

7 February 2019

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

Architecture  
Urban Design  
Planning  
Interior Architecture

**Submission – St Leonards and Crows Nest 2036 Draft Plan**  
**Proposed planning changes relating to 72 Christie Street, St Leonards**

Dear Sir/Madam,

Architectus has been engaged by UOL Group Ltd ('the land owner') to provide a submission to the Department of Planning & Environment ('DPE') for the St Leonards and Crows Nest 2036 Draft Plan ('Draft Plan'). This submission specifically relates to land located at 72 Christie Street, St Leonards ('the site'), which was recently acquired by the UOL Group Ltd. The site is a large land holding totalling approximately 2,800sqm in area.

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**1. Purpose of Submission**

This letter identifies key findings following a preliminary review of the Draft Plan in relation to the subject site. It further identifies key issues to be further investigated in the later stages of built form and land use testing. A summary of preliminary findings for the site include:

- **Proposed planning controls do not incentivise development on the subject site;**
- **Proposed height and FSR controls do not optimise the site's development potential and leverage its proximity to public transport infrastructure;**
- **Opportunities for enhanced public domain are not realised under the proposed planning controls; and**
- **The proposed height limits within immediate vicinity of the site have no specific planning justification.**

Preliminary built form testing has indicated that the site is suitable for consideration as a Significant Site as per the criteria outlined within the Draft Plan and should be considered as such, subject to further built form testing to ensure optimum development outcomes which align with state strategic objectives.

**2. Site Overview**

**2.1. Local Context**

The site is strategically located within the St Leonards and Crows Nest Precinct ('the Precinct'), approximately 5km north of Central Sydney. St Leonards is the sixth largest office market in the Sydney Region. The Precinct will be undergoing significant urban transformation under DPE's vision for the precinct as a mixed-use area of employment, residential and supporting land uses.

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Nominated Architect  
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Ray Brown  
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**Figure 1: Site location**

Subject site outlined in red; St Leonards / Crows Nest Precinct outlined in light blue.

Source: Nearmaps. Annotated by Architectus.

The Precinct has been identified by the Greater Sydney Commission's ('GSC') Metropolitan and North District Plans as a *significant health and education employment precinct, with a progressive focus on mixed residential uses to capitalise on the increased amenity of the new Crows Nest metro station.*

The site is well connected by public transport, located approximately 300m south of St Leonards train station providing services along the T1 North Shore Line with connections to Sydney CBD, North Sydney, Chatswood, Macquarie Park and Macquarie University. St Leonards is one of the busiest train stations in metropolitan Sydney, also serving as an interchange for major bus routes.

The site is also located within 300m from the new Crows Nest Metro Station which will provide improved travel time and accessibility to nearby centres including Chatswood, Barangaroo, Martin Place and the Hills District. A myriad of local services, shops, open spaces and health facilities and within walking distance from the site due to its immediate proximity to the existing St Leonards centre, and 400m of Crows Nest centre and the Royal North Shore Hospital.

The site presents significant opportunity for renewal and revitalisation within the Precinct, and ability to provide significant uplift within proximity to existing and planned infrastructure. Importantly, the site's strategic location within St Leonards presents an opportunity to consider a mix of uses on the site to realise the site's development potential and delivery of public benefit.



## 2.2. Site Detail

The site is legally known as Lot 730 in Deposited Plan 771802 and is located at 72 Christie Street, St Leonards NSW 2065. The site is approximately 2,800 sqm, with a primary street frontage to Christie Street and a secondary street frontage to Lithgow Street. The frontage to Christie Street is approximately 85m, with the frontage to Lithgow Street at approximately 93m. The site has an approximate depth of 127m.



