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Independent Planning Commission NSW
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Attention: Andrew McAnespie

RE: REZONING REVIEW

**PLANNING PROPOSAL TO AMEND SYDNEY LOCAL ENVIRONMENTAL PLAN 2012 FOR
ADDITIONAL BUILDING HEIGHT AND FLOOR SPACE RATIO FOR THE PURPOSE OF A
MIXED USE TOWER**

44-70 ROSEHILL STREET, REDFERN (LOT 1 DP 792628)

Dear Andrew,

This letter has been prepared by Willowtree Planning Pty Ltd on behalf of Redfern Rosehill Pty Ltd in relation to the Rezoning Review for 44-70 Rosehill Street, Redfern (Lot 1 DP 792628). The Planning Proposal seeks the amendment of *Sydney Local Environmental Plan 2012* (SLEP2012) to include additional building height and floor space ratio (FSR) on the site.

We write in response to your email of Monday the 11th of February 2019 whereby a request has been made on behalf of the Independent Planning Commission (IPC) Commissioners (Peter Duncan and Richard Mackay) to provide the proponent's return comments on the undated, untitled and unauthored referenced Strategic Merit Test Plan (Email titled 'IPC meeting material – strategic map') attached as **Appendix 1** to this correspondence. For the record, the proponent or anyone associated with the proposal have never seen, been furnished with, nor discussed the plan provided with Council.

The proponent and their consultant team have now had the opportunity to not only review the plan provided by Council as referenced and attached, but have also had the opportunity to review the transcript of Council's interview with the IPC on Tuesday the 5th February at 9:51am (**Appendix 2**).

In our view, given that City of Sydney Council's contentions in respect of the strategic, and in turn site specific, merit of the proposal are centred around the specific contentions raised in Council's interview relating to the attached undated, untitled and unauthored plan and cross referenced at item 40 of the transcript provided below:

"MS Buckshaw: Then we come to the Camperdown – Ultimo Collaboration Area, Now this is led by the GSC, and the priority of the area is "to support economic vitality and growth;: that is the stated aim of the of that collaboration area, And the GSC will be working with key stakeholders and agencies –

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state agencies- to really try and move that strategic intent forward, and take a very placed-based strategy approach to supporting health and education in particular in this precinct, and moving that forward. So that work is underway"

Specifically we are being requested to provide commentary on the applicability of the Camperdown – Ultimo Collaboration Area.

It seems clear when considering the contention from Council, and having regard for the plan provided, that a further 'alternate truth' has been added to Council's submission now both verbally and on the public record, which needs to be addressed, not in part but in full.

Given the above, it is our understanding that the IPC are requesting a response in full to Council's publicly available transcript from their interview on the above stated date and time. We are of the view that the proponent's Planning Proposal and supporting material, along with the publicly available interview transcript, address all of the concerns raised by Council throughout the assessment process. Therefore we feel it not necessary to again rebut or draw out the relevant, and without question, strategic and site specific merits of the proposal. Instead, the matter of the relevance of the Camperdown to Ultimo Collaboration Precinct, which has only just now been raised by Council (although considered as irrelevant in the preparation of the strategic merit test by the proponent) is the pertinent matter for which a response need be provided.

Accordingly, the Eastern City District Plan, as the primary source of publicly-accessible information on the Camperdown – Ultimo Collaboration Area, has been reviewed. The District Plan provides as follows:

The Camperdown – Ultimo Collaboration Area "is part of the Innovation Corridor along the western and southern fringes of the Harbour CBD. The opportunities to grow this precinct are further discussed in Planning Priority E8" (GSC Eastern City District Plan, page 59).

The Collaboration Area has a total land area of approximately 630.5 hectares (refer **Figure 1** and **Appendix 3**).

Priority E8 'Camperdown – Ultimo' (page 65) focuses on the GSC leading collaboration between key stakeholders and agencies to create an area of "international standing".

The Planning Proposal's landowners are *not* identified as a key stakeholder or agency within the Collaboration Area.

