

11 March 2015

Mr Craig Wrightson
General Manager
Lane Cove Municipal Council
PO Box 20
Lane Cove NSW 1595

Attn: Chris Pelcz - Strategic Planner

Dear Mr Wrightson,

SUBMISSION FOR THE ST LEONARDS SOUTH DRAFT MASTER PLAN

1.0 Introduction

- 1.1 Milestone (Aust) Pty Limited (Milestone) has been engaged by the Greenwich St Leonards Action Group and write with regard to the St Leonards South Draft Master Plan (Draft Master Plan) prepared by Annand Associates Urban Design for Lane Cove Municipal Council (Council).
- 1.2 Based upon a review of the Draft Master Plan documentation made available on Council's website, a site inspection of the Master Plan area and the surrounding built form and its context, we strongly object to the Draft Master Plan on the following grounds:
 - Vehicle access and congestion impacts;
 - Parking impacts;
 - Overshadowing impacts;
 - Privacy impacts;
 - Unreasonable height and density;
 - Excessive bulk/scale streetscape impact;
 - Lack of green open space;
 - Loss of character; and
 - Lack of consideration for precinct context.

2.0 Background

- 2.1 The Draft Master Plan area is bounded by the Pacific Highway to the north, River Road to the south, Greenwich Road to the west and the Sydney northern rail line to the east (refer to **Figure 1**).
- 2.2 An existing pattern of low density residential development (comprising single and two storey detached houses) is located to the south of the Pacific Highway and Marshall Avenue which extends south along Canberra Avenue, Holdsworth Avenue and part of Berry Road. The area fronting the Pacific Highway (on the opposite side of Marshall Lane) is in transition and comprises commercial and retail development ranging in scale from 2 to 4 storeys. Commercial development to the west of the site, on the corner of Berry Road and the Pacific Highway, is 3 to 7 storeys in scale and transitions to lower scale residential development away from the Pacific Highway. Apartments of 4-6 storeys are located on the eastern edge of the Draft Master Plan area fronting Duntroon Avenue and adjoining the Railway Line. We note that Newlands Park is the only significant area of open space available in the Draft Master Plan area.
- 2.3 Following a request from some residents from Marshall and Holdsworth Avenue who will be immediately affected by the proposed development by Loftex on Marshall Avenue (DA-143/2014), Council developed a Brief for the St Leonards Strategy.

2.4 Council engaged Consultants David Lock and Associates together with Straight Talk and Brown Consulting to complete Stage 1 of the St Leonards Strategy and the 'St Leonards Strategy Precinct Report', dated November 2013 was produced and included:

- Consideration of the current State, Metropolitan and local strategic planning context;
- A summary of existing conditions such as land use, demographic profile, urban structure and built form, public domain and natural features, vehicular and pedestrian access and movement, and physical infrastructure;
- A summary of the community consultation undertaken as part of Stage 1; and
- An analysis of issues and opportunities for the precinct.



Figure 1: St Leonards South Master Plan Area
Source: St Leonards South Strategy Precinct Report 2013

2.5 On 17 March 2014, Council endorsed Stage 1 of the St Leonards Strategy.

2.6 Stage 2 has commenced and a Draft Master Plan has been prepared by Annand Associates Urban Design (AAUD) which explores various growth scenarios as a means of meeting any potential increase in residential and employment targets under the NSW Government's 'A Plan for Growing Sydney'.

2.7 At Council's Ordinary Meeting held on the 8 December 2014, Council resolved to:

- endorse the Draft St Leonards South Master Plan for public exhibition;
- receive a further report following the public exhibition for review by Council;
- give consideration to the remainder of the precinct being zoned High Density (R4) prior to the determination of the Master Plan; and
- engage a valuer to undertake an independent valuation of the feasibility of proposed floor space ratios (FSR's) in the precinct.

3.0 Grounds for objection

Vehicle Access and Congestion Impacts

3.1 The St Leonards South Strategy Stage One Precinct Report (November 2013) noted that Council was undertaking traffic modelling to analyse the existing capacity of the surrounding road network based on 2012 traffic flows.