**Figure 2: Aerial of site within surrounding context**

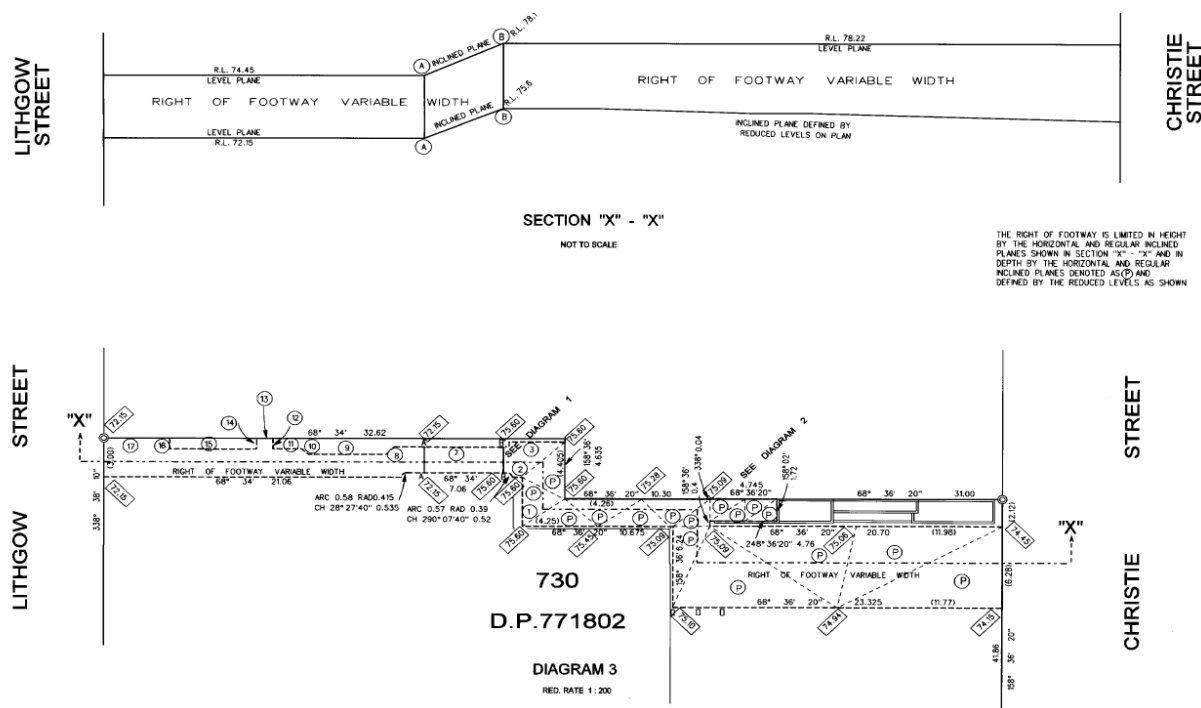
Subject site outlined in red dash.

Source: Nearmaps. Annotated by Architectus.

The site is subject to an easement for a right of footway of variable height and depth benefitting Lane Cove Council ('Council'). This permits access over the subject site for members of the public, connecting Christie and Lithgow Streets, and is located entirely on 72 Christie Street (Lot 730 DP 771802) as illustrated by the provided DP. This right of footway is a legal requirement and any future development on the site must accommodate the minimum dimensions set out in the deposited plan (**Figure 3**).

It is noted that there are no other public east-west connections between Christie and Lithgow Streets, other than the established easement on the site, with the length of the block between Christie Land and Oxley Street being almost 300m in length. The easement presents a key opportunity for the site to strengthen pedestrian east-west connectivity in the area with significantly improved public domain and built form interface.

The existing development on the site consists of an 8 storey A-Grade commercial building with 4 basement parking levels and commercial floorplates of up to 1,800 sqm. The subject site itself is not listed as a heritage item under Lane Cove Local Environmental Plan 2009, nor is it within a heritage conservation area.



**Figure 3: Detail of easement dimensions for Lot 730 DP 771802**

Easement is located adjacent to the northern lot boundary.

Source: NSW Land Registry Services.

### 3. St Leonards and Crows Nest 2036 Draft Plan

In total, around 27.5ha of land in the St Leonards and Crows Nest Study area is identified for proposed changes. This includes land holdings located along Chandos Street to the north, Oxley Street to the east, Park Road to the west and David Street to the south.

No changes are proposed to Willoughby Road or Alexander Street, Heritage Conservation Areas or the Artarmon Industrial Precinct. Areas identified for increased uplift are primarily concentrated along the Pacific Highway, and between the St Leonards Train Station and proposed Crows Nest Metro Station.

The subject site is identified within the area recommended for planning control changes. Key changes are summarised in **Table 1** below.

