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Department of Planning and Environment  
GPO Box 39  
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**Attention: Strategic Planning Team**

**RE: ADDENDUM TO 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 has been prepared by Willowtree Planning Pty Ltd on behalf of Ramsay Health Care and provides an addendum to the Planning Proposal that was submitted to Lane Cove Council on 11 April 2017 in relation to the site of Ramsay Health Care's (RHC) Northside Clinic mental health hospital at 2 Greenwich Road, Greenwich (Lot 1 in DP 662215 and Lot 2 in DP 56604).

This addendum has been prepared in response to the draft vision, objectives and guiding planning principles released by the Department of Planning and Environment (DPE) on 4 August 2017 in relation to the St Leonards and Crows Nest Station Precinct. 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 subsequent sections of this letter. Overall, the proposed rezoning is considered to be consistent with the strategic intent for the precinct.

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.

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The subject site is located within the St Leonards and Crows Nest Station Precinct which was announced by the Minister of Planning as a strategic investigation area in July 2016. The precinct has been identified as a key employment centre that, combined with the new Crows Nest metro station, provides a unique opportunity for renewal and activation.

The Interim Statement establishes the following vision for the precinct:

*The St Leonards and Crows Nest Station Precinct has a strategic role within the Sydney metropolitan area. It provides a unique opportunity to strengthen and develop many of the existing qualities which attract people to live, work and relax here. Future development will be responsive to place with a clear identity and purpose, which is inspiring, enjoyable and rewarding.*

Further to the above, a diverse range of commercial and mixed use development are to be focused between Crows Nest and St Leonards stations. New communities are to be established through a range of housing types within liveable and sustainable neighbourhoods connected to local retail, services, public open spaces and a high quality public domain.

In accordance with this vision, the proposal responds to the Precinct's strategic role by providing for new commercial floor space and housing within a highly accessible location that is well-served 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. Future development would respond to 'place' through design that reflects the site's role in providing a transition between the Pacific Highway corridor and residential neighbourhoods.

The proposed rezoning also responds to the draft objectives of the Precinct, as summarised below:

- 1. Leverage world-class health and education uses to provide opportunities for future employment growth.*

The proposed rezoning and future redevelopment of the subject site would assist Ramsay Health Care in funding the development of the new and expanded Northside Clinic at 2 Frederick Street (approved under SSD 7588). As aforementioned, the successful operations of the Northside Clinic require new and expanded facilities in response to increasing demand for quality mental health services demonstrated by growing waiting lists for many services including a number of critical and unique mental health services which are not readily available elsewhere. In particular Northside Clinic is already the largest provider of inpatient and day patient treatment for people with eating disorders and drug or alcohol dependency and also includes specialised treatment units in mood disorders, drug and alcohol detoxification and rehabilitation, post-traumatic stress disorder and day programs, and it is vital that services are expanded to meet the needs of the community. The development of the new and expanded Northside Clinic will therefore create additional access to mental health services in the LGA and ultimately increased access to health care and related jobs in the area.

- 2. Protect and strengthen the Precinct's commercial role supported by complementary uses to capitalise on renewed confidence in the commercial market.*

The proposal will preserve the use of the site for employment generating development through the provision of ground floor commercial premises. The potential provision of retail premises, commercial offices, child care and residential accommodation on the site will ensure the retention of suitable employment generating land uses supporting the creation of job opportunities, the provision of retail, business and office premises and the provision of services to support other land uses.

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- 3. Create future employment opportunities leveraging off the increased transport capacity of the new metro station.*

The proposal will positively contribute to the economy through the provision of employment-generating development in the form of ground floor commercial space. Combined with the additional jobs created through the expansion of the Northside Clinic on its new site (SSD 7588), the jobs sustained by the commercial space will result in a net employment increase in the area.

Further to the above, the proposal will stimulate additional commercial activity in the locale with positive connotations for surrounding businesses. Similarly the provision of new jobs and services close to where people live, work and visit will improve the overall level of service-provision in the area.

- 4. Strengthen and enhance opportunities in the Artarmon employment area to fulfill the important urban service needs of the wider North District.*

The proposal does not relate to the Artarmon employment area.

- 5. Create a network of new and existing useable and diverse open spaces which prioritise walking, cycling and access to transport, promote a healthier urban environment and encourage social interaction.*

The site is located in close proximity of existing public open space as well as public transport and therefore will promote a high level of amenity and walkability for future workers and residents.