3.2 Council's report for the Ordinary Council Meeting held on 8 December 2014 further noted that initial traffic modeling has indicated that the area can accommodate a 'larger number of dwellings than are currently proposed, subject to traffic measures being undertaken'. Council's initial traffic modeling is not publicly available and the traffic measures to be undertaken have not been outlined by Council. We express concern that the traffic impacts on Berry Road and Marshall Avenue from the rezoning have not been fully considered and that modeling has not taken account of the following (especially since 2012):

- extensive residential development underway in other areas in St Leonards/Crows Nest;
- traffic effects flowing from North Sydney and Lane Cove (both also undergoing rapid residential growth);
- visitor traffic; and
- increased bus and pedestrian traffic.

- 3.3 There is already significant congestion at the intersection of Berry Road and the Pacific Highway. The Stage One Precinct Report identified that traffic and congestion is a major limiting factor in the rezoning of the area and noted that:

"Any future development will increase traffic flow on the surrounding road network and cause exponential growth in queuing... This is a particular issue for the intersection of the Pacific Highway and Berry Road and subsequent impacts on Duntroon Avenue/River Road intersection."

- 3.4 We express concern that the rezoning of the Marshall Avenue South Sub-precinct to high density will create a traffic bottleneck on Marshall Avenue and Berry Road as vehicles attempt to access the Pacific Highway via these streets. We highlight that Berry Road towards the Pacific Highway is a "short" (with approximately 45 metres of usable space) road and can only accommodate a few cars to queue to exit Berry Road. We also note that Berry Road is the only street that permits a right turn onto the Pacific Highway in the vicinity of the site and wider catchment of Greenwich and therefore acts as the main 'feeder' road to this arterial road (refer to **Figure 2**). Consequently, Berry Road becomes highly congested during peak hour periods and also experiences congestion during off peak periods, including on weekends.