#### PROPOSED CONTROLS & GUIDELINES (DRAFT PLAN)

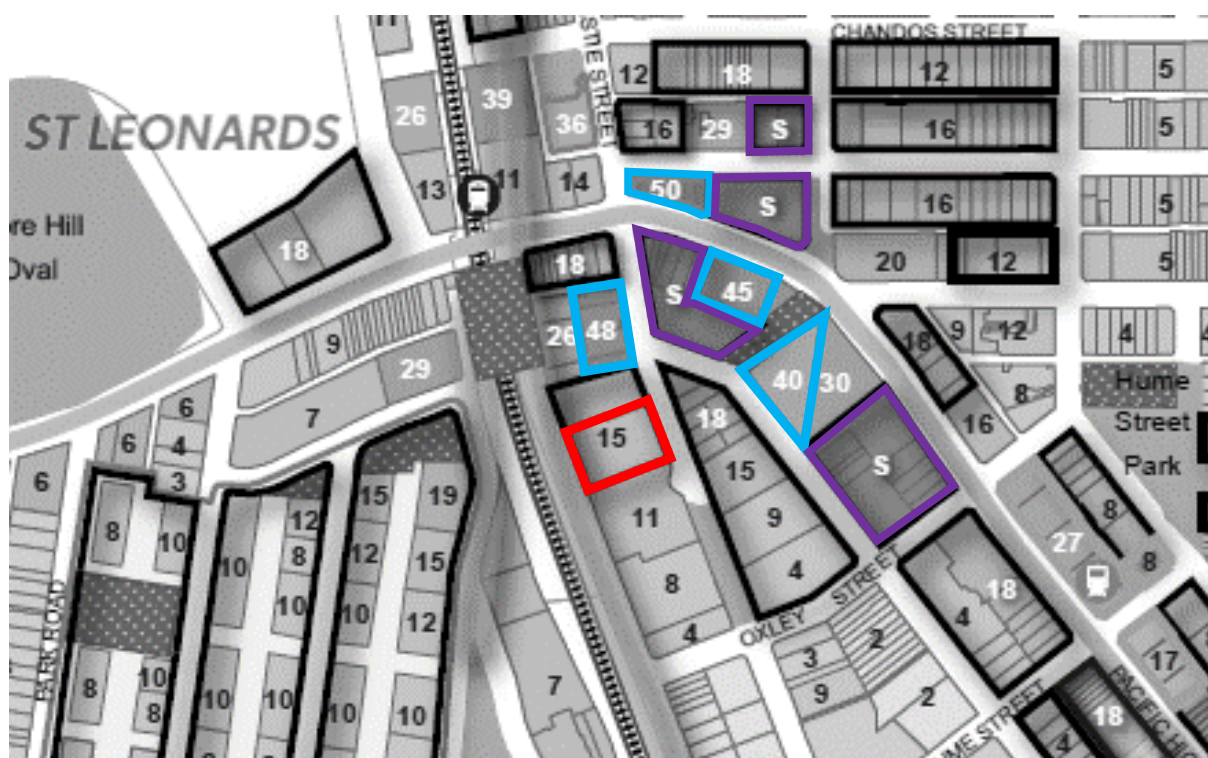
<b>LAND ZONING</b>	B3 Commercial Core
<b>HEIGHT OF BUILDING</b>	15 storeys
<b>FLOOR SPACE RATIO</b>	7:1
<b>STREET SETBACK</b>	3m at both Christie and Lithgow Street frontages
<b>STREET WALL HEIGHT</b>	4 storeys
<b>SOLAR IMPACT</b>	Solar access to be protected to key public open spaces (10am-3pm), key streets (11:30am-2:30pm) and residential areas (3 hrs between 9am-3pm)

**Table 1: Key proposed planning controls and guidelines under the Draft Plan**

The proposed Draft Plan controls present significant uplift opportunities for the subject site, albeit retain the B3 Commercial Core zoning, prohibiting residential uses.

Within proximity to the subject site, 40 or more storeys are proposed under the Draft Plan (**Figure 4**). Additionally, within 250m of the site, there are a four (4) designated Significant Sites which have been identified for additional height subject to further design testing and community consultation to determine the appropriate height, floor space ratio (FSR) and other design details.

These sites characterise the built form context in which the subject site is located, presenting an opportunity to investigate further site uplift which responds to surrounding densities.



**Figure 4: Map showing surrounding sites over 40 storeys and Significant Sites.**

Subject site (red); Sites over 40 storeys (blue); Significant Sites (purple).

Source: NSW DPE, annotations by Architectus.

#### 4. Analysis and Key Findings

Architectus has undertaken a review of the Draft Plan and supporting documentation. On behalf of the landowners, we support DPE's objectives to rejuvenate the St Leonards and Crows Nest area. However, in relation to the subject site the review highlighted several missed opportunities to align the site's development potential with key state strategic drivers, these are outlined in the following section.