A detailed analysis of the GSC Innovation Corridor Map (page 63) clearly identifies key landholdings forming the Camperdown – Ultimo Collaboration Area including:

- Sydney School of Entrepreneurship
- Student Accommodation
- UTS Campus
- Carriageworks
- Australian Technology Park
- Sydney University Campus
- University of Notre Dame
- Royal Prince Alfred Hospital
- Central to Eveleigh SEPP lands

The key landholdings comprise approximately 173 hectares (27.4 percent) of the Collaboration Area (refer **Figure 1** and **Appendix 3**).

The subject site is *not* identified as a specific landholding within the Camperdown – Ultimo Collaboration Area.

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Given the scale of identified landholdings controlled by key stakeholders, the GSC's vision to make the Collaboration Area Australia's innovation and technology capital (i.e. an innovation district) by 2036 will largely be realised by unlocking the full potential of these lands.

Select major projects planned, approved or under construction across key identified landholdings include:

- Mirvac's approved \$1B ATP masterplan under construction
- Sydney University's approved \$1.4B campus masterplan
- UTS \$1B plus 'smart campus' masterplan underway
- Urban Growth's Central to Eveleigh Masterplan

A key purpose of the Collaboration Area is to optimise these assets and major projects by identifying new opportunities for partnerships and collaborations to improve productivity.

Instead, the subject site falls within the Collaboration Area's broader definition of:

"surrounding high density and mixed-use precincts with workers, residents and students support the Collaboration Area's vitality and growth" (GSC Eastern City District Plan, page 65).

Key GSC objectives for these surrounding lands is:

"the growth of start-up and creative industries" and *"supporting a range of housing types and price points for key workers and students"* (GSC Eastern City District Plan, page 65).

The Planning Proposal clearly fulfils the definition of creating high density and mixed-use precincts around the key identified landholdings of the Collaboration Area.

The Planning Proposal's original Voluntary Planning Agreement (VPA) also delivers the key objectives of growing affordable start-up opportunities and supporting a range of housing types via a 'blended affordability' model, including 5% affordable housing and 813sqm of affordable start-up space. The affordable start-up space, able to accommodate approximately 55 creative and tech entrepreneurs in close proximity to key stakeholder assets, would bring a positive economic multiplier to Sydney over time and incubate local talent.

The Planning Proposal also positively contributes to the Collaboration Area's vision of creating an "innovation district."

Interestingly, in understanding world's best practice for creating innovation districts the GSC has engaged the Brookings Institute's Julie Wagner for international expert advice. Julie Wagner identifies 'residential' as a key element of successful innovation districts around the world in multiple publications.

In negotiating the proposed VPA with Council, they requested the proponent remove the affordable 'start-up' business floor space and increase the affordable housing offer.

In making this request, the Council in effect recognised the subject site falls within the broader definition of *"surrounding high density and mixed-use precincts with workers, residents and students support the Collaboration Area's vitality and growth."*

As clarified during the IPC interview, the Planning Proposal does not seek to change the existing B4 zone that was established by the City of Sydney as part of its strategic planning processes.

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Notwithstanding, commentary from the City of Sydney infers the existing B4 zoning itself may not be appropriate and suggests the Collaboration Area process may address this matter. There are two observations regarding this:

- There is approximately 124ha of B4 Zone within the Collaboration Area, being less than 20 percent of the total area (refer **Figure 2** and **Appendix 4**).

The suggestion this zone should be reviewed to increase employment floor space beyond the market is unrealistic and unprecedented. In effect, it would be a down-zoning adversely impacting on land values, property valuations, Council rates, etc.

- The GSC has published *Place Strategies* for the Liverpool and Randwick Collaboration Areas.

Both documents have similar aspirations in creating innovation districts. However neither document:

- 1) challenges the validity of existing B4 Zone;
- 2) identifies the review of B4 Zones as necessary;
- 3) recommends additional planning mechanisms within the B4 Zone to increase employment floor space.

As such, there is no precedent or evidence the GSC's *Place Strategy* for the Camperdown – Ultimo Collaboration Area would rezone the land or add mechanisms to increase commercial floor space within the B4 Zone.

The two (2) attached maps visually illustrate the above, including the 'Key Stakeholder, Agencies and Land Parcels' and 'Existing B4 Zoned Lands'.

