

2 September 2017

NSW Department of Planning and Environment
GPO Box 39
Sydney, NSW, 2001

Dear Sir/Madam,

Subject: *The Department of Planning and Environment Interim Statement - The St Leonards and Crows Nest Station Precinct*

I write in relation to the St Leonards and Crows Nest Station Precinct Interim Statement and the Preliminary Social Infrastructure and Open Space Study and Findings report from the NSW Department of Planning and Environment (NSW Planning). I will provide some observations and address some of the shortcomings in the social infrastructure, open space, green parks, urban design and services.

The information as presented by the NSW Planning is preliminary and we do note that it should provide sufficient detail in addressing all issues at a high level for some of the major aspects that affect the precinct. Some concepts in the report seem to be isolated outcomes and the report arrives at incorrect conclusions which will prove to be difficult to apply in St Leonards due to the specific conditions in the area. There is also a lack of objectivity in the NSW Planning report while some of the key issues have been ignored.

Some generalised and mother hood statements that appear in the report are not backed by concrete steps to action that will ensure a positive outcome. Some examples can be found on Page 3 of the report which maintains that: *"This world class service will mean that daily activities such as getting to and from work, meetings, school or education, sports and a day out will be easier and faster to do". Added to this is the statement that: "The investigation seeks to harness the potential of this transformative investment in infrastructure to achieve sound and positive planning outcomes"*. The report does not provide even at a high level how this will be achieved and the constraints that should be considered or taken into account.

The conclusions and recommendations in the NSW Planning report are not robust in relation to infrastructure, public open space, traffic and roads which are key components when planning the St Leonards residential precincts. Perhaps one of the major shortfalls of the NSW Planning report is that cumulative effects (for service and infrastructure) from other high density development within the precinct and the adjacent LGAs are ignored. Traffic and amenities strategies such as sidewalks, crosswalks and bike lanes are also missing and not critically considered for potentially the whole area. I do acknowledge that these are mentioned but again no real strategy is set or levels of delivery being established. For instance, a statement that states that a transport outcome will be pursued which will not exacerbate the speed of travel in the area by more than that acceptable by the Roads and Maritime Services agency.

Growth Projections and Priorities

Based on the NSW Planning report growth projections “... *the area around St. Leonards and Crows Nest is projected to experience major growth, ranging from a 30-110% population increase. Other major population growth centres in the area include Chatswood and Lane Cove which will experience less growth*”. The NSW Planning report does not articulate clearly how this increase in population will be absorbed nor does the plan produce a workable method for St Leonards and surrounding areas such as Greenwich, Northwood, Naremburn and Artarmon will deal with the increase in population given that these areas would be severely affected by any plans in St Leonards.

It is clear that the wider areas adjacent to St Leonards have been ignored even though these are on the door step of the precinct in the immediate vicinity and in adjacent areas that link with St Leonards for transport, parking and services. The residents of these areas view St Leonards as their hub for public transport and the place to go to run errands yet the NSW Planning report is silent about significant impact on these residents and worst it fails to consider the long term consequences when these areas are severely affected by the changes in St Leonards.

State Government targets for additional density in St Leonards (near a transport hub) are already met by current and proposed projects, including in Willoughby and North Sydney LGA. Contrary to popular belief St Leonards has already absorbed a significant and steady increase in population since 2011 while the level of services and infrastructure has declined. The report fails to take a view of what level of density is acceptable for the area given the growth already experienced and the lag time to have acceptable infrastructure and services.

Services, Infrastructure and facilities

Councils and the NSW Planning are pushing for more people to be in this precinct without increasing the level of services and infrastructure, widening the roads providing more schools, improving transport, parking and amenities. It is important to note that in the past few years St Leonards received a big increase in the population from the number of apartments without any augmentation in services and infrastructure. It will take years before amenity services and infrastructure is brought back to levels that the precinct is accustomed to.

The NSW Planning report acknowledged that Crows Nest and St Leonards are likely to experience the highest population growth rates due to the number of high density residential units. Introducing new facilities in these areas in a cost effective way will be challenging and in fact may never eventuate at the expected levels as the funding is not available and the area becomes more crowded with substandard amenities. Let alone the time it takes to bring these services into action. Setting a plan to increase infrastructure and services is a long way from actually having the services in place. Is it not a better plan to have the services in place and then bring in the residents!

