

16 September 2017

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Ann-Maree Carruthers
Director, Urban Renewal (Sydney Metro)
Department of Planning and Environment
320 Pitt Street
SYDNEY NSW 2000

Dear Ann-Maree,

St Leonards and Crows Nest Station Precinct – Interim Statement

This submission has been prepared by Ethos Urban on behalf of the Park Road West and Portview Road Action Group (Landowners Group).

The submission responds to the public exhibition of the *St Leonards and Crows Nest Station Precinct Interim Statement* and supporting documentation prepared by the Department of Planning and Environment.

The Landowner Group wishes to acknowledge the considerable time and effort invested in the preparation of the Interim Statement. Subject to our comments below, the Landowner Group believes the Interim Statement provides a solid foundation from which to plan for future growth and development of the St Leonards and Crows Nest Station Precinct, including the St Leonards South Precinct.

The Sydney Metro, currently under construction, will be a significant piece of infrastructure that will improve amenity for residents and workers in the locality. The members of the Landowner Group accept that such a major investment in infrastructure, along with other plans for the area in terms of employment, health facilities, federal funded sporting facilities, significant local school upgrade and other transport initiatives, are an inevitable catalyst for significant change in local land use, built form and density.

However, the Landowner Group's primary concern is that this be done in a holistic way which provides a certain and equitable result for residents in the affected area.

Summary of Submission

In summary, the landowner Group:

- **supports the State Government led precinct-wide planning process** as a means to ensure a comprehensive and holistic approach to future land use and built form planning for the area;
- **supports the extension of high density development for the whole of the St Leonards South precinct to Greenwich Road**, being within an 800 metre radius of the current and proposed St Leonards/Crows Nest transport hub.

To be clear, Landowner Group support is premised on a high-density outcome without staging or transitioning that simultaneously enables the current opportunity to be realised to its full potential and allows members of the group to exit on a basis which is equitable across all residents in the St Leonards South precinct;

- **re-iterates its opposition to the Lane Cove Council proposal** for the precinct, as set out in the *St Leonards South Masterplan*;
- **notes the one-off opportunity for a well-planned high-density precinct** in St Leonards South, recognising the current absence of significant strata dwellings in the precinct and the relative ease of implementation;
- **notes that the existing main roads (Pacific Highway, Greenwich Road and River Road) provide natural boundaries** addressing the need which would otherwise arise for transitioning of built form from high to low density across the precinct;
- **supports future pedestrian and cycle linkages** directly connecting St Leonards South with the Crows Nest Metro Station and notes the opportunity for significant residential development within walking distance of transport, open space, sporting facilities and employment, consistent with the Greater Sydney Commission vision for the future Sydney;
- **seeks clarity and certainty regarding timing of development** in the St Leonards South Precinct, recognising that a staged approach will have the detrimental amenity and value implications which the Landowner Group has addressed extensively in its previous submissions;
- **supports on-going community engagement** through the process (recognising that thus far the Department has managed this excellently).

The detail of our submission is set out below.

1.0 The Park Road West and Portview Road Action Group

The Landowner Group represents an overwhelming majority of properties in the western half of the St Leonards South Precinct. This includes:

- **All the residents of Park Road (west)**, excluding No.1 Park Road (i.e. 19 out of the 20 properties); and
- **27 out of the 31 residents of Portview Road**. Of the remaining four properties: two are rentals (assumed to be supportive given they will be economically driven). One is uncontactable. Only one is opposed. Five of the above residents have expressed support should any of the St Leonards South area be rezoned, which we believe is now inevitable.

The combined land ownership of the Landowners Group is shown in Figure 1 below.



Figure 1- Portview Road and Park Road Action Groups' Landholdings

Source: Nearmap / Ethos Urban

The Landowner Group has also canvassed the residents of Anglo Road and Greenwich Road. The outcome of this (on a door-knock basis) is as follows:

- **Anglo Road** has a far greater mix of rentals and owner-occupiers and some commercial premises. Of the eleven owner-occupiers identified, seven are supportive, including a significant block at the top of Anglo Road East (abutting the Greenwich Road East properties). Four are known to be opposed. We have assumed rental and commercial properties will be supportive, given they are economically driven;
- **Greenwich Road** is also a mix of rentals, owner-occupiers and commercial premises. The Northside Clinic is moving as set out above, there are existing flats, then five houses. The three of these which are owner-occupied have confirmed their support. The other two are rentals and thus assumed to be supportive. There are two boarding houses (again economically driven) and some town houses. The other side of Greenwich Road is already entirely apartment blocks.