Based on the above factually correct application and GSC certified information pertaining to the Camperdown to Ultimo Collaboration Precinct, again it is clear that the contention made by Council in respect of its application to the subject site, is not only an alternate truth but indeed not applicable nor relevant to the merits of this Planning Proposal as clearly and factually provided above.

Should the IPC require clarification on any of the aforementioned points, we welcome the opportunity to discuss further.

Yours faithfully,



Chris Wilson
Managing Director
Willowtree Planning

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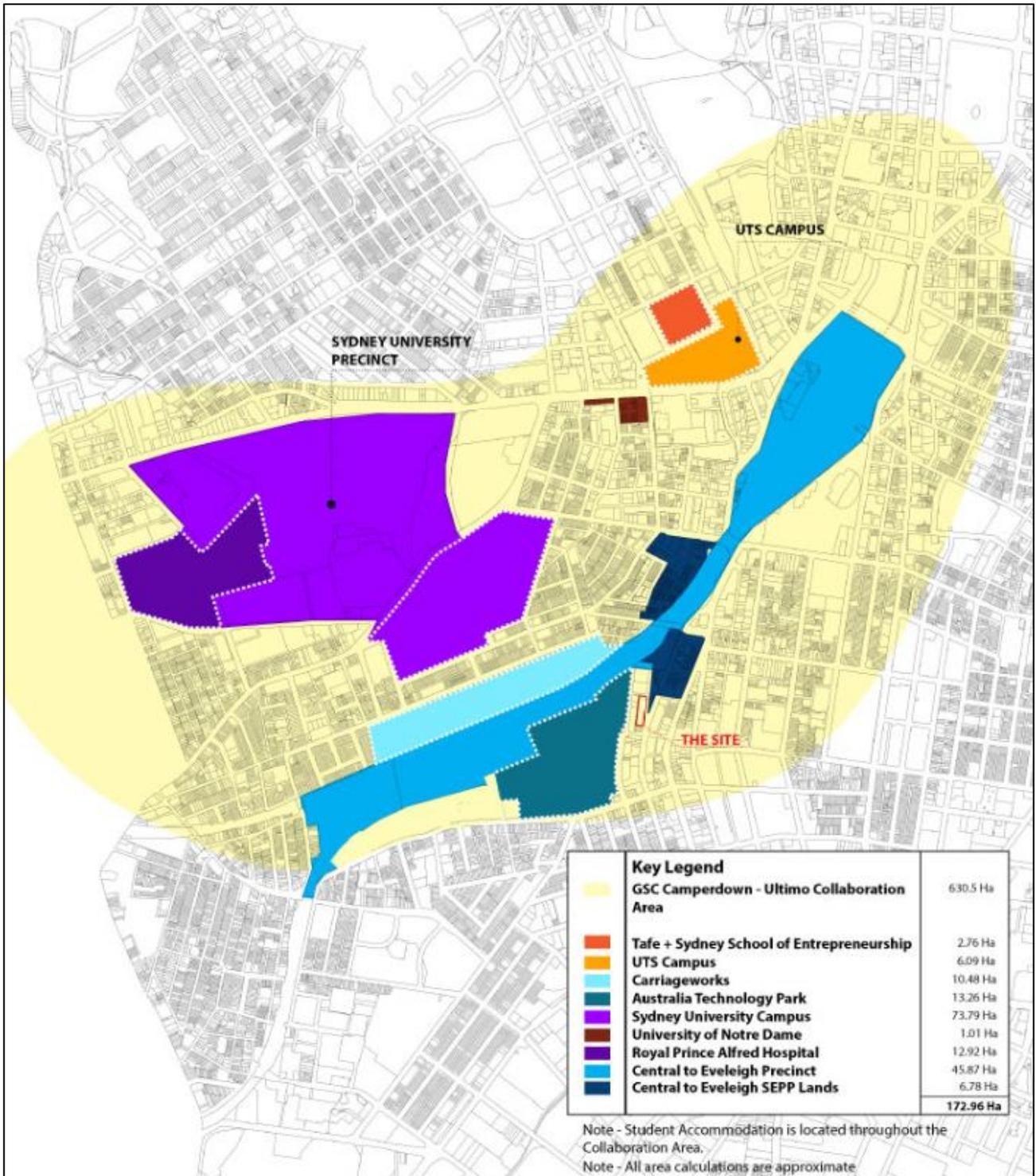