If the NSW Planning strategy is to be effective for the precinct then workable objectives justifying critical points including, community facilities (in all its facets), open space (including large green parks), playgrounds, sporting grounds and infrastructure that are required to support the vision have to be prearranged, even at this initial stage. This should be combined with significant community input, rather than previous blueprints from Councils that have not been accepted by the community. As well, Council plans tend to be narrow in scope and not take into account the cumulative impact of all developments that have just been built, in the pipeline or about to be approved in the wider area of St Leonards.

It is not clear that urban renewal and development opportunities near the Metro stations would support the revitalisation of local centres and create opportunities for new community facilities and local meeting places. It is important to note that Metro stations do not bring the expected positive impacts on local community or amenities as portrayed in the NSW Planning reports specifically if these are isolated and not integrated into wider user friendly areas. Case in point is the Forum Plaza in near St Leonards train station. It has a train station and is used as a transit area. The Forum is not used outside transport peak periods and is virtually dead.

Hence, having a Metro station isolated will not activate the area but becomes another isolated structure like all the plazas and concrete space St Leonards already has. The NSW Planning seems to emphasise unsuitable priorities for the precinct that are incompatible with the vision and objectives already specified by NSW Planning. The emphasis should be on achieving the goals for the precinct that relate to employment, services and recreational activities. As well NSW Planning should not approve isolated plazas that add to the feel of 'dead' open space with no users for the area.

The NSW Planning report overlooks the fact that the current facilities experience high levels of demand from existing usage within the LGA and neighbouring LGAs. Demand for green expansive parks, sport facilities and playing fields is an ongoing and dynamic requirement that should be augmented with every new high density development that takes place. Not sharing the same green parks facility repeatedly and double counting for each new development. Without a parallel increase in services and infrastructure commensurate to the loss of amenities each development should stand the test on its own.

The NSW Planning report unfortunately encapsulates the prevailing conditions incorrectly without appropriate planned amenities and outcomes for the residents. All community facilities and services should be in place before any plans for new high density are even proposed. It is imperative that before any density is added better plans for services and infrastructure should be allotted that the community can have a say in its delivery. The report should also take a view as to what is the maximum level of population for the area. That is how much more can be squeezed into the area before it comes unmanageable given the constraints that exist.

The trend in the last few years in St Leonards is for high residential density with 1 and 2 bedrooms apartments with very limited amenity. The NSW Planning report

acknowledges that a number of trends will impact recreation and open space: *“Access to public open space will become critical in the area, as private open space in smaller dwellings is becoming more limited”*. This trend of 1 or 2 bedrooms should not be the norm but instead to encourage families with 3 and 4 bedrooms however amenities and open space should be supported insistently in order to overcome the considerable shortfalls in open space in the precinct. NSW Planning should not leave this aspect to market forces which tend to be driven by profit and short term view and keep building studio and one bedroom apartments but should adamantly take the view of catering for the future for family needs of 3 and 4 bedroom apartments (e.g. set targets for the number of 1 bedroom apartments).

Open Space, Pocket Parks and Community Parks

The NSW Planning report stated that: “There are two large public green spaces inside the Precinct which comprise of: Gore Hill Memorial Cemetery and the Gore Hill Oval. The oval supports organised sport, and hence limits the opportunity to be used for informal recreation and play”.

The St Leonards area suffers from relatively low provision of open space despite having some of the highest residential densities. St Leonards should enjoy major benefits from the provision of accessible social/family recreation spaces including an area for kicking balls, free access social sports facilities, skate and picnic facilities and possibly dog exercise, tables and seats. The study recommends that Council pursue opportunities for new open space and recreation opportunities in the Crows Nest/St Leonards Pacific Highway corridor, and in areas without open space within 300m of residential dwellings but the study does not specify clearly the size of the green park and the accessibility to solar light in order to ensure that the parks are useful and not just pocket parks that are not popular.

