

Ms Ann Maree Carruthers  
Director, Urban Renewal  
NSW Department of Planning and Environment  
330 Pitt St  
Sydney NSW 2000

Dear Ms Carruthers,

**RE: 39 HERBERT ST, ST LEONARDS – SUBMISSION ON ST LEONARDS AND CROWS NEST PRECINCT INTERIM STATEMENT**

Thank you for the opportunity to provide comment on the Interim Statement for the St Leonards and Crow's Nest Precinct. Mirvac is the owner of a 3.7 hectare site at 39 Herbert St, St Leonards approximately 550 metres to the North of St Leonards Station.

We are concerned that the broad designation of the entire 63.7Ha of the Artarmon Industrial area as employment and urban services does not sufficiently reflect the diversity of uses and the growing demand for higher order health and It related uses in the area.

The SGS Strategic Employment Review indicates that there will be an undersupply of both office floor space as well as urban services floor space across the Precinct with at least 284,000sqm of additional employment floor space required by 2036. It also clearly highlights that the largest and highest growth industries are knowledge intensive and health and education uses.

The strong view outlined on employment zones, particularly areas classified to have a range of uses defined as 'urban services' due to the important function of these areas in modern and expanding cities is of concern to Mirvac. The term urban services needs to be more clearly defined as does the built form requirements of these industries. We concur that there is a need to protect key urban service functions and businesses but are of the view that these can be accommodated easily within the large area of the Artarmon Employment area and indeed in most cases can be vertically integrated with higher order employment uses if required.

It is important that the specific function, locational requirements and need for space of each industry sector located in Artarmon as well as the travel pattern of workers in these industries be considered and matched to the demand. In order to achieve the Greater Sydney Commissions aim of a 30 minute city it will be important that the pattern of employment reflect the needs and demographic of the local area.

The area referred to as the Artarmon Industrial Area is significant in size and capable of accommodating a diverse range of uses. It also needs to be examined considering the comparative advantages of its proximity to good public transport, the need for good road access, the uses relationship to the local area and the requirement for buffers around particular uses.

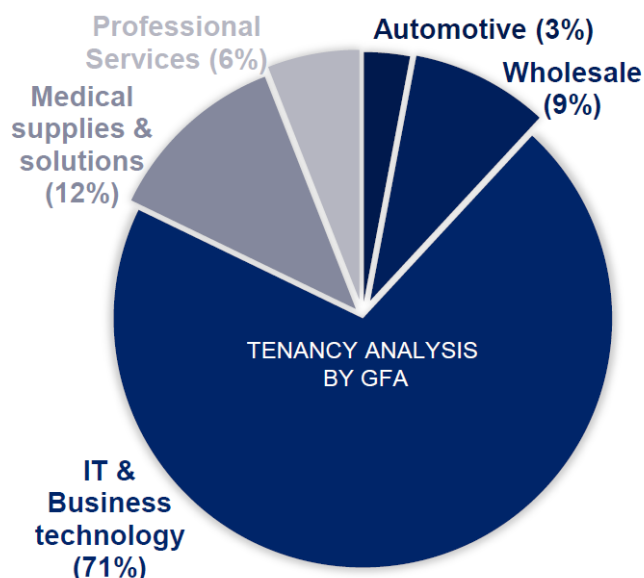
As mentioned above the health care sector and professional/technical/scientific/IT services are the largest industry clusters in the precinct. In relation to Mirvac's site, the current zoning (IN2 – Light Industrial) and built form (low clearance warehousing & older style office) on the site is unable to support current and future employment growth for the area given the changing nature of employment generating activities.

Higher order employment uses such as advanced manufacturing, bio tech, med tech and other uses demand space not dissimilar to commercial office in its configuration. This will not be able to be accommodated under the current IN2 zone and FSR of 1:1. Mirvac has previously commissioned urban design analysis that demonstrates that higher building forms can easily be accommodated on the site without any adverse impacts on the surrounding area.

The area in the close walking catchment of St Leonards Station corresponds to the IN2 zoned land on Herbert St. Mirvac's site contains a range of tenants and uses that have no 'urban service' function and could be located elsewhere in the metropolitan area or accommodated onsite in more suitable commercial office space following the sites redevelopment. For example, buildings within our site are being used for the storage of cars ahead of their sale. These types of uses produce very little employment and represent a significant underutilisation of such strategically located employment lands, close to public transport and a highly educated workforce.

The use of the Business Park Zone allowing a mix of warehouse, health services, office, manufacturing and light industry with an appropriate FSR in the range of 3:1 would allow for employment floor space better suited to the requirements of health and knowledge intensive industries wanting to locate their operations in this area, while still making provision for a wide range of other service industries. Locating higher densities closer to the walking catchment of the station is also likely to encourage a more sustainable travel pattern in the area and trade off the amenity that will come with increased services in these areas.

The current industry mix on the Mirvac site provides a clear indication of the demand profile and the future space requirements for the area. The diagram below shows industry mix by gross floor area.



The current building on the site are for the most part not best suited to the current occupants and the site is built to the maximum allowable under the existing GFA. The site currently has an employee floor space ration of one per 50sqm with a total of 750 jobs onsite, this density would be expected to increase under a purpose built vertically integrated development. Even at the current rate under a B7 zone with an FSR of 3:1 the site could provide more than 2,200 jobs in close proximity to RNSH and the St Leonards Station.

In summary, the area within the walking catchment of the St Leonards Station and the Royal North Shore Health Precinct has enormous potential to provide high value jobs and to respond to the needs of the growing health, professional, technical, scientific and education sectors as outlined in the position statement.

A changing approach to built form, more flexible zoning and an increase in retail amenity, provision of good quality public domain and a supply of affordable and key worker housing will be increasingly important for the growth and success of these 'smart jobs' industry clusters.

It is imperative that ongoing planning in the area continues to drive a move towards increasingly specialised and high value employment, greater employment density and the need for high density more affordable accommodation in the area.

Please do not hesitate to contact me on 0415 291 708 should you require any further information on the attached Vision.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Fabian Nager', with a stylized, flowing script.

Fabian Nager  
Development Director