

Greenwich / St Leonards Action Group  
Submission to the NSW Government Planning and Environment for the St Leonards and Crows Nest Station Precinct

24 August 2017

Department of Planning and Environment  
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Sydney, NSW, 2001  
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Dear Sir/Madam,

**Subject: The St Leonards and Crows Nest Station Precinct**

This submission has been prepared by the Greenwich/St Leonards Action Group ('GSL Action') in relation to the St Leonards and Crows Nest Station Precinct Interim Statement ('Interim Statement'). GSL Action is a community organisation active in representing the views of the St Leonards and Greenwich community. GSL Action recognises the importance and significance of the St Leonards and Crows Nest Station Precinct and appreciates the opportunity to provide feedback to the NSW Department of Planning and Environment (DP&E).

We also attach a submission, along with this submission, which has been prepared by the Town Planners, Milestone Pty Ltd in relation to the South St Leonards Master Plan (rezoning) initiated by Lane Cove Council. The Milestone submission should be taken into consideration in light of the Interim Statement and the DP&E Vision ('Vision') as it provides the opportunities and/or constraints of the rezoning for St Leonards South.

It is important to note that the Interim Statement offers little detail of the associated impacts from increasing density in St Leonards in relation to actual infrastructure, services, transport, amenity, locality and community aspirations. The future needs for good-quality local area are not explained and attaining good community outcomes have not been well considered even at this early stage of the Interim Statement plans. In some sections the Interim Statement becomes echoes of previous proposals already presented by councils and not investigated thoroughly. It is the previous council's blue prints, especially Lane Cove Council, that place questions on the appropriateness and legitimacy of the plans in light of the DP&E Vision.

In this submission we will discuss some shortfalls and opportunities that are presented in the Interim Statement. We have concluded that the Vision as presented in the Interim Statement needs to be more refined, with more high level detailed of what is to be achieved and targeted, even at this initial stage, in order to deal appropriately with the diverse aspects of the area and maximise effectiveness.

Moreover in some sections the Vision appears to be concentrating far too much on conceptual ideas rather than factual conditions that relate to the area. Perhaps one of the major failings in the Interim Statement is that the cumulative effects of more density and population from new developments in the 3 LGAs have been ignored and not factored in. Only a theoretical assessment has been undertaken as if the area exists in isolation of the surrounding areas. To simply refer to these in a line or two does not mean that the challenges and problems have been effectively considered.

## **Some comments and suggestions on the Vision will be discussed below:**

**Open Space and Parks:** The Vision needs to clearly define its references for open space and parks and principally differentiate between the terms of open space and parks. The two terms “open space” and “parks” are not identical or replaceable or interchangeable. These are two independent terms even in architectural and design realm. Yet throughout the Interim Statement and plans the two words/phrases are used interchangeably and fluidly incorrectly referring to the facilities. For example, the Gore Hill Cemetery was referred to as open space but then cannot be referred to (nor classified) as a park or usable space as residents are not able to have a barbeque or kick a ball. Furthermore, while Gore Hill Oval in St Leonards can be classified as open space it is used for team sports such as rugby, football and various other sports. This is not a park in the true sense of the word i.e. you cannot have a barbeque in the Oval, take your dog for a run, take a long stroll and kick a ball with a friend unless you are part of a competition/game.

There is a need for greater scrutiny of certain facts presented in the Interim statement. For example in certain diagrams Gore Hill Oval in St Leonards is presented as open space while in several other sections it is referred to as a park. Gore Hill Oval is a sports oval and does not have any picnic areas and children are not able to play due to sports. Furthermore Gore Hill Oval is planned to be a sporting venue with more sports facility. Hence the Vision cannot consider this sport Oval as a park. This is not accurate as the Oval cannot be two different elements with different characteristics and counted twice.