Other small parks in the area, such as at the top of Portview Road, Greenwich is of limited use as it is small in size, with bad furnishings and poor solar access. Solar access will be a key factor when placing pocket parks next to high rise towers which will limit solar access (also given their sloping South? Sloping aspect) and make these parks useless, other than during periods when the sun is in a vertical position, which is for a short period of time. Hence, the parks will become cold and windy at other times and unusable, except by smokers. Paved space in the area such as the plaza is not green open space that can be frequented by families and will be underutilised by families and residents with dogs. These are akin to shopping malls and eateries. Any open space and green parks should cater for young families and children up to 4 years as there will be an increase in the number for these demographics, so far Lane Cove Council has ignored this group. As such NSW planning should step in and address these issues by mandating better and bigger green parks.

There is insufficient social infrastructure and open space in the precinct. There is not a good range of recreation facilities in the St Leonards area and maintaining an adequate supply, quality and diversity of opportunity will be an ongoing challenge. Gore Hill Oval is a sports oval and not a park and Newlands Park is over utilised. It is the only

expansive park in the area and is used heavily on weekends. It is very crowded with existing residents and not including any new comers. Yet it is identified by the NSW planning study as major/ regional open space that is in close proximity to the study area. However the study fails to show that it is crowded at times and the only real park in the area.

Wider Area and Three LGA

Substantial high-density residential development is already underway on other sites in St Leonards and in the immediate adjoining areas such as along the Pacific Highway. Density targets for Lane Cove LGA and St Leonards to 2031 have already been met. The latest version of the Metro Plan does not identify St Leonards among the North Shore centres targeted for further residential intensification. Yet the reports fail to keep this in perspective pushing for more residential high density.

The plans do not take into account the effect of traffic, transport and services from neighbouring councils, the adjacent areas and the wider area of St Leonards that will impact the precinct. The NSW Planning is muted when it comes to the cumulative effects of adjacent areas and even more muted on the areas further up the Pacific Highway that filter down to St Leonards.

Connectivity – Isolated Structures

A “stepping down effect” is really needed in St Leonards especially as it comes closer to the surrounding residential areas. There are major barriers identified in St Leonards that restrict connectivity and movement such as the steep terrain and sloppy streets which proves too hard to push a pram or walk with children to the train station. The area has natural barriers and it is difficult to have connectivity as people on one side cannot see the other side due to the sloping nature and peaks along Pacific Highway. Then the connectivity fails as a concept, does not apply to the precinct and will not work effectively.

The reports produced for the NSW Planning note the terrain and topography of the area, the report fails to reach a conclusion in setting objectives for the area. Having general terms of developments that will enhance “activation” and connectivity in the area with walkways that allow access within the area are such motherhood generic statements that can be applied to any area or used to justify more concrete footpaths. The report fails to reach statements that actually take account of the topography of the area and the natural barriers (including the Pacific Highway). For instance having an isolated plaza on the wrong side of the Pacific Highway does not add to the connectivity but leads to an isolated wind swept concrete area. More is needed to have residents congregate together to build a hub of activity, not to isolate this activity into more areas.

Strategic Employment

Page 8 of the NSW Planning report states that: *“The Strategic Employment Review indicates that there will be an undersupply of both office floor space as well as urban services floor space across the Precinct with at least 284,000sqm of additional*

employment floor space required by 2036. We have too much of active retail frontages such as cafes and shops and not enough genuine commercial long term sustained employment such as offices and businesses”.

St Leonards is in need of more commercial space that encourages long term employment and office work (potentially large business to act as key tenants). Commercial space such as cafes and gyms do not meet the specifications of long term employment. It is offices that are needed to support long term employment to revitalise St Leonards. It is likely that there will not be enough momentum for revitalisation if high density planning policy rather than commercial is pursued in St Leonards.

An example is the residential development at 472 Pacific Highway, St Leonards which has a proposed commercial space in the DA of only 4,900 square meters or 7% of the total site as compared to the 12,000 square meters that was in place before this development. An enormous loss of 7,100 square meters of valuable commercial space. This proves that councils and the developers are ensuing more residential high density sites in St Leonards at the expense of commercial space.

Also the large high density residential development with a 100m tower and more than 330 units at 1-15 Marshall Avenue, St Leonards has less than 1.3% commercial space and has little to do with real long-term commercial, employment or medical emphasis but was approved for more residential units. Surely the developer could have more space dedicated to commercial space and surely NSW planning would ensure that developers dedicated more space for commercial in its vision.

It is important that NSW Planning in its current plans and at this stage should emphasise and include commercial space in its plans to ensure that less emphasis on residential space and more commercial and medical space is augmented, .

