

38 Dalleys Road

Naremburn

NSW 2065

4 September 2017

Dear Sir/madam

I am writing in response to the draft *St Leonards and Crows Nest Precinct Interim Statement* which is currently on exhibition. Being a landowner in the suburb of Naremburn, I am excited about the growth plans for the St Leonards and Crows Nest Precinct and the suburb of Willoughby. This letter identifies an area within the Naremburn area which I believe should be rezoned as part of future planning in order to assist in achieving housing targets for the suburb. This area is referenced throughout this letter as the '*Naremburn Subject Area*'.

This letter is structured as follows:

1. Summary of Strategic Planning Documents
2. The proposed Naremburn subject area
3. Reasons for investigating the potential rezoning the subject area.

1. SUMMARY OF STRATEGIC PLANNING BACKGROUND

1.1 A Plan for Growing Sydney

A Plan for Growing Sydney released in December 2014 details the NSW Government's vision for Sydney's future as a '*strong global city, a great place to live*'. One of the biggest challenges to achieving this aim is how to provide the 689,000 new jobs and 664,000 new homes for an extra 1.6 million residents predicted by 2036.

The Plan focuses new housing to be located close to public transport that runs frequently and can carry large numbers of passengers. This will make it easier for more people to get to jobs, education facilities, hospitals, sporting, cultural and entertainment facilities by public transport, taking pressure off congested roads.

Putting more housing and services close to strategic centres, such as St Leonards, can also make it easier for everyday activities like shopping, dropping children at school or child care or visiting the local park by foot or bike.

By increasing housing choice, we can respond to changing housing needs and lifestyle preferences.

1.2 Draft District Plan North

The draft District Plans released by the Greater Sydney Commission (GSC) on 21 November 2016 present an ideal opportunity to ensure that growth planned for throughout Greater Sydney is delivered sustainably and is aligned with current and proposed infrastructure investment.

Some of the District's priorities of significance to this submission include:

- Accessing jobs and services within a 30 minutes journey.
- Planning for expansion and enhancement of the urban amenity around super health precincts such as St Leonards.
- Improving housing choice, diversity and affordability particularly recognising the increasing proportion of older people in the North District and the need for smaller homes.

The Department's projections of population and household growth include a need for 24,100 dwellings in the North District by 2036. Analysis suggests that there is capacity to deliver beyond this target which is important to assist with demand. As such, the final housing target for the North District is 25,950 dwellings including 1,250 in Willoughby.

A five year and 20-year supply strategy must be prepared by Willoughby City Council which must include the identification of potential new areas for housing.

The draft District Plan North includes the St Leonards and Crows Nest Priority Precinct area as illustrated below.