Accordingly, through a combination of residents who have expressed their support and a reasonable assessment of the likely drivers for rental properties, we believe support in these streets is also widespread.

Across the 4 streets, support is overwhelming.

The Landowner's Groups formed in response to the St Leonards South Master Plan Planning Proposal that was supported by Land Cove Council and is currently on hold pending the progression of this broader precinct-wide planning investigation. The properties owned by the Landowners Group are directly border the area of the proposed master plan and, had the planning proposal progressed, would have experienced significant environmental impact and land use conflict due to the unacceptable interface of the proposed high density with the existing low density. This is discussed further in **Section 2.2** of this submission.

As you would be aware, the Landowners Group have met with the Department on four occasions; three times at the Department and in a follow-up meeting on-site, where Department staff were kind enough to give up their time to meet with most of the landholders in the Groups. The Group has also made a number of previous submissions and believes that the Department broadly understands the Landowners Group's position. The Landowners Group appreciate the efforts Department staff have made with their stakeholder engagement to directly hear the views of the local community.

2.0 Comments on the Interim Statement and Precinct Planning Process

2.1 The need for Holistic Strategic Planning Approach

The Landowners Group fully support the intervention of the Department of Planning and Environment in the strategic planning for the St Leonards and Crows Nest Station Precinct. The precinct is divided between three separate local government areas and is characterised by a disparate range of land uses and sub-precincts including health, commercial core, industrial, retail and residential. The Department's leadership is essential to ensure that the process is resourced and coordinated and that an overall State and Regional perspective is applied to land use planning for the Sydney Metro corridor. State Government leadership also ensures that key planning concerns such as connectivity do not stop at Council boundaries but are coordinated across the whole precinct.

2.2 Opposition to the St Leonards South Master Plan Planning Proposal

The Landowners' Group continues to strongly oppose the St Leonards South Master Plan. The current planning proposal submitted by Council and endorsed at the LEP Gateway but currently on-hold, is the result of ad-hoc local planning processes and will facilitate a poor built form outcome.

The built form and layout proposed in the master plan provides for no transition between the high-density development (up to at least 8 storeys) proposed for the master plan area and the low density detached dwellings in the streets to the immediate west. This sudden transition will result in land use conflict with high density buildings adjacent to single storey development. The community represented by the Landowners Group will also see a significant deterioration in their residential amenity through the on-going construction and traffic impacts associated with future development across the street. Significant concerns are still held by the Landowners Group regarding the lack of transparency in the process undertaken by Lane Cove Council, with significant changes being made to the master plan (including significantly expanding its area) with no consultation and attempts by Council to exclude residents from critical meetings on the matter.

The Landowners group also have considerable concern as to the lack of a coordinated plan for the provision of community infrastructure associated with the development. Increasingly in Lane Cove, community infrastructure is being funded by ad-hoc voluntary planning agreements that are then used to justify increases in density.

As articulated in this submission, the Landowners' Group accepts that the area will need to accommodate significant increases in density as a result of the Sydney Metro and other infrastructure investment in the precinct, however, the isolated and ad-hoc response to this in

Council's master plan is not the appropriate way forward. Consideration of the whole precinct in terms of land use and built form and the formulation of a consistent and transparent approach to the funding of associated infrastructure is required.

A consistent high-density approach across the precinct will allow for a holistic development incorporating necessary infrastructure, community facilities and planned open spaces to develop a community/village rather than an ad-hoc series of one-off developments. This will also allow for an equitable exit plan for all precinct residents.

