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DARLING PARK, 201 SUSSEX ST
SYDNEY NSW 2000**

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28 August 2017

Ms Ann-Maree Carruthers
Director of Urban Renewal
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Ann-Maree,

2-6 NORTHCOTE STREET, NAREMBURN – ST LEONARDS AND CROWS NEST STATION PRECINCT

We act for Bedoba Holdings Pty Ltd, the owners of 2-6 Northcote Street, Naremburn ('the site').

In August 2016, our client submitted a Master Planning Report (by *Elenberg Fraser Architects & Urbis*) to inform the Department's strategic investigation of the St Leonards Precinct. The report:

- provided strategic analysis of the site and surrounds including an assessment of the strategic planning policy context; and
- established a vision and concept for the site which aligns with the strategic policy direction and context.

The Department recently released the next stage of their investigations forming the Interim Statement ('the Statement') for the St Leonards and Crows Nest Station Precinct ('the Precinct'). On behalf of our client, we provide the following review of the Statement.

1. THE SITE

The site is located at 2-6 Northcote Street, St Leonards and is legally described as Lot 1 and Lot 2 in DP 801523. The site is located on the periphery of railway land to the west and the St Leonards commercial centre to the south. Figure 1 depicts the site and its locality.

Under the Willoughby LEP 2012 the site is:

- zoned B3 Commercial Core;
- has a height control of RL86 adjacent to Northcote Street and RL95 on the western portion of the site;
- and has a FSR of 2:1 with an ability to achieve 2.5:1 if the site is amalgamated with adjoining sites to the north to have an area over 3,900sqm.

