

6 September 2017

17075

Carolyn McNally
Secretary
Department of Planning & Environment
320 Pitt St,
Sydney
NSW 2000

ACN.
615 087 931

Dear Carolyn,

**Submission in response to the St Leonards and Crows Nest Interim Statement
207 Pacific Highway, St Leonards**

173-185 Sussex St
Sydney NSW 2000

Thank you for this opportunity to provide feedback on the St Leonards and Crows Nest Interim Statement (the Statement). This submission has been prepared by Ethos Urban on behalf of Altis Property Partners as the Responsible Entity and Trustee for the the owner of 207 Pacific Highway, St Leonards (the Site).

Executive Summary

This submission supports the general intent and draft objectives of the St Leonards and Crows Nest Interim Statement to coordinate renewal and develop a precinct wide redevelopment plan commensurate to its status as a strategic centre and State Government's investment in a new metro station at Crows Nest.

In relation to the subject site, we request that any future strategic planning:

- identifies the site as part of the St Leonards Centre Core, not the Health and Education Character Area as it is currently shown;
- retains shop top housing as a permissible on the site; and
- increases the height and FSR controls commensurate with the recently rezoned sites in the Lane Cove LGA, reflecting the site's central location and its access to transport infrastructure, open space and employment.

The Site

The site is located centrally within the St Leonards and Crows Nest precinct, 150 metres from St Leonards Station within Willoughby Local Government Area. The site is also 600 metres walk from the proposed Crows Nest Metro Station.

The site fronts Pacific Highway to the south. The northern alignment of the site adjoins the Royal North Shore Hospital (RNSH) health precinct, a major health facility within Sydney's North District. The site itself does not form a part of the RNSH campus and accommodates uses independent of the health precinct.

The two commercial-office buildings on site currently accommodate tenants in the financial and IT services market. The eastern building is 12 storeys and the western

E. info@ethosurban.com.au
W. ethosurban.com.au

T. +61 2 9956 6962

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building is a part 7 and part 4 storey building, stepping down in height towards Reserve Road. The site has a combined GFA of approximately 19,955m².

Under the current Willoughby Local Environmental Plan 2012 (WLEP) controls, the site is zoned B3 Commercial Core. Shop top housing is permitted on site as an additional use under Schedule 1 of the WLEP 2012. The maximum height of building standard ranges from 15.5 metres to 38.5 metres (from Reserve Road to Herbert Street) reflecting the existing buildings on the site. A maximum FSR of 3:1 applies across the site.



Figure 1- Site Location

St Leonards and Crows Nest Interim Statement

The Statement is understood to be a preliminary audit review of the precinct identifying existing densities, key services and infrastructure within the area. The Statement along with its supporting background studies represent the first round of studies and documentation that will ultimately inform the St Leonards and Crows Nest Infrastructure Land Use Plan.

This submission is generally supportive of the intent of the Statement. Under the Statement, the site is identified as being:

- a large lot site that is unconstrained by strata and heritage;
- in close proximity to social infrastructure and open spaces;
- within 400 metres of St Leonards Station and 800 metres of Crows Nest Metro Station; and
- well placed for some additional uplift and density.

The Statement also outlines ten key character areas within the precinct. The subject site is located within the Health and Education Character Area (refer to **Figure 2** below).

This does not accurately represent the ownership or current use of the site which accommodates commercial buildings associated with the IT and financial services industry. The site does not form a part of the RNSH health precinct and functions independently to the hospital.

We also note that the Statement does not align with the strategic directions (refer to **Figure 2**) set out under the Strategic Employment Review (SER) report prepared by SGS which accurately identifies the site as accommodating commercial services and thereby recommends it form a part of 'St Leonards Core'.