Additionally, through the integration of retail, a café, commercial space and a possible childcare centre on the ground floor of a future shop top housing development, the proposal has the potential to create a small neighbourhood centre and 'heart' for the Greenwich North Transit Village. This would enhance neighbourhood amenity, promote walkability and healthy lifestyles, encourage community interaction and address the need for a focal point within the community.

- 6. Incorporate opportunities for transit oriented development including commercial and mixed use development that takes advantage of existing and future transport.*

Given the site's strategic location in proximity of an extensive public transport (train and bus) and road network, it is ideally located in accordance with the principles of transit-oriented development. Therefore, the site provides valuable opportunity to contribute to a sustainable, transit-oriented community providing a high standard of living for residents and workers.

- 7. Develop high quality and diverse residential areas that create sustainable and liveable communities.*

By providing new residential accommodation within St Leonards in conjunction with commercial premises, a wide range of people will be accommodated. 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. Owing to its proximity to existing and planned public transport, the site provides valuable opportunity to contribute to a sustainable, transit-oriented community.

- 8. Preserve, strengthen and enhance the existing diverse character areas.*

The subject site is located between commercial development fronting the Pacific Highway and residential development to the east, south and west, thereby being ideally located to provide a mix of uses as a transition between distinct commercial and residential areas. The proposed rezoning to permit shop top housing therefore aptly responds to the surrounding context and the unique transitional character of the subject site. Similarly, the proposed rezoning is consistent with the draft guiding principles for the Precinct, demonstrated as follows:

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- *Responsive – Buildings and spaces that are sensitive and responsive to place, local character and context.*

As demonstrated through the indicative design scheme for shop top housing on the site, the proposed rezoning would facilitate development that exhibits high quality design and is contextually-responsive. Through the stepped built form, active ground floor spaces and overall design, shop top housing on the site would provide an effective transition between high density commercial development along the Pacific Highway and neighbouring residential areas, activate the public domain, enhance neighbourhood amenity and contribute to the creation of a highly liveable urban environment for new workers and residents whilst effectively protecting the amenity of existing properties. The future development would also increase residential options for nearby hospital workers and thereby sustain employees in the area.

- *Integrated – A built environment that links communities within a cohesive place.*

The integration of a range of uses, including retail premises, commercial offices, child care and residential accommodation, within a coherent built form will contribute to a highly amenable and sustainable living and working environment. This diversity of complementary uses, combined with the activation of the site at ground level through high quality urban design, will enhance the vibrancy of the site and surrounding locale whilst responding to the needs of the community through service provision, job creation and dwelling diversity.

The proposal also has the potential to create a small neighbourhood centre and 'heart' for the Greenwich North Transit Village. This would enhance neighbourhood amenity, promote walkability and healthy lifestyles, encourage community interaction and address the need for a focal point within the community.

- *Resilient – A building, place or space that is sustainable in the context of social, economic or environmental changes.*

The proposed rezoning would facilitate the delivery of a building, place and space that respond to and enhance the social, economic and environmental contexts of the site and surrounding area. Shop top housing on the site would capitalise on the strategic location of the site in proximity of existing and planned public transport by providing opportunities for the establishment of small businesses, co-working office space, childcare and other services, spaces for the community to interact and new types of housing close to where people work.

- *Equitable – A built environment that is fair and accessible for all citizens.*

The proposal will provide for the needs of a growing and diverse population through the provision of new housing in an accessible location supported by established infrastructure, employment centres, retail services, public open space and community facilities. The proposal will benefit the local and regional community by providing services to complement other land uses and improving the experience and convenience of living in and visiting Greenwich and south St Leonards.

By activating the site at ground level, development for the purposes of shop top housing would also provide social benefits related to enhanced vibrancy, street life and additional opportunities for social interaction. A small neighbourhood centre and 'heart' for the Greenwich North Transit Village has the potential to develop through the integration of retail, a café, commercial space and a possible childcare centre on the ground floor of a future shop top housing development, thereby providing new employment opportunities, accommodating small businesses, supporting community interaction and addressing the need for a focal point within the community and for additional child care services.

- *Liveable – A built environment which supports and responds to people's patterns of living, and promotes enjoyment, safety and prosperity.*

By providing new residential accommodation within St Leonards in conjunction with commercial premises, a wide range of people will be accommodated. Housing affordability and choice will therefore be improved whilst

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promoting high standards of living through considered land use planning and design, ultimately creating a liveable and loveable place to live, work and visit. Owing to its proximity to existing and planned public transport, the site provides valuable opportunity to contribute to a sustainable, transit-oriented community providing a high standard of living for residents and workers.

