People caring for people

Ramsay Health Care Australia Pty Ltd
ABN 36 003 184 889
Level 8, 154 Pacific Highway
St Leonards NSW 2065 Australia
Telephone: +61 2 9433 3444
Facsimile: +61 2 9433 3460
Email: enquiry@ramsayhealth.com.au
www.ramsayhealth.com.au

Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attention: Strategic Planning Team

RE: PLANNING PROPOSAL TO AMEND LANE COVE LOCAL ENVIRONMENTAL PLAN 2009 TO PERMIT SHOP TOP HOUSING AS AN ADDITIONAL PERMITTED USE AND ADDITIONAL BUILDING HEIGHT

2 GREENWICH ROAD, GREENWICH (LOT 1 IN DP 662215 AND LOT 2 IN DP 56604)

Dear Sir/Madam,

This letter accompanies a request for Rezoning Review on behalf of Ramsay Health Care (RHC). The subject Planning Proposal was submitted to Lane Cove Council on 11 April 2017 seeks to amend *Lane Cove Local Environmental Plan 2009* (LCLEP2009) to include Shop Top Housing as an Additional Permitted Use, as well as additional building height, on the site within the B3 Commercial Core zone. The land subject to this Planning Proposal is described as 2 Greenwich Road, Greenwich (Lot 1 in DP 662215 and Lot 2 in DP 56604).

The Planning Proposal has been under consideration by Lane Cove Council for 90 days and Council has failed to indicate its support for the Planning Proposal. A timeline of relevant dates is provided as follows:

- 11 April 2017 – Planning Proposal lodged with Lane Cove Council.
- 7 June 2017 – Request issued to Council by the Applicant for the Planning Proposal to be deferred.
- 10 July 2017 – Request issued to Council by the Applicant for the Planning Proposal to be included in Council's agenda.
- In total, the clock was stopped for 33 days.
- 11 August 2017 – The PP has been active with Council for 90 days.

Council has also provided verbal advice confirming that the 90 days have expired and Council are not going to favourably determine the Planning Proposal. A letter documenting this discussion has been requested from Council and Council has confirmed that the letter is forthcoming. A copy of correspondence with Council to date accompanies this letter. Accordingly, a rezoning review is now requested.

Further to the above and as described within the Planning Proposal Report prepared by Willowtree Planning and the Urban Design Report prepared by Roberts Day, the subject Planning Proposal seeks to amend *Lane Cove Local Environmental Plan 2009* (LCLEP2009) to include Shop Top Housing as an Additional Permitted Use in the B3 Commercial Core zone, as well as additional building height up to 33m. The proposed rezoning

intends to facilitate the future development of the site for mixed use development comprising of ground floor commercial space and upper level residential accommodation. This is intended to replace the current Northside Clinic mental health hospital which is scheduled to be relocated in early 2018 to a larger, modern, purpose-built facility at 2 Frederick Street, St Leonards (approved under SSD 7588 on 15 November 2016). The existing asset at 2 Greenwich Road has reached the end of its useful life and the Northside Clinic operations require new and expanded facilities and will move offsite in early 2018. The proposed rezoning and future redevelopment of the subject site would assist RHC in funding the development of the new and expanded Northside Clinic.

RHC have provided two (2) concept design options known as Scenario 1 and Scenario 2 as part of this Planning Proposal. These scenarios have been prepared and submitted having regard for the current and draft legislative planning framework that applies to the locality and test the suitability of the site for shop top housing with a maximum height of 33m. Scenario 1 has been prepared in the event that the Department of Planning & Environment (DPE) led Crow's Nest Priority Precinct Planning process does not eventuate in the immediate future having regard for RHC's immediate commercial and funding requirements for the new purpose-built facility at 2 Frederick Street, St Leonards (approved under SSD 7588 on 15 November 2016). Should DPE's priority precinct planning process come to fruition in the immediate future, the preferred scenario 2 concept design has been provided and prepared to accord with and achieve the likely objectives for the subject site in the context of the wider precinct.

Both concept designs have been informed by detailed site analysis and consideration of the surrounding context in order to provide an optimal development outcome that capitalises on the strategic potential of the land whilst preserving the amenity of adjoining sites and the surrounding public domain.

Scenario 1 demonstrates a concept design for the site that effectively integrates with the current state of the surrounding context whilst requiring only minor amendment to the current planning framework.

Scenario 2 provides an alternative concept design for the site situated within a broader investigative framework for the surrounding area. This design demonstrates the uplift in FSR that would be justified if amendments to the planning framework were to occur at a larger scale and territorial scope.

RHC's preference for Scenario 2 will still see the current 3:1 FSR applicable to the site complied with while maintaining the proposed height applied for in both concept design scenarios.

Subsequent to the Planning Proposal being prepared and submitted to Council, on 4 August 2017 DPE released its draft vision, objectives and guiding planning principles for the St Leonards and Crows Nest Station Precinct in its Interim Statement. All documents released as part of the Stage 1 Strategic Planning process have been reviewed and the proposed rezoning is considered to aptly respond to the strategic vision set out. More detailed review of the Planning Proposal in light of the St Leonards and Crows Nest Interim Statement is provided in the enclosed Addendum Letter. Overall, the proposed rezoning is considered to be consistent with the strategic intent for the precinct.

Further to the above, the Planning Proposal and Rezoning Review are justified given that the proposal satisfies the strategic merit test and has site-specific merit, in accordance with Step 2 in DPE's *A Guide to Preparing Local Environmental Plans*. Further to the strategic justification provided throughout the attached Planning Proposal Report, an assessment against the Step 2 criteria is provided as follows.