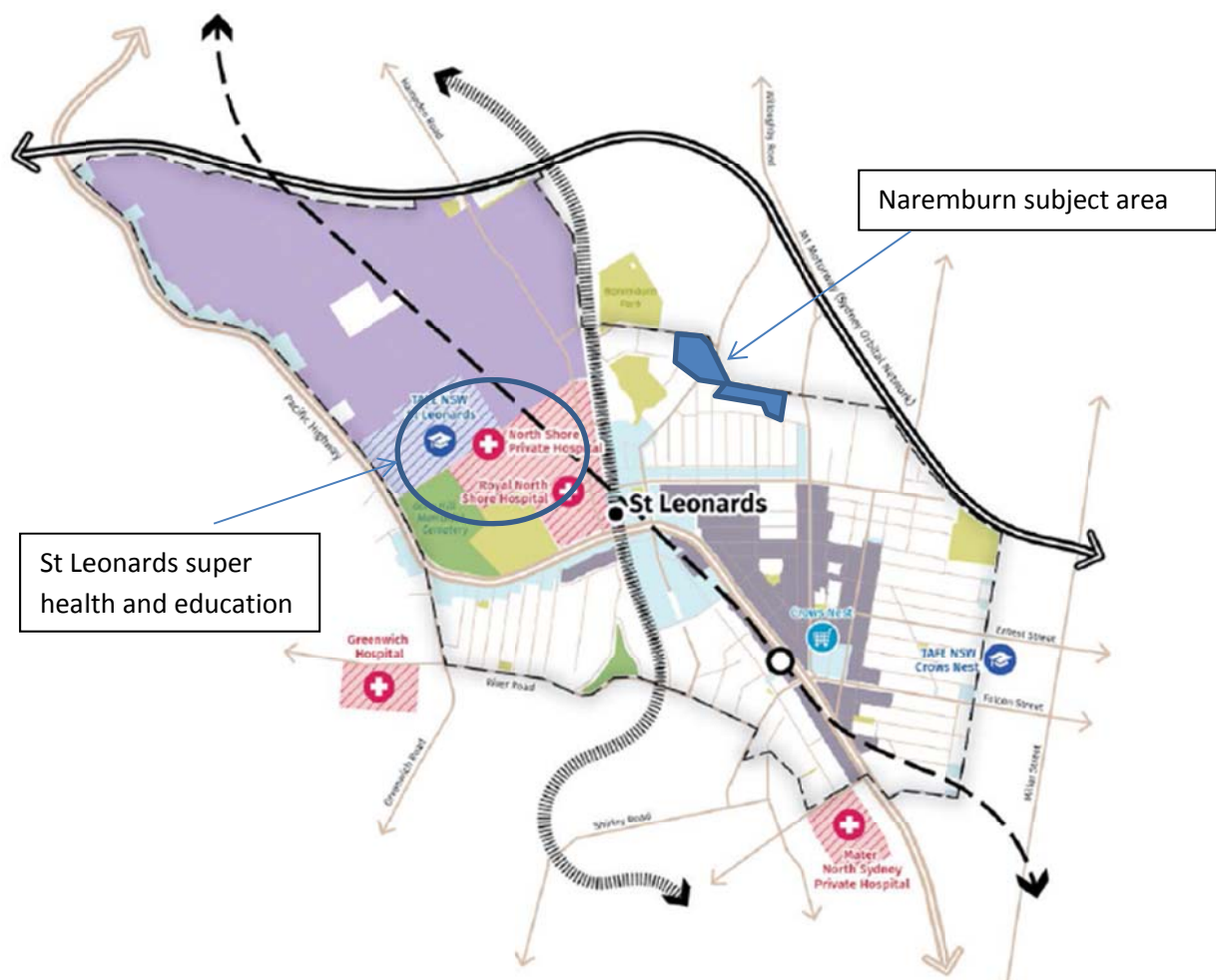


Figure: 1 St Leonards centre and surrounding existing centres (Source: Draft District Plan North)

A key action relating to St Leonards is:

“Action P4: Facilitate place making and the growth and diversification of job opportunities in St Leonards”

- The draft District Plan identifies St Leonards as a *‘health and education super precinct’*, due to the location of the Royal North Shore Hospital, North Shore Private Hospital and TAFE NSE St Leonards Campus. The district plan notes that key considerations for the St Leonards area will be to *‘leverage off the new Sydney Metro station at Crows Nest to deliver additional employment and residential capacity’*.

1.3 Priority Precincts

The Priority Precincts program is a NSW Government program integral to meeting the goals of *A Plan for Growing Sydney*. The Priority Precincts program aims to provide for new housing and jobs in centres with good existing or planned transport services, and coordinates the delivery of infrastructure to ensure that the growth will be supported by improved public open space and community facilities.

The key features of the priority precinct program include:

- Changing preferences and lifestyles in terms of Sydney’s residents.
- Desire to live near centres.
- Preference for apartments.
- Convenient transport options.
- Aging in place.
- Walking distance to public transport, shops and services.
- Evidence based planning and the identification of constraints and opportunities in the area and proposals for rezoning.
- Community consultation.

1.4 St Leonards and Crows Nest Priority Precinct

The Department of Planning is currently undertaking investigations for the strategic planning of the St Leonards and Crows Nest precinct.

The Sydney Metro Project is Australia’s largest public transport project and a new metro station is proposed at Crows Nest. St Leonards is identified as a *‘strategic centre’* in *A Plan for Growing Sydney*. Maintaining and creating employment in the centre will be a key planning principle for the development of the Priority Precinct along with provision of new homes and services. The decision to identify the St Leonards and Crows Nest Priority Precinct is based on a number of factors including the realisation that the precinct could:

- maximise the use of the new Metro and other existing public transport networks;
- provide more jobs closer to home and promote public transport to employment areas, reducing the need for private vehicular trips; and
- respond to strong current demand and project future demand for additional employment and housing.

The *Interim Statement* for the *St Leonards and Crows Nest Precinct* has been released for public exhibition.



Figure 2: St Leonards and Crows Nest Priority Precinct (source: Department of Planning)

The *Interim Statement* identifies the subject area within a ‘character area’ named ‘*Residential (Naremburn)*’ as illustrated in Figure 3. The character description notes that the area is proposed to be retained for low density housing and that majority of area is within a Conservation Area.