##### 4.1. Proposed planning controls do not incentivise development on the subject site

A key objective of the Draft Plan is to balance commercial and residential uses across the Precinct and ensure new employment sites in the area cater to a range of business types and sizes (Draft Plan, page 11). The Draft Plan applies the employment targets set by the Greater Sydney Commissions North District Plan. As such, approximately 16,500 new jobs will need to be accommodated within the Precinct by 2036, with St Leonards Centre designated to provide new 'A Grade' employment floorspace through mixed use developments to support long term job growth (Draft Plan, page 34 & 35).

Generally, in Architects' experience in urban renewal, to ensure proposed planning controls incentivise redevelopment a FSR of at least three times the existing floor space is required to sufficiently incentivise turnover. The site's current gross floor area is at the maximum FSR under Lane Cove Local Environmental Plan 2009 of 4.5:1, equating to a desired non-residential FSR increase in order of 13.5:1. The proposed FSR of 7:1 under the Draft Plan raises the real concern as to whether this is enough increase to incentivise the site's redevelopment.

There is a potential risk of compromising fundamental objectives of the Draft Plan, in particular the delivery of employment generating land and maximising development opportunities in close proximity to significant public transport infrastructure and residential catchments.

Furthermore, it is identified the proposed zoning and planning controls for the subject site are inconsistent with land use objectives and recommendations of the Draft Plan. These inconsistencies are summarised in **Table 2** below.

<i>Land Use Principle</i>	<i>Response</i>
<b>Allow mixed-use development on key sites to encourage more A-grade commercial office floorspace.</b>	<p>The site is proposed to remain B3 Commercial Core, which prohibits any residential uses, at an FSR of 7:1. The site's prohibition of residential uses also presents a further challenge to redevelopment feasibility.</p> <p>As outlined above, this is considered unlikely to incentivise development on the site.</p>
<b>Identify areas suitable for medium and high-density housing. Identify areas suitable for medium and high-density housing</b>	<p>The site is located within the Pacific Highway corridor, being only 130m from the road itself, and within 400m of both the train and metro stations. The site is well positioned within the Precinct to support high-density housing.</p>
<b>Cater to a variety of housing to recognise the diverse community.</b>	<p>As identified in <b>Figure 3</b>, the site's proximity to sites above 40 storeys and Significant Sites located within the Pacific Highway Corridor presents further opportunity to investigate site uplift to respond to surrounding densities and existing context.</p>

**Table 2. Key Draft Plan land use objectives and recommendations**

It is acknowledged that the Draft Plan places critical importance on the preservation and delivery of commercial floor space (particularly A-grade office space) within the Precinct to support long term job growth and commercial market trends (Draft Plan, page 35). Subsequently, we share the view to increase the non-residential FSR provision for the subject site in alignment with the Draft Plan proposed FSR control of 7:1.

However, there is opportunity to investigate additional residential FSR above the proposed commercial FSR. Further built form testing would be required to ascertain solar impacts, over-shadowing and view impacts on the surrounding context, to inform overall development capacity of the site. However, preliminary testing shows that potential impacts of built form above the proposed height and FSR would be acceptable, and that additional height above the Draft Plan's proposed 15 storeys could accommodate residential FSR. Preliminary testing is shown overleaf in **Figure 5**.





**Figure 5: Western view of the subject site modelled as a significant site (residential shown in yellow and commercial in blue) demonstrating consistency with surrounding building heights within the draft Plan area.**

Source: Architectus.

The allowance of residential FSR on the site will provide an integrated mix of uses, with increased opportunity to provide greater housing choice and increased resident and worker populations in proximity to major public transport stations. It further provides opportunity to enhance important pedestrian links and enhance street activation, without compromising employment floorspace.

Mixed-use development provides opportunity for the site to have one street as the commercial address and other street for residential address, promoting the benefits of mixed-use developments as the more uses on site, the more entry points are required from a street.

Mixed-use development on the subject site enhances opportunities to provide increased amenity to residents within the precinct, including the large residential area south. It provides opportunities to explore interface enhancements and improve height transitions, as well as promoting self-sufficiency through improving local services within the immediate vicinity.