Figure 1 – Site Context



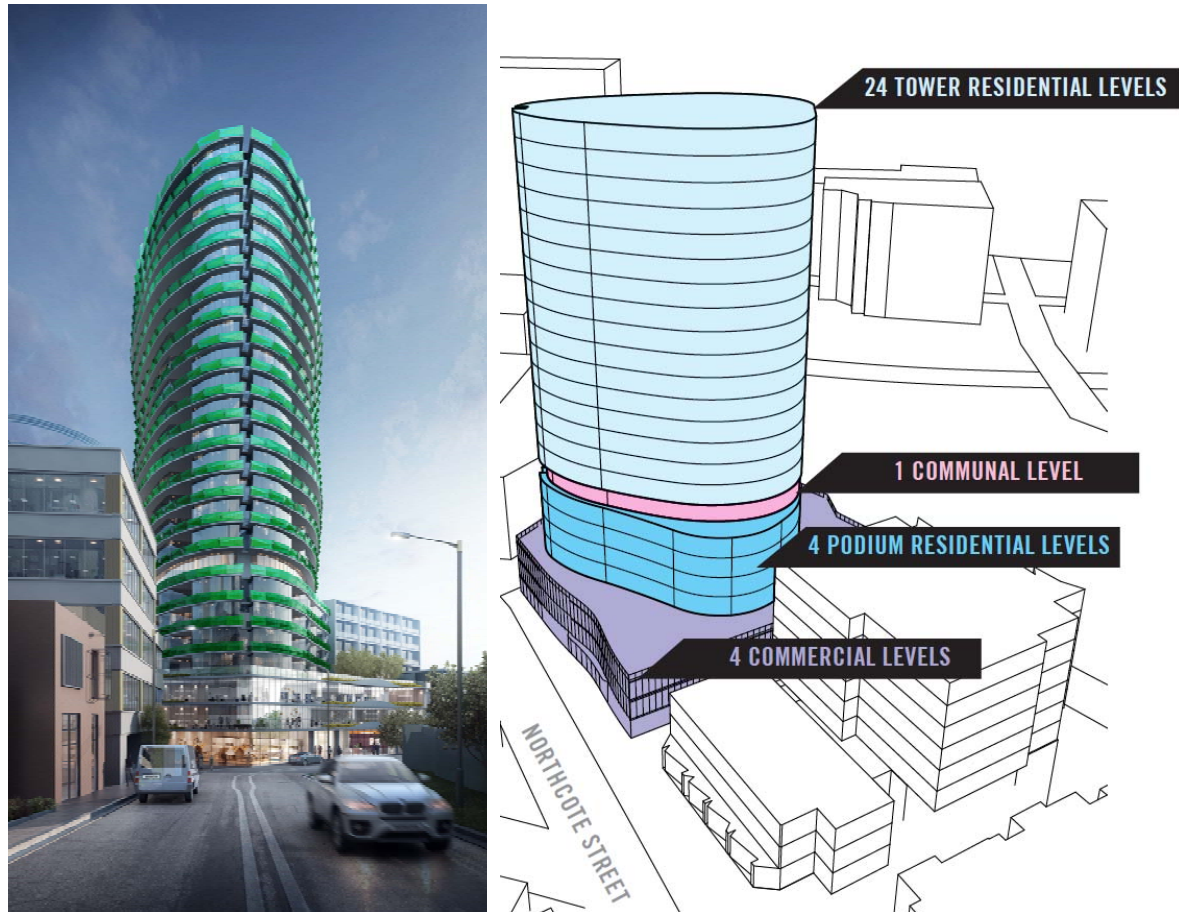
Source: Elenberg Fraser

2. THE PROPOSAL

As per the proposal submitted to the Department, our client seeks a mixed-use development incorporating:

- Retail and commercial tenancies at the ground floor level with clear glass frontage to promote activation of both Northcote Street and Evans Lane.
- A podium of commercial tenancies providing 5,908sqm (2:1), 921sqm of additional commercial floor space than is currently accommodated on site.
- A tower comprising residential and communal floor space which provides 188 units.

Figure 1 – The Proposal: Massing and Land Use



Source: Elenberg Fraser

3. RESPONSE TO THE INTERIM STATEMENT (2017)

The Statement defines the site as being located in the ‘9. Residential (Naremburn)’ area. Our client is supportive of this designation of the land for future residential use as the site is currently adjacent to multi storey residential properties at 8-14 and 16-30 Northcote Street. However, we maintain that further consideration of this site needs to be reflected in the next round of detailed investigations made by the Department. For each item listed in the Statement, our response follows:

“Key matters for consideration include appropriate transitions between these character areas and any new development, protection of the heritage character of these areas and improved connectivity.”

Contextually, the site is located in close proximity to land adjacent the railway corridor. This land to the west has been strategically planned by the landowners for high density development close to the station. The site is also adjacent the lower scale residential development (to the east) protected by the Naremburn Conservation Area. An opportunity therefore exists to provide a transition from future taller buildings to the west down to the conservation area to the east. The subject site sits between these two areas. Figure 3 demonstrates the proposed and approved building heights (in blue and pink respectively), compared to the existing (in orange).

Figure 2 – Height Study

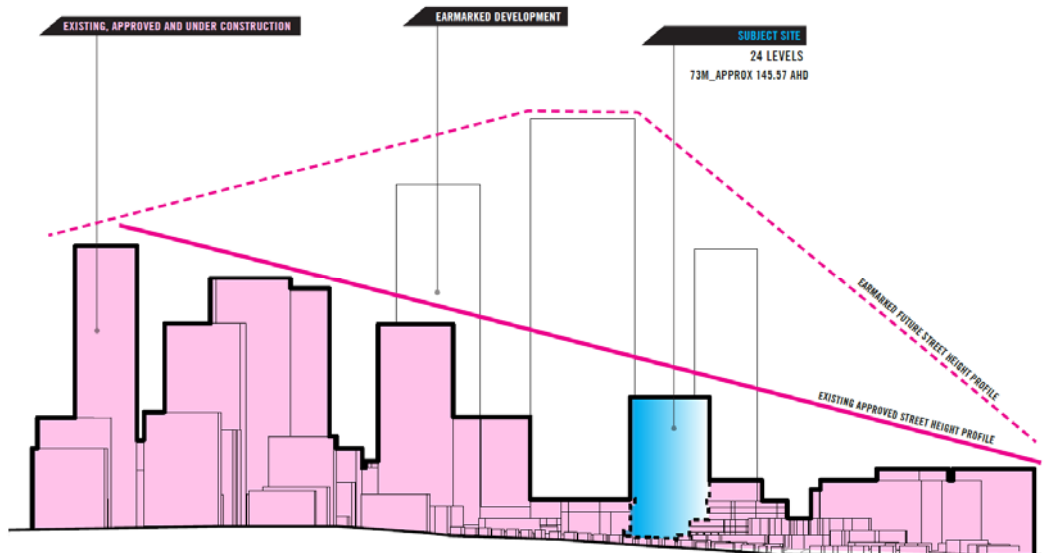


Source: St Leonards Precinct Development Height Study

Immediately west of the site, a proposed building height of 38 levels is proposed, whilst the existing residential development to the north east is 8 levels. The proposed building height of 24 levels, provides a suitable transition in building scale between the planned density and height of buildings adjacent the railway corridor and the low density residential development to the east. This transition is further demonstrated in Figure 3, which shows how the built form achieves this transition.