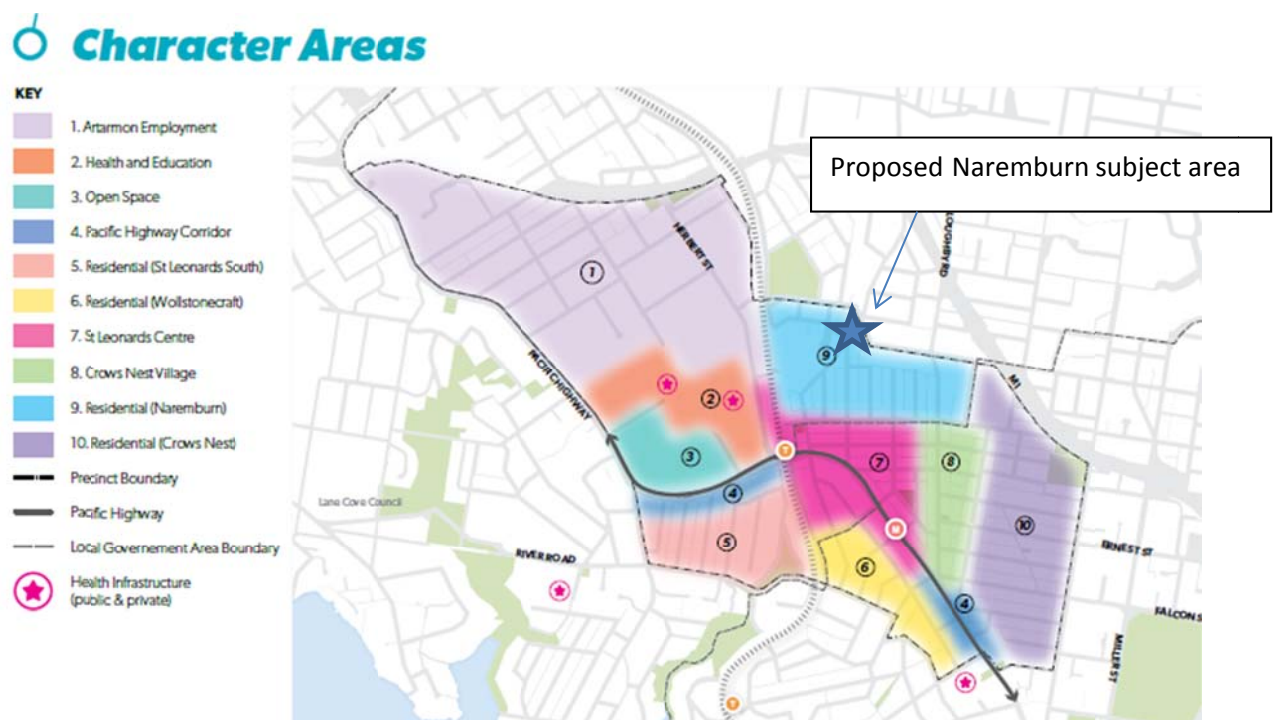


Figure 3: St Leonards and Crows Nest Priority Precinct – Character Areas (source: DPE)

In fact, when comparing the *Character Area* with the *Willoughby LEP Land Zone Map* (Figure 7), it can clearly be seen that the majority of the area to the south and west of the *Naremburn Subject Area* is currently zoned medium (R3) or high density (R4) housing. The conservation area, to the west, is R2 low density residential. An extract is included in Figure 4 below for ease of reference.

