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**in** Property Council of Australia

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Mr Jarrod Booth and Ms Laura Dodds-Hebron  
City Engagement  
City of Sydney  
Level 7, 456 Kent Street  
SYDNEY NSW 2000

Via email: [sydneyyoursay@cityofsydney.nsw.gov.au](mailto:sydneyyoursay@cityofsydney.nsw.gov.au)

Dear Mr Booth and Ms Dodds-Hebron,

We welcome the opportunity to provide feedback on the draft Entertainment Sound Management Development Control Plan (DCP) and Special Entertainment Precincts discussion paper.

Our members include the nation's major investors, owners, managers, developers, designers and builders of property of all asset classes. They create landmark projects, environments, and communities where people can live, work, shop, and play. The property industry shapes the future of our cities and has a deep long-term interest in seeing them prosper as productive, sustainable, and safe places.

The Property Council acknowledges the work that City of Sydney has undertaken in recent years as part of *Sustainable Sydney 2030-2050* to create a thriving cultural and creative life, and supports the progress made to date on the NSW Government's vibrancy reforms. We also commend the City's proactive approach in striking the right balance between supporting diverse entertainment activities and protecting residential amenity and support the intent of the draft DCP.

We appreciate the clear guidance provided in the draft DCP for sound management requirements for new and significantly altered entertainment venues, as well as developments that may be affected by entertainment sound. These guidelines will help ensure consistency and clarity in the planning and development process.

The proposed approach to trading hours and trial periods will provide greater flexibility for businesses, while maintaining an appropriate level of assessment of their impacts and encouraging good management. We also welcome the provisions allowing for the attenuation of entertainment sound at the source, provided it meets the criteria and has the consent of relevant parties, as this flexibility will encourage innovative solutions to sound management challenges.

The discussion paper identifies opportunities to make trading in special entertainment precincts easier by streamlining approvals for trading hours. We note that the extended trading hours in Figure 2 of the discussion paper for Category C venues are the same as the base trading hours proposed in the draft DCP (refer below table).

Trading hours		Draft Entertainment Sound Management DCP	Special Entertainment Precincts discussion paper
Late Night Management Area	Base	24 hours	6am to 2am
	Extended	-	24 hours
City Living Area	Base	24 hours	7am to 1am
	Extended	-	24 hours
Local Centre Area	Base	7am to 2am	7am to 11pm
	Extended	-	7am to 2am

While it is proposed that the base hours in a special entertainment precinct will be 'as of right' with no need for a development application, there may be a risk of confusion for businesses navigating any new requirements introduced. Given the preferred boundaries for special entertainment precincts align with the City's existing late night trading areas, we suggest that these hours are reviewed for consistency or that clear guidance is provided to venues trading in these locations.

We understand that Council will seek to establish special entertainment precincts through a planning proposal to amend *Sydney Local Environmental Plan 2012*. We welcome the opportunity to be consulted on any proposed changes resulting from the discussion paper.

We thank the City of Sydney for the opportunity to provide a submission to this draft DCP and discussion paper. If you have any questions about this submission, please contact NSW Policy Manager, Emma Thompson at [ethompson@propertycouncil.com.au](mailto:ethompson@propertycouncil.com.au) or by phone on 0458 294 817.

Yours sincerely,



**Katie Stevenson**  
NSW Executive Director  
Property Council of Australia