Table 1. Strategic Merit Test	
Merit Criteria	***Merit Assessment***
The Planning Panel or Commission will undertake an assessment to determine whether the proposal: a) has strategic merit as it is:	
Consistent with the relevant regional plan outside of the Greater Sydney Region, the relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying to the site, including any draft regional, district or corridor/precinct plans released for public comment; or	The proposed rezoning is consistent with the draft North District Plan as it applies to the district as a whole and also to the St Leonards centre specifically. In accordance with the Plan's Productivity Priorities and Actions, the proposed broadening and densification of uses on the site will increase the supply and diversity of available commercial floor space and housing in accessible locations. This directly responds to the strategic location of the site in proximity of new Sydney metro station at Crows Nest and the growing St Leonards strategic centre. Additionally, by providing new residential accommodation within St Leonards 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 through considered land use planning and design, 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 proposed rezoning 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 redevelopment of land that has been historically developed will promote the creation of a better quality environment built on the principles of sustainability. More detailed review and assessment of the proposed rezoning in light of the draft North District Plan is provided within **Section 4.1.1.3** of the Planning Proposal Report. As outlined above, the proposed rezoning is also consistent with the Interim Statement for the St Leonards and Crows Nest Station Precinct given that it provides for new commercial floor space and housing within a highly accessible location that is well-serviced by existing and planned public

	transport. This will build on the Precinct's assets by contributing to a diversity of employment opportunities, introducing dwelling diversity through contextually-responsive design, creating a vibrant public domain, protecting existing public open space and indirectly supporting the establishment of new hospitals within the designated health precinct. Responding to the site context, shop top housing and the conceptual building design provide a transition in land use and built form from the high density commercial premises adjoining the Pacific Highway corridor and lower density housing to the south. Within the attached Addendum Letter, full assessment is provided.
Consistent with a relevant local strategy that has been endorsed by the Department; or	The proposed rezoning is consistent with local strategic plans including the draft St Leonards South Strategy and Lane Cove 2025 (being Council's adopted Community Strategic Plan). The various Draft Master Plan options developed as part of the draft Strategy have been informed by Principles and site-specific Standards/Goals. The inclusion of shop top housing for the site aligns with these Standards and Goals including Liveability, Housing for all stages of life, Maximised walkability/cycling access and Amenity, as further demonstrated within **Section 4.2.2.1** of the Planning Proposal Report. The proposal is also consistent with the strategies outlined in the Community Strategic Plan in that it will provide for the needs of the community through the provision of commercial space and new housing to accommodate businesses and the local population in a highly accessible location serviced by public transport and in close proximity of key employment centres, retail services, open space, community facilities, health and education facilities and other amenities. Additional consideration is provided in **Section 4.2.2.2** of the Planning Proposal Report.
Responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognized by existing planning controls.	The site falls within the catchment of the new Crows Nest Metro Station and accordingly in the future will benefit from enhanced accessibility by public transport. Given this significantly augmented accessibility, the site is ideally located for new commercial and residential uses. The proposal also responds to the employment and housing targets identified within draft strategic planning documents, and accordingly will contribute

	to the provision of the required jobs and homes for the growing population.
The Planning Panel or Commission will undertake an assessment to determine whether the proposal: b) having met the strategic merit test, has site-specific merit, having regard to:	
The natural environment (including known significant environmental values, resources or hazards)	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 conceptual built form does account for the natural topography of the land and assists in providing a visual transition between commercial development fronting the Pacific Highway and residential development to the south. This site-specific design response is detailed within **Section 3.4** of the Planning Proposal Report and the Urban Design Report.
The existing uses, approved uses and likely future uses of land in the vicinity of the land subject to a proposal	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 transitionary 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. Further details of the contextually-responsive and sympathetic conceptual design are provided within **Section 3.4** of the Planning Proposal Report and the Urban Design Report. 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. In the future, the current commercial and residential uses surrounding the site may be densified in accordance with the Interim Statement and Structure Plan developed by DPE for the St Leonards and Crows Nest station precinct.
The services and infrastructure that are or will be available to meet the demands arising from the	The site is serviced by existing infrastructure that is capable of servicing higher density commercial and residential development. In particular the site is

proposal and any proposed financial arrangements for infrastructure provision.	highly accessible by public transport, being within 600m walking distance of St Leonards train station which is serviced by the Central Coast and Newcastle Line and the T1 North Shore and Northern Line. The site is also in immediate proximity of bus stops providing connections to Lane Cove, McMahons Point, Chatswood, Artarmon, Epping, Sydney CBD, Manly and Botany. This results in the site being awarded a transit score of 71 denoting excellent transit that is convenient for most trips, and a walkscore of 84 representing a very walkable location with most errands accomplishable on foot. Additional demand generated for public transport would be adequately accommodated by the new Sydney metro station at Crows Nest given that the site falls within the catchment of the metro.

Full details of the proposal are provided within the following enclosed documents:

- Rezoning Review Application Form.
- Application Fee (Cheque for amount of $20,000).
- Correspondence from Lane Cove Council.
- Planning Proposal Report prepared by Willowtree Planning.
- Urban Design Report prepared by Roberts Day.
- Addendum Letter prepared by Willowtree Planning to address the St Leonards and Crows Nest Interim Statement that was released by the Department of Planning and Environment (DPE) on 4 August 2017.

The enclosed documents are considered to suitably justify the amendment of *Lane Cove Local Environmental Plan 2009* (LCLEP2009) to include Shop Top Housing as an Additional Permitted Use, as well as additional building height, on the site. It is therefore recommended that the Planning Proposal is approved by the Planning Panel and that the necessary steps are pursued to enable it to proceed to Gateway Determination under Section 56 of the EP&A Act.

Yours faithfully,

Alex Belcastro
National Business Development Manager
Ramsay Health Care, Australia