that the building envelope results from a conceptual design and planning proposal process should be considered on demonstrable strategic and site-specific merits in the context of a design excellence process. As advised by GANSW, this process would make appropriate provision for:

1. Testing of amenity.
2. Responding to critical urban design considerations.
3. Establishing and responding to a Design Excellence Strategy.

As such the approach for establishing a future design vision and planning controls for the Fiveways Triangle 'Significant Site' via a landowner-led Planning Proposal is most appropriate and supportable means of achieving future revitalisation outcomes intended for 'Significant Sites' and to achieve the best possible public benefits in relation to site specific opportunities and State Government infrastructure investment.

2.3. Voluntary Planning Agreements (VPAs)

The draft Special Infrastructure Contribution (SIC) Plan has been prepared to enable the sharing of costs of delivering identified infrastructure as timing and demand requires. It is noted that the identified infrastructure items outlined in the Infrastructure List is not exhaustive. There may be other infrastructure needs identified by Councils or in response to emerging circumstances over time to manage impacts of future development and to facilitate positive place and community-based outcomes.

It is essential that any requirements for a SIC dovetail appropriately with other mechanisms at the local government level (i.e. local contribution plans and voluntary planning agreements) that are necessary to facilitate delivery of future infrastructure needs. The draft SIC Plan advises that local contribution plans (such as Section 7.11 and 7.12) would still apply and will be complementary to SIC requirements. This is understood and supported.

However, page 6 of the draft SIC Plan advises that Voluntary Planning Agreements previously negotiated with landholders would be taken into consideration and potentially offset against SIC

requirements. While this is supported, this section of the document is silent on the potential for a VPA to be negotiated with Council once the SIC becomes operational. The SIC would not override future potential for North Sydney Council to negotiate VPAs via the Planning Proposal process, but it appears that the draft SIC does not consider the potential for VPAs to offset SIC requirements in appropriate circumstances. This would effectively inhibit potential for Councils to negotiate VPAs, effectively reducing Council's ability to respond to emerging or previously unforeseen circumstances or opportunities that are not already prescribed in local contribution plans or the future SIC once adopted.

The SIC should not inhibit negotiation of VPAs with Council, as such agreements are essential to respond to circumstances and opportunities that may not have been considered in preparing the identified Infrastructure List and the draft SIC Plan. It is noted that many of the items on the Infrastructure List identified to be State administered are of local rather than district importance. Examples include improvements to and the provision of local parks and playgrounds and cycle lanes, which are intended to be funded via the SIC. We note the exception of item 'C1 Community Arts Centre', which would be funded via a VPA.

The SIC should allow for VPAs to be negotiated at the local government level and taken into consideration in relation to potential offsets against both local contribution plans and the SIC. This is especially important given a number of the identified infrastructure items provide for local amenities rather than infrastructure of district importance such as improvements to Pacific Highway intersections.

To this effect, page 6 of the draft SIC Plan should state:

There may be circumstances where negotiation of a Voluntary Planning Agreement with Local Government is warranted to enable Councils to respond to local or site specific opportunities to provide or improve infrastructure. In determining the required contribution, the Department may consider offsets relating to a VPA against a local contribution plan or the SIC Plan where appropriate.

The above statement would provide local government organisations with a more appropriate degree of flexibility to adapt to emerging or previously unknown circumstances, opportunities or demands. It will result in a 'nimble' approach to funding and delivering infrastructure to ensure that the needs of the local and wider community are adequately met.

2.4. North Sydney Council Resolution - 29 January 2019

According to the Minutes of Meeting of North Sydney Council meeting on 29 January 2019, Council resolved to prepare a submission including the following matter in relation to the Fiveways Triangle site:

3. THAT the submission in relation to the Triangle site at Fiveways submit that the proposed Significant Site designation be removed and that the existing planned heights be maintained in order to protect the Conservation Area, school and surrounds from adverse amenity impacts.

The corresponding officers' report (Emma Booth Team Leader Design 29 January 2019) recommended the following:

1. THAT Council prepare a submission to the Department of Planning and Environment based on the matters and issues raised in this report.

2. THAT the submission include a request that the Department, Greater Sydney Commission and the three affected councils work together to refine what has been exhibited in the context of matters raised in this report and other issues that may be raised by Lane Cove and Willoughby Councils. This should occur prior to the finalisation of the 2036 Plan and include a strategy to stage the sequential release of residential development opportunities over time.