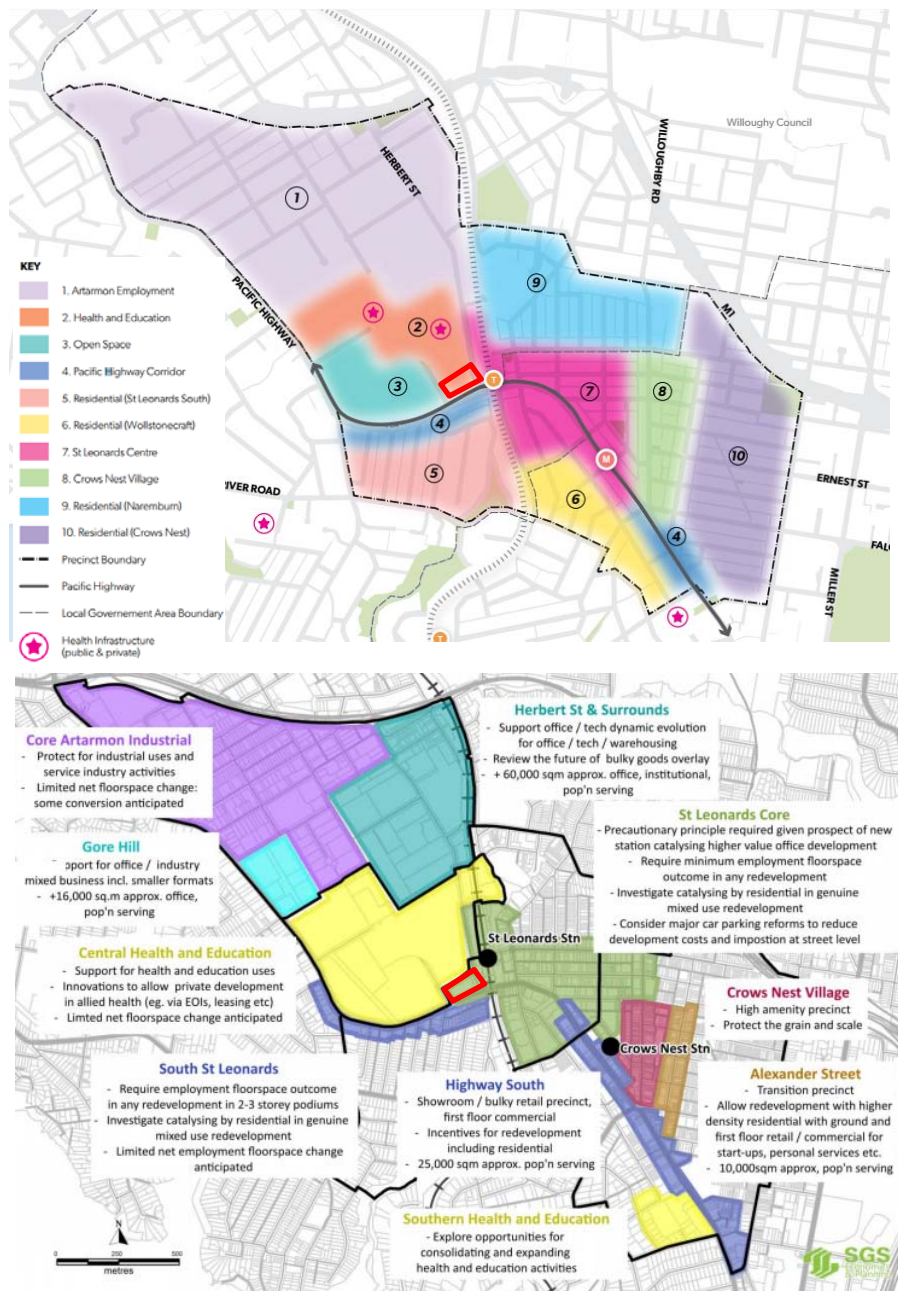


Figure 2- Character Areas Map under the Interim Statement (top image); Planning Directions Map under the Strategic Employment Review Report (bottom image)

Source: St Leonards and Crows Nest Interim Statement Report, DP& E and Strategic Employment Review Report, SGS

Given the proximity of the site to St Leonards Station and the St Leonards Centre, we request that the Statement's Character Area Map and future studies be updated to extend the St Leonards Centre Character area to include the site, consistent with the SER report.

We have also identified other inconsistencies in the strategic directions outlined for the site under the Statement and its supporting documentation which are detailed at **Appendix A**. We request that these changes are taken into account to ensure that the future direction of the precinct is accurately represented. In particular we note:

- The Combined Conceptual Strategies Map under Section 5.3 of the Preliminary Urban Design Analysis Report identifies the site as part of a wider 'transitional area' and a 'gateway' site. The report is unclear on the definition of these terms. A gateway is typically a landmark building that signifies the entry to a precinct, which would be contrary to a transitional building, which assists with the transition between the character of two different areas. It is considered that a gateway building is appropriate on the site, which clearly reads as the entry to St Leonards, and not a transitional building, noting that the lower density areas to the south are already identified as part of the transition area.
- The Opportunities Map under Section 5.2 of the Preliminary Urban Design Analysis Report identifies potential for a high street interconnecting Reserve Road to Herbert Street via the subject site. It is understood this may have been based on the assumption the site is also owned by NSW Health. The proposed High Street is not supported and would prevent any redevelopment occurring in the future and should not be included in future studies.