As shown within **Figure 1** which provides an extract from the Character Areas Map, the site is located between the Pacific Highway Corridor and the St Leonards South Residential area.

The Pacific Highway Corridor is proposed to be *an activated, high density mixed use corridor with a key focus on employment*. Other opportunities and considerations include:

- *Create additional employment floorspace and investigate new opportunities for employment, particularly lower floor uses.*
- *Synergies and associated employment uses between the health and education uses around Royal North Shore, North Shore Private and Mater Hospitals and increasing employment capacity will be promoted.*
- *Whilst retaining the key function of the Pacific Highway, new walking and cycling connections will be investigated as well as an improved public domain and minimising overshadowing impacts to the south.*

In accordance with these opportunities, the proposed rezoning to enable shop top housing would activate the site at ground level through an improved public domain, provide new opportunities for business investment and employment and minimise overshadowing of residential development to the south. Accordingly, the proposal is consistent with the intended development within the Pacific Highway Corridor.

Further to the above, St Leonards South is proposed to be *a higher density residential area over time*. Opportunities and considerations include:

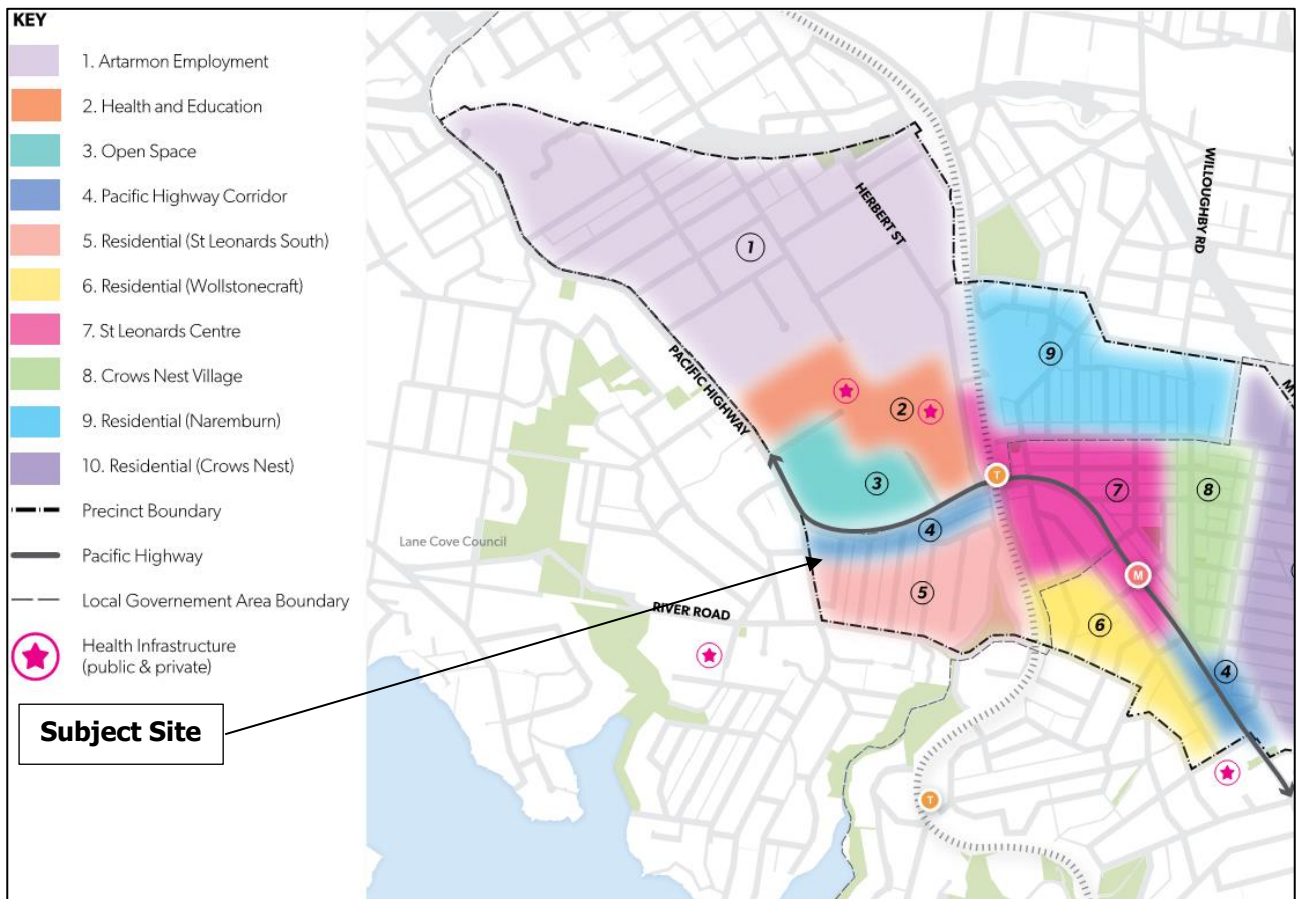
- *Increased densities will be focused in those areas closest to St Leonards station.*
- *Key matters for consideration include traffic, access and connections, provision of open space, schools and minimising overshadowing.*