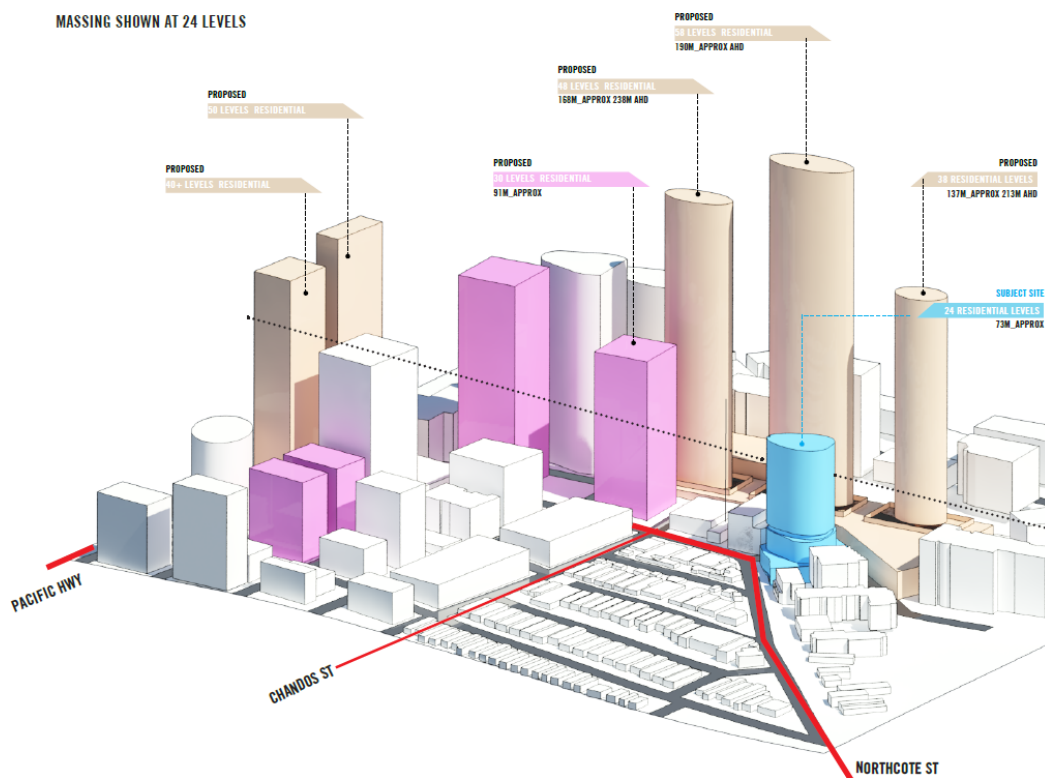
With regard to the low density area to the south-east of the site, the inclusion of the stepped podium responds to the low scale environment by mirroring the height of the existing office development to the west of the site and the residential development to the east.