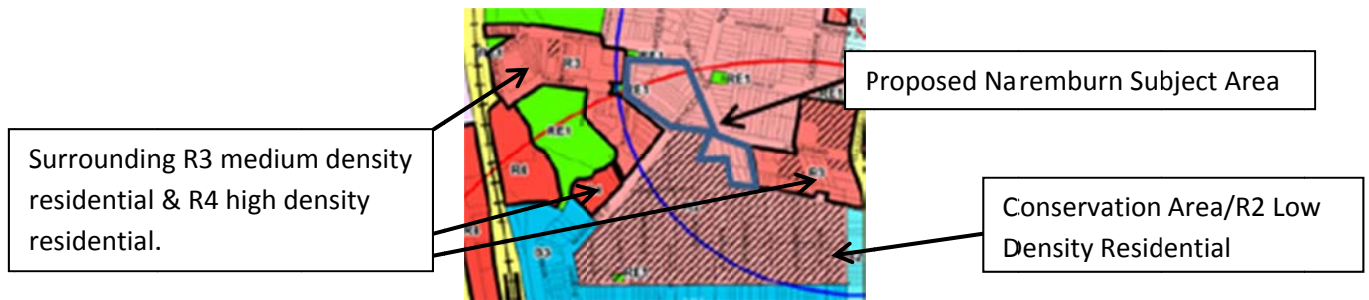


Figure 4: Extract from Figure 7

1.5 Metro Line

The *North West Rail Link Corridor Strategy* was released in 2013. The Corridor Strategy established a strategic framework to guide development around the eight new Metro stations along the Sydney Metro Northwest. The figures below illustrate the extent of the proposed Metro line with a new station proposed at Crows Nest.



Figure 5: Illustration of Crows Nest Metro Station (source: Sydney Metro)

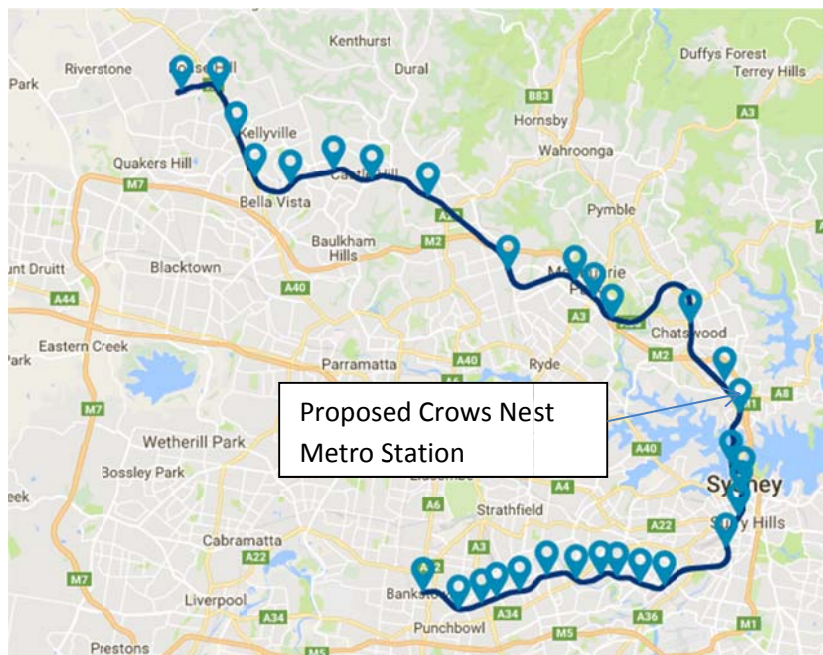


Figure 6: Map of the North West Metro including Crows Nest Station (source: Sydney Metro)

1.6 Draft Willoughby Planning Strategy, 2017

As a first step to identifying the 5 and 20 year strategy for housing in Willoughby (as required by the Draft District Plan), Willoughby Council have issued the Draft Planning Strategy for comments. The following principles have been considered as important in the identification of areas suitable to accommodate additional density:

- Offer a variety of housing types.
- Located close to public transport including train stations and major bus routes.
- Heritage significance is not compromised.
- The capacity of existing infrastructure is considered. The majority of new developments should occur in locations that are in close proximity to education, transport, health, social, cultural and employment services.
- Impacts on traffic and improvements to public transport need to be considered.
- New pedestrian and cycle links required.
- Additional density to be provided near existing business centres to support local business and recommended in the Willoughby City Strategy.
- Increased population to be matched by social planning.
- Quality of existing housing stock.

Page 28 of the Willoughby Housing Position Statement identifies 'St Leonards/Naremburn' as a suggested area for investigation. **Figure 7** illustrates the areas within 800m walk of St Leonards railway station, the proposed Crows Nest Metro Station and 400m of the Naremburn shopping centre. For the purposes of this submission, the distance to the *St Leonards super health precinct* has also been illustrated on **Figure 8**.

