

7 February 2019  
218959

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

[Att: Eva Klaic]

Dear Ms Klaic,

## **SUBMISSION TO ST LEONARDS AND CROWS NEST 2036 DRAFT PLAN 110 – 120 Christie Street, St Leonards**

This submission has been prepared by Ethos Urban on behalf of the landowners of 110 – 120 Christie Street, St Leonards (the site) in relation to the *St Leonards and Crows Nest 2036 Draft Plan* (the Draft Plan).

This submission proposes an alternative solution for the site in order to appropriately respond to its strategic position, as well as works undertaken by the client in the review of the previous St Leonards Central Unsolicited Proposal to Government for the wholesale redevelopment of lands immediately west of the site.

**The subject site is located directly adjacent to the St Leonards Train Station and is well located to catalyse significant urban renewal opportunities. However, this needs to be undertaken congruent with the lands immediately west of the subject site. This submission seeks the identification of the site for a mixed used zone of 13 storeys with an floor space ratio (FSR) of 4.5:1 (as per the site to the west) to enable holistic precinct revitalisation and realisation of the draft Plan's vision and objectives for St Leonards.**

The broad vision to increase housing and employment opportunities close to high frequency public transport and services is supported – however the Draft Plan fails to realise the opportunities to create 'transit oriented' communities in such close proximity to the station, particularly for urban renewal. In doing so, it misses key opportunities to create integrated redevelopment around St Leonards Train Station, as envisaged by the Draft Plan as well as the Regional and Northern District Plans for metropolitan Sydney.

In relation to the site, the following key issues are identified:

- **The Draft Plan does not capitalise on the site's adjacency to St Leonards Train Station.** The site is well located adjacent to a major train station and the application of a 6-storey height limit on the site does not stimulate its re-development.
- **The Draft Plan does not consider the holistic development of the site mindful of its context.** The inequitable heights proposed on the adjacent site to the west (St Leonards Central site) if delivered independently will unfairly encumber re-development of the site, specifically:
  - Development of the site to the west to the heights and density proposed within the Draft Plan has the potential to sterilise the subject site due to overshadowing, limited building separation, visual privacy, site-sterilising impacts adversely impacting on the amenity of the site.
  - Development of the adjoining site has the potential to further exacerbate interface issues at Evans Lane, proposed for the important green link through St Leonards due to elevated topography. Development of tall towers on the adjacent site is likely to result in poor amenity which will discourage use of the proposed 'Green Link' to the west of the site, along Evans Lane. Careful planning is required to ensure the functionality of this link. Without holistic planning between the sites the opportunity to provide an integrated link is lost.
- **Design response to adjoining heritage area.** It appears that the DPE has sought to reduce the scale of the site in response to the adjacent heritage conservation area. This however can be considered through other means, such as clear DCP provisions in any subsequent development guidelines.

We believe there is strong strategic merit to increase the built form and density controls on the site in a manner that is entirely consistent with the Draft Plan's vision and objectives. It is clear the reduction in height control is to respond to the adjacent heritage conservation area, however this can be managed through finer grain controls via development control plans etc. or at development application stage to ensure an appropriate transition.

**It is therefore requested that the DPE amend the Draft Plan to identify 110 – 120 Christie Street, St Leonards for a higher density mixed used zoning, with a height commensurate to the adjoining site of 13 storeys and an FSR of 4.5:1.**

## 1.0 The Site and the Opportunity

The Christie Street site is located at 110 – 120 Christie Street, St Leonards and sits to the east of the train line and the St Leonards Central site. The Christie Street consists of four corresponding buildings shown at **Figure 1** being:

- 110-112 Christie Street (Lot 9 Section 28 DP4241);
- 114 Christie Street (Lot 2 DP900827);
- 116-118 Christie Street (SP60114); and
- 120 Christie Street (Lot 13 Section 28 DP4241).