Opportunities also exist to provide various public benefits through a mixed-use development. Including, delivery of additional open space and pedestrian connections as identified by the Social Infrastructure Report (Arup, 2016), which potentially include the extension of the Christie Street linear park, wider pedestrian connection along Council's easement. Additional public benefit delivered on the site through mixed use development will align with a key landscape objective of the Draft Plan to *leverage the improved amenity and connectivity opportunities arising from Lane Cove Council's plans for St Leonards Plaza* (Draft Plan, page 46). With the 5,000sqm St Leonards Plaza proposed less than 100m from the site along Lithgow Street providing a major community and recreation space for the Precinct, additional public benefit delivered on the site will have the opportunity to be integrated with the plaza, Christie Street linear park and DPE's foreshore to foreshore link, enhancing the amenity for both residents and workers within the Precinct.

Comprehensive built form testing will be completed to confirm the best development outcome for the site and the surrounding context.

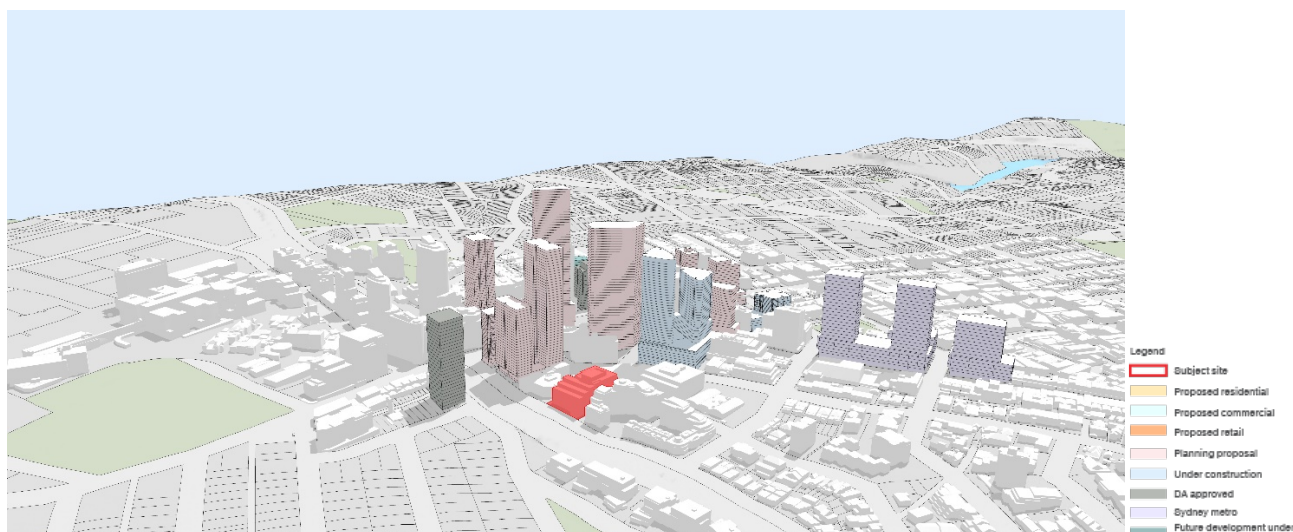
#### 4.2. Opportunity for increased FSR and heights commiserate with other strategic centres

The site is within 300m (approximately 4 minutes' walk) of both the St Leonards train station and the Crows Nest metro station, which is scheduled to commence services in 2036. As outlined within the Draft Plan a key objective for built form within St Leonards town centre is, *'to achieve the Greater Sydney Commission's vision for St Leonards to be a growing office market in the future, the Draft Plan*

*proposes a cluster of high-density mixed-use development between St Leonards and Crows Nest station. This is a logical place for increased density from a transit-oriented development perspective and the accessibility of this location is attractive to businesses.’ (Draft Plan, page 24). Furthermore, Transport for NSW reiterate the benefits associated with the new metro highlighting “It would also bring a number of city-building benefits. This would include increased economic activity, economic productivity, jobs, savings in infrastructure provision, sustainability benefits, health benefits, more choice of housing and more affordable housing, more access to services, and greater social equity. In particular it would provide a catalyst for urban renewal and development opportunities around the new stations at Crows Nest” (Chatswood to Sydenham Environmental Impact Statement, 2016).*

St Leonards, as a strategic centre, should be achieving heights and densities commensurate with its accessibility to public transport (metro, trains and buses). Existing building tower heights in St Leonards are in order of over 30 storeys in several locations. Several planning proposals and development applications will exceed this height, with towers up to 50 storeys. Development around the future Crows Nest metro station is expected to take on a similar character and scale as St Leonards, with taller buildings capitalising on the capacity provided by the metro station.