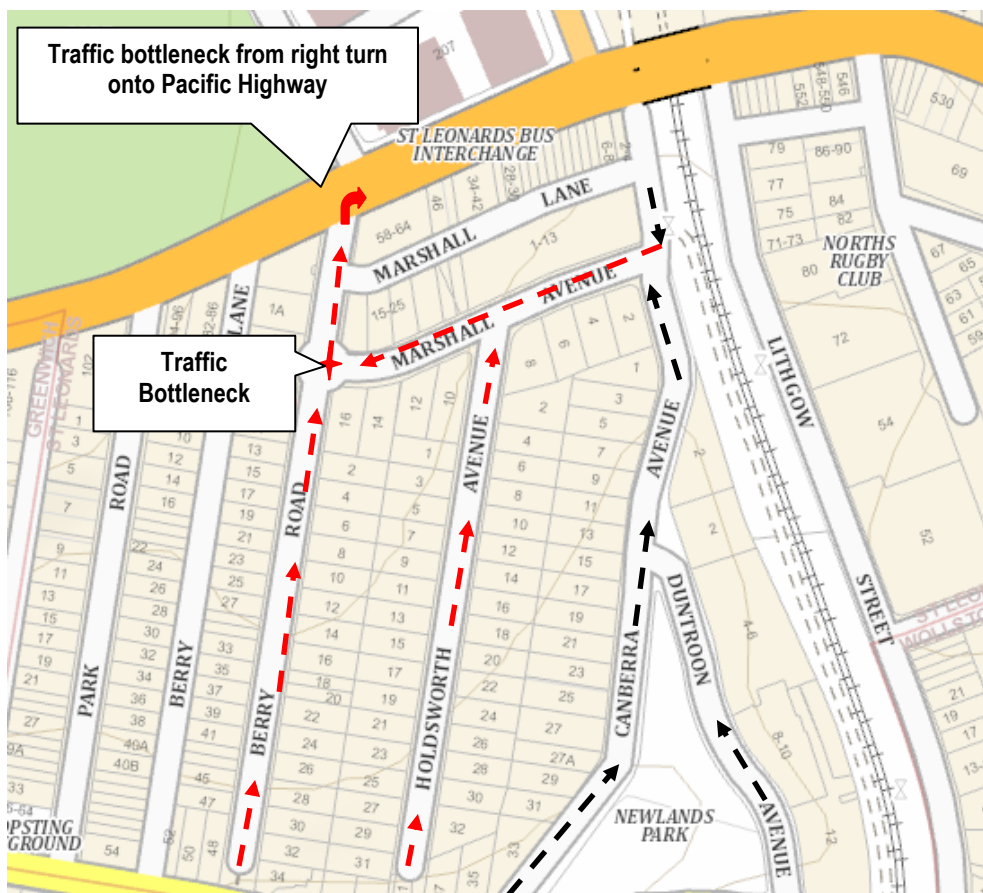


Figure 2: Current traffic bottlenecks in Draft Master Plan area
Source: SIX Maps 2015

- 3.5 We consider that Council's suggestion that traffic from a further 2,000 new dwellings (based on Proposal 1 for High Density) could be accommodated without the need for significant infrastructure renewal and within the current street network is unrealistic and will pose significant adverse traffic and congestion impacts.

Parking Impacts

- 3.6 On-street parking is currently highly restricted and in limited supply in the area given demand from commuters and visitors and staff of the nearby Royal North Shore (RNS) Hospital (refer to **Photo 1**).



Photo 1: Street parking along Marshall Avenue

- 3.7 We are concerned that the rezoning of the Marshall South Subprecinct (being the area bounded by Marshall Avenue, Canberra Avenue, Berry Road and River Road) to high density will exacerbate existing parking issues in the area. There is no study available that assesses the parking impacts of any proposed rezoning of the area or considers the broader parking impacts to the locality. The consequences regarding on-street parking in the precinct are not just from the proposed developments resulting from the rezoning of the area, but also parking demand from the wider St Leonards area.
- 3.8 Increases in on-street parking demand from local residents, commuters and the RNS hospital will affect the amenity of residents in the area and compound traffic and congestion issues. These congestion and parking issues will be compounded by construction traffic when the construction of rezoned high density residential buildings occurs.

Overshadowing Impacts

- 3.9 Many of the residents in the locality have a useable front garden which acts as the only private open space available. The proposed rezoning and any subsequent high density development will significantly overshadow a large portion of houses; particularly during the morning hours (refer to **Figure 3**). Accordingly, this overshadowing will have considerable detrimental implications for the enjoyment of the private open space available to residents.
- 3.10 The overshadowing diagrams held in the Appendices to the Draft Master Plan do not fully account for the potential overshadowing impacts especially given not all sites will be built at the same time. The houses left behind or developed later will be overshadowed considerably for an unknown period of time. Therefore, the overshadowing diagrams underestimate the full extent of the potential overshadowing impacts from high density development in the area.
- 3.11 Given the topographic conditions, south facing slopes will result in unreasonable overshadowing implications.

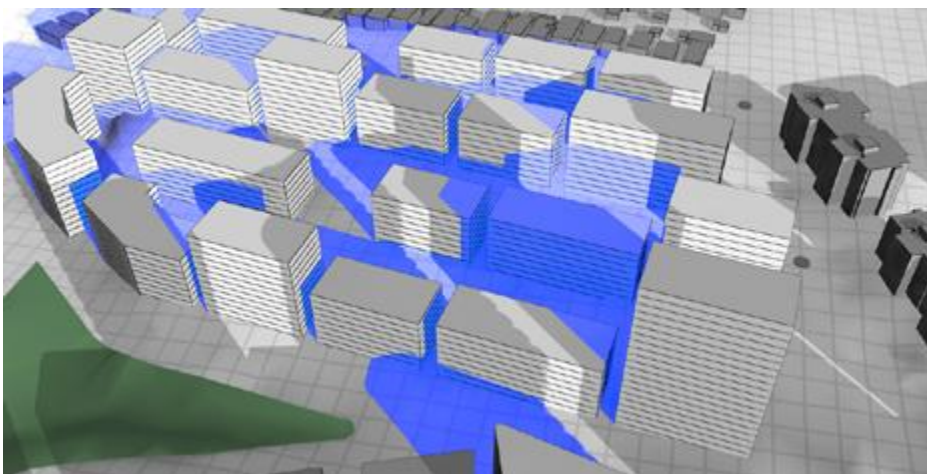


Figure 3: Overshadowing impacts at 9.00am to Eastern Facades from the 'Preferred Option'
Source: Draft Master Plan (page 23 of Appendices)

Privacy Impacts

3.12 Given the topographic conditions of the area, there is the potential for adverse visual and acoustic privacy impacts.

