

21st March 2014

NSW Department of Planning & Infrastructure
Via: www.planning.nsw.gov.au/proposals - website

To Whom it May concern,

**Re: Draft Newcastle City Centre locality specific provisions Section 6.01
Newcastle DCP (March 2014) and the impacts of the proposed changes to land
known as 18 Honeysuckle Drive, Newcastle.**

The Doma Group (Represented by Doma Commercial (NSW) Pty Ltd) thanks the NSW Department of Planning and Infrastructure for the opportunity to comment on the Draft Newcastle DCP (March 2014) during the community consultation process. The Doma Group have a proven track record in multi-unit residential development and commercial office construction.

The Doma Group responded to a recent Call for Proposal which closed on the 8th November 2013 for the sale of land known as 18 Honeysuckle Drive, Newcastle. The site was released to the market by the Hunter Development Corporation (HDC) to promote future development activity in the ongoing revitalisation of Newcastle and the further gentrification of the Honeysuckle Precinct.

The Site is located on the southern side of Honeysuckle Drive and the corner of Worth Place, directly adjacent to the NIB building. It is a vacant site and has an area of 4,129 m2. The Site is zoned B3 Commercial Core within the Newcastle LEP 2012.



Aerial Photo of 18 Honeysuckle Drive

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Doma Group has been working with local architectural firm dwp|suters to develop a concept design for the site, responding to the current legislative controls.

The DCP allows a finer grain assessment of specific precincts and key allotments. We consider that 18 Honeysuckle Drive is a unique site that will provide a unique connection between Honeysuckle and Civic Precincts. We have sought independent planning advice to review the proposed DCP and wish to submit a site specific response for 18 Honeysuckle Drive as follows:

Character Statement – C. Honeysuckle

We note the Principles (a) states development between the rail corridor and Honeysuckle Drive provides a ‘building address to both frontages’. We have developed our design for 18 Honeysuckle Drive to follow the same urban design language and character of buildings established along the commercial office precinct at 22 and 24 Honeysuckle Drive. We consider that a more detailed study along the corridor is required because the width is variable from narrow to up to 4metres. Whilst we appreciate that the NSW State Government has announced a light rail system as a preferred transport solution, the alignment is not certain. Further, the delivery of this key transport solution will take a number of years to establish to then allow the rail corridor to be removed and opened up for future adaptive uses. Additionally the light rail corridor may well be deemed feasible to install in the existing train corridor once final planning has been completed. In the mean time and until the rail line is removed we suggest that forcing developments to have frontage onto the rail line is unwarranted.

General Controls

As the DCP suggests *“Honeysuckle is currently the premier locale for A-grade large floor plate commercial office development”*. There is already a hierarchy of street relationship and setbacks from both Honeysuckle Drive and the rail corridor established by the development of new ‘A’ grade buildings as depicted in the photo below:



The commercial office precinct is well established along Honeysuckle Drive

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Based on the established built form profile of this precinct and having the 18 Honeysuckle site turn the corner to Worth Place and 'book end' the commercial precinct, we make the following additional comments to the items raised in the building form.

A1 - Street Wall Heights

A1.01 – we recommend an additional Alternative solution be added to page 25 as follows:

- Setbacks are to consider the relationship with neighbouring buildings to ensure a consistent approach to the prominent boundaries of the site.

We acknowledge that in some instances where aging built form is likely to be demolished and redeveloped, establishing new building lines sets the standard for a future streetscape. However, in this case with Honeysuckle Drive consisting of recently constructed significant commercial buildings, new development should complement the existing building lines.

A2 - Building Setbacks

The DCP seeks to mandate a 4 metre setback from the rear boundary along the rail corridor. We believe that the Department needs to do further detailed study to this corridor and review the existing building setbacks established as part of the newly emerging commercial office precinct in Honeysuckle Drive. As stated above, recently constructed development within Honeysuckle has now established existing building setbacks that cannot be now changed for the predominant length of the northern boundary of the rail corridor. Furthermore, it is our opinion that the width of the rail corridor behind 18, 20 and 22 Honeysuckle Drive is appropriate for future public domain amenity at this location without the additional 4m mandated setback distance.

A2.01 - we recommend an additional Alternative solution be added to page 27. This will compliment A2.01 (b) and allow some flexibility for a site specific response by amending as follows:

- Setbacks are to consider the relationship with neighbouring buildings to ensure a consistent approach to the prominent boundaries of the site.

A3 – Building Separation

A3.01 – we recommend an Alternative solution be added to page 28 as follows:

- Building separation between alternate uses (in a mixed use development) may not necessarily comply with table 6.01- 4 where the development can demonstrate the building separation ensures ventilation, daylight access, view sharing and increased privacy between neighbouring buildings.

A4 – Building Depth and Bulk

We appreciate that the Department is trying to avoid large inappropriate office buildings of significant form and scale by limiting the maximum depth of the building. Given that the building depths of the recently completed office buildings at 20 and 22 Honeysuckle Drive it is appropriate at this location that the building depth be generally consistent with established office buildings.

A4.01 – we recommend an additional Alternative solution be added to page 29 as follows:

- Building depths are to consider the relationship with neighbouring buildings to ensure a consistent approach to the prominent boundaries of the site.

Conclusion

The new office project at 18 Honeysuckle Drive will enhance the street level activity and vibrancy of the Honeysuckle Precinct and provide for a range of employment-generating opportunities within the *premier locale for A-grade large floor plate commercial office development*. The suggested modifications are consistent with the principles of the draft Newcastle Urban Renewal Strategy. Without the support for the proposed modifications, the agility and flexibility of the project to respond to the market is potentially diminished.

The Honeysuckle Precinct is unique within the Newcastle City Centre in that it was a brownfield site with only a few minor historical structures remaining. Since commencement of the development of the precinct there have been a number of significant buildings that have been developed. This built form has established the bulk, scale and character of buildings within the precinct. The development of any new buildings along Honeysuckle Drive needs to follow the rhythm and language of the established commercial precinct and allow flexibility to respond appropriately to its neighbours with alternative solutions to the DCP to ensure the continued growth of Newcastle as the Hunter Region's capital.

We again thank the Department for the opportunity to comment on the draft DCP. If successful with the HDC Call for Proposal we would look to progress our design to obtain Director General's Requirements on 18 Honeysuckle Drive. We would seek planning consideration from the Department based on the current controls, while acknowledging the intent of the new DCP, in order to promote more tailored solutions to the development of quality buildings.

Please feel free to contact the undersigned if you wish to discuss any components of this submission further.

Yours faithfully
DOMA Group



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General Manager Development