While the subject site consists of a number of separate buildings and land owners, they now represent a group that will be collectively impacted by the draft Plan. Combined, the subject site represents a viable redevelopment opportunity – being approximately 2,300m<sup>2</sup>.

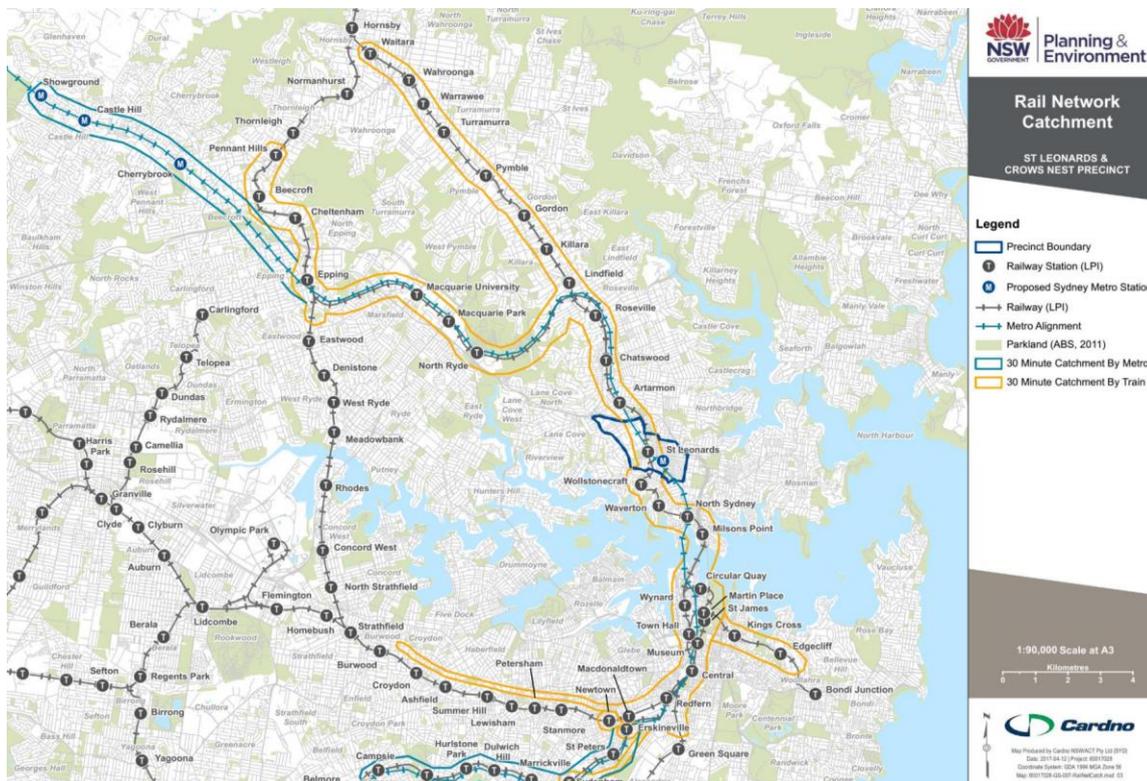
The site is one block to the east of the St Leonards train station and rail line. It is situated in a high amenity and well serviced area and is:

- located within the St Leonards Activity Centre;
- directly adjacent to the St Leonards Station and train line;
- a short walk from:
  - Royal North Shore Hospital (approx. 100m; 1 minute' walk);
  - Talus Reserve (150m, less than 2 minutes' walk);
  - Gore Hill Oval (less than 300m, 2 minutes' walk).
- under 30 minutes travel time on public transport to major existing and future employment centres in Sydney (Macquarie Park, North Sydney and the Sydney CBD, refer **Figure 2**);
- adjacent to the St Leonards train station and car park to the west and a residential precinct to the south; and
- subject to the *Willoughby Local Environmental Plan 2012* which zones the site B3 Commercial Core, with an FSR of 1.5 and a maximum building height of 14m.

