

28th November 2018

Director,
Planned Precinct Infrastructure Delivery
Department of Planning and Environment
GPO Box 39 Sydney NSW 2001

Plans to rejuvenate St Leonards and Crows Nest Precinct.

To whom it may concern,

I'm writing on behalf of Tanert Pty Ltd, owners from 2 - 4 Pacific Highway and Pamela Ann Pty Ltd owners of 65 Nicholson Street, St Leonards.

We welcome the Department's review of the planning and land use controls for the St Leonards and Crows Nest Precinct, as well as the draft Local Planning Statement and Infrastructure Plan. The advent of the new Metro Line, as well as the recent expansion and redevelopment of the Royal North Shore Hospital, provides a unique opportunity to undertake a comprehensive and precinct wide review of this area which has suffered from decades of fragmented planning and siloed thinking from the three respective Local Councils.

We believe that, despite the best intentions of the Council's which have controlled the area, St Leonards and Crows Nest have failed to live up to their potential as vibrant town centres. In many cases development has been ad hoc and poorly planned, and the narrow interests of the respective Councils have been given priority over the needs and aspirations of the wider community. A centralised, State Government led, review of the future for the precinct is both timely and welcome.

However, while we welcome the Department of Planning and Environment's active involvement in the precinct, we are concerned that many of the draft documents on exhibition are failing to capitalise on the significant investment of public funds into new enabling urban infrastructure. The new Metro Station at Crows Nest is a once in a generation opportunity to recast this precinct as a well-designed, vibrant, high density, employment and residential precinct. No other precinct, outside the Sydney CBD, is better serviced with public and private infrastructure. It is already serviced with a large, full service, teaching hospital. It has a well-established road network as well as high-quality open space. It's transport connectivity with the rest of the metropolitan area is unparalleled outside the Sydney CBD. It is certainly better serviced than Parramatta CBD, Green Square or Pyrmont/Ultimo Precincts. **We think it quite inexplicable then that the suggested scale and density of development in St Leonards/Crows Nest is so significantly less than in these other precincts.**

The final future planning controls for St Leonards/Crows Nest should be informed by the lessons learnt from these other precincts. For example, the planning controls in Green Square provide strong provisions for ensuring best practise urban design through incentives and floor space bonuses. Consideration should be given to including such incentives in the future planning controls for this precinct. Parramatta CBD masterplan likewise has clear incentives aimed at capturing private value and directing it towards a public purpose. Similar schemes were also included in the Pymont/Ultimo REP such as inclusionary zoning and special provisions for regional open space. Each of these precincts have a high-density, urban form, which supports a strong and growing local economy, protects and enhances local heritage and environment attributes, and supports a large population. While some mistakes were made, these precincts represent some of the best urban planning in Australia.

The supporting planning and urban design studies which the Department have exhibited for St Leonards/Crows Nest all suggest similar policies should be adopted in the future planning controls for this precinct. It is therefore very anomalous, that the suggested draft policies fail to take up most of these recommendations. **One can only conclude that other considerations have been allowed to crowd out good urban planning and good public policy.**

We believe that the draft Documents the Department have exhibited should all be reconsidered and, in many cases, substantially changed. The entire St Leonards/Crows precinct is within an 800 metre 'ped shed' of high capacity/high volume mass transit. It can support much greater density of both housing and employment than is being suggested in the draft strategies. To not do so represents an unacceptable lost opportunity for Sydney.

The infrastructure plan and the provision of a State Infrastructure Contribution (SIC) is supported but is very limited in scope and should be expanded to examine other critically needed civic infrastructure. SIC's are a very blunt policy tool and are effective in only providing for development enabling infrastructure. They also have perverse impacts on supply and can be market distorting. They need to be supported by planning controls which direct development towards a public purpose. For example, the whole of Northern Sydney, with a population approaching one million people, has access to only one public theatre (Chatswood). This is a disgrace and a clear indication of long-standing poor planning policy. Incentives should be included for density bonuses in area's zoned Commercial Core in exchange for the provision for a new theatre in St Leonards or Crows Nest. Similar considerations should be given to incentivise other needed infrastructure, such as schools and primary health care facilities. A SIC alone can't be relied on to deliver these services.

Furthermore, the infrastructure strategy does not seem to align to the Council's strategies for the precinct. For example, Lane Cove Council have been levying development to build a new Plaza over state government land in St Leonards, yet this project only receives a passing mention in the documents the Department have exhibited. If this project is not supported by the State than Council should be asked

to stop levying new development. If it is supported by Government, then it should be included in the strategy. In short, the draft Infrastructure Strategy should be reconsidered.

In relation to preserving employment in the precinct the draft documents are lacking in innovation and it would appear the Department is seeking to rely on the LEP standard template to support jobs. In the Commercial Core, the Department should consider adopting some of the objectives in Sydney City's draft LEP which support greater density for particular types of commercial development such as hotels and vertical schools. Relying on the Standard template is 1970's planning and will result in a very sterile and lifeless town centre.

We support retention of the industrial area in North St Leonards/Artarmon, however we again believe it should not be subject to the provisions of the standard template. The Department should give careful consideration to the type of urban services this precinct should support and plan accordingly. Furthermore, the proximity of this precinct to both the Hospital and train station should provide scope for much greater density of urban and industrial uses than would be provided by the current IN1 and IN2 zoning. If the Department leaves this precinct with the same controls, it runs the very real risk of it developing as a bulky goods retail strip. Bulky goods retail provides little in the way of employment but is a huge traffic generator. It will be a very poor planning outcome if such a precinct was permitted adjacent to a regional hospital and high capacity train station. This precinct should be further studied, and more tailored planning controls considered before the final plan is adopted.

In relation to my client's specific properties we would like to provide the following comments.

2-4 Pacific Highway St Leonards:

In the Strategies supporting documents, particularly those undertaken by Ethos Urban, it is suggested that this property be considered for greater density and activation. It is seen as a gateway to the town centre and very close to the train station. The documents suggest this activation is best achieved as a mixed-use development providing a transition between the high density, urban core to the north and east and the high density residential to the south and west, or as higher density commercial core. The final draft documents however suggest that there should be no change to these properties! This is inexplicable.

This part of the St Leonards precinct has been underperforming for some thirty years. Vacancy rates are high, and not one single property has been able to achieve the level of development currently provided for under the existing controls. **This is because the existing planning controls are wrong.** It makes no planning sense to have on one side of your property a high-density residential development of nearly forty stories and on the other side of your property a commercial zoning with an FSR in excess of 15:1, while your property languishes as a low-density business zoning.

Either the property is Commercial Core, in which case a much higher FSR is warranted or it is B4 Mixed Use. To leave these properties unchanged is to consign them to another thirty years as an underperforming retail strip. Such a key site, adjacent to the railway deserves more consideration than this.

65 Nicholson St, St Leonards:

We welcome the suggestion in the draft plan that this property be considered as a 'special site' and strongly welcome the recommendation that it be rezoned to B4 Mixed Use. It is in very close proximity to the new Metro Station as well as the existing St Leonards Station. A mixed-use development of this site provides for a sensible transition between the commercial development along the Pacific Highway and the existing residential neighbourhood to the south and west.

While the final controls for this precinct need to be further clarified we do believe significant density of both commercial and residential development can be accommodated in this precinct and that greater height and density controls should be considered in any future planning proposals.

We would welcome being kept informed of the Departments deliberations and are interested in helping the Department to progress these reforms in a timely manner.

Yours sincerely

Sean Macken
Macken Strategic Planning Solutions
Level 2, 276-278 Abercrombie St
Darlington 2008
sean@seanmacken.com.au