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1. Introduction

APP Corporation Pty Ltd (APP) would like to extend its congratulations to the Department of Planning and Environment (DPE) in collaboration with North Sydney, Lane Cove and Willoughby Councils, on the completion and exhibition of the St Leonards and Crows Nest 2036 Draft Plan (the Draft Plan).

APP supports a number of the key elements of the Vision for the St Leonards and Crows Nest Precinct (the precinct), including:

- improvements to permeability through the introduction of a new, green, active transport corridor and east-west links along, and across the North Shore rail corridor;
- wholesale improvements to the public domain through the expansion of the Hume Street Park and the provision of new linear parks along Mitchell and Oxley Streets;
- increased land use flexibility, diversity and focus through the expansion of the B4 Mixed Use zone and establishment of a new artisanal and boutique retail hub on Atchison Street;
- early identification of a need for new primary and secondary school facilities to cater for projected increases in the local population; and
- the establishment of a density dwelling target of 7,525 new dwellings and employment target of 16,500 new jobs by 2036, aligning with those targets established in the Greater Sydney Region Plan and North District Plan.

APP are eager to see that the potential of the St Leonards and Crows Nest Precinct is fully realised, reflecting the unprecedented level of access that residents, visitors and workers of the area will enjoy upon the completion of the City & Southwest sections of the Sydney Metro in 2024. The precinct will undoubtedly become one of the most desirable places to live and work within Greater Sydney.

In this submission we have identified some issues for further consideration in finalising the 2036 plan. These talk mainly to additional opportunities in the implementation of the strategy to deliver on the Vision for the precinct.



2. Areas for Further Consideration

APP has conducted a thorough review of the Draft Plan and identified five main areas where the strategies can be strengthened, particularly with regards to implementation to deliver on the Vision.

2.1.1 Government and Private Sector Collaborations

The intent of the Draft Plan is to inform future amendments to the three Local Environmental Plans (LEPs) applying in the Precinct, each amendment being led by the respective Council (North Sydney, Lane Cove and Willoughby). Given our previous experience in master planning for St Leonards, the conflicting aspirations of these Councils has resulted in partial upgrades and a dis-jointed, poorly connected precinct. Genuine coordination between the three organisations is required to realise the objectives and Vision of the Draft Plan. It is our view that this coordination would be better achieved through a precinct-specific amendment to the State Environmental Planning Policy (SEPP) — State Significant Precincts 2005. Such an amendment could be undertaken more efficiently with buy-in from each of the Councils, and consolidates the approach to rezoning, public domain improvements and changes to development standards into a single Environmental Planning Instrument (EPI).

The announcement of Crows Nest Station on the new Sydney Metro line has generated an unprecedented level of developer interest in the precinct, demonstrating that there is strong demand for new residential apartments within walking distance to job centres, amenities and frequent, committed public transport services.

It is unlikely that the developer interest will abate in anticipation of the LEP amendment process, notwithstanding the short-term downturn in the market. The DPE in collaboration with Councils should take an active approach in working with the private sector and developers in considering any site-specific planning proposals that consolidate large key sites. These planning proposals can enable improved master planning outcomes and opportunities for enhanced public domain. This is particularly important in this precinct where a number of smaller lots exist in fragmented ownership.

All levels of government should seize on opportunities to collaborate closely with key land owner groups and developers to secure public domain upgrades, deliver meaningful affordable housing and critical social and community infrastructure in lieu of development incentives. These incentives need not necessarily be increased densities or floor space for all - rather, focussed key sites should be thoroughly investigated where the highest levels of public benefit can be realised.

2.1.2 Land Use Flexibility and Highway Interface

The Draft Plan sets out principles for increased setbacks to provide for an avenue of tree planting along the Pacific Highway. This may not be feasible from a design or commercial perspective on select sites, particularly where lot depth is already limited or the site is an amalgamation of smaller lots with fragmented ownership, such as the numerous two-storey shops along the Pacific Highway.

Ground floor retail, also envisaged in new developments may not be feasible given that the level of vehicular traffic along the Pacific Highway does not lend to a pedestrian friendly environment. This is evident in the existing retail environment along the highway in Crows Nest (see Figure 1). With the exception of those beside key bus stops, shopfronts are predominantly occupied by specialty stores or



businesses which rely on phone or online orders, rather than passing pedestrian traffic. A significant number of others have remained vacant for several years.