The image below outlines recent development in St Leonards and Crows Nest and highlights an inconsistency of height and density allocation for sites within proximity to public transport infrastructure. It highlights a missed opportunity for the subject site to provide a crucial interface between the now abrupt 48 storey tower east of the subject site. Importantly, the inconsistency of proposed heights highlight a missed opportunity to deliver on a key strategic driver of the Draft Plan which seeks to optimise development potential for sites within proximity to St Leonards train station and the Crows Nest metro station.



**Figure 6: Western view of the subject site shown in red highlighting an inconsistency with surrounding heights in the draft Plan area.**

Source: Architectus.

#### 4.3. Inconsistency with proposed building heights within the immediate vicinity of the subject site.

Architectus considers that there is no justification for the plethora of differing building heights in close proximity to each other in the Precinct. For example, immediately around the site the heights are proposed at 26, 48, 45, 40, 30, 4, 9, 11, 15 storeys – all within 50-100m of the site. No other urban centre in metropolitan Sydney has such a pattern differing heights in close proximity.

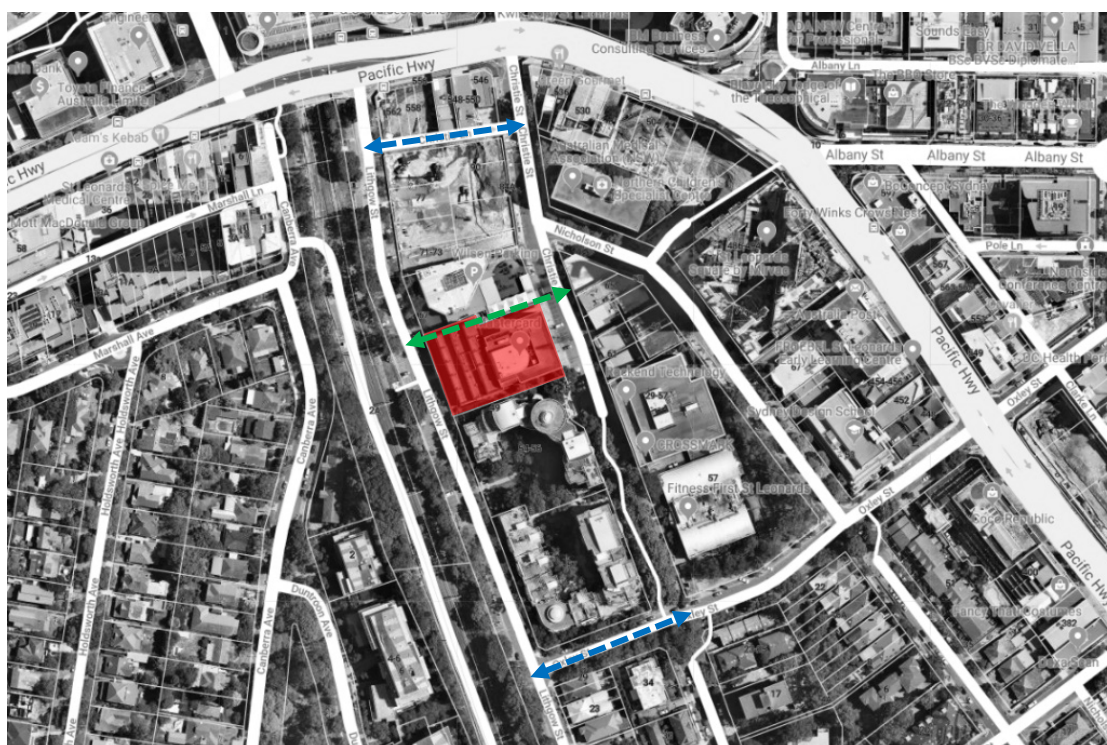


Good urban planning and urban design practice is to set areas of similar height and density within a precinct to be more equitable among landowners and to be less arbitrary. The notion of significant sites over 1500sqm in area for specific study to set the right controls is reasonable.

Generally, for sites in an urban centre they should be grouped by street block or an area of street blocks for specific height and FSR controls – and only having differences where there is a strong reason. Overshadowing low density heritage conservation areas is a valid reason for requiring stepped building heights to protect a reasonable amount of solar access (such as 2 hours between 9am-3pm on June 21 – rather than 3 hours given the access to the services and activities of the urban centre).