There are more inconsistencies in the Interim Statement such as Newlands Park which is referred to as Newlands reserve. It is not a reserve. This is a relatively small park and it is the only one in the expansive space of St Leonards and neighbouring areas such as Greenwich and North Sydney. Newlands Park is frequented by the residents from a wide area and is a very busy park especially on weekends. Also this park has already been earmarked as open space for the high density development in Marshall Avenue, St Leonards (Loftex tower) with an estimated 500 and over new residents that will frequent this park. There are also three other high density developments in St Leonards in close proximity of this park that will result in demanding use of this park. As such the park is already exceeding capacity. Additionally, this park will receive less sun light due to the tower developments after the Marshall Avenue, St Leonards development is constructed due to shadowing that will linger for a long period of time. Hence, it will be impossible for this one park to be a suitable park for the precinct based on the previous comments and we fail to see how the Vision did not arrive at this conclusion.

Hence, the presented Vision needs to be more accurate in relation to the consequential and intended outcome for open space and the parks. As well, the Vision needs to take a clear view as to what constitutes a park, the elements that make a good park to attract residents. In other words, would a small green patch next to a high rise which receives insufficient or real sun light constitute a park? Would it make a park more attractive if it is levelled rather than sloping and steep? Does a sloping green patch constitute and be defined as a usable Park? Is an ever smaller and smaller patch

of shadowed green grass good enough to be referred to as a park for the St Leonards and Crows Nest super precinct?

The Vision at first glance might appear to provide a detailed assessment of green space and open space however after further investigation that does not seem to be the case. The Vision should clearly mention what constitutes a usable park space? What does it look like? What is the real use and need for open space? These are important considerations in setting the Vision for the area. Also the attitudes towards open space from residents have to be taken into account and considered at this stage of the process. A small pocket park cannot be the Vision for a St Leonards. The process for a Vision for open space has to be set correctly and specified at the outset of a planning process in order to achieve good outcomes for a living and breathing community. This is especially true for a super precinct such as St Leonards.

**Isolated Plazas:** The Vision makes various references to a number of isolated plazas and other concrete built form “as areas for residents to enjoy”. The Vision needs to clarify the term “enjoy” and by whom. The Vision notes “... plazas scattered throughout the Precinct. There are a number of high quality open spaces proposed including those proposed by the local Councils such as the Hume Street Park and St Leonards Rail Plaza (south of the Pacific Highway).” The word scattered implies isolated, insulated and not connected. In our opinion scattered defeats the purpose of having residents enjoy these plazas. Keeping in mind that residents have to find these plazas and these plazas have to be useful and effective. That is they serve few purposes (i.e. have few facilities not just few facilities). Also the Vision will be enhanced if it concentrates on building a better plan from the beginning that are connected and interrelated so that the residents can make better use of the facilities rather than become deserted on weekends and only frequented by office workers at lunch time.

As well, the Interim Statement should guard against unnecessary “too good of a picture”. For example having two plazas in St Leonards does not drive success for the precinct or activation especially when the Forum plaza is more accessible, popular and considered as a focus for St Leonards. The other plaza will be less frequented because it is isolated on the other side of the highway. This is not activation but isolation.

Additionally, we like to draw your attention to the several plazas proposed so far in St Leonards. These plazas, from our local experience, would also have considerable wind issues (please refer to the relevant wind reports that shows the wind effects on the area) to the extent that there is a need for considerable wind mitigation (i.e. barriers, glass panels, etc.) will need to be included which consequently makes these plazas less open, useable and non-conducive for enjoyment due to the barriers. Again these factors have not been discussed nor detailed in the Vision which is needed at this stage in order to set the Vision of the requirements in terms of quality and useability throughout the year; Or is the Vision simply to merely provide token plazas that can be identified on a map to tick a box that the agencies have to achieve. The Vision needs to set a view that plazas need to be function linked and provide a high level of use and are friendly and in context to the area. A mere statement that the Vision is to rely on a plaza is not good planning to simply note just that a plaza is needed since you might end up with a token plaza that is not useful.