The proposed rezoning for shoptop housing adheres to these opportunities and considerations by providing higher density development and additional residential accommodation in an appropriate location in proximity of the Pacific Highway corridor and public transport. As demonstrated through the indicative design, shop top housing could be developed with no adverse overshadowing impact. Additionally, the site is located in proximity of established road and public transport infrastructure, open space, schools and other services and facilities. Therefore the proposal is highly compatible with the vision of St Leonards South.



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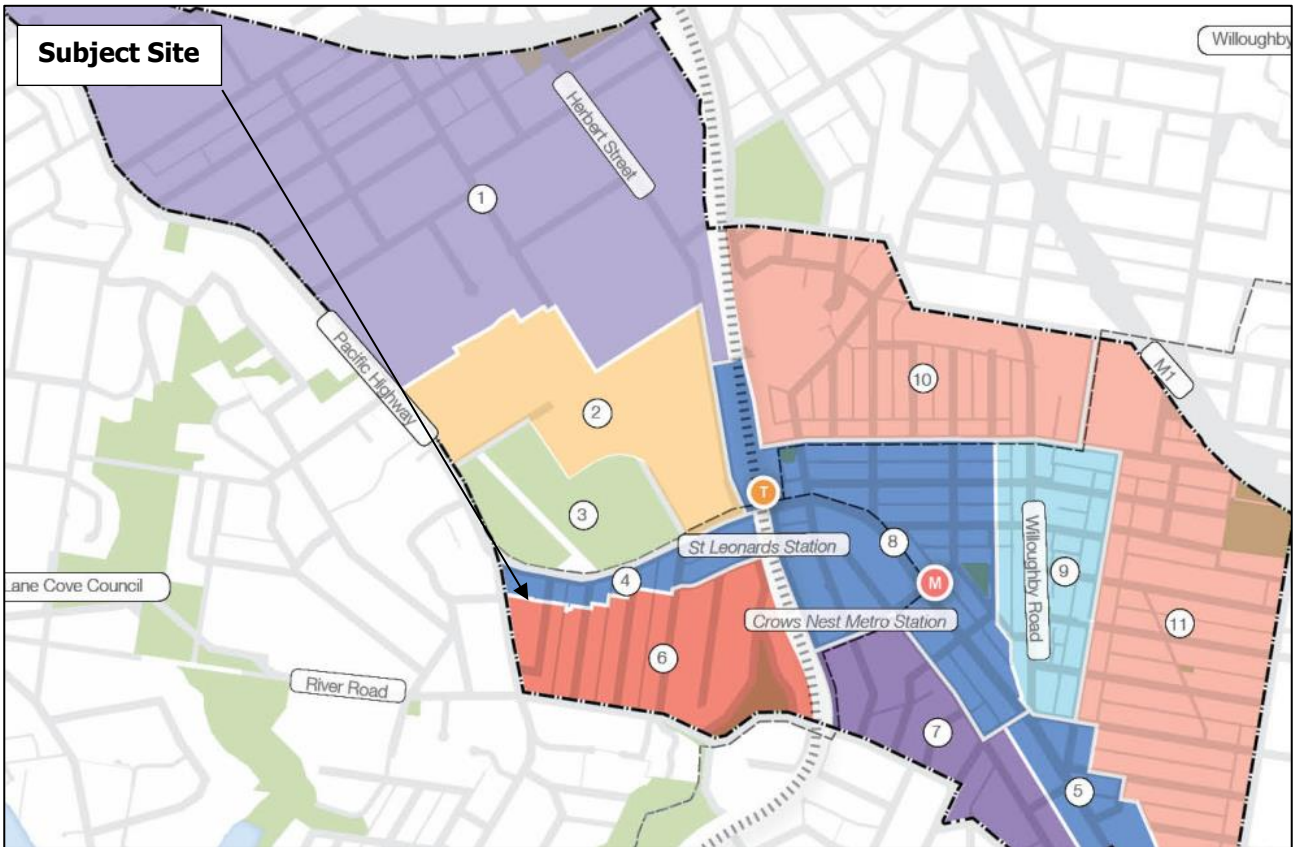