2.3 Support for increased residential density on the St Leonards South Precinct

The Landowner Group welcomes the recognition in the Interim Statement that increased residential density should appropriately be applied across the whole St Leonards South Precinct extending to Greenwich Road and including the properties owned by the Landowner Group. Houses in this area are located generally between 400m-800m from the St Leonards and Wollstonecraft Stations, and the new Crows Nest Metro, assuming a new pedestrian Metro linkage is established across the railway line as contemplated. This has long been recognised in strategic planning terms as being an appropriate distance for high density residential development.

As discussed earlier, it is appropriate and equitable that the whole St Leonards South precinct be considered for high residential density. This will limit land use conflict and provide for a consistent built form and scale. It will also allow residents in this area to exit on economically viable terms, which is a critical factor in the current broad-based support offered by the Landowner Group. While residents are currently supportive of the proposal, in the face of the situation instigated by the actions of Council, the Landowner Group believes any rezoning should be conducted on an equitable basis allowing residents across the precinct to move to some comparable area.

This approach also allows for the brownfields nature of the opportunity to be fully grasped (having regard to the proximity of the area to the CBD, current and proposed transport, the St Leonards TAFE, the proposed new \$10m Gore Hill sporting facility, the significant upgrade of the local primary school and local employment opportunities, particularly arising from the health precinct). These facilities (and planned employment growth) will bring with them the need for additional housing, which the Greater Sydney Commission has indicated should preferably be within walking distance under their decentralized model.

The connectivity of the area to a number of different transport options (bus, road, heavy rail and Metro) make the area very well suited for a high-density approach.

The lack of existing strata dwellings in the St Leonards South area (as highlighted in the Interim Statement) further supports the extent of the opportunity. This also highlights the risks of a

development that seeks a short-term medium density fix, which will limit the capacity to develop the precinct to its maximum potential.

Nor do we believe the opportunity is confined to Park Road and Portview Road. The upcoming relocation of the Northside Clinic site at the top of Greenwich Road East also provides opportunities on Greenwich Road. This site and a number of contiguous Greenwich Road sites backing onto supportive residents on Anglo Road offer significant opportunities at the Greenwich Road end of the precinct.

It is notable that Greenwich Road, Pacific Highway and River Road are significant roads that significantly reduce the transitioning issues that might otherwise arise (and would clearly arise under the Lane Cove Council plan).

High density through the whole St Leonards South will not only support population growth that in turn will support the Government's investment in transport infrastructure, it will also provide the opportunity for greater flexibility in terms of local open space provision, and the achievement of proposed connections between the St Leonards South and the Crows Nest Metro Station. The overwhelming support of residents in the area will facilitate property amalgamation that will in turn remove the traditional obstacles to development that are created by land fragmentation.

Notwithstanding that the Interim Statement and supporting urban design studies support higher densities, there is a lack of clarity and consistency through the documentation with regard to the extent of higher density development and the timing. In Section 4.6 of the *Preliminary Urban Design Analysis*, there is clear support for higher density across the whole precinct:

It is also proposed that increased residential capacity is captured to the southern section of the precinct. These areas are largely within walking distance of the two stations, and have good levels of amenity. This is also a last remaining area within the Precinct that may be able to accommodate increased density.....

The accompanying map however, clearly designates the area as being *high density*.

Notwithstanding the above, in Section 4.9, it states:

The area to the south of the Precinct is to be investigated for further intensification to accommodate medium density residential.

The Preliminary Structure Plan in Section 5 also appears to be inconsistent with the previous analysis and refers to the St Leonards South area as a *Transitional Area*. This designation is not clearly defined and does not provide any clarity as to the extent and timing of future increases in residential density.

The Landowners group believes that it is critical that the strategic planning process for the St Leonards and Crows Nest Station Precinct provide certainty for landowners and residents moving forward. “Transitional” or “Interim” designations create uncertainty for residents with regard to future investment in their properties and lifestyle decisions. A gradual or staggered transition of density across the St Leonards South Precinct will create land use conflicts in the interim and expose residents to construction, health and valuation impacts.

