1 December 2018

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St Leonards NSW 2065

Mr. Malcolm McDonald
Director Urban Renewal
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr. McDonald

Re: Submission St Leonards and Crows Nest 2036 Plan
Crows Nest Sydney Metro Site
St Leonards South Master Plan

Please accept our submission in respect of the Draft St Leonards and Crows Nest Plan (The Plan), the Crows Nest Sydney Metro Station Site and the St Leonards South Master Plan are incorporated and / or informed by the The Plan[1] it our submission addresses all three elements.

We have been residents in this area since early 2014. We are also employed in the area having offices at North Sydney and Chatswood. The majority of our leisure time is spent in this area. We moved to the area as we valued a number of things including the local character, proximity to work and transport options.

It is important to note that we support development in the area where that development is consistent with improving quality of life and amenity for our community. Having reviewed The Plan we do not accept that it meets that criteria. We consider it to be a gross overdevelopment that is likely to materially degrade quality of life.

We call on the NSW Government and the Department of Planning and Environment to: -

- Withdraw the The Plan
- Withdraw Crows Nest Metro Station rezoning proposal,
- Return to first principles: -
    - Community quality of life and amenity must override development for development sake,
    - The community needs must be prioritised over developer profit and greed
- Undertake a lengthy, open and transparent consultation process, and
- Come up with a plan that provides for realistic and fair development that will enhance the local area.

Our objections include: -

1. Planning

We object in principle to the over-riding of Council planning controls. We object to the Metro Over Station Development due to inconsistency with the recommendations from North Sydney Council's Crows Nest Placemaking and Principles Study. We note key principles set out in the study include: -

- Maintain and enhance the village atmosphere in Crows Nest
- Maintain and enhance access to amenities
- Proactively manage development pressure
- Provide public benefit

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[1] draft crows nest sydney metro site rezoning report 2018 10 12 Section 2 Context

Council report CiS02[2] is highly critical of the Over Station Development (OSD) finding: -

- *The proposal's height, scale and use have not been informed by the DPE's Planned Precinct for St Leonards/Crows Nest.*
- *The highly valued village feel of Crows Nest and solar access to key spaces like Willoughby Road and Ernest Place, will be compromised as a result of the proposals.*
- *The OSD appears to propose limited employment floor space and misses an opportunity to lead the employment agenda in this precinct.*
- *Contribution of public benefit, particularly community space, does not appear to be part of this proposal.*
- *The design of the OSD appears to include car parking above ground which will detract from the architectural merit and interest of the buildings, reduce capacity to accommodate employment floor space and is a poor transport planning outcome given that a new Metro representing high levels of public transport accessibility, underpins the OSD.*

We strongly question whether the proposal meets the stated aims of State, Local and Metro planning Documents and the Greater Sydney Commissions proposal that commercial space, not residential space, should be provided around railway stations. In support of our significant concern we refer to Council Report CiS02' conclusion: -

> *The NSW Government's commitment to strategic and holistic planning, which characterises much of its current planning reform agenda, does not appear to have informed the current proposal by TfNSW.*

2. Village Atmosphere & Density

We understand that should high-rise residential targets be approved this area could see another 7,100 residences and 21,600 residents by 2036 (SBJ Pg. 21)

This directly conflicts with stated aims in official planning documents and more importantly with community feedback as stated in The Plan: -

> *The community would like to keep the village atmosphere around Crows Nest[3].*

Some of the characteristics of villages within large cities include[4]-

- The scale of the buildings and spaces is suitable and comfortable
- The residential density can sustain a range of key services
- There is ample public and green space, which is used in many ways
- Facilities are provided for community events and everyday activities
- There is a long-term vision that residents support
- Leaders represent the community and reflect its concerns
- The community is well served by both public and **private** transport

We reject the idea that The Plan and Crows Nest Metro Station proposal come anywhere close to meeting these characteristics.

We object to the blatant attempt in The Plan to create a high-rise corridor down the Pacific Highway, including the Metro Rezoning proposal. It wholly conflicts with the objective of protecting the 'village

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[2] Item Cis02 Report to the General Manager SUBJECT: Crows Nest Integrated Station Development AUTHOR: Emma Booth, Team Leader Design ENDORSED BY: Joseph Hill, Director City Strategy Dated 30/07/2018

[3] St Leonards and Crows Nest Draft Local Character Statement 2018 10 19, Page 11

[4] Scanlon, Sagor, Whitehead and Mossa, (2016) New London Villages: Creating Community. Retrieved from http://www.lse.ac.uk/business-and-consultancy/consulting/consulting-reports/new-london-villages?from_serp=1

atmosphere' of Crows Nest and ruins any ability to transition from the tower developments to the surrounding suburbs.