Figure 1. Key Stakeholder, Agencies and Land Parcels (Roberts Day 2019)

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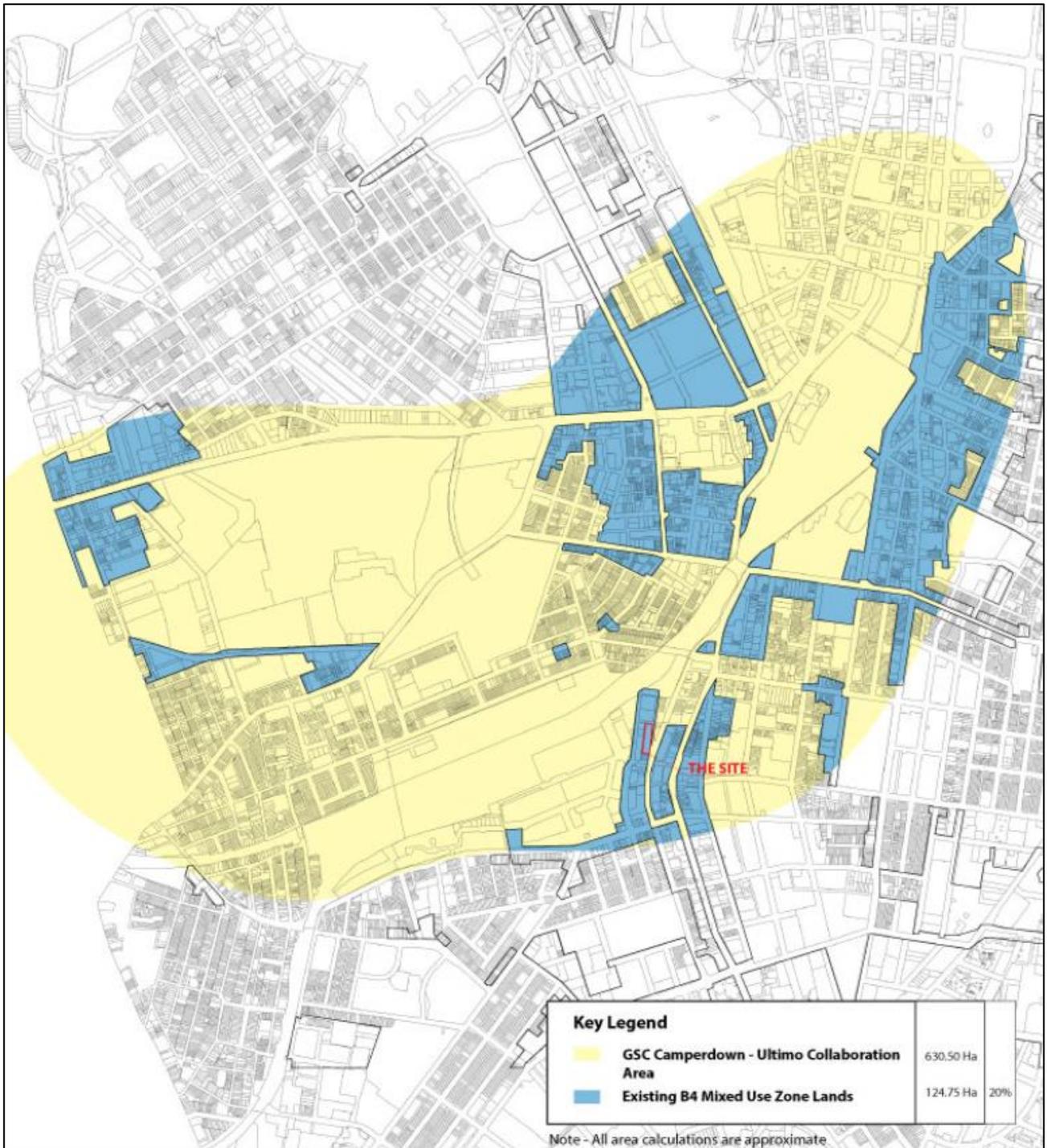


Figure 2. Existing B4 Zoned Lands (Roberts Day 2019)