

4 February 2019

Director, Sydney Central Urban Renewal  
 Department of Planning and Environment  
 GPO Box 39 Sydney, NSW 2001

Architecture  
 Urban Design  
 Planning  
 Interior Architecture

**St Leonards and Crows Nest Draft Planning Package**  
Proposed planning changes relating to the expansion of Hume Street Park

Dear Sir/Madam,

Architectus on behalf of the landowners of 39-41 Hume Street, Crows Nest have been engaged to make a submission in response to the St Leonards and Crows Nest 2036 Draft Planning Package. Specifically, the landowners wish to state their strong objection to the proposed acquisition of their lots as part of the proposed Hume Street Park expansion. We provide the following comments for the Department of Planning & Environment (DPE) to consider.

The subject sites currently contain two commercial unit blocks, legally known as (SP 30953 and Lot 1 DP 900132). Refer to **Figure 1**. The sites are strategically located directly opposite Hume Street Park (8 metres) and the proposed Crows Nest Metro Station (35 metres). The sites benefit from two street frontages including Hume Street to the west and Hume Lane to the east. Each of these street frontages comprise a distinct character, where Hume Street is made up of low-rise commercial buildings, and Hume Lane which is used predominately for servicing and accessing basement car parking.

Architectus Sydney  
 Level 18 MLC Centre  
 19 Martin Place  
 Sydney NSW 2000 Australia  
 T +61 2 8252 8400  
 F +61 2 8252 8600  
 sydney@architectus.com.au  
 www.architectus.com.au

Adelaide  
 Auckland  
 Brisbane  
 Christchurch  
 Melbourne  
**Sydney**



**Figure 1 - Site location**  
 Subject site outlined in red.  
 Source: Nearmaps (with Architectus edits)

Architectus Group Pty Ltd  
 ABN 90 131 245 684

Nominated Architect  
 Managing Director  
 Ray Brown  
 NSWARB 6359

Based on a detailed review of the Draft Planning Package, we understand both sites are:

- Identified as part of the proposed Hume Street Park expansion; and
- Proposed to be rezoned from B4 Mixed Use to RE1 Public Recreation.

It is acknowledged the sites would be subject to acquisition through a SIC fund of \$25,900,000, prior to implementing the proposed planning control changes. Whilst we support DPEs intention for increased amenity and access to public open space, the proposed acquisition and inclusion of the subject sites is not supported for the following reasons:

The Hume Street Park concept plan in the Draft Green Plan does not adhere to best planning and urban design practice

The proposed concept of Hume Street Park as shown within the Draft Green Plan has been extended to provide *'additional open space and deep soil kickabout space, with informal seating'* (Draft Green Plan, pg.43). The proposed concept for Hume Street Park does not demonstrate best urban design practice nor adhere to sound urban design principles for open space planning. This is evidenced for the following reasons:

- Areas of open space should maximise solar access, particularly in urban renewal areas. This is emphasised within the Draft 2036 Plan through built form principles and proposed planning controls which stipulate *'no additional overshadowing to Hume Street Park between 10:00am – 3:00pm'* (Draft 2036 Plan, Pg. 26). Removing development potential to the east of Hume Street Park may increase development pressure toward the north along Albany Street, which in turn will overshadow the park.
- Open space should be highly accessible and visible from the street. With partial closure of Hume Street, the proposed park expansion will not be visible from Clarke Street. This configuration significantly reduces opportunities for passive surveillance to Hume Street Park.
- Open space should be activated with retail uses overlooking and facing the park. Removing development potential along the eastern side of Hume Street will reduce development intensity within proximity to the new metro station.

**Recommendation:** Prior to finalising the Draft Planning Package we recommend DPE:

1. Reconfigure the concept design for Hume Street Park outlined in the Draft Green Plan, pg.43 to prioritise solar access, passive surveillance and activation to the park.

Proposed rezoning does not maximise the site to its full potential

Hume Street is currently made up of predominately low-scale commercial buildings (around 3-4 storeys in height) which accommodate mostly small to medium sized businesses, with smaller floorplates. Rezoning of these sites from B4 Mixed Use to RE1 Public Recreation would result in the loss of commercial floor space, as well as a loss of jobs. It would also see the removal of much needed small-medium sized businesses which provide a different commercial offering opposed to larger A-Grade commercial office buildings such as smaller professional suites, medical practices, allied health services and food and beverage offerings.

A key objective of the Draft 2036 Plan is to maximise development potential in proximity to the new metro. The Draft 2036 Plan makes reference to *'clustering of high density mixed-use development between St Leonards and Crows Nest station, which can accommodate increased density from a transit-oriented development perspective'* (Draft 2036 Plan, pg.24).

Given the site's strategic location, located within 35 metres, at the doorstep of significant rail infrastructure, services, amenity and open space, rezoning the subject sites from B4 Mixed Use to RE1 Public Recreation would significantly undermine the site's development potential to activate the edges of the park. It further alleviates future opportunities for Council to leverage developer contributions through potential redevelopment and uplift of B4 Mixed Use zoned land along Hume Street, in turn lessening the sites potential to enhance the public domain, in accordance with a key objective of the Draft 2036 Plan.

**Recommendations:** Prior to finalising the Draft Planning Package we recommend DPE:

2. Revise the land use recommendations in the Draft 2036 Plan to maintain mixed use development (B4 Mixed Use) along Hume Street.
3. Revise the built form recommendations in the Draft 2036 Plan to reflect built form testing outcomes around the park in accordance with the St Leonards / Crows Nest Planning Study – Precinct 1 (2012) and the Hume Street Park Crows Nest Proposed Development Report (2015).
4. Develop a public domain strategy to support the upgrade of Hume Street Park.