We object to the height and mass of the proposed buildings in the plan and Metro proposal. Buildings of this size are not needed to meet Crows Nest's requirements for increased residential stock to meet Greater Sydney Commission growth projections. The area is already ahead of the 2021 targets, plus has several large residential towers already approved or under construction. The proposal is not in accordance with community wants.

To quote from Page 17 of the Draft Local Character Statement

> *The community wants the lower scale form of Willoughby Road and the heritage areas to be kept, as they provide an escape from the higher density areas and buildings around St Leonards Station and along the Pacific Highway.*[5]

The Statement actually admits that residents want an escape from high density. It this is the case why is this high-density overdevelopment being forced upon us. Or is it the case that the NSW Government and its planning authorities think some sections of the community are more deserving of a better quality of life than others?

On the same page a claim a claim regarding density control is made: -

> ***Density***
> *Density controlled around St Leonards* and along Pacific Highway.

Given the existing high-rise, buildings currently under construction / approved awaiting construction and the developments proposed in the 2036 Plan this can only be seen as pure marketing and spin (and not very good at that).

We object to the proposal to build two 27-storey buildings, one 17-storey building and one 8-storey building over the Crows Nest Metro Station. These will be massive towers that will loom right over and take away the whole sky and light from the East Wollstonecraft precinct from the Highway down to Christie Street. The do not meet any reasonable definition of village. Shading will be a significant issue.

We object to the area bounded by Falcon Street; Alexander Street and the Pacific Highway being designated as 'Significant'. We understand this will permit rezoning for very tall high-rise buildings.

We conclude by saying The Plan and Metro rezoning proposal pay lip service to the notion of a 'village'. They are nothing more than a marketing ploy.

3. Infrastructure

We do not accept that the Draft Local Character Statement provides any meaningful social infrastructure. Our comments apply in respect of Crows Nest and South St Leonards.

Premier Berejiklian is on the public record calling for a "breather" to allow the government's infrastructure program to "catch-up" to demand.[6] We agree with the Premier that infrastructure is essential. For many years the approach has been to increase residential density then play catch up on the infrastructure.

Nowhere in The Plan do we see real and guaranteed (through legislation) commitment to: -

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[5] st leonards and crows draft local character statement 2018 10 19, Page 17

[6] Visentin. L. Updated10 October 2018 — 10:07pmfirst published at5:56pm. Premier doubles down on calls for migrant intake to be halved. https://www.smh.com.au/politics/nsw/premier-doubles-down-on-calls-for-migrant-intake-to-be-halved-20181010-p508ug.html

- Increasing child care or primary and secondary schools to cater for the total 10,000 + residences proposed in the SBJ Design Study[7]. Promises to 'investigate' schools into the future are nothing more than hollow words. The ARUP report[8] notes that child-care facilities are at capacity / critically low.
- Ensuring local roads and residents will cope with increased traffic.
- Providing facilities for the elderly such as aged care facilities. With an aging population surely there is a growing need.
- Adequate provision of social and community housing
- Adequate parking space, particularly at transport hubs, something we understand to be State and Local Government Policy.
- Any other significant infrastructure upgrade other than some peripheral sporting facilities at Gore Hill Park (bearing in mind the oval upgrade will primarily benefit organised sporting teams).

We object to parking areas immediately above the railway station, which will ruin the view and amenity at street level.

We object to The Plan as it does not appear to provide any legislated guarantee of adequate and appropriate infrastructure. To proceed with The Plan as is simply 'kicking the infrastructure can down the road'. The very same mistake that this and previous governments have made. In the absence of an adequate and appropriate infrastructure guarantee The Plan should be withdrawn.

4. Public Space

The proposed green space indicated in the Figure 1.1.24 of the SBJ Urban Design Study[9] shows minimal additional green space will be provided to support the needs of a massive influx of residents into the area. It absolutely fails to meet its Vision objective No 5 as set out on Page 27 of the report. We note that vision objective appears to view green space for walking and cycling i.e. transport not recreation.

The minimal amount of proposed green space is also totally inconsistent the headline statement on Page 13 of the Draft Local Character Statement[10]

> *Quality open spaces and public areas, and how they are connected via tree-lined streets and recreation areas, are essential considerations for the St Leonards and Crows Nest community. It's important to bring the elements of nature that the community like into built up areas, and ensure that the natural and built environments are brought together in creative ways.*

and the community's preference for local parks[11]

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[7] st leonards and crows nest 2036 stage 02 urban design study 2018 10 19

[8] st leonards and crows nest precinct social infrastructure arup 2018 09

[9] st leonards and crows nest 2036 stage 02 urban design study 2018 10 19, Page 37

[10] st leonards and crows draft local character statement 2018 10 19, Page 13

[11] st leonards and crows draft local character statement 2018 10 19, Page 15

We object to the lack of open public space throughout all areas covered by The Plan.