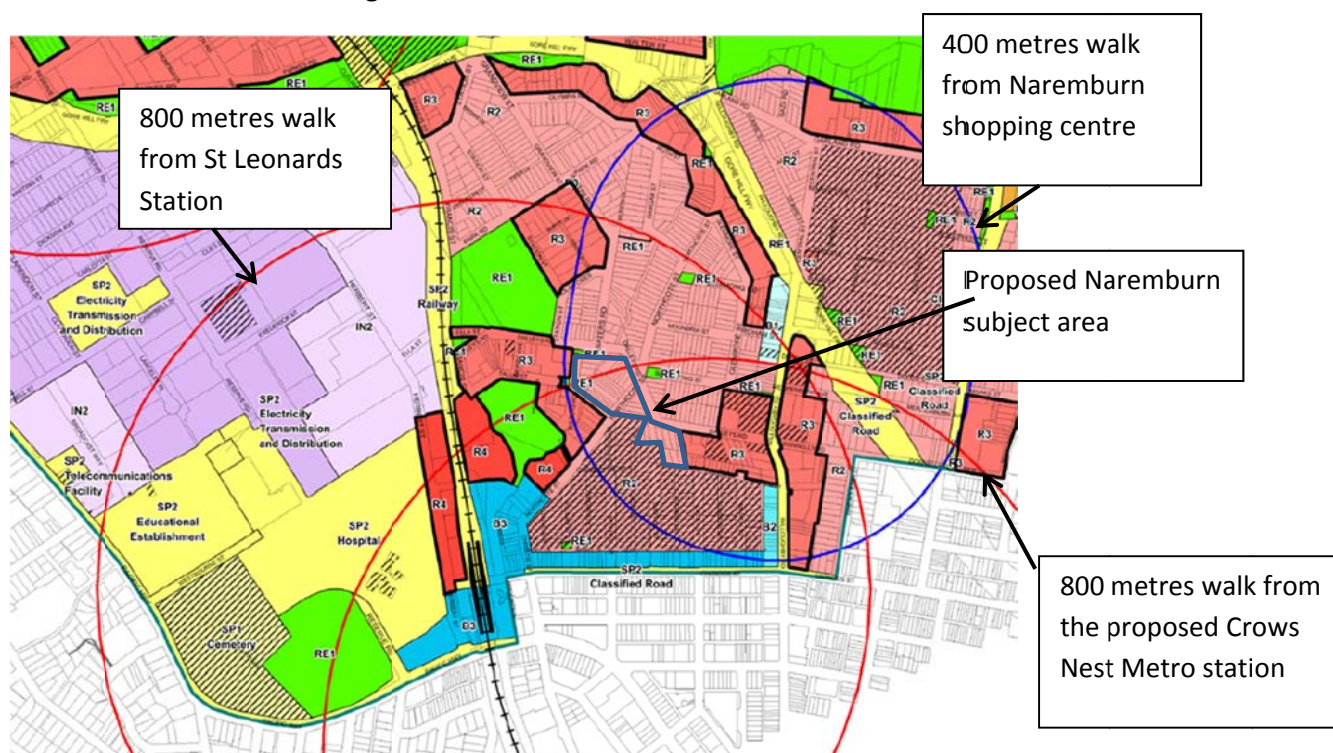


Figure 7: St Leonards/Naremburn investigation area (Source: Willoughby City Council Housing Position Statement, 2017)

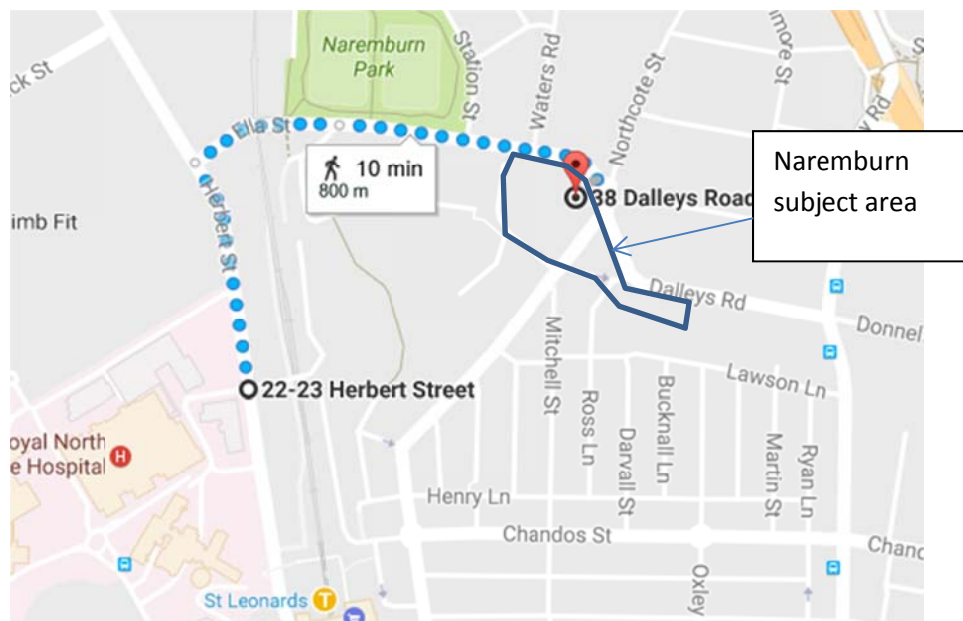


Figure 8: Walking distance (approx. 800 metres) to the St Leonards super health precinct (Source: Google maps)