Missed opportunity for more equitable distribution of open space

An equitable distribution of accessible open space should be located throughout the precinct. Given the high density nature and urban context of the area, all residents should have equitable access to open space. As a guide, all residents should generally be within 250m of a park or recreation space.

Based on a review of the Draft Planning Package, there are other areas in the Precinct which show gaps of accessibility to open space. In particular, areas between Albany and Chandos Street do not have good access to open space. Refer to **Figure 2**.



**Figure 2 - Walking distance to open space**  
 Source: Extract from the Draft Green Plan, 2018

**Recommendation:** Prior to finalising the Draft Planning Package we recommend DPE:

- 5. Consider a more equitable distribution of open space in St Leonards and Crows Nest.

Miss-alignment between state and local strategic plans

Based on a detailed review of the Hume Street Park Crows Nest Proposed Development Report (2015) and Draft Green Plan (2018), there is a mis-alignment between local and state government concept plans.

In 2015, North Sydney Council resolved that concept design **option 3** be adopted as the preferred vision for expansion of Hume Street Park and endorsed the way forward for the redevelopment of the park.

The concept plan for Hume Street Park outlined in the Draft Green Plan is inconsistent with Councils preferred **option 3** concept design. Refer to **Figure 3** and **Figure 4**. Key changes to the concept plan include:

- The proposed expansion area of the park including the lots subject to potential acquisition; and
- The alignment of the through site connection to Willoughby Road.

The noted mis-alignment between local and state policies raise a significant risk under the proposed planning control changes outlined in the Draft 2036 Plan. It also goes against design principles and development criteria noted in the Draft 2036 Plan including potential to overshadow the park, reduced passive surveillance and reduced development intensity within proximity to the new metro.



**Figure 3 – North Sydney Councils preferred concept design ‘Option 3’**

Source: Extract from the Hume Street Park Crows Nest Proposed Development Report (2015)



**Figure 4 – Revised Concept Plan**  
 Source: Extract from Draft Green Plan, 2018

**Recommendation:** Prior to finalising the Draft Planning Package we recommend DPE:

6. Review the Hume Street Park concept plan to align with Councils preferred option 3 concept design, as shown in the Hume Street Park Crows Nest Proposed Development Report (2015).

We also note inconsistencies and errors between the plans and diagrams outlined in the Draft Planning Package, that are relevant to the subject site. These inconsistencies are unclear and provide uncertainty around the future development outcome for the site.

The key inconsistencies relate to the following diagrams:

- The subject site is included in the proposed zoning changes plan (Refer to Area 2 on page.56 of the Draft 2036 Plan).
- The subject site is not included in the area relating to potential changes to planning controls (Refer to area outlined in orange on page.43 of the Draft 2036 Plan).

## Conclusion

On behalf of the landowners, Architectus have provided feedback on the St Leonards and Crows Nest Draft Planning Package in relation to the proposed planning changes relating to the expansion of Hume Street Park and the future development and land use outcome for the subject site known as 39-41 Hume Street, Crows Nest.

Generally, Architectus' **comments** are:

- The proposed planning changes outlined in the Draft 2036 Plan are identified for rezoning and potential land acquisition. As demonstrated throughout this submission, this is not an ideal planning and urban design outcome for the site.
- The proposed expansion of Hume Street Park could be reconfigured to achieve a better urban design outcome, which maximises development potential within proximity to the new metro station and considers key benefits and future development opportunities along the edges of the park including maximising accessibility, solar access and passive surveillance to the park.
- There are other areas within broader St Leonards / Crows Nest locality which would better benefit for more equitable distribution of open space.
- The concept does not align with North Sydney Councils plans for Hume St Park.

Based on the above, our key **recommendations** are:

1. That the DPE do not consider the subject sites as part of the Hume Street Park expansion area
2. That the DPE do not consider the subject sites for potential land acquisition.
3. Reconfigure the concept design for Hume Street Park outlined in the Draft Green Plan, pg.43 to prioritise activation and maximise solar access to the park.
4. Revise the land use recommendations in the Draft 2036 Plan to maintain mixed use development (B4 Mixed Use) along Hume Street. As such, it is requested the subject sites are removed from the proposed land use changes mapping (Draft 2036 Plan, pg.56).
5. Revise the built form recommendations in the Draft 2036 Plan to reflect built form testing around the park in accordance with the St Leonards / Crows Nest Planning Study – Precinct 1 (2012) and the Hume Street Park Crows Nest Proposed Development Report (2015).
6. Develop a public domain strategy to support the upgrade of Hume Street Park.
7. Consider a more equitable distribution of open space in St Leonards and Crows Nest.
8. Review the Hume Street Park concept plan to align with Councils preferred option 3 concept design, as shown in the Hume Street Park Crows Nest Proposed Development Report (2015).

We welcome this opportunity to work with DPE to deliver the best urban design outcome for the site. We consider the site has great future potential and we look forward to assisting you in realising this. If you wish to discuss further, please contact Greg Burgon on 0428 485 615 or at [greg.burgon@architectus.com.au](mailto:greg.burgon@architectus.com.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G. Burgon'.

Greg Burgon  
Principal, Urban Design  
Architectus Group Pty Ltd