Integrated Transport

Some of the challenges identified in the NSW Planning report for the precinct do not include connectivity of public transport. The Metro Station and other public transport modes are not well connected to each other to allow easy flow for commuters between the different modes of transport such as we see in other major cities such as London.

The precinct is likely to experience disconnected modes of transport where commuters have to move between streets to get to the next connection rather than a flow from one to the other transport networks. The precinct is not well connected between the different public transport systems as proposed in the reports which will prove to be a hindrance for delivering the outcomes specified in the report. That is, limiting movement in the Precinct, will not provide a solution for the exact problems the NSW Planning is attempting to resolve.

Plaza

The NSW Planning report states that: "... however there are a large number of plazas and gardens clustered around St Leonards Station and Crows Nest". This is not a true reflection of life in the precinct as most residents are not interested in plazas which is mainly concrete and is paid patronage. Most prefer green parks where they can enjoy the afternoon. There are plenty of cafés and restaurants in St Leonards to cater for the population.

A plaza is an imposing concreted area with a specific boundary and a glorified confined courtyard. It is not truly open space or green space. Any plaza in St Leonards will be windy and not frequented on weekends. A plaza will be isolated and have mainly cafés for paid up customers and not enjoyed by residents. Any new plaza proposed will compete with the Forum plaza near the station which is well connected with the train station. Isolated plazas should not be considered as open space or recreational as it is mainly for paid customers that use the seats in the cafes. The NSW Planning should concentrate its efforts on creating more green open space and parks that can be frequented by a large numbers of residents form all ages.

Traffic Affected by the Wider Area

The traffic generated from the new high density residential developments, with visitors, new residents and services vehicles is not reflected adequately in the traffic assessment report. The new developments or the developments on the way will add traffic to the roads which are already at capacity. There are several new and proposed developments (in the pipeline or yet to be approved) in St Leonards and the surrounding areas that will add markedly to the traffic congestion and parking problems.

The cumulative impact of additional developments in the whole area of St Leonards including those of the neighbouring LGAs was not appropriately considered since increasing the number of residential units will add to the traffic congestion on the Pacific Highway as well as council roads. As everyone needs cars on weekends for sporting activities, shopping and visiting friends the adjacent areas around St Leonards will be impacted.. While St Leonards may have low proportion of people that use private vehicles to travel to work, the surrounding areas more than make up for this as more cars will filter down the Pacific Highway to St Leonards. There is high car usage in Greenwich with some houses having 3 cars.

Any traffic movement or congestion in the precinct will have a domino effect on the car traffic flow all the way onto the Pacific Highway and surrounding streets. The other surrounding streets are not wide enough for the traffic to flow well. Albany Street and Oxley Street have increasing traffic, noise and are already congested. Herbert Street is at a snail's pace most days and the Pacific Highway is chaotic at best of times with the current level of traffic and pedestrians. The NSW Planning will have to address these issues thoroughly and come up with practical solutions in any of the traffic assessment reports at these early stages.

Health, Education and IT

It is worth noting that the precinct has been identified as a health and education super precinct boasting" *a number of policy directions for the Precinct focusing on leveraging off a new metro station at Crows Nest to deliver additional employment and homes, improving connectivity and the public domain, protecting employment land and providing synergies between many of the health related uses*".

The NSW Planning identifies St Leonards as a strategic centre and as such should have specific well-articulated plans to deliver this vision with defined priorities to retain a commercial core in St Leonards for long-term employment growth providing offices, health, retail, services, and health-related land uses and infrastructure especially around the Royal North Shore Hospital. This does not mean that high density residential developments should be given priority in the precinct as the NSW Planning show in their plans.

Community, Character, Heritage and Sense of Place

The proposed NSW Planning plan will increase exposure of the urban edge and contribute to urban sprawl which is a major concern to the community. Many of the residents in the area are committed to preserving the sense of place and community as well as heritage aspects. The community does not feel empowered to make decisions that will impact the future. In fact residents have a feeling of loss of sense of community, loss of character and lack of consideration for a good precinct context. The NSW Planning plan is not likely to deliver on any of these concerns.

I hope that you can consider my comments and I am willing to discuss these matters further.

Yours sincerely,

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