We object to the lost opportunity to create a civic open space on the station site. Crows Nest has a very low ratio of open area compared to built space.

We object to the lost opportunity to create a civic open space on the metro station site at North Sydney.

5. Employment

We object that the proposed development does virtually nothing to meet the employment goals for the area. The Greater Sydney Commission envisages thousands of more jobs for this area – not an oversupply of residential apartments.

6. South St Leonards Master Plan

We object to Lane Cove Council's St Leonards South Master Plan: -

1. We object to the proposal to rezone 138 houses to high rise to allow the construction of 2,400 apartments. Lane Cove Municipality already exceed its housing targets. There is no requirement for St Leonards South to be included in any rezoning at the proposed density levels.

   Lane Cove East Ward bears an inordinate share of development within the Council area. We believe that with the existing approvals for several high-rise apartment buildings along the Pacific Highway Lane Cove Council has already exceeded its commitment to increased density in the area.

2. We object to the inadequate provision of infrastructure and amenity to support this massive overdevelopment.

3. We object to the derelict approach being taken to vehicle movement in the area. Vehicle access and egress for traffic in the local streets within the proposed development area is grossly inadequate. The additional traffic on local streets will degrade our quality of life.

   Local roads in the development area and River Road in particular will not cope with the additional resident's vehicles. It is a nonsense to suggest the majority of residents won't have cars and will rely on public transport.

   The proposed 2,400 apartments a very significant number of cars will accompany the residents. The nature of local roads in the proposed area, including one-way streets, suggests there is grossly inadequate access to, and exit from streets including Marshall Avenue, Berry Avenue Park Road, Duntroon Avenue and Holdsworth Avenue.

As residents of Duntroon Avenue, we look over a narrow road that is a used very heavily by traffic making its way from the Pacific Highway to River Road and vice versa. Other roads in the proposed development area are also narrow. In peak hour we already see traffic queuing up to enter River Road. River Road is bumper to bumper from Greenwich up to the intersection of Falcon Street and the Pacific Highway. And yet the findings of the most recent traffic study include these comments: -

> *Overall, this Study finds that traffic increases are very moderate for each of the development sites, especially where proposed developments are "replacing existing substantial buildings".*

We fail to understand how the proposed development i.e. 2,400 apartments plus associated commercial buildings can be viewed as "replacing existing substantial buildings"

> *Modelling indicates that "relatively minor improvements" would be required to maintain satisfactory network function as a result of all development. Furthermore, these improvements (illustrated in Figure 4 on Page 9) would "be required regardless of the approved and proposed developments subject of this report".* 12

We fail to understand how a credible traffic study concludes that the minor recommended improvements would "be required regardless of the approved and proposed developments subject of this report". By making this comment the authors suggest that the addition of 2,400 residents and the related commercial improvements in St Leonards require no additional improvements to manage traffic in the area.

Based on the information made available to us the traffic study's we believe the study is totally flawed and shows no consideration to movements in the narrow street in South St Leonards. Whilst it is clearly premised on network flow on major arterial roads, such as the Pacific Highway it completely ignores the local residents - current and proposed.

4. We object to the lack of green space and the failure of the Plan to accurately reflect actual usable green space in the area. The suggestion in the South St Leonards Master Plan that there is ample space in the area including Newlands Park, Gore Hill Over and a proposed small green space in the development is disingenuous at best.

[12] ST LEONARDS SOUTH A REPORT ON TRAFFIC IMPACTS OF LARGE-SCALE DEVELOPMENTS ON PACIFIC HIGHWAY Prepared for Lane Cove Council By O. Sannikov TEF Consulting, 21 September 2017

The plan estimates 4,800 residents will occupy the area. As it stands Newlands Park is already heavily used by the local community. The landscape of the park, having steep slopes on Duntroon Avenue and River Road means that usable space within the park is significantly less than its overall area.