The Actions and Next Steps in the *Housing Position Statement* note that this is the first step in reviewing the R3 (medium density) and R4 (high density) residential controls in order to determine how additional housing can be accommodated. The Actions note some underlying principles for the investigations moving forward including:

- The majority of new housing within 400 metres walking distance of a centre and in areas already zoned for higher densities.
- A review of these areas to stimulate growth.
- The identification of sites for an increase in controls being included in Council's affordable housing areas.

2. THE PROPOSED NAREMBURN SUBJECT AREA

The proposed *Naremburn Subject Area* that I consider should be investigated further for rezoning to a R3 Medium Density Residential zone is illustrated in **Figure 9**.

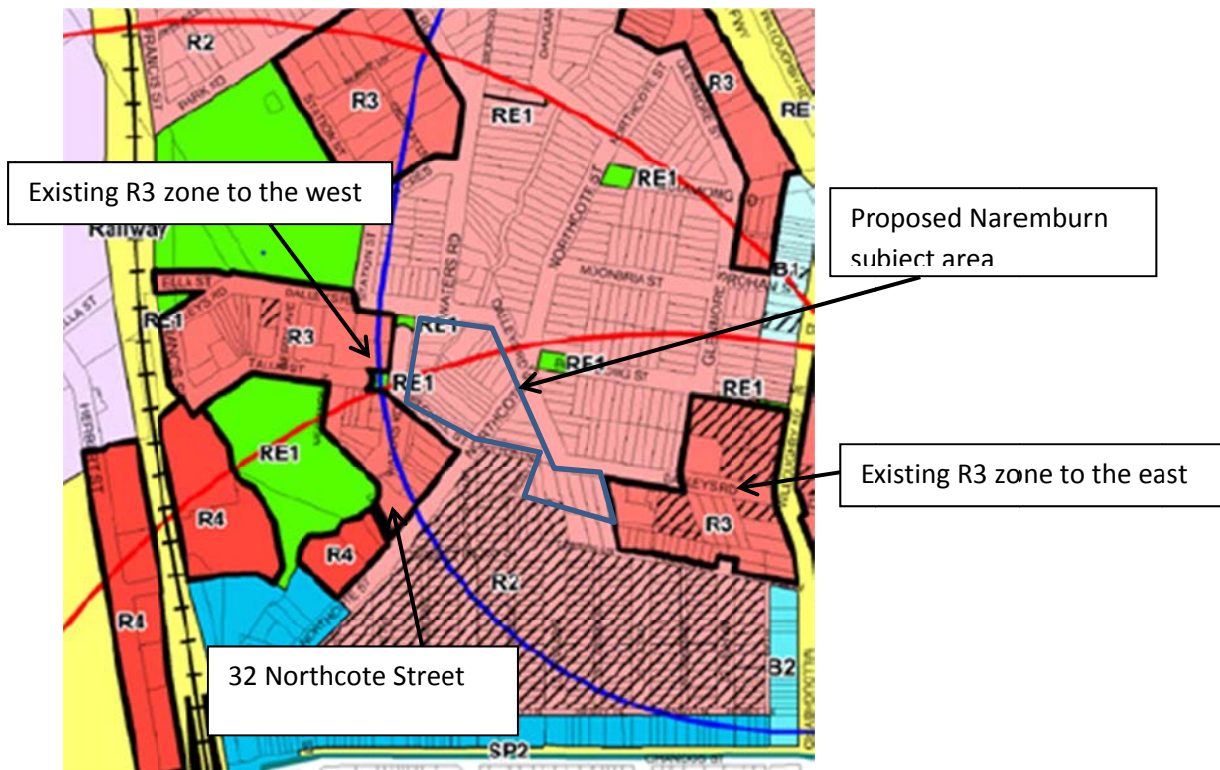


Figure 9: Proposed Naremburn Subject area

The proposed *Naremburn Subject Area* is an ambiguous shape of approximately 10,000sqm. The subject area is currently zoned R2 low density residential. The subject area runs generally to the south of Dalley's Road between an existing R3 medium density residential area to the east and west as illustrated on **Figure 9**.