Shoptop Housing Use

We request that the any future land use zoning applied to the site retain shop top housing as a permissible land use on the site. This will allow the future use of the site to be developed in line with market demand and ensure that St Leonards Centre evolves organically providing both employment floorspace and homes close to jobs. This is consistent with directions under the SER report which recommends that precautionary principle be applied to protect employment floor space whilst catalysing development by allowing residential use in St Leonards Core.

Retaining the potential for residential uses on site can also particularly benefit the adjoining RNSH hospital campus as it creates a unique opportunity to deliver housing in proximity to the hospital in accordance with the draft North District Plan. Consistent with the SER report recommendations, minimum employment floor space and floor space/ height bonuses can be used to ensure delivery of employment floor spaces and encourage uptake of commercial development.

Height and Density

Given the site's prominent location in the St Leonards centre, and access to public transport, open space, and employment, the current planning controls of 3:1 and 15.5 – 38.5m are a significant underutilisation of a key site. It is therefore requested that as part of the Priority Precinct process that the site be given a height limit and FSR commensurate to its designation as a gateway site under the Urban Design Study. We recommend that the planning controls allow for similar height and FSR as site's that have recently been rezoned within the Lane Cove LGA.

Conclusion

Altis Property Partners are generally supportive of the Statement subject to the requests made in this submission. Altis would like to be involved in the planning process and welcome the opportunity to work further with the Department of Planning and Environment in progressing the preparation of a final Land Use and Infrastructure Plan for St Leonards and Crows Nest precinct area. Should you have any queries regarding this submission or wish discuss the submission further, please do not hesitate to contact me on 9956 6962 or mrowe@ethosurban.com.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M. Rowe', with a horizontal line underneath.