The current planning process being undertaken by the DPE is an ideal opportunity to facilitate a land use and built form outcome for the site that reflects its strategic significance and capitalises on its unique locational attributes.



**Figure 1 Subject site (shown in red)**  
 Source: Nearnmap



**Figure 2 30 Minute Rail Network Catchment**  
 Source: Strategic Transport Study – St Leonards and Crows Nest Station Precinct (Cardno)

## 2.0 St Leonards and Crows Nest Station Precinct – Interim Statement

In July 2016, the DPE announced the strategic planning investigation of the St Leonards and Crows Nest Station Precinct. In August 2017, the DPE released an Interim Statement.

The Interim Statement identified 10-character areas, with the subject site sitting on the axis of the St Leonards Centre Precinct and the Naremburn Residential Precinct (refer **Figure 3**). The Interim Statement identified the following opportunities and key considerations for the Corridor:

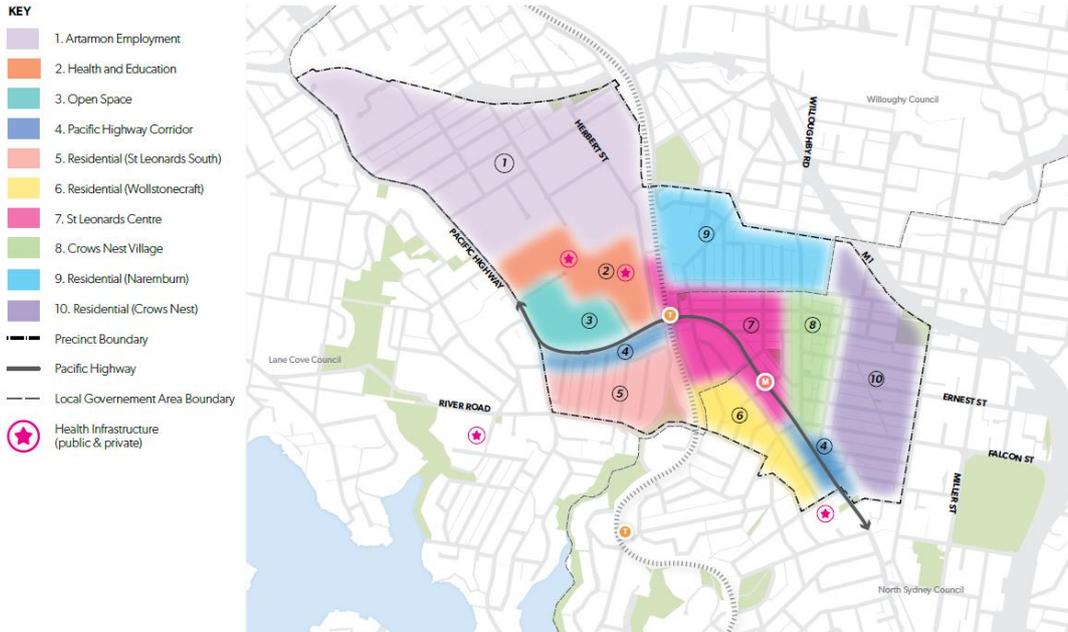
Objective	Comment
<i>The St Leonards Centre and Crows Nest Station area is proposed to be a true high density centre that ensures the Precinct strengthens its role as a major commercial centre in Sydney.</i>	The site is located immediately adjacent to St Leonards Train Station and is therefore appropriately positioned to accommodate additional height and density. However, development of the site to achieve this objective is presently restricted by the height, zoning and FSR controls applied to the site under the Draft Plan. An integrated approach is required to ensure St Leonards Centre is developed as a true high density centre.
<i>It will support a mix of commercial, retail, community, residential and public domain uses that complement St Leonards and Crows Nest.</i>	Due to its strategic location the site can support new commercial, retail and residential uses. However, re-development of the site for such uses is presently restricted by the ad hoc application of height and FSR controls under the Draft Plan. Development of the site to the west will unfairly encumber the redevelopment of the site, as a result of amenity impacts such as building separation, overshadowing, amenity impacts. An integrated approach is required for the planning of this area.
<i>An improved public domain through varied building types, improved connections and a high quality streetscape will be delivered.</i>	Redevelopment of the site would allow an improved streetscape relationship, providing a podium with taller building component above, facilitating an appropriate transition between uses and building types from west to east. This transition would be facilitated by additional density on the site. Further, historic plans and strategies have explored opportunities to provide a green link along Evans Lane. This is also envisaged in the current Draft Plan, however little consideration has been made to how this might be achieved in a holistic and strategic manner. Specifically, development of tall towers on the adjacent site is likely to result in poor amenity i.e. narrow space, overshadowed etc. which will discourage use of the proposed link.
<i>It will provide for the social, cultural and civic needs of the community as the Precinct grows.</i>	The site's location adjacent to key social and community services strengthens the opportunity for integrated urban renewal. Increased density on the site will enable further provision of social, cultural and civic uses that can contribute and strengthen the precinct. Holistic planning would enable integration of the site with the uses proposed for the adjacent site.
<i>Key matters for consideration include amalgamation of key sites to ensure good design outcomes can be achieved, appropriate heights and densities to ensure amenity is not compromised, minimising overshadowing impacts to the south, open space requirements, the prioritisation of pedestrians and traffic minimisation.</i>	The site is a prime candidate for amalgamation. This submission is indicative of the collaborative approach demonstrated by the current land owners to achieve an outcome that will achieve a high quality land use and built form outcome that will make a positive contribution to surrounding interfaces and land uses, including the established residential areas to the east. As outlined above, development of the site to the west will unfairly encumber re-development of the site. Further amalgamation should be promoted through the appropriate application of planning controls under the Draft Plan.

