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Director, Sydney Central Urban Renewal
Department of Planning and Environment
GPO Box 39
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Attention: Director, Sydney Central Urban Renewal

**RE: TOWN PLANNING SUBMISSION
DRAFT ST LEONARDS AND CROWS NEST 2036 STRATEGY
2 GREENWICH ROAD, GREENWICH (LOT 1 IN DP 662215 AND LOT 2 IN DP 56604)**

Dear Sir/Madam,

This submission has been prepared by Willowtree Planning Pty Ltd on behalf of Ramsay Health Care, in relation to the *Draft St Leonards and Crows Nest 2036 Strategy* (draft 2036 Strategy). Specifically, this submission relates to the site of 2 Greenwich Road, Greenwich (Lot 1 in DP 662215 and Lot 2 in DP 56604).

It is noteworthy that the site is the subject of an approved Gateway Determination (dated 6 September 2018) for amendment to *Lane Cove Local Environmental Plan 2009* (LCLEP2009) to include Shop Top Housing as an Additional Permitted Use, as well as additional building height, within the B3 Commercial Core zone.

Pursuant Condition 1(a) of the Gateway Determination, the Planning Proposal is required *to be updated to demonstrate consistency with the draft findings of the St Leonards and Crows Nest Station Precinct strategic investigation*, and pursuant to Condition 5, the Planning Proposal is required *to be amended to demonstrate consistency with the final strategic planning framework for the St Leonards and Crows Nest Station Planning Precinct*.

Ensuing the Gateway Determination, the draft 2036 Strategy was published and has direct implications for the rezoning of the site.

Whilst the subject site was included in the *St Leonards and Crows Nest Interim Statement* (Interim Statement), the site has been *excluded* from the draft 2036 Strategy. This is despite the Interim Statement having recognised the strategic merit of the site, as demonstrated through the designation by the Interim Statement of the site as a transition between the Pacific Highway Corridor (proposed to be *an activated, high density mixed use corridor with a key focus on employment*) and the St Leonards South Residential area (proposed to be *a higher density residential area over time*). The Interim Statement identified opportunities for higher density built form to be delivered in both the Pacific Highway Corridor and the St Leonards South Residential area.

TOWN PLANNING SUBMISSION

Draft St Leonards and Crows Nest Strategy 2036

2 Greenwich Road, Greenwich (Lot 1 in DP 662215 and Lot 2 in DP 56604)

Accordingly, through the Interim Statement as well as through the favourable Gateway Determination of the site-specific Planning Proposal, the Department of Planning and Environment (DPE) has previously acknowledged the merit of higher density, mixed use development on the subject site.

Importantly, the proposal has also been determined to exhibit strategic and site-specific merit on a standalone basis without being reliant on planning for the wider precinct. This has been demonstrated through detailed assessment against the tests prescribed in DPE's *A Guide to Preparing Local Environmental Plan* and key State regional, district and local Strategic Plans. The strategic and site-specific merit of the proposal remains unchanged, despite the recently-released draft 2036 Strategy.

In summary, the strategic and site-specific merit of allowing Shop Top Housing and additional building height on the site owes to the following:

- The proposal is consistent with the *Greater Sydney Region Plan* and *North District Plan*:
 - In accordance with the Plan's Productivity Priorities, the proposed broadening and densification of uses on the site will increase the supply and diversity of available commercial floor space and housing in a highly accessible location.
 - By providing new residential accommodation in conjunction with commercial premises, a wide range of people will be accommodated, as required by the Plan's Liveability Priorities. Housing affordability and choice will therefore be improved whilst promoting high standards of living, ultimately creating a liveable and loveable place to live, work and visit. Specifically, the provision of shop top housing on the site will contribute to the delivery of the 1,900 new dwellings required for Lane Cove over the next five (5) years.
 - Commensurate with Sustainability Priorities, the proposal will also augment the efficiency with which land is used through the diversification and densification of uses that are highly compatible with surrounding development and coordinated with supportive infrastructure.
- The proposal was consistent with the previous iteration of planning for the St Leonards and Crows Nest Station Precinct. Notably, the site was identified *in-between* the Pacific Highway Corridor and St Leonards South Residential precinct. In accordance with the vision for the Pacific Hwy corridor, the proposal would provide lower-floor employment-generating uses, whilst also being consistent with the vision for St Leonards South which *is proposed to be a higher density residential area over time*. Shop top housing would allow for the site to provide a transition between these two character areas.
- The proposal is consistent with local strategic plans including *Liveable Lane Cove 2035* (being Council's adopted Community Strategic Plan). The proposal will contribute to the creation of a liveable area offering a range of housing connected to infrastructure, jobs and community facilities by an integrated transport network.
- The subject site is not identified in proximity of any area of biodiversity and accordingly the proposal will not exhibit any adverse impact on the natural environment. Neither does the site comprise any other environmental values, resources or hazards. Rather the proposal relates to a site that has been historically developed and forms part of an established urban area.
- The site is located within the transition zone between high density commercial development adjacent to the Pacific Highway and lower density residential development to the south. Shop top housing responds to this transitional context through the integration of both commercial and residential uses contained within a built form that makes efficient use of the site whilst also protecting neighbouring amenity. A contextually-responsive and sympathetic conceptual design has been prepared for the site.

TOWN PLANNING SUBMISSION

Draft St Leonards and Crows Nest Strategy 2036

2 Greenwich Road, Greenwich (Lot 1 in DP 662215 and Lot 2 in DP 56604)

- Shop top housing on the site would also complement the surrounding context by assisting in the creation of a neighbourhood centre for Greenwich North to enhance the amenity, convenience and level of service afforded to residents and workers of the area.
- The site is serviced by existing infrastructure that is capable of servicing higher density commercial and residential development.
- The site is highly accessible and ideally located in accordance with the principles of Transit Oriented Development (TOD). Specifically, the site is within 600m walking distance of St Leonards train station, 1.2km of the new Crows Nest Metro station and in immediate proximity of multiple bus stops, has been awarded a transit score of 71 denoting excellent transit that is convenient for most trips, and has a walkscore of 84 representing a very walkable location with most errands accomplishable on foot.
- In their favourable assessment and determination of the Rezoning Review, the Sydney North Planning Panel concluded the proposal demonstrates **strategic and site-specific merit**.
- By approving the Planning Proposal to proceed through the Gateway, DPE acknowledged the **merit of the proposal**, specifically on the basis of it **delivering housing supply and choice** in an area **supported by existing and future public transport infrastructure**.

This submission thereby demonstrates the strategic merit of allowing Shop Top Housing and additional building height on the subject site. It is therefore recommended that the draft 2036 Strategy is amended accordingly.

Yours faithfully,



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