Michael Rowe


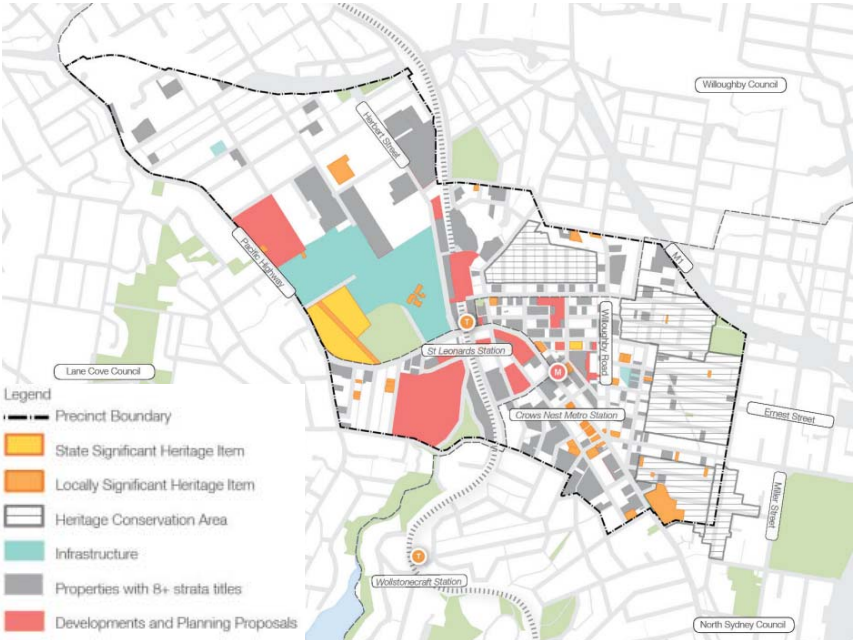
Director

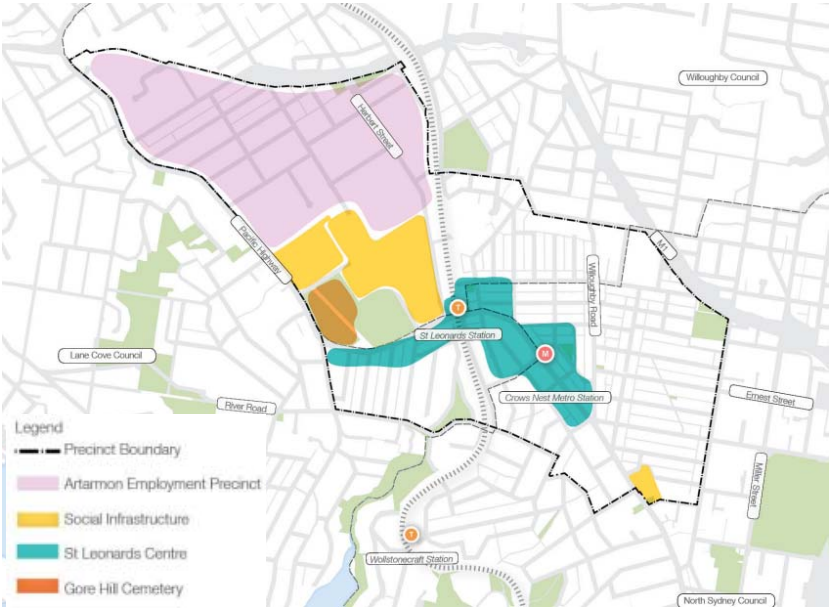
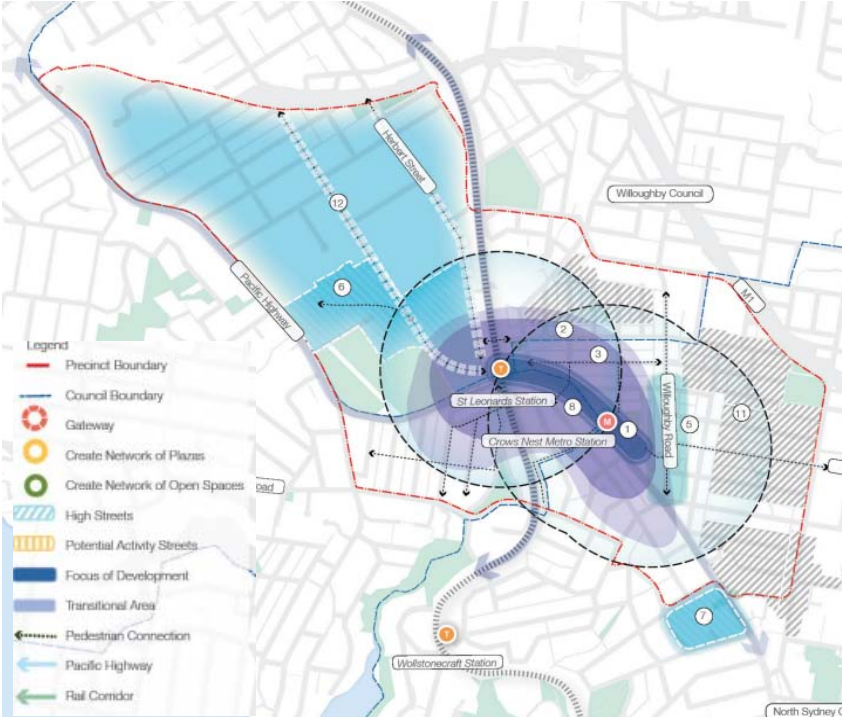
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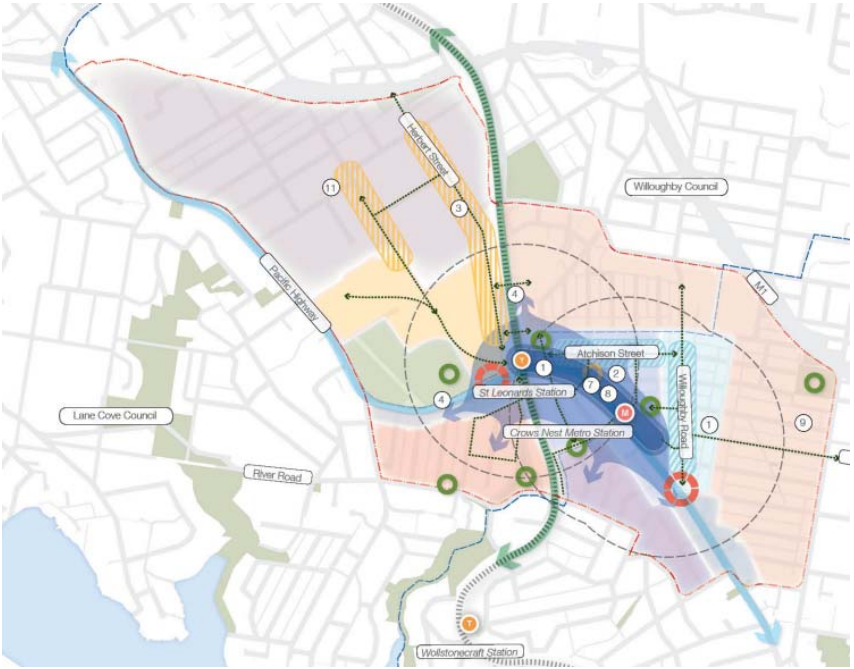
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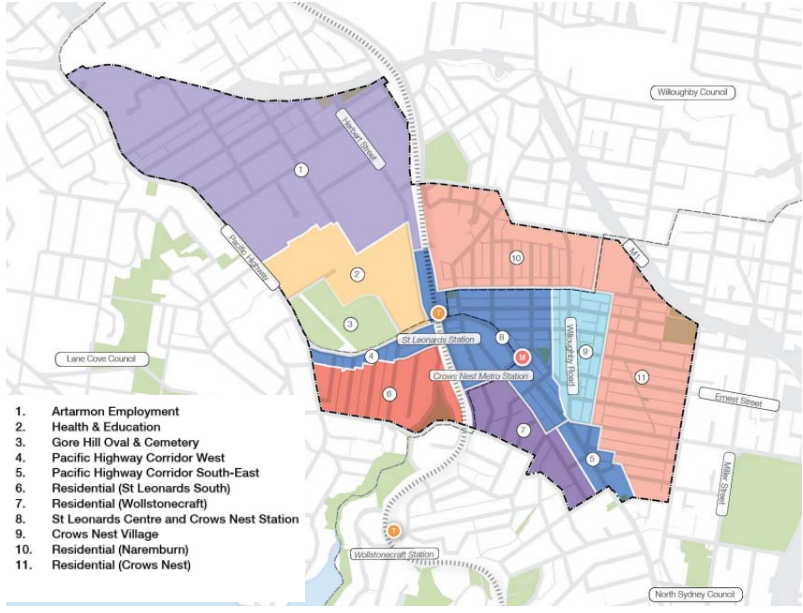
APPENDIX A