**Figure 1. Character Areas Map (Department of Planning and Environment, 2017)**

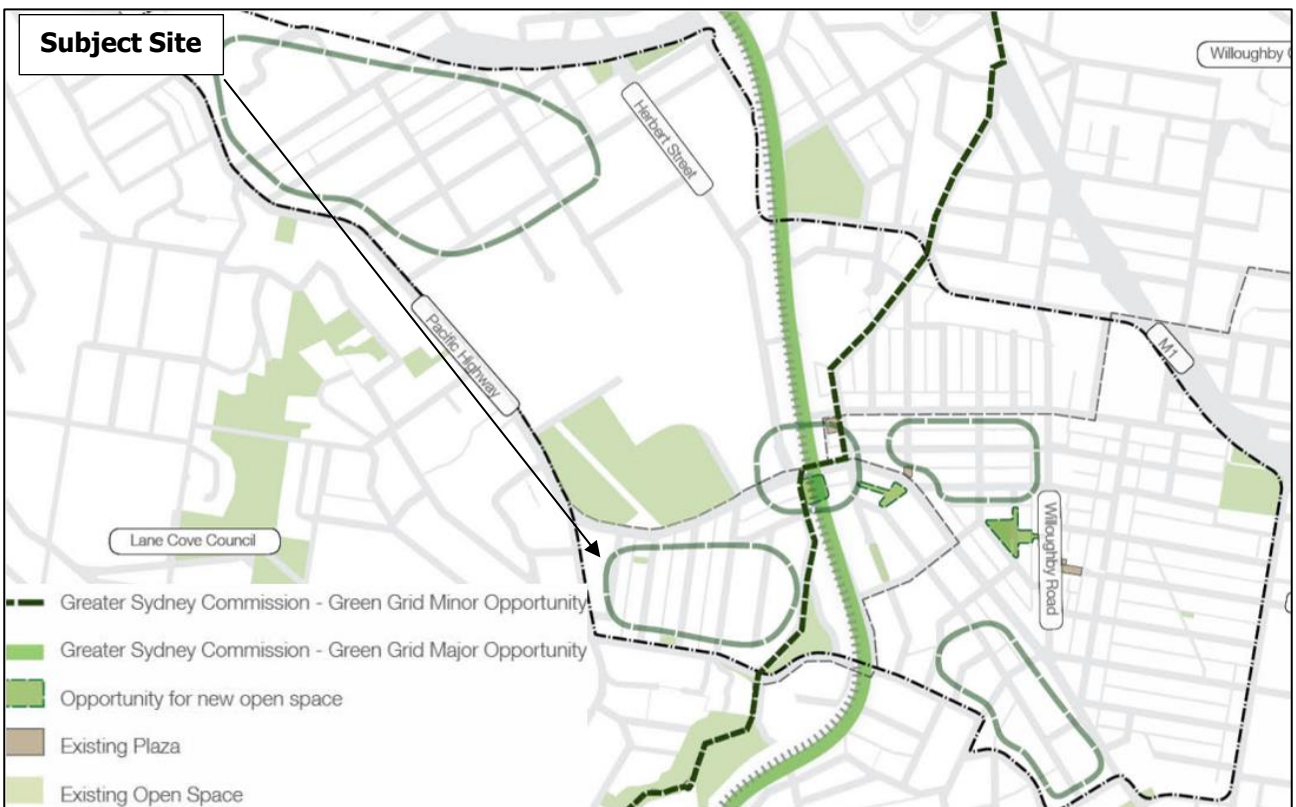
Deriving from review and analysis of strategic and urban conditions within the Precinct, a Preliminary Structure Plan has been developed. Consistent with the above Character Areas Map, within the Character Areas page of the Preliminary Structure Plan (**Figure 2**) the site is identified between the Pacific Highway Corridor West and the St Leonards South Residential area. The site is also identified in a location that may provide a minor opportunity for the development of a green grid (**Figure 3**).