Unreasonable Height and Density

3.13 We note that the preferred development form in the Draft Master Plan proposes high density residential development between the area bounded by Marshall Avenue, Berry Road (east side), River Road and Canberra Avenue and will allow 8 storey development (25m height) that may be increased with developer bonuses (refer to **Figure 4**). This has been identified as the preferred option by the Draft Master Plan as it 'provides significant high density development in close proximity to the [Railway] station' and 'leaves the rest of the precinct alone'.



Figure 4: 3D Model of the Preferred Development Form of the Draft Master Plan
Source: Draft Master Plan

3.14 Whilst it is acknowledged that the Draft Master Plan area is in close proximity to the St Leonards Railway Station, the street network, topography and character of the area mean that rezoning of part of the Draft Master Plan area to a high density built form is inappropriate. There are imperative design and planning merits to not support a significant increase in the current heights of the built form in the area.

3.15 In this regards, we note that the St Leonards Strategy and the 'St Leonards Strategy Precinct Report', dated November 2013 indicated that the topography of the land does not support high rise units and that steep, south facing slopes will create significant overshadowing issues (as outlined above),

3.16 As individual sites are progressively redeveloped to high density development, low density housing not developed (for various reasons) will become isolated and individually adversely impacted from overshadowing.

3.17 The additional height is inconsistent with the outcomes envisaged by the St Leonards Strategy 2006. One of the objectives of the St Leonards Strategy 2006 is to create a unified built form pattern for St Leonards given the fractured nature of the centre which is split between Lane Cove Council (Council), North Sydney Council and Willoughby City Council. Section 3.6 of the St Leonards Strategy 2006 states that:

"The graded height limits in the North Sydney Council part of the centre create a coherent pattern stepping down to Naremburn and Crows Nest. We consider that this principle should be repeated in the Lane Cove Council part of the centre, with buildings stepping down from the Highway frontage towards the south west. West of the rail line, building heights need to be lower to consider the residential amenity below them to the south."

3.18 **Figure 5** below shows Figure 20 of the St Leonards Strategy 2006, which supports the recommendation to step the height down from the Pacific Highway to the south.

3.19 Whilst wider strategic planning policy supports higher density development near Railway Stations and public transport corridors, it is sound planning practice to:

- Provide a 'transition area' between high density centre development and existing low density residential development The proposed heights of the high density areas in the Draft Master Plan will not result in development stepping down from Pacific Highway as intended by the St Leonards Strategy 2006 and would result in a detrimental urban design outcome.
- Provide development proposals that consider the nature of the precinct (for example the topography and character of the area).

- Give consideration to other high density development in the wider area.

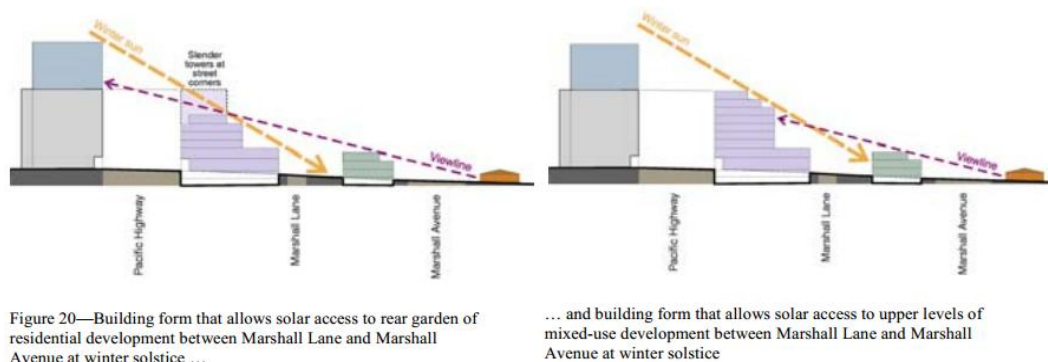


Figure 5: Height Progression from Pacific Highway
Source: St Leonards Strategy 2006