The Interim Statement is supported by a Preliminary Urban Design Analysis prepared by SJB Architects that determines additional height and density within the Precinct is reasonable for two reasons:

- it's located within the core of St Leonards Train Station catchment and represents an opportunity to provide transit-oriented development and within the St Leonards Centre; and
- it is within an area that is suitable for increased residential density and additional height commensurate to the transitional height between the St Leonards Train Station and the residential land to the south west of the site.

The Interim Statement identifies opportunities for uplift on the site and to provide mixed land use outcomes that support the broader precinct and that are ‘complimentary to commercial and residential uses’. Rezoning the site would align with the strategic objectives outlined in the Interim Statement.

## Character Areas



**Figure 3 St Leonards and Crows Nest Station Precinct – Character Areas**

Source: St Leonards and Crows Nest Station Precinct – Interim Statement

### 3.0 St Leonards and Crows Nest 2036 Draft Plan

On 14<sup>th</sup> October 2018, the DPE released the Draft Plan. The Draft Plan’s vision for St Leonards and Crows Nest to 2036 is to create ‘a major centre for workers, residents, students and visitors, offering a variety of homes, jobs and activities for the diverse local population’.

Although the Draft Plan establishes principles for the whole precinct, in respect of the site a number of key issues are identified:

- The Draft Plan limits the urban renewal potential and future redevelopment of the site, by virtually maintaining the existing planning regime for the site. This is incongruous with the original vision which identified the site as having strategic merit to accommodate high-density mixed-use development, leveraged by its strategic location.
- The Draft Plan misses the opportunity to bed down the previous strategic planning and design analysis undertaken by both the DPE and the Council.
- The Draft Plan fails to recognise the strategic opportunity to deliver on key objectives of the Draft Plan, for example the provision of a regionally significant green link and enhanced pedestrian and cycle connections around the site.
- The Draft Plan identified a 13-storey height limit on the adjacent site to the west. The application of the 6-storey height limit on the subject site (as per existing controls) does not respond to the opportunities to achieve precinct integration, design excellence or high levels of amenity.

It is our view that the site presents significant opportunities for uplift supported by a mixture of uses as envisaged by the Interim Statement.

