

17 Mitchell Street
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**Submission to the NSW Department of Planning and Environment
St Leonards and Crows Nest 2036
Crows Nest Sydney Metro Site Re-zoning
Due date for submissions 3/12/2018**

**Confusion in due dates for submissions
Request for Submissions made to and including 13/12 to be accepted and considered by the
Department of Planning**

In making this submission, I wish to register my concern that the Department of Planning has failed to adequately publicise the deadline for submissions on this re-zoning proposal. It has failed to make clear to the community that the re-zoning proposal and the Concept State Significant Development application are two separate proposals, with submission dates that are different but look remarkably similar – 3/12 and 13/12 respectively.

I note that the Community Overview publication for the Crows Nest Metro makes absolutely no reference to the re-zoning proposal or the need to make submissions in respect of it. This is not a true summary of the approval process, omitting reference to what is a vital initial stage.

<file:///C:/Users/south/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/9333TLCQ/Crows%20Nest%20OSD%20community%20overview%20booklet.pdf>

Furthermore, the submission information included on p 28 of the Overview refers to the need to make a submission to the NSW Department of Planning and Environment. Given that the submissions on the re-zoning proposal are to be submitted to the same authority, it is not unreasonable that community members would assume that the 13/12 deadline is the only deadline that they must meet.

Your submission must reach the NSW Department of Planning and Environment by 13 December 2018 and must include:

1. Your name and address
2. The name of your application
3. The application number that your submission is relevant to - SSD 18_9579
4. A brief statement on whether you support or object to the proposal
5. The reasons why you support or object to the proposal.

Many community members have received email reminders about the 13/12 deadline, with, again, no reference to the re-zoning deadline of 3/12.

N

I am aware that the attention of the Minister and the Department has been drawn to this confusing situation but I am unable to see that action has been taken in respect of this.

In the light of the above, submissions in respect of the re-zoning should be accepted up to and including 13/12 and duly considered by the Department. This advice should be published on the Department of Planning website.

I have the following specific objections to the re-zoning proposal:-

Objection 1

Proposed Development of Site(s) inconsistent with the Greater Sydney Commission objectives for the St Leonards and Crows Nest Strategic Centre and the three of four objectives in Sydney