The surrounding areas to the proposed subject area have evidence of recent development activity with a medium density development at 32 Northcote Street recently fully selling. Consideration of the proposed Naremburn subject area for R3 medium density residential would be in-keeping with the area.



Figure 10: Recent development at 32 Northcote Street, Naremburn



Figure 11: Medium density development at 20 Dalleys Road, Naremburn

3.0 REASONS FOR INVESTIGATING THE POTENTIAL OF THE SUBJECT AREA FOR REZONING

I fully support the *St Leonards and Crows Nest Priority Precinct* and would welcome the inclusion of the *Naremburn Subject Area* for rezoning to R3 medium density residential. Based on the Draft District Plan's key priority of increasing jobs within '30 minutes' of existing strategic centres such as St Leonards stations and the super health and education precinct, there is a strong case for considering the proposed *Naremburn subject area* for additional density and ultimately to assist in achieving Willoughby City Council's 5 and 20 year housing targets.

The following table summarises the key reasons for considering this area for rezoning to R3 medium density. It details how increasing density on the subject area can support latest strategic planning directions as detailed in *A Plan for Growing Sydney*, the *Draft District Plan North*, the *Interim Statement*, as well as local policy directions detailed in the *Draft Willoughby Planning Strategy*.

Table 1: Reasons for supporting rezoning of the Naremburn subject area

Strategic Planning Document	Principle/Action	Support for the rezoning of the subject areas in Naremburn
A Plan for Growing Sydney	Focus new housing close to public transport that runs frequently and can carry large number of people.	The subject area in Naremburn is within an 800 metre walk of both St Leonards railway station and the proposed Crows Nest Metro station. Increasing housing density in this area can help achieve one of the key principles of A Plan for Growing Sydney by providing housing choice close to public transport.
A Plan for Growing Sydney	Putting more housing and services close to strategic centres, such as St Leonards.	As the subject area is within an 800 metre walk of St Leonards centre, increasing housing density in this location will provide more people with the opportunity to access the services of St Leonards.
Draft District Plan North	Accessing jobs and services within 30 minutes.	By increasing density on the subject area, there will be an opportunity for more people to access jobs and services in under 30 minutes. Access to the existing rail network at St Leonards, the proposed Metro Station at Crows Nest plus existing bus services enable people to access jobs and services in Sydney CBD, St Leonards, Chatswood and beyond within (and under 30 minutes). Increasing density in this area will clearly assist more people achieve this important goal of using public transport to access jobs and services.
Draft District Plan North	Planning for the expansion and enhancement of the urban	The subject area is also located within an 800 metre walk of the St Leonards

	amenity around super health precincts such as St Leonards.	super health and education precinct. It is important to provide housing choice for key workers in both the education and health sectors. Increasing density on the subject area could provide housing choice for workers within these sectors.
Draft District Plan North	Improving housing choice, diversity and affordability particularly recognising the increasing proportion of older people in the North District and the need for smaller houses.	Increasing the density on the subject area would increase housing choice and diversity by introducing medium density development. Similar developments in neighbouring streets shows the success of medium density developments such as 32 Northcote Street (approximately 400 metres from the subject area).
Draft District Plan North	The final housing target for the North District is 25,950 dwellings including 1,250 in Willoughby. Willoughby City Council must prepare a 5 and 20 year supply strategy to identify potential new areas for housing.	<p>The identification of this subject area within Naremburn is a logical extension of existing R3 Medium Density Residential zoned areas which ultimately lead onto the St Leonards strategic centres (refer Figure 5).</p> <p>Increasing density in this area would increase housing choice and allow more people to access job and services within 30 minutes. It would also increase housing choice opportunities for key workers within the super health and education precinct.</p> <p>Whilst more investigations would need to be undertaken to confirm infrastructure upgrade requirements and urban design, the subject area is a logical area to be considered in the 5 year supply strategy for Willoughby.</p>
Draft District Plan North	Action P4: Facilitate place making and the growth and diversification of job opportunities in St Leonards. Key considerations for the St Leonards area will be to <i>leverage off the new Sydney Metro station at Crows Nest to deliver additional employment and residential capacity</i> .	The subject area is located within approximately 800 metres walk of both the existing St Leonards railway station and the proposed Crows Nest Metro station making it an ideal location to achieve this key action of the Draft District Plan.
St Leonards and Crows Nest Priority Precinct	The St Leonards and Crows Nest Priority Precinct is an area currently under investigation. The identification of the	Whilst the vision and planning for the St Leonards and Crows Nest precinct is evolving, the subject area should be considered for inclusion in proposed