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**Figure 2. Preliminary Structure Plan- Character Areas (SJB Architects, 2017)**

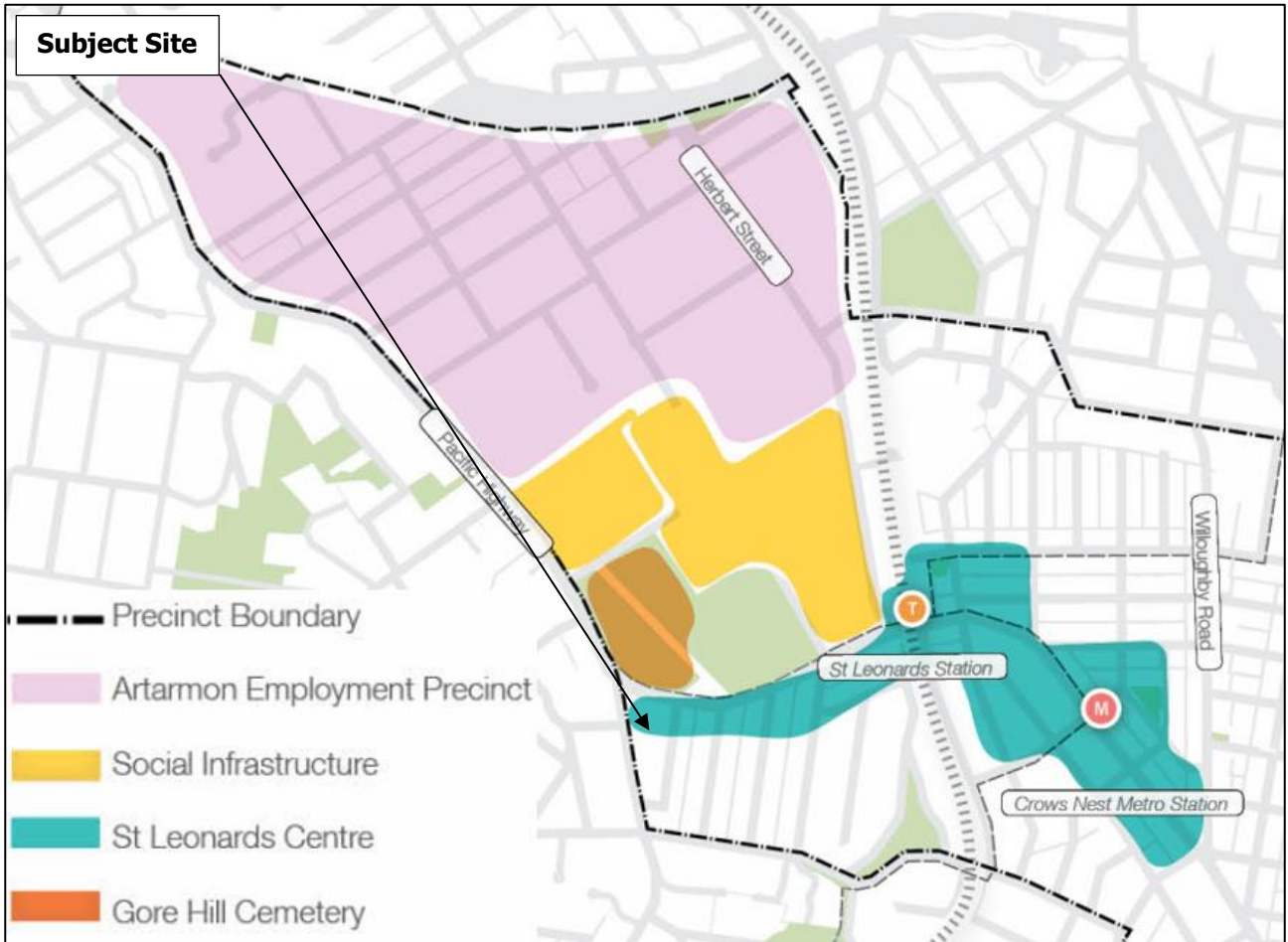


**Figure 3. Preliminary Structure Plan- Open Space Opportunities (SJB Architects, 2017)**

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Whilst within the Preliminary Structure Plan the site is not identified as forming any challenges or opportunities, within the Urban Analysis a number of constraints and opportunities are identified. In the Land Use Constraints Map (**Figure 4**) the site and broader Pacific Highway corridor are identified as forming part of the St Leonards Centre. Whilst largely operational during the day, at night these areas become quiet. This portion of the area lacks residential population. The proposed rezoning directly responds to this constraint by providing new housing in mixed use development. By introducing a new residential population within the western corridor of the St Leonards centre, activity would be generated throughout the day and night, thereby contributing to a more vibrant and amenable urban environment providing new opportunities for more diverse employment and service offerings.