The aforementioned report to Council stated the following in relation to the Fiveways Triangle site:

i) 'Significant site' designation of the 'Triangle site' at the Fiveways

The 'Significant site' designation of the Triangle site is an opportunity consider the redevelopment potential of the whole block through a design process between Council and the developer. This is supported. Any height expectation however, needs to be tempered by clear principles that protect solar amenity of the conservation area, school and surrounds and character of the area. As written, the area-wide design principles and significant site design criteria are subject to broad interpretations. Further, the 'Note' at the bottom of page 62 suggests the criteria can be varied, potentially weakening the intent of the process.

Council's resolution is contrary to the officers' recommendations, which sought to refine principles relating to solar amenity, school and character of the area rather than to remove the site as a significant site and rely on lower height and FSR controls that do not reflect the site's strategic importance.

Council's position that the height should remain as per the existing planned heights is inappropriate in that those heights do not sufficiently consider the opportunities afforded by the significant investment in the Sydney metro, the potential SIC required to fund such infrastructure, and the location of the Fiveways Triangle site in walking distance to the future Crows Nest metro station. The opportunity for greater density on the Fiveways Triangle site is supported by the GANSW, which recognises the strategic importance of this site as previously raised in 2.2.1 of this submission.

The strategic importance of the site as a key gateway and opportunity site cannot be disputed and should not go unrecognised. Given the minimum area for designation as a significant site being 1,500m² and the area of the subject site at approximately 3,200m², the Fiveways Triangle site well exceeds the key criterion for identifying significant sites and should remain as such. Its designation as a significant site is further supported by its location and characteristics as a large island site at the entry gateway of the Crows Nest St Leonards precinct.

Council's resolution to remove the Fiveways Triangle site as a significant site is unnecessary as the Planning Proposal process allows for any concerns, issues and potential impacts of any future built form on the subject site raised by Council to be considered and addressed in accordance with the significant site design criteria via the Planning Proposal process. In this regard, the Planning Proposal process is the most logical means of determining and establishing an appropriate height and FSR for this significant site and is the best way to consider all technical opportunities and constraints to ensure impacts of a future development on the site are appropriately addressed.

We note concerns raised by Council in relation to schools in proximity to the Fiveways Triangle site. Based on preliminary built form investigations, the North Sydney Girls High School would be largely be unaffected by shadowing from any built form on the Fiveways Triangle site for the majority of the day with potential for shadow cast to occur from about 2pm onwards (mid-winter), providing approximately five hours of solar access between the hours of 9am and 3pm (mid-winter). The impacts on the North Sydney Girls High School can be managed through careful consideration of significant sites criteria via the Planning Proposal process. Cammeraygal High School would be subject to stricter solar access criteria being located outside of the Plan Area and will therefore not be impacted in this regard.

Any solar impacts on the conservation area south west of the Fiveways Triangle site would be minimal. Preliminary built form investigations indicate that a future development on the site would allow for approximately 4 hours solar access to the conservation area between the hours of 9am and 3pm (mid-winter) with potential for shadow cast to occur from 1pm onwards (mid-winter). As such, there is no compelling reason for the designation of the Fiveways Triangle site as a significant site to be removed on the basis of visual character or solar impacts.

While a future built form on the subject site will likely be visible from within the conservation area, the ability to view towers that are designed in a slender and sculptural form is not in of itself detrimental to

the character and heritage values of the conservation area. Further, it cannot automatically be assumed that a taller slimmer tower would be of greater impact than a lower wider built form outcome. This can only be truly considered as a part of detailed design investigations and impacts analysis. This matter further supports the need to undertake a comprehensive Planning Proposal process to allow impacts of a potential future development on the site to be considered in depth and in accordance with the relevant significant sites criteria.

As such, a merit-based approach that allows for the future development controls for the strategically important Fiveways Triangle gateway site to be considered in relation to the 'significant sites design criteria' should remain. The Fiveways Triangle site should retain its designation as a 'Significant Site'.

We trust this submission is of assistance and we look forward to the St Leonards and Crows Nest 2036 Plan progressing towards finalisation.

Any evolution of the plan in relation to the Fiveways Triangle site should be undertaken as a consultative process with the landowner. City Plan and Eastern Property Alliance would welcome and appreciate an opportunity to meet with the DPE to discuss the Fiveways Triangle site in relation to the draft Plan. City Plan will be in touch in due course to arrange for an opportunity to meet.

Should you require any further clarification of the above matters, please do not hesitate to contact the undersigned on 8270 3500.

Yours Sincerely,



Susan E Francis
Executive Director