	<p>precinct is based on a number of factors such as maximising the use of the new Metro, providing jobs closer to home and responding to strong demand for jobs and housing.</p> <p>The draft Vision for the St Leonards and Crows Nest Precinct notes that: <i>'The Precinct.... will provide for new communities in a range of housing types reflecting different characteristics of the Precinct. Equitable living will be provided....'</i></p> <p>The Draft objectives include: <i>'Develop high quality and diverse residential areas that create sustainable and liveable communities'.</i></p> <p>The Draft Guiding Principles include:</p> <ul style="list-style-type: none"> • <i>'Encourage amalgamation of smaller sites to facilitate good urban design outcome;</i> • <i>Encourage a range of housing types within the Precinct that addresses the needs of the current and future populations;</i> 	<p>rezoning. It supports the draft vision, objectives and principles by:</p> <ul style="list-style-type: none"> • providing housing choice close to the jobs and services of St Leonards Strategic Centre and the super health and education precinct. • being within 800 metres walk of the existing railway network and Crows Nest Metro, increasing density on the subject area achieves the key aim of the priority precinct planning by maximising homes close to public transport; • encourages amalgamation of a small site for medium density housing which provides a product for current and future population in the Precinct. <p>In addition, the subject area is surrounded by existing R3 medium density residential land to the east and west. As such, the description of the <i>character area</i> should be updated to reflect this density. The upzoning of the <i>Naremburn subject area</i> is a logical extension to existing R3 zoned land, and which will not impact on the nearby conservation area.</p>
Draft Willoughby Planning Strategy	<p>The Draft Housing Position Statement notes the following principles as important when identifying areas suitable to accommodate additional density:</p> <ul style="list-style-type: none"> • Offer a variety of housing types. • Located close to public transport including train stations and major bus routes. • Heritage significance is not compromised. • The capacity of existing infrastructure is 	<p>These principles have been carefully reviewed and the subject area is considered to align with all of the principles and hence be suitable to be considered as an area for additional density.</p> <ul style="list-style-type: none"> • An R3 medium density zone would allow a variety of housing types in the area. • The subject area is within 800 metres walk of St Leonards station and the proposed Crows Nest Metro Station. • The subject area is not located in the Naremburn Conservation Area.

	<p>considered. The majority of new developments should occur in locations that are in close proximity to education, transport, health, social, cultural and employment services.</p> <ul style="list-style-type: none"> • Impacts on traffic and improvements to public transport need to be considered. • New pedestrian and cycle links required. • Additional density to be provided near existing business centres to support local business and recommended in the Willoughby City Strategy. • Increased population to be matched by social planning. • Quality of existing housing stock. 	<ul style="list-style-type: none"> • The subject area is currently serviced and augmentation to existing services would need to be considered as part of future investigations. • Consideration of road access and impacts on the local network would need to be considered as part of future investigations with upgrades proposed as necessary. • Pedestrian and cycle linkages through to St Leonards, the Crows Nest Metro, Naremburn centre and the super health and education precinct can all be considered in the future design. • The subject area is within 400 metres of the Naremburn Centre and 800 metres of St Leonards strategic centre, and so able to access many service opportunities. • Social planning would be considered as part of further investigations and developer contributions made as necessary. • The existing housing in the area is detached dwellings. There are a number of medium density developments within close to the subject area as illustrated in Figures 8-9. Development of the subject site for additional density would be in-keeping with the evolving nature of this area.
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Conclusion

Due to the reasons detailed above, I believe there is a strong case for the rezoning of the identified area within Naremburn. The *Naremburn subject area*:

- is a logical extension of existing R3 medium density zoning to the east and west,
- provides housing choice in the area which can assist key workers in the nearby super health precinct,
- provides access within 30 minutes (or less) to jobs in St Leonards, Sydney CBD, Chatswood and beyond.,

- does not impact the Naremburn conservation area, and
- has existing infrastructure and services which could be upgraded as part of a future proposal.

I would welcome the opportunity to discuss this with you further. If the Department of Planning believes there is merit in progressing the rezoning of this area, I would be active in discussing with the relevant neighbours in order to assist the amalgamation of lots.

Kind regards

A handwritten signature in dark ink, appearing to read 'Zoe Melis', with a stylized, cursive script.

ZOE MELIS

0419856219