Figure 3 – Transition in Building Heights



Source: Elenberg Fraser

Figure 4 – The Changing Context of St Leonards



Source: Elenberg Fraser

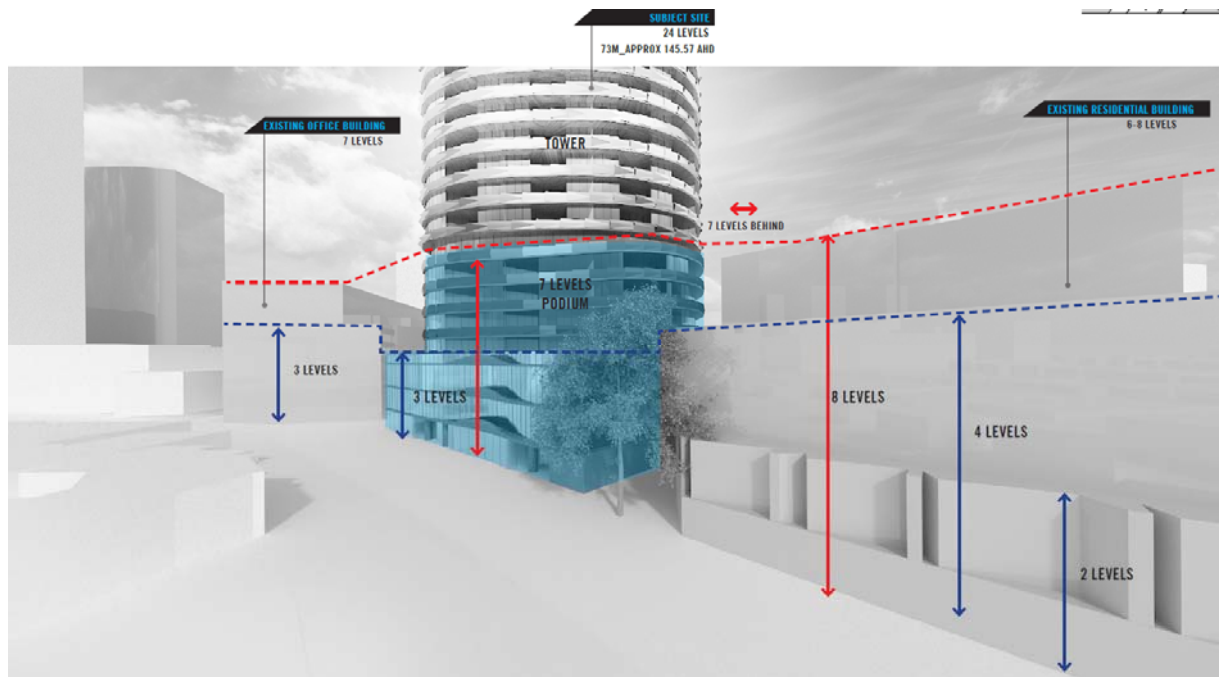
In responding to the low density of the Naremburn Conservation Area and the future projected growth of St Leonards, the proposal has regard for both the existing and future context.

In terms of impact, the investigations completed by the project Architect demonstrate that minimal overshadowing impact will occur on the adjacent low density residential development (refer to Appendix A).

"No significant increase in densities is proposed as the majority of these areas are located within the Naremburn and Holtermann Estate Conservation Areas."

The site is not located within the Naremburn Conservation Area and should therefore not be subject to the same 'no change' future development restrictions. Consideration of the proximity of the site to the Conservation Area has been had in the proposed massing of the built form through the inclusion of the stepped podium (refer Figure 4). The two transitions in setback to Northcote Street at 3 levels and 7 levels creates a sense of human scale at street level, and sets the mass of the residential tower away from the Conservation Area.

Figure 4 – Response to Scale of Existing Streetscape



Source: Google Earth

"Naremburn and Crows Nest areas are proposed to be retained for lower density residential development."

The proposal does not preclude the retention of the low-density areas of Naremburn and Crows Nest which are delineated by inclusion into the Naremburn and Crows Nest Conservation Areas.

In further support of the proposal, we note that Section 4.9 and 5.2 of the Statement describes:

- that an opportunity exists to create a mixed-use precinct that encourages uses to support the Mater Hospital and that complimentary commercial and residential uses are to be investigated;

- that an increase to density within the 400 metres catchment areas should occur.

Of which the proposal achieves through seeking an increase in allowable building height and density.

4. CLOSURE

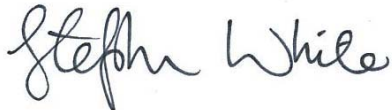
We request the Department of Planning and Environment support to rezone the land to B4 mixed use with an associated increase in building height and FSR controls to facilitate the site's redevelopment. The proximity of the existing rail station and new metro station is a clear catalyst to support the uplift of this site. The concept submitted balances the undeniable opportunity for more density with a sensitive scale that will ensure amenity levels of the residential properties nearby will not be unduly affected.

The proposal aligns with State Government's vision to increase density and provide additional mixed use development within a Strategic Centre. Specifically:

- The site is well located to contribute to housing and employment targets in close proximity to the major transport links.
- The investigations undertaken by our client demonstrate that more commercial floor space than the site currently accommodates can be achieved increasing employment opportunities within the centre.
- The proposed density responds to the sites location in a transition area between the core of St Leonards and the lower scale residential development to the north and east.

We look forward to continuing to work with the Department to realise the full potential of the subject site into the future.

Yours sincerely,

A handwritten signature in black ink that reads "Stephen White". The signature is written in a cursive, flowing style.

Stephen White
Director



APPENDIX A – SHADOW ANALYSIS