An appropriate degree of flexibility should be incorporated into the planning controls to ensure the viability and success of new developments along the highway. Development incorporating a variety of ground floor treatments should be considered, including, but not limited to:

- Offices without active street frontages;
- Large residential lobbies and/or communal spaces which have been successful along the highway in North Sydney (see Figure 2); and
- Residential apartments with courtyards presenting high walls to the street frontage, identified as a suitable treatment to the similarly busy Parramatta Road (see Figure 3).



Figure 1 – Existing retail shopfronts on Pacific Highway in Crows Nest



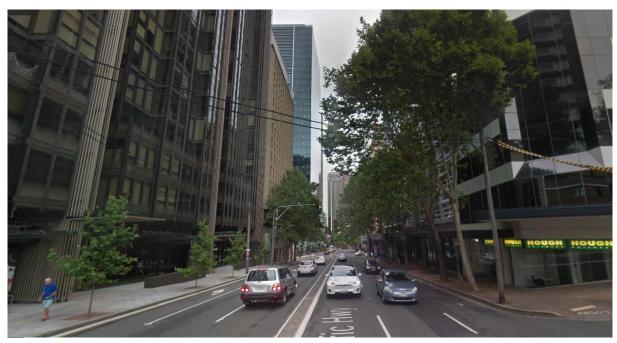


Figure 2-Existing development with ground floor offices on Pacific Highway, North Sydney



Figure 3–184 Parramatta Road, Camperdown (note ground floor courtyards with high walls to street frontage)



2.1.3 Creating a Vibrant Job Centre and Destination

Upon completion of Crows Nest Station, the precinct will become one of the most desirable locations to live and work in Greater Sydney with its unprecedented access. The Draft Plan envisages the St Leonards and Crows Nest Precinct as an employment hub, providing 16,500 additional jobs over the next 20 years to support a growing and evolving economy, with new jobs in the industrial, professional, creative retail, health and education sectors.

In order to incentivise the creation of these new employment opportunities, it is essential that there are commensurate improvements in the public domain and local services. APP commends the DPE for the public domain upgrades proposed under the Draft Plan including the linear parks along Mitchell and Oxley Streets, as well as the expanded Hume Street Park. These improvements ensure that future residents and workers in the precinct will at all times be within walking distance to high quality public open space and areas of respite.

There are endless opportunities to further incentivise the development of employment generating land uses within the precinct. APP encourages DPE and the Councils to consider a wide range of land uses that promote a 24-hour economy within the B4 Mixed Use zone, including small bars, music venues and late night shopping. These land uses, coupled with the proposed public domain upgrades, pedestrianised laneways and small plazas will not only create additional jobs, but also ensures that the precinct will be a vibrant day and night destination for residents, workers and visitors.

2.1.4 Alternative School Sites

APP welcomes the early identification of the need for a new primary and secondary school by the DPE to support the growing St Leonards and Crows Nest Precinct. Under the Draft Plan, the new schools are proposed to be located within the Royal North Shore Hospital (**RNSH**) site. It is noted that under the Part 3A Concept Plan approval for the hospital and subsequent modifications, approximately 10,000m² of residual land has been earmarked for "research and education" (Zone 6) (see Figure 4 – include image of proposed school site).

Several issues are foreseen with the location of the new primary and secondary schools in the RNSH site. These include possible conflicts between school and hospital traffic (vehicles and pedestrians) during peak hour times, acoustic impacts from helicopter and ambulance movements to/from the hospital and constrained pedestrian connections between St Leonards Station and the future schools site.

In light of the above, planning for the new schools should begin as soon as possible in consultation with the Department of Education and SINSW. If early investigations identify that the RNSH site is not suitable for the new schools, land acquisition for an alternative school site should commence immediately.

A suggested alternative location would be one of the large allotments adjoining the RNSH sites to the north on Herbert Street (see Figure 4). These lots have significant site area and benefit from a direct, legible pedestrian link to St Leonards Station. Vehicular movements associated with the new schools would cause minimal disruption to the role and function of the hospital being positioned away from the main hospital entrances.