**High Level of Educated Residents:** The Vision accurately notes that a high level of educated residents reside in the area, however by the same token, the Vision does not make a view to either support the continued existence of these residents in the area or not and a position to maintain the surroundings and context that attracted these highly educated residents to the area. Is it the suburban feel of the area and level of amenities and good services, parks, infrastructure and the community and village atmosphere that prevail now that attracted this segment of the population!

It is not sufficient to merely state in words in a report that the Vision will “Preserve, strengthen and enhance the existing diverse character areas.” The Vision should set a view in relation to maintaining the setting and the character of the area which attracted the high level of educated residents to the area in the first instance; Or perhaps is the Vision to really change the locality so that it is less attractive forcing a change of the nature of the residents to a more transient group of residents who are less concerned about the quality of the area. We all know that educated residents are also affluent and hence demand a less densely populated and less congested amenities (e.g. schools and transport) for an area to live in.

More to the point, the Vision needs to consider how much of the area should be safeguarded and not placed at risk of overwhelming changes from over exposure and over development. At the same time, the Vision should identify the challenges and dilemmas that face this demographic group and aim for a better way to cater for their needs within the new Vision. The smaller the area to be protected the fewer residents will have to share and the closer they feel engulfed by over development (i.e. too close to over development). Also it is important to note that the size of the area has a bearing on the conditions that prevail for this group and that this can adversely affect them as a result of a smaller area. Put differently, by allowing more densely/high rise development near residential areas (such as St Leonards South) then the Vision by default is serving to alienate the high level of educated residents and in turn inducing change to the nature and character of the area that should otherwise be maintained. If the intended Vision is to sustain this demographic group then the aim of the Vision should be to enhance the surroundings and clearly articulate plans around this.

**Connectivity:** The Vision refers to the connectivity in the precinct. However, the Vision fails to set a view as to what is considered as connectivity in the precinct. Is walking for 5 minutes acceptable or is walking for 15 minutes up a steep hill facing the elements considered “connected”? Was the terrain and the geographic challenges been correctly taken into account? How feasible and practical is it that residents will walk to the train or bus stop as well as other destinations? It is important to draw the attention to the fact that Greenwich, Northwood, Wollstonecraft and for that matter, St Leonards and the Royal North Shore Hospital (‘RNSH’) are located on hilly steep terrain characterised by steep slopes in most places. It is not feasible to walk around these streets. The area is located in a hilly area and the elderly, mothers with prams, dog walkers and people who use wheelchairs find it difficult to walk up a steep hill. Mostly resident’s habits would be to wait on the Pacific Highway to catch the bus line 144 which would take them to RNSH easily. Have these factors been considered in the Vision and plans properly? How is this taken into account in the Vision? From our investigations and analysis it seems that all this has been unfortunately missed.

**Employment:** The St Leonards/Crows Nest area has been identified as a super precinct with employment and medical emphasis as such the expectation is that the area should have higher emphasis of employment and not residential. In turn the Vision should foster and clearly represent this outcome. Instead the Vision that comes across is the opposite. The Vision does not define commercial space. It is interesting how many new developments approved by Lane Cove Council simply refer to a Gym, a Coffee Shop and serviced apartments as commercial space. Surely, these do not lend themselves to a long term commercial hub. In short, the space is not conducive to offices or complex business operations. St Leonards needs more commercial space that encourages long term employment and office work. It is more surprising that only one and a maximum of two floors are designated as commercial space in new developments rather than the entire building. This is a loss for the precinct.

Not having office on the high rise of a building implies that only small organisations will locate to the area since iconic and large businesses will be attracted to iconic offices with views. Some could argue the appeal of moving away from the Sydney CBD is you can attain better premises not ones located on the lower floors. Hence again, the Vision needs to articulate that quality high rise office space is required to attract quality business or just any space to attract any business which do not create a hub. Also if the Vision acknowledges that the area is an employment and health precinct then it is surprising that the three Councils (Lane Cove, North Sydney and Willoughby) have been and are still converting commercial floor space to high density residential. Case in point is the previous Leighton House at 472-486 Pacific Highway, St Leonards which was all commercial floors but recently approved by Lane Cove Council for high density residential as well as 504 Pacific Highway, St Leonards.

