27 November 2013

Stephanie Bashford Manager – Strategic Planning Lane Cove Council 48 Longueville Road LANE COVE NSW 2066

Dear Stephanie,

Addendum to Planning Proposal: 472 – 520 Pacific Highway and 95 Nicholson Street, St Leonards

We write following the lodgement of a planning proposal for the above site seeking to amend Lane Cove Local Environmental Plan 2009 to rezone the subject sites from B3 Commercial Core to B4 Mixed Use with amendments to the permissible height.

This letter addresses your email dated 25 November 2013 requesting that the proposal be specifically assessed against the Department of Planning and Infrastructure's Section 117 Direction *1.1 Business and Industrial Zones*. The objectives of Direction 1.1 are as follows:

- (a) encourage employment growth in suitable locations.
- (b) protect employment land in business and industrial zones.
- (c) support the viability of identified strategic centres.

The capacity of St Leonards Centre's to accommodate jobs and the satisfaction of Draft Metropolitan Strategy for Sydney to 2031 employment targets are addressed in detail in Section 4.2, 4.3 and 8.3 of the Planning Proposal.

In summary and for completeness, the proposal meets the objectives of Direction 1.1 as follows:

- A long term sustained shift in commercial market preference from St Leonards to other key centres within the Global Economic Corridor (such as Macquarie Park) has caused a decline in take up rates of commercial floorspace in St Leonards over the last 10 years. Factors such as fragmented land patterns, high land cost, lack of identity as a CBD centre and greater flexibility in other centres has contributed to the decline of St Leonards as a commercial centre for traditional office space. The proposal will be an investment catalyst to reinvigorate years of stagnation in the centre.
- The proposal will not dilute the overarching goal of future employment growth with target growth of 8,000 additional jobs to 2031 in St Leonards which needs to continue to build on its strengths as a specialised health employment precinct. The market analysis has identified that this is the future employment profile of the centre and thus should be the focus of government to strengthen its position as a 'specialised' office centre its key differential to other centres.
- There is sufficient land to accommodate the anticipated increase in employment growth including health and traditional commercial office use. The proportion of office based employment under the

Draft Strategy jobs growth targets will also be sufficiently accommodated in existing or approved developments.

- The proposal seeks to rezone the site from a B3 Commercial Core zone to B4 Mixed Use zone. While the rezoning will reduce the amount of purely business and employment focussed zoning in the centre, it allows for the continued provision of business uses through accommodation of mixed uses. In accordance with the objectives of the B4 zone, the proposed development integrates suitable office, retail and residential uses. Over 6,000sqm of commercial space is proposed to maintain an employment function.
- The proposal recognises the benefits of providing residential development to take advantage of the locational and amenity benefits this part of the Centre can provide. The proposal supports the State government's current direction of increasing density in major centres and broadening land uses in areas with good public transport and without eroding its primary employment function.

This information is intended to supplement the Section 117 assessment provided in Section 7.2 of the Planning Proposal. We trust this is of assistance and is sufficient to respond to your request. If you require anything further in relation to the assessment of the planning proposal please contact the undersigned on 8233 9900.

Yours sincerely,

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Stephen White Director