Table 1

Report	Inconsistency	Recommendation
Preliminary Urban Design Analysis	<p>Section 3.12 Infrastructure and Amenities</p> <p>Map identifies the subject site as part of the RNSH precinct. The site does not form a part of the hospital campus.</p> 	Update mapping to remove the RNSH / Health classification.
Preliminary Urban Design Analysis	<p>Section 4.2 Constraints – Built form</p> <p>The site is identified as infrastructure associated with the RNSH Campus</p> 	Update mapping to remove the infrastructure classification.

Report	Inconsistency	Recommendation
Preliminary Urban Design Analysis	<p>Section 4.4 Constraints- Land Use</p> <p>The map identifies the site as social infrastructure. The site does not form part of the RNSH precinct and currently accommodates commercial-office buildings.</p> 	Update mapping to remove the social infrastructure classification and replace it with St Leonard's centre.
Preliminary Urban Design Analysis	<p>Section 5.2 Opportunities</p> <p>The opportunities map considers interconnecting Reserve Road directly to Herbert Street via the site.</p> 	<p>Remove / divert the proposed 'high street' from running through the site.</p> <p>It is noted that the Preliminary Structure Plan-Movement Map under Section 5.5 identifies the street as a pedestrian route rather than a main street.</p>

Report	Inconsistency	Recommendation
	<p>Section 5.3 Combined Conceptual Strategy</p> <p>The site is identified as a gateway site and forms a part of a transitional area. However these terms are not defined under the design report and it is unclear how this affects the proponents site.</p> 	<p>Retain gateway designation and include a definition for clarity. Replace the 'transitional area' classification with an extension of the St Leonards core.</p>
<p>Preliminary Urban Design Analysis</p>	<p>Section 5.4 Preliminary Structure Plan- Character Areas</p> <p>The map includes the site as part of the health and education precinct, which does not reflect the current B3 commercial core zoning and the commercial uses of the site. We request that the site forms a part of the St Leonards Centre and Crows Nest Station Character Area.</p>	<p>The site be included in the 'St Leonards Centre and Crows Nest Station' not the 'Health and Education' Character Area.</p>

Report	Inconsistency	Recommendation
	 <p>The map displays the Crows Nest area, divided into 11 numbered zones. The legend identifies the following zones:</p> <ol style="list-style-type: none"> 1. Artarmon Employment 2. Health & Education 3. Gore Hill Oval & Cemetery 4. Pacific Highway Corridor West 5. Pacific Highway Corridor South-East 6. Residential (St Leonards South) 7. Residential (Wollstonecraft) 8. St Leonards Centre and Crows Nest Station 9. Crows Nest Village 10. Residential (Naremburn) 11. Residential (Crows Nest) <p>The map also shows surrounding areas like Lane Cove Council, Wollstonecraft Station, Crows Nest Metro Station, and North Sydney Council.</p>	