St Leonards has been identified as a medical precinct and therefore the Vision should have clear objectives of less residential units in order to support the RNSH plans. The State Government's Vision for the area is to remain commercial focused (long employment goals) with medical/health emphasis and should also be driven to support health provision for the area as well as a hub of medical focused services. Placing high density in the wrong area and taking space that will be needed in the future is not good town planning in fact it will lead to a bad outcome no matter what dressing is added (e.g. community centre).

**The three Councils, North Sydney, Willoughby, Lane Cove and the Precinct:** The Vision and the plans seem to be based on previous information submitted by the three Councils, North Sydney, Willoughby and Lane Cove. Some of these plans are not based on good planning outcomes and at times these councils did not represent the views of residents. Every development supported by councils had been strongly opposed by residents hence the DP&E is not getting a balanced input about each region or precinct. The DP&E is promoting a council's view and using their plans as a basis rather than considering alternatives or looking at fresh new ideas that will work better for the precinct. Moreover previous consultation processes did not take any of the concerns or issues raised into account. Hence, this process is not robust and is diluted by preconceived plans by the time it gets to upper levels. Mostly objections are not taken into account because the plans/reports are well shaped and established prior to residents having any input. Hence, residents who are not town planners or engineers will not be able to effectively comment on already well developed Council plans. Thus allowing residents to simply comment on already developed ideas or plans is not

allowing residents to have input in shaping the area but only tinker around the edges of plans that will get pushed through. The Vision suffers from the same weakness where the input is merely tinkering with the edges and not formulating a better and creative outcome for the area. As such the Vision should not start with the Council plans or adopt them but these should be assessed taking into account residents' views. It is a better result to follow a unifying vision being set across all the three LGAs.

Our analysis of the Interim Statement revealed that the sections relating to St Leonards, in the Lane Cove Council LGA, takes direction and significant concepts from Lane Cove Council and sometimes with little genuine deviation. The over reliance on Lane Cove Council plans will prove to be inconsistent with the Vision for St Leonards. There is some danger in accepting these plans with-out really looking more deeply into the motivations, consequences (intended or not) and accuracy of these concepts. Some examples include the parks, open space, connectivity, plaza, services plans, solar access and over development.

**Housing Types and Apartment Living in St Leonards:** The Vision notes that **70% of residents** in the area reside in apartments (note sure if this includes apartments in the process of being constructed or already approved). This is a very high percentage of one housing type in the area. It is important at this stage to clarify the Vision's approach for the area. Is it to increase this percentage to a higher number, in excess of 70% or is it more appropriate for the Vision to set and represent a balance of the housing in the area? Case in point is that if this percentage is to increase beyond 70% then the area will not have any of the beneficial aspects but transforms into "Towers City" rather than an area which has a mix of housing that appeal to highly educated segment. Added to this is the percentage increase if the St Leonards South Master plan/rezoning is approved? The logic in the Vision defies several principles and in the main good planning. High-density residential development is already proceeding at an unsustainable scale across St Leonards with up to 15,000 new residents in 7,500 new apartments under construction, approved or proposed across the St Leonards area (North Shore Times, 15/5/2015). Hence, St Leonards and for that matter Lane Cove LGA is well on its way of achieving its increase in residential target for 2035. Why achieve the entire target now with no supporting infrastructure!

The Interim Statement discusses the need for a mix of housing variety but does not take into account that there is a large need for single dwelling houses. Semi high density developments are also very appealing. Target population increases will still be met with duplexes and low rise developments. Refer to statistics from Core Logic which shows demand for "Houses" is greater than "Units". The Interim Statement also focusses on achieving excessive high density residential targets rather than quality of housing. Furthermore the Interim Statement does not mention maintaining houses where possible but rather of demolishing houses to make way for high density towers. Certainly a priority to infill vacant sites around highways, train stations etc. will be easier to deal with rather than demolishing established houses. Overcrowding high rise residential buildings into suburban neighbourhoods in St Leonards does not make a good plan.