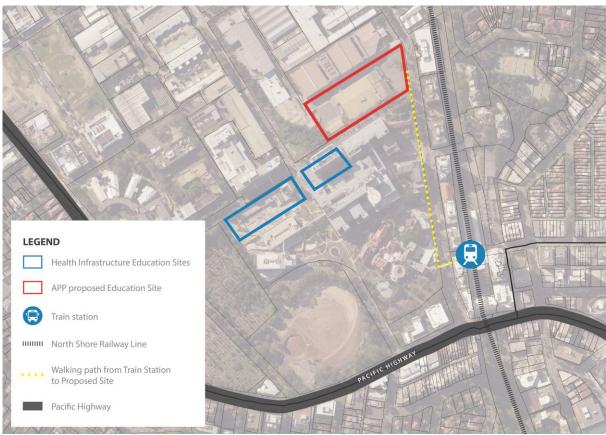


Figure 4 – HI NSW education sites and APP proposed site

2.1.5 Access and Connectivity

As discussed, the construction of Crows Nest Station on the Sydney Metro line will result in the precinct being one of the most accessible and desirable locations to live in Greater Sydney. However, as is identified in the Topography section of the Draft Plan, a significant number of streets within the area are "steep walking streets", including some of the streets which will form the heart of the future centre. Much of the precinct is already inaccessible to the elderly and disabled due to these topographic constraints, narrow walkways and footpaths and disconnected paths / pedestrian barriers.

Improvements to the public domain need to consider opportunities to deliver improved, equitable access for all. Whilst typically an afterthought in the master planning process, it is strongly recommended that DPE engage an equal access consultant as early as possible to conduct a detailed precinct analysis. The access consultant should be working closely with the engaged urban designers, traffic consultant and architect to ensure feasible design solutions within the public domain and at the interfaces to new developments and infrastructure nodes can be achieved. For the purposes of costing infrastructure improvements it is also essential that accessible design is understood and comprehended in any new Contributions Plans.



3. Conclusion

APP has conducted a detailed review of the Draft Plan 2036 for the St Leonards and Crows Nest Precinct and identified five key areas where the Vision should be further developed:

- 1. Government and Private Sector Collaborations: The principles, Vision and approach to rezoning and changes to development standards should be pursued under an amendment to SEPP (State Significant Precincts) 2005 as opposed to three separate LEP amendments. Genuine coordination and alignment of the Vision between the three Councils is required to successfully deliver on an improved St Leonards. Additionally, greater collaboration with the private sector is encouraged to expand opportunities on key sites for improved public domain and social benefits.
- 2. Land Use Flexibility and Highway Interface: The Pacific Highway presents a unique challenge in terms of built form. The current retail environment along the highway demonstrates that ground floor retail may not necessarily represent the best possible or viable outcome for activation. The DPE and Councils should remain open to a variety of ground floor activation treatments including boutique office space, large residential lobbies, communal spaces or residential apartments with screened courtyards to protect resident amenity.
- 3. Creating a Vibrant Job Centre and Destination: In order to incentivise the creation of the desired 16,500 new job places in the precinct by 2036, high quality public domain and services must be provided within a short walking distance to places of employment. Whilst improvements to the public domain have been thoroughly considered in the Draft Plan, an opportunity to further incentivise the creation of employment generating land uses remains. Vibrant land uses including small bars, music venues, restaurants and late night shopping which will contribute to a 24 hour economy should be incentivised, particularly as a means of activating existing laneways.
- **4. Alternative School Sites**: The early identification of the need for new schools in the Draft Plan is commended. Investigations into the suitability of the Royal North Shore Hospital site, as is proposed under the Draft Plan, should commence immediately. Should the location prove unsuitable, land acquisition negotiations for an alternative site should begin as early as possible.
- 5. Access and Connectivity: The topography of the St Leonards and Crows Nest Precinct poses direct challenges to the creation of a pedestrianised environment, particularly for the elderly and disabled. The DPE should engage an access consultant to identify opportunities for improvements to the precinct to ensure access for all.

If you would like to discuss any of the matters raised in this submission or have any questions or comments, please do not hesitate to contact the undersigned via email at Josh.Owen@app.com.au or call 0428 819 780.



Thank you for your time in considering this submission. With great anticipation we look forward to the release of the final 2036 Plan.

Josh Owen

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