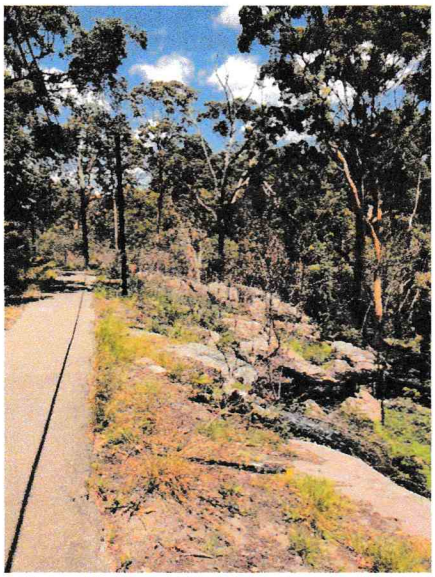
The proposed additional public green space indicated in the Overall Precinct Vision is not significant in area. Stage 1 Gore Hill Park includes: -

- Re-aligning the existing oval and installing a synthetic playing surface with cricket wicket
- The construction of a regional playground, associated outdoor ball courts and outdoor gym
- The construction of a perimeter walking track[13]

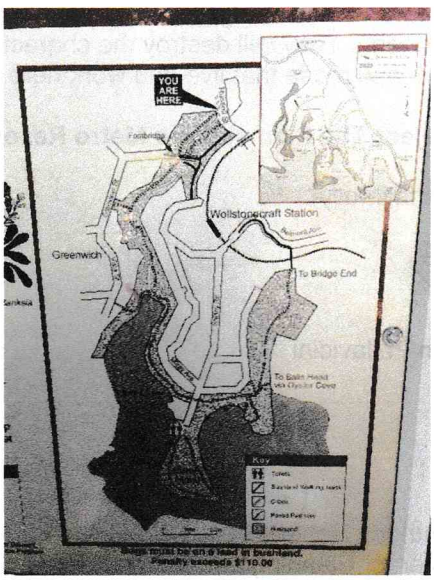
It is, and will remain, primarily a sporting oval for team sports. Outdoor gym equipment previously existed. Whilst these are valuable improvements, they are incremental at best. It is very likely the redevelopment of the oval will solely benefit organised sporting teams. Whilst this is commended it does not provide additional amenity and green space for 4,800 resident's use plus anticipated resident numbers from developments already approved in the St Leonards area.

Stage 2 is reported to include a multi-purpose indoor centre funded by a Voluntary Planning Agreement associated with the development of the nearby Gore Hill Technology Park[14]. Absent any guarantee Stage 2 will proceed we are highly sceptical that it will materialise, or if it does that agreement with any developer will realise facilities as currently suggested.

The Master Plan suggests residents will have access to Smoothey Park. Again, it is disingenuous of any level of government, planning authority or consultant to suggest this is fully useable green space. As lovely as Smoothey Park is, it is a bush corridor – no more, no less.



Smoothey Park – where is the usable space in this bush corridor?



Signage clearly indicating Smoothey park is Bushland

In summary, we do not accept the useable green space and proposed facilities are anywhere near adequate for the proposed number of residents. Considering the proposal is for medium and high-density apartment living the minimal amount of green space will likely lead to over use / overcrowding. That is not in the public interest.

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[13] http://www.willoughby.nsw.gov.au/about-council/media-releases/2017-media-releases/construction-begins-on-gore-hill-park-redevelopment/

[14] Construction begins on Gore Hill Redevelopment. Retrieved from https://www.haveyoursaywilloughby.com.au/GoreHillPark

7. Our Vision for South St Leonards

Prior to moving to St Leonards, we recall viewing documents suggesting the development would be medium-rise up toward the Pacific Highway, tapering to low-rise toward Greenwich Road. We believe this, in conjunction with improved infrastructure, amenity, useable green space and appropriate traffic management that considers local roads (not just RMS arterial Roads) should be the **starting point** for a proper consultation with the community.

That consultation should give no weight to submissions on the part of those who have or seek to speculate and profit at the expense of the community. On numerous occasions we have been told there is support for the South St Leonards over-development. We assume that support emanates from home owners that have sold to the developers and the developers themselves. We understand many current home owners in the development area have sold to developers for sums totalling several hundred million dollars. We understand some want the development area extended.

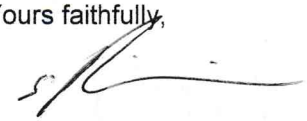
These groups have a vested interest in seeing it proceed in its proposed form. Developers and residents who sell their houses are unlikely live in the area post development. As such their interests should not override community interest. Developers that speculate prior to completion of planning and rezoning do so at their own risk. If planned profits on speculative development activity fails to materialise that is at the developers own risk. Residents that lobby for further development so they can make huge profits do not represent community interest.

Final Comments

We conclude our submission be stating that we consider Draft St Leonards and Crows Nest Plan and Metro rezoning proposal are overdevelopment disasters just waiting to happen. They are ill-considered plans being forced upon us by the NSW Government, the DPE, Sydney Metro and greedy developers. They will destroy the character of the area that we live in and materially degrade quality of life for all those that live and work here.

We reject The Plan and the Metro Rezoning proposal!

Yours faithfully,



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