**Metro Station:** The Vision should also be set to cover the wider area for example the opportunity to use the Metro station to activate and improve transport in other areas. Not just concentrate all activity in the one area which is already congested and has a train station, St Leonards. The Vision

should have the foresight to push the proposed Metro station at St Leonards to the other end of Crows Nest which currently has no transport other than buses. Locating the Metro close to say Haybery or Falcon Street would ensure Willoughby Road becomes more accessible and a focal point for the wider area. Patrons can use the Metro from any point along the network to access the Crows Nest entertainment area. As well, residents who live in Crows Nest who are too far from St Leonards station can access the Metro. This will lessen the need for buses to carry commuters from Crows Nest.

Moving the Metro station not only will alleviate congestion in St Leonards but also allow the Metro to become more useful to a wider area of residents. This will lessen the overlap between the two mass transport systems. That is St Leonards commuters will have choice of two train systems while those in Crows Nest will have no choice, just buses.

As an alternative, the view of having a Metro station in the Artarmon Industrial area will be visionary in that it can support to link that part with main transport for employment boost. In addition, if the Metro station is positioned close to the Lane Cove Bus Interchange (Longueville and Pacific Highway intersection) then commuters might be encouraged to walk over the bridge to take the Metro and avoid using buses to go into the City.

**Parking and Traffic Requirements:** The Vision did not address parking requirements in general and how to deal with the parking requirements for the existing St Leonards train station and the new Metro. If parking is difficult to deal with and it is considered easier to simply assume that all commuters will not use their cars to access the two stations, then the Vision needs to articulate this view/position. Even if this was to become true what will happen to the current commuters that currently drive? How long will it take them to change their mode of transport? These are important specific factors that prevail in the precinct and these should be taken into account when the Vision considers these aspects. It is over simplistic to assume that everyone will stop using their cars to access the station. Keep in mind that areas surrounding St Leonards have heavy reliance on cars and some have up to three cars in one house hold. Hence as minimum the Vision should set a plan as to how to cause this change in behaviour and how to avoid commuters from other areas not using their cars to access the station. Not mentioning the obvious raises doubt about the Vision being too theoretical in isolation and not offering practical solutions.

There are already significant unresolvable traffic problems in the precinct without taking the additional cars and new residents into account. On page 12 of Preliminary Transports Journey to Work the report states that "There are more people commuting from the north shore to the precinct than other areas across the Sydney Metro Area." The areas with a higher number of people commuting to the precinct include the lower north shore, areas in St Leonards, Greenwich, Lane Cove, Neutral Bay and Wollstonecraft.

As well, residents who live in Northwood, Greenwich and Gore Hill are further away from the train and Metro Stations making their commute to the station even harder. Will they be provided with extra buses? If yes where is the section in the Vision to deal with those who are not in the immediate area to travel to the train station? In simple terms how will people living in Northwood

travel to the train station in St Leonards. Is there a vision for these residents or have they been ignored?

The formed view in the Interim Statement where areas need to absorb more population increase does not take into regard existing constraints that already prevail that can't be changed. For example, an area which already experiences heavy traffic congestion will not be able to cope with an increase in traffic regardless of the assumptions (such as that people will not be using their cars) because this traffic is not generated within the area but often from outside the area. Hence again, not all areas can accommodate an increase in their population because they are close to a train line.

**Traffic planning:** Recent Traffic report undertaken for the GSC by Cadno noted that "Sydney's Walking Future demonstrates that the lower North Shore has one of the highest walking mode shares in Sydney at over 25%." Hence, the Vision should make reference that it is not possible to account for benefits arising from encouraging residents/commuters to use less car transport and walk because they are already at the peak of using walking as a mode of transport. Hence, statements such "Incentives should be introduced that reduce reliance on private vehicles for example for carpooling, and parking supply should respond to parking demand." made by Lane Cove Council in their "Lane Cove Community Strategic Plan 2025" should be put in context of being theoretical and not practical (i.e. dismissed as not understanding the area) because it is not possible to assume any more meaningful (if any) benefit that can be achieved from encouraging residents to use less of their cars (already high non car usage).