## 4.0 Key Issues

### 4.1 Holistic Planning

Preparation of the St Leonards and Crows Nest 2036 Draft Plan provides the opportunity for well-considered strategic planning and to reduce uncoordinated ad hoc spot-rezonings within the Precinct. However, The Draft Plan fails to realise the opportunity for integrated urban renewal of the site and surrounding area.

Maintaining a purely commercial zoning for the site will inhibit the delivery of a development and the opportunity to provide an appropriate transition to the low-density residential development to the east. Further, the proposed 13-storey height limit on the adjacent site, has the potential to sterilise the re-development potential of the site, if the 6-storey height limit on the site remains under the Draft Plan (refer to **Figure 3**). The Draft Plan does not respond to the opportunity for a holistic development approach between the two sites, to achieve precinct integration, design excellence and high levels of amenity.

### 4.2 Consistency of Heights / Density

Under the Draft Plan, the inequitable heights proposed on the St Leonards Central site to the west, if achieved will unfairly encumber re-development of the site. Whilst it is clear the reduction in height control is to respond to the adjacent heritage conservation area, an appropriate transition in height and density can be achieved through finer grain controls via development control plans etc. or at development application stage, without restricting development on the site through the Draft Plan. The Draft Plan limits integrated planning of the sites.

### 4.3 Design and Amenity

The scale of development proposed within the Draft Plan has the potential to result in reduced setbacks and building separation, solar access, amenity, visual and acoustic privacy. The scale of development between the two sites should be revisited to ensure a high level of amenity is maintained. Further, additional density and height on the site would enable the development of a building which appropriately transitioned to the residential buildings to the east, through a 2-storey podium with taller building form above.

Further, the amenity of the surrounding public domain has not be adequately considered. The Draft Plan proposes a 'Green Link' to the west of the site along Evans Lane. As shown in **Figure 4**, this narrow laneway is bordered by the site and the adjacent site to the west. Development of tall towers, or the provision of podium is likely to result in poor amenity which will discourage the use of the proposed link. Careful planning is required to ensure the functionality of this link. Without holistic planning between the sites (possible through the application of controls which do not limit re-development) the opportunity to provide an integrated link is lost.



**Figure 4** Extract from Draft Plan showing proposed heights and 'Green Link'

Source: St Leonards and Crows Nest 2036 Draft Plan



**Figure 4** Evans Lane, St Leonards – looking south

Source: Google

## 5.0 Conclusion

The landowners are supportive of the DPE's strategic objective to plan a 'major centre' that encourages growth, stimulates economic development and collaboration in the St Leonards and Crows Nest Precinct. Notwithstanding, the Draft Plan fails to realise the opportunity to deliver a holistic outcome that will facilitate the revitalisation and realisation of the Draft Plan's vision and objectives for St Leonards.

Rezoning the subject site to increase the permissible building height and density will enable better built form outcomes that will allow for integrated precinct planning. Further work and consideration is required to develop a planning framework for the site that reflects its strategic location and more deeply considers the opportunity to revitalise the St Leonards centre.

This submission has demonstrated that the site is capable of accommodating built form and range land uses that are strategically appropriate and compatible with the surrounding area, however restricted under the Draft Plan.

**It is therefore requested that the DPE amend the Draft Plan to identify 110 - 120 Christie Street, St Leonards for a higher density mixed used zoning, a height commensurate to the adjoining site of 13 storeys and an FSR of 4.5:1.**

We thank the DPE for the opportunity to provide a submission on the Draft Plan and welcome future opportunities to provide input into the planning process. Further, we would welcome the opportunity to meet and discuss the opportunity the site brings to the realisation of the Precinct Vision.

Further discussion on each of these issues is provided at **Attachment A**. Should you have any further questions or wish to discuss this submission in further detail, please do not hesitate to contact me.

Yours sincerely,



**Tom Goode**  
Director  
tgoode@ethosurban.com