In the face of continued uncertainty as to timing and planning outcomes it also seems likely that this will lead to a splintering of the Group over time, with consequent land amalgamation issues and loss of the brownfields opportunity currently presented. Residents have already been living with this uncertainty now for some years following the “process” adopted by the Lane Cove Council and this will likely take its toll in the absence of some clear path forward.

Clearly, if the analysis supports an increase in residential density, this should be put in place up front with appropriate land use zones and height and density controls. This provides certainty for residents, developers and Government. The key driver for density is the introduction of the Sydney Metro and frequent rail services to North Sydney and the CBD, Chatswood, Macquarie Park and the North West. The Sydney Metro will be fully operational from day one, and to maximise the value of the infrastructure from day one, there is no need for associated residential density to be staged or transitioned. Further, a holistic approach is likely to lead to better outcomes with regard to funding by developers of internal infrastructure needs within the precinct.

Therefore, the Landowners Group's support is premised upon a non-staged, high-density outcome for the St Leonards South precinct, with the request that this be reflected in the amendments to the relevant Environmental Planning Instruments at the conclusion of the precinct planning process.

2.4 Improved Pedestrian and Cycle Connectivity

The Landowners' Group are highly supportive of the proposed improvements to connectivity for the precinct. The proposed direct pedestrian connection linking St Leonards South to the Crows Nest Metro Station will significantly improve walking times to the station and facilitate higher density development. The link will also enable residents of St Leonards South improved access to retail, restaurant and entertainment offerings at Crows Nest. Proposed improvements in connectivity between St Leonards South and St Leonards Station are also supported.

The Precinct Planning being undertaken by the Department provides the opportunity to significantly improve cycle connectivity on the Lower North Shore. There are opportunities to create cycleways to link the area to North Sydney as part of a broader Lower North Shore cycle network. In this regard, there are areas within the T1 rail corridor that could be considered as potential routes.

2.5 Infrastructure Provision and Funding

A consistent approach is required for the provision of, and funding for, future infrastructure across the precinct. Through the Department's leadership, the infrastructure needs of the future community can be identified, planned and provided for through future development. Clear and consistent mechanisms for infrastructure funding through "value sharing" need to be developed to provide certainty for future development and avoid ad-hoc development decision making on the basis of justifying infrastructure funding shortfalls.

Certainty with regard to future development potential is required as part of this process, "interim" or "transitional" designations provide no certainty in terms of future population density, associated community infrastructure needs and funding mechanism.

2.6 On-going community engagement

As stated earlier in this submission, the Landowners Group are appreciative of the community engagement undertaken by the Department so far during the precinct planning process. It is important that the level of community engagement be maintained moving forward in this process. Unfortunately, there has been a history of land use decisions being undertaken in St Leonards South by Council without adequate consultation with residents. This has led to ad-hoc decision making and general unease and uncertainty for the local community as to future development in the locality. A clear and transparent consultation framework moving forward will provide greater level of dialogue and ensure the views of the community are heard.

3.0 Conclusion

The Park Road West and Portview Road Action Group are supportive of the holistic strategic planning approach being undertaken by the Department for the St Leonards and Crows Nest Station Precinct on the basis set out in the summary of key points at the start of this submission. Only through a coordinated planning framework under the leadership of the Department, can the benefits of the Sydney Metro and other infrastructure initiatives be maximised for the whole St Leonards and Crows Nest Communities.

The Landowners Group appreciate that the *Interim Statement* and supporting studies are the result of early investigations and further refinement will be undertaken in the coming months. We are hopeful that these submissions may assist in the final formulation of plans for the area which are supported by the overwhelming majority of residents.

The Landowners Group acknowledge that the introduction of the Sydney Metro will inevitably bring with it significant change to the Precinct. In this regard, a high-density outcome is supported across the St Leonards South Precinct, provided that bit is delivered as part of a future development

framework that provides up-front certainty and is applied equitably across the precinct and avoids the land use conflicts inherent in Council's St Leonards South Master Plan Planning Proposal.

We look forward to working collaboratively with the Department on future stages of the Precinct planning process.

Yours sincerely,

A handwritten signature in blue ink, reading "Gordon Kirkby", is displayed on a light yellow rectangular background.

Gordon Kirkby

Director, Planning

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