In fact according to Transport For NSW statistics Lane Cove car usage is high on weekends (refer table below showing Trips per person per weekend at 9.6). Hence, Lane Cove Council's initiatives are again out of touch with the practical aspects of the area since this type of travel (weekend) is not possible to reduce by initiatives such as carpooling since it is recreational and private in nature.

Travel											
Districts North (DPE)											
Total Travel (Trips)											
	Hornsby	Hunters Hill	Ku-ring-gai	Lane Cove	Manly	Mosman	North Sydney	Pittwater	Ryde	Warringah	Willoughby
Trips weekday ('000)	604	52	465	156	212	138	278	265	391	599	264
Trips weekend ('000)	520	55	438	166	123	128	249	232	340	599	293
Trips per person weekday	3.7	3.5	3.9	3.9	4.8	4.1	4.4	4.3	3.6	3.9	4.0
Trips per person weekend	3.2	3.7	3.7	4.1	2.8	3.8	4.0	3.7	3.2	3.9	4.5
Trips per household weekday	10.4	9.0	11.3	9.6	11.7	8.7	8.9	11.8	9.3	10.2	10.3
Trips per household weekend	9.0	9.6	10.7	10.2	6.8	8.1	8.0	10.3	8.1	10.1	11.5

**Royal North Shore Hospital provides "world class health service":** The Vision notes that RNSH provides "world class health service". This is true and RNSH should have priority. RNSH status should be encouraged at all levels by maintaining the area around it, not allowing more development. The Vision repeats the assertion that RNSH provides world class health services; however, the Vision does not discuss how world class health services will be maintained and even enhanced if more residential development is encouraged with more traffic and congestion on the roads. The Vision does not confirm or affirm consistently the need to make this the central point in the plan for the area. Merely citing a statement and repeating it in the reports does not "get us there". If we



consider accessibility and traffic management that prevail in the area and take into consideration the increase in population then how long should a trip take for someone living in the catchment area of RNSH to reach RNSH in peak time? How about off peak time? How long should emergency vehicles take to travel to transport patients (i.e. traffic and delay)? World class service becomes superfluous and irrelevant if residents cannot get to these services in time.

The Vision refers to a medical precinct at St Leonards but does not make any attempt to link the Mater precinct with RNSH. It would be a huge advantage to link the two medical areas together and form a hub which is easily accessible from either area.

**The Industrial Area of Artarmon:** The Vision does not take into account that the relative distance of Artarmon to the CBD is a key attraction to the manufacturing/industrial component in Artarmon industrial area. Artarmon has a high level of printing and design companies as businesses are able to print and deliver their product to the CBD in a relatively short time. As well car dealerships and services centres are accessible as people drop their cars, continue into the CBD and then pick up their cars on the way back. This is a good service that attracts more and more customers each year. It is one of the attractions that keep these businesses successful. The Vision should recognise that these are key elements that should be enhanced and in turn traffic becomes a key aspect to their success. As such we believe that the need for low rise industrial complexes is important rather than high rise blocks and towers.

**SEPP 65 Principles:** The Vision does not set a view in relation to the quality of the apartments which are required in the precinct. For example, the Vision notes that developments to be "... highly liveable". Given the nature of the area, highly educated segment, should imply that the apartments need to exceed the quality design principles requirements of SEPP 65 in regards to space, size, setbacks, excess storage, solar access and privacy in order to be "highly liveable"? The Vision also makes the assertions that "... new developments will be responsive to the existing environment and context". It is common for precincts to apply specific applicable design requirements for certain precincts different to other precincts i.e. tailor made for that specific area in order to take advantage of location and topography. In other words the Vision should set the view that developments in the area should aim to exceed the requirements of SEPP 65 and aim to have a higher quality of living in relation to solar access, noise mitigation, services, number of bedrooms to accommodate families etc. The DP&E could show leadership and innovation to introduce these concepts in the St Leonards area.