**Figure 4. Constraints – Land Use (SJB Architects, 2017)**



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Relatedly, opportunities for land use are identified for the site in conjunction with the St Leonards Centre and potential high density residential areas (**Figure 5**). Specifically, the opportunities analysis specifies that *development along the Pacific Highway should continue to be appropriate to the amenity of the highway and offer important urban services. The priority of this area is to facilitate transit movement.* The proposed rezoning to enable shop top housing would enable the site to provide urban and commercial services at ground level commensurate with the opportunities identified for the St Leonards Centre whilst also providing a high level of amenity for residents of the site and its surrounds.

Pursuant to the opportunities analysis, *the area to the south of the precinct is to be investigated for further intensification to accommodate medium density residential.* The proposed rezoning for shop top housing would facilitate the provision of residential accommodation on the site. As demonstrated by the indicative built form design, an appropriate density of development would be provided responding to the transitional nature of the site associated with its location between high density commercial development along the Pacific Highway and existing residential neighbourhoods to the south.

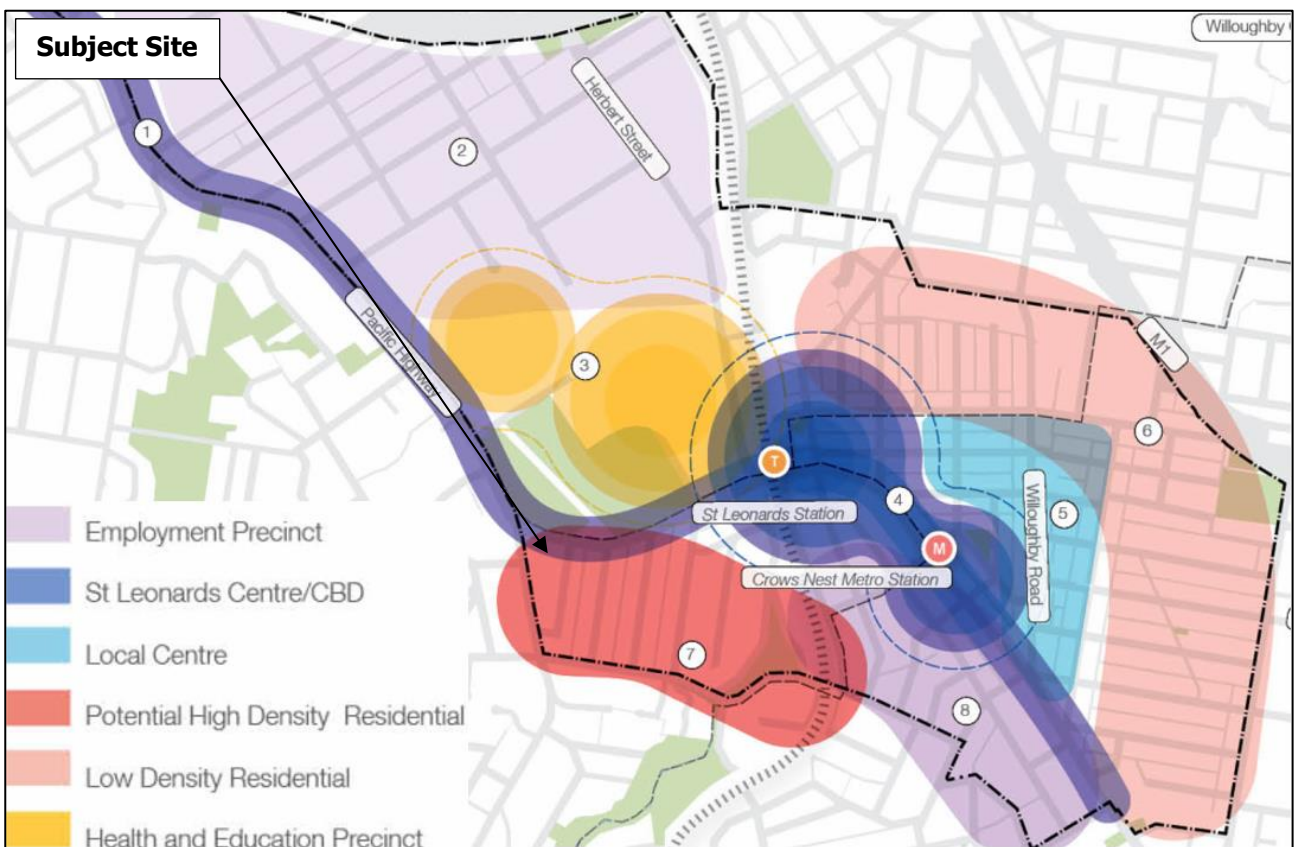


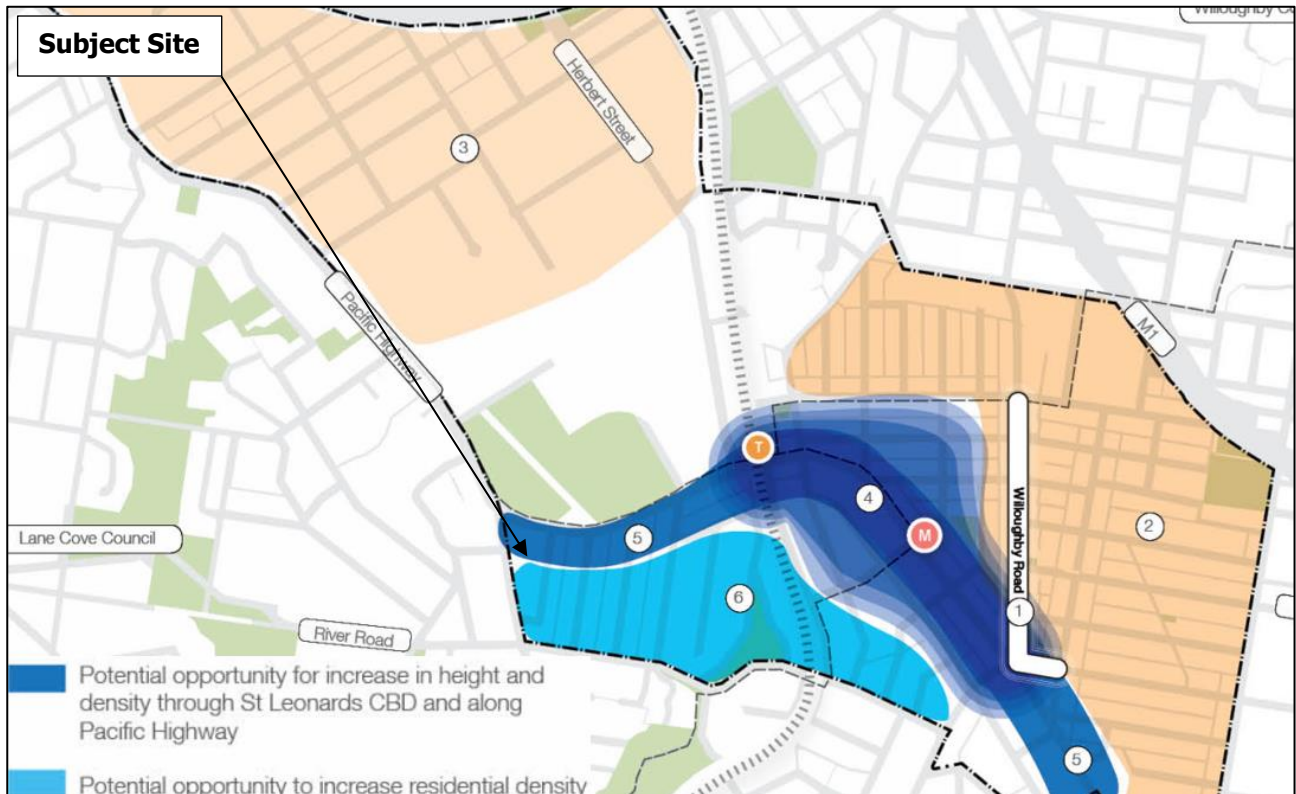
Figure 5. Opportunities – Land Use (SJB Architects, 2017)

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Additional to land use, opportunities are also identified in relation to built form (**Figure 6**). Additional density may be reasonably located along the Pacific Highway, whilst increased residential capacity and additional employment opportunities may be captured in St Leonards South. The proposed rezoning for high density shop top housing responds to these opportunities and will facilitate the provision of additional housing as well as commercial premises and community facilities at street level.

Opportunities are also identified in relation to movement given the site is located within the catchments of Crows Nest Metro Station, St Leonards train station and Wollstonecraft train station. Additionally, the site falls within the 200m radius of existing open space.



**Figure 6. Opportunities – Built Form (SJB Architects, 2017)**

Accordingly, this addendum letter has demonstrated that the proposed rezoning for shop top housing and additional building height is consistent with the strategic vision for the St Leonards and Crows Nest Precinct. The proposal achieves the vision and objectives, adheres to the guiding principles, responds to the opportunities and constraints, and is consistent with the character, land use and built form envisioned for the site pursuant to the Interim Statement.

Yours faithfully,

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