Excessive Bulk and Scale/Streetscape Impact

- 3.20 The high density built forms proposed by the Draft Master Plan provide a bulk and scale that is inconsistent with the desired future character of the area and the proposed future streetscape of this part of St Leonards. The proposed development is contrary to the community expectations for the area and will result in the loss of character style housing in the area.
- 3.21 The nature of the area does not support high density development across the Marshall South Subprecinct (being the area bounded by Marshall Avenue, Canberra Avenue, Berry Road and River Road). Good urban planning allows for tiered development zones to minimise overshadowing and amenity impacts. For instance, the bottom of Holdsworth Avenue should not have the same density as the beginning of the Avenue. We note that Council is proposing some reduction in scale but consider that this is not of a sufficient magnitude and, with proposed additions to scale using VPAs, will potentially lead to higher buildings in the undesirable locations.
- 3.22 The Draft Master Plan does not have adequate transition allowances for building heights at the parameters of the rezoning areas, especially along Berry Road and River Road. Consideration should also be given to stepping down building heights in the area facing Newlands Park to avoid overshadowing impacts on this important open space area.

Lack of Green Open Space

- 3.23 No additional green open space for the community is proposed as part of the Draft Master Plan. Council's report for the Ordinary Meeting dated 8 December 2014 presents that deep planting and small pocket parks will suffice as green open space and that developer-funded 'pocket parks' could be incorporated between high rise developments.
- 3.24 Newlands Park is the only open space currently available in the area and is often full on weekends. We express our concern that there is a lack of open green space to accommodate for the needs of any new residents from the rezoning and that this will have a significant detrimental effect on the amenity and property values of existing properties.
- 3.25 Our assessment revealed that across the Lane Cove, Willoughby and North Sydney Local Government Areas that intersect with St Leonards, the only really usable open space as a 'park' is Newlands Park. Refer to **Figure 6** below for an assessment of the provision of useable green open space in the St Leonards/Greenwich area. We note that there is insufficient open space to cater for the current residents and the influx of residents from the proposed high-density developments in the area (this includes development that is currently under construction, recently approved or developed as well as from the rezoning under the Draft Master Plan).
- 3.26 The proposal put forward by Council's consultants under the option to rezone the remainder of the precinct is to have small pocket parks wedged next to high rise buildings as a method of adding additional parks. This is proven not to work since the Council has already implemented the same concept on top of Park Road, Portview Road, Anglo Road and bottom of Park Road, all these areas have been presented as parks but have failed for the following reasons:
- The small parks are of an unusable size.
 - As the parks adjoin high rise developments on a sloping topography, they do not have the desirable features of a park being open with adequate space and sufficient sunlight.

Without proper allocation and allowance for open space there will be adverse impacts on the quality of life, health and wellbeing of residents.



Figure 6: Current provision of Green Open Space in the Greenwich St Leonards Area
Source: Google Maps 2015

3.27 Council has at times presented the option of building a plaza/bus interchange as additional open space. A commercial zone and of built form (concrete) is not viable as public green open space.

3.28 The lack of provision of adequate open space and removal of street trees (to accommodate redevelopment) proposed by the Draft Master Plan is contrary to the aim of Direction 3.2 of the NSW Government's 'A Plan for Growing Sydney' which is "to improve the quality of green spaces and create an interconnected network of open spaces and parks, tree-lined streets, bushland reserves, riparian walking tracks and National Parks."

Loss of Character

3.29 The Draft Master Plan area comprises numerous federation style houses (particularly along Holdsworth Avenue). The proposed high-density development under the Draft Master Plan will result in the loss of these iconic federation houses and of the character of the area and will replace these houses with uniform, modern apartments. We express our concern that this loss of character will affect the identity of the St Leonards area.