There are several significant issues that were not addressed by the Interim Statement nor considered in the Vision. In relation to apartments and the nature of the apartments, is there a Vision for diversity and diversity of living. The Vision states that "Equitable housing will be provided for a diverse demographic" hence, will there be a view in relation to the number of studios apartments, one bedroom, and more importantly, three and potentially four bedrooms apartments. As well as generous spacing with ample amenities be built to fit in with the area to accommodate larger families who maybe affluent and highly educated? These important considerations have to be taken into account before this stage is finalised.

**Urban planning:** The Vision should also set a level of complexity to be tackled. That is, set time goals for achieving particular levels of development over time frames. For instance if the aim is to build for the near future then why not set a view that only easy sites that have a low level of complexity will be considered now with the aim of not impacting any potential options in the future. Future developments will be assessed as a second future phase after completing the first phase. Thus, when considering new initiatives or potential areas for development then only those initiatives that do not require additional expenditure for infrastructure or are less complex should be prioritised. Other initiatives and sites should be set for future consideration. The benefit of such an approach is to increase yield by achieving easier projects (low hanging fruit) and reduce demand/expenditure on infrastructure which is a long lead item. As well, more time can be spent on setting the view of some key projects/initiatives and not be distracted by initiatives which are not currently achievable.

The Vision should also consider the quality of the final product or planning. For instance, the Urban Design study has already identified that some sites will be difficult to deal with due to their topography and traffic management issues. Hence, should these be dismissed on the basis of not being able to achieve the desired outcome and thus allow all participants to concentrate on initiatives that can achieve the required outcome in a timely period?

**Infrastructure:** The Vision does not take into account that developers tend to build their own developments (i.e. towers) considerably faster than infrastructure can be developed. Hence what is the vision in relation to staggering developments until infrastructure is given the opportunity to catch-up. Alternatively what will be the interim measure to alleviate the lack of infrastructure and services until they are built? For example it takes 3 years to redevelop a school and only less than 2 years to complete an average tower.

We believe that the DP&E and the Vision while is the initial stage needs to set the right and complete vision. It should set high standards to achieve the correct vision and the standard for a world class health, to prevent concentration of super high density residential towers, encourage appropriate planning with the correct growth strategies for a highly educated area. It is in the absence of sound policies and sound plans that the area will suffer from shortages for service and infrastructure for many years. It is up to the DP&E and their Vision to produce plans and policies that will set the scene for the precinct. Whether “cluttering up” the area or providing the canvas for favourable open space and parks, High level of educated residents, long term employment, commercial emphasis and RNSH providing “world class health service and respecting the SEPP 65 Principles.

In summary, while the Vision sets very good high level ideas it appears to be simply pooling diverse concepts into one and it is not clear if this is due to time constraints or simply to meet minimum requirements (for example classifying parks and open space interchangeably). As well, the Vision lacks any clear view in a number of areas which cannot be justified because it is high level Vision statement but appears to be lacking any real vision that befits the actual area such as, the steep and hilly nature of the topography coupled by the specific particulars applicable to the area. The Vision, although superficially mentions, but in reality, does not really consider and build into the equation the characteristics that affect the precinct. For example, while the Vision notes that the area already has 70% of residents living in units fails to draw a view of where this should stop or what impact this

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will have on the character of the area! Another example is that the area has highly educated residents but does not draw a view of supporting these residents or forcing to change the residents and pushing them out. Being silent draws a conclusion that these highly educated residents will be pushed out by not maintaining their surroundings that attracted them to the area in the first place. Put differently mentioning a statement and not dealing with the facts implies that it has not been fully considered; that either due to time constraints to publish the report or a lack of resolve to deal with the issues and simply it is best to be ignored.

It is important that the Vision is holistic, comprehensive, without missing large and important (even though at high level) and taking each issue to a conclusion (fully analysed).

Thank you for the opportunity to provide this feedback. We are more than happy to elaborate on any of the points listed above.

Yours sincerely

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