#### 4.4. Opportunity for enhanced public domain are not realised under proposed planning controls.

Council's pedestrian easement located along the site's northern boundary presents an opportunity for the site to strengthen pedestrian east-west connectivity in the area with significantly improved public domain and built form interface. The importance of this pedestrian link is heightened by the lack of permeability between Christie and Lithgow Streets, with the nearest east-west connections being approximately 130m to the north (Christie Lane) and approximately 140m to the south (Oxley Street).



**Figure 7: East-west links in context of site**

Subject site (red); Council pedestrian easement (green); Christie Lane and Oxley Street (blue).

Source: Nearmap, annotations by Architectus.

As such, treatment of this east-west pedestrian link, including interface, width, activation and accessibility, would need to be factored into the site's built form testing to ensure the optimisation of this space is achieved.

A mixed-use development would better support the utilisation and enhancement of the existing pedestrian through-site link located towards the northern site boundary. Providing opportunities for improved public domain outcomes in relation to street activation and enhanced connectivity to open space and key destinations. It further aligns with key principles and objectives of the Draft Plan, notably:

- *Identify opportunities to improve safety along existing pedestrian and cycling routes (Draft Plan, page 11);*
- *Provide clear, continuous and direct pedestrian and cycle routes to priority destinations such as St Leonards station and surrounding commercial core, the future Crows Nest Sydney Metro station, Royal North Shore Hospital and St Leonards TAFE (Draft Plan, Page 58);*
- *Provide improved access to parks, bushlands, waterways and public domain (Draft Plan, Page 58); and*
- *Allow for more active retail uses in the St Leonards Commercial Core (Draft Plan, Page 55).*

#### 4.5. Opportunity to fulfil Significant Site criteria and optimise the site's development potential in line with strategic objectives of the Draft Plan

The Draft Plan identifies Significant Sites suitable for additional height and FSR, subject to further assessment and community consultation (Refer to **Figure 4**). It is understood, Significant Sites are required to demonstrate consistency with the vision, design criteria and area wide design principles as outlined on Page 62 of the Draft Plan. It is also acknowledged the Significant Site criteria established within the supporting Urban Design Study (SJB, 2016), outlines design principles, and key performance criteria including:

- Sites must be greater than 1,500m<sup>2</sup>;
- Ensure no net loss of commercial floor space (total commercial floor space of the subject site is approximately 11,259 GLA i.e. approximately 12,600 GFA and 4.5:1 FSR);
- Provide affordable housing that is proportionate to overall development;
- Proposal should demonstrate design excellence;
- Ensure appropriate separation between tall buildings (40m for greater than 18 storeys); and
- Include a public benefit offering (such as open space, community facility etc).

It is noted that the subject site can readily meet these criteria.

The strategic location of the site within the precinct, notably its proximity to St Leonards and Crows Nest stations, presents a key opportunity for the site to fulfil the Significant Site criteria to optimise the site's development potential in line with State strategic objectives. Preliminary investigations indicate the site is suitable for consideration as a Significant Site and can readily meet the specified criteria.

Comprehensive design testing for the site will be completed as part of the next phase of work to determine the most appropriate built form.

This will include testing to assess potential over shadowing, solar impacts and any potential view impacts. Preliminary investigations have identified the site's designation as a Significant Site would enable additional public benefit to the Precinct, with opportunity to provide public domain enhancement, community facilities, affordable housing and built form that is commensurate with high density strategic centres.

## 5. Recommendations and conclusion

On behalf of UOL Group Ltd, Architectus has reviewed the St Leonards and Crows Nest Draft 2036 Planning Package, in relation to the future context and preferred development outcome for the subject site known as 72 Christie Street, St Leonards.

**To achieve the site's full strategic potential, we recommend the site be determined a 'Significant site' as part of the Final 2036 Plan, with opportunity for Mixed Use development. We believe this is the best outcome for the site, which is consistent with the strategic objectives and intent of the Draft 2036 Plan.**

In order to comprehensively demonstrate the site full strategic development potential, additional built form testing will be undertaken and provided to DPE on 8 March 2019. On behalf of UOL Group Ltd, we would like to thank the Department of Planning and Environment for the opportunity to comment on the Draft 2036 Planning Package and welcome the opportunity to work collaboratively with the Department and Council to realise the sites full redevelopment potential and commensurate public benefit outcomes.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Harrison', followed by a period.

Michael Harrison  
Director, Urban Design and Planning  
Architectus Group Pty Ltd