3.30 The NSW Government's 'Plan for growing Sydney' supports high-density development near railway stations and public transport corridors. However this policy needs to be taken into context, assessed against other alternatives, the characteristics of the particular area and broader initiatives in the wider/adjoining areas. As well, the policy outcomes need to be assessed to ensure that a sustainable living environment (both in private and public areas) can be achieved and to ensure an immediate and long term benefit to the area and residents.

Lack of Consideration for Precinct Context

3.31 Council and its consultants have limited their assessment to the small precinct of St Leonards, which is in the Lane Cove Council Local Government Area (LGA). This is demonstrated in a number of reports and consultant studies that do not consider the developments taking place outside the precinct (for example the traffic impacts from the Council approved developments along the Pacific Highway and Willoughby LGA). It is clear even from a cursory assessment that the area of St Leonards is undergoing rapid residential growth with over 3,000 units under construction or approved from the three LGAs that control the suburb of St Leonards (in the next 12-24 months).

- 3.32 We note that, as per Item 84 of the Council meeting minutes from 22 April 2014, Lane Cove Council has already (by May 2014) surpassed its interim target of 2,700 apartments for increased housing density under the State Government's development plan for Sydney. Thus there is less of an impetus to have additional high-density residential development in the Council's LGA and the St Leonards precinct in particular.
- 3.33 Research of local government records across the three LGAs of Lane Cove, Willoughby and North Sydney highlights that 3,000 new apartments are recently constructed, planned or underway in the St Leonards area. Hence, the compelling motivation to build in the Draft Master Plan area should be minimal, as housing targets have already been met.
- 3.34 St Leonards is at the junction of three different LGAs (Willoughby, North Sydney and Lane Cove). However, the Draft Master Plan does not appear to be coordinated across all three Councils. North Sydney Council and Willoughby Council have both expressed concern over the Council's decisions to increase building heights and residential capacity and noted that it is contrary to strategies agreed by the three Councils under the St Leonards Strategy 2006. We express our concern for the lack of coordination between the three Councils and the impacts that this will have for the future of the St Leonards area.
- 3.35 Strategic planning for the area is taking place by Lane Cove Council where the implications of their decisions are not being considered in context of adjoining local government boundaries and broader district issues resulting in a reduced capacity to achieve good development management outcomes with a focus on social, environmental and economic sustainability whilst maintaining local character and identity.
- 3.36 We note that there is no natural boundary within the Draft Master Plan area to integrate high rise development into the existing low density built form without significant adverse amenity impacts. We consider that any development along the rezoned boundary should have conditions placed on the development to reduce building envelopes to allow a transition between these areas and minimise amenity impacts to residents adjacent to the rezoned land.

4.0 Conclusion

- 4.1 The rezoning of the St Leonards area to a high density built form will result in significant adverse traffic impacts and congestion, will exacerbate existing parking availability problems and affect the amenity of residents in the locality. The proposed bulk and scale of future development in the area is not suitable for the locality given these traffic, access, parking and amenity issues.
- 4.2 Council has not undertaken a full and proper assessment of the environmental impacts of the rezoning in terms of traffic and congestion impacts on the residents of the St Leonards area.
- 4.3 The proposed high density rezoning will detrimentally impact on the residential amenity of the residents of the St Leonards area.
- 4.4 The nature of the area with small narrow blocks, narrow streets, steep topography, limited access mean that high-density development will impact on the privacy, shadowing, infrastructure and the amenity of residents in the area.
- 4.5 The developments that will be built as a consequence of this Draft Master Plan will not deliver an outcome that is in keeping with State Environmental Planning Policy No 65—Design Quality of Residential Flat Development.
- 4.6 We request that Council considers the concerns discussed in this submission and includes these comments into the report presented to the Council once the public exhibition period has ended.

Having regards to the grounds for objection as set out at Part 3 above, the Draft St Leonards South Master Plan should not be adopted by Council.

Should you have any queries, do not hesitate to contact the undersigned.

Yours sincerely
Milestone (AUST) Pty Limited



Chloe Dunlop
Senior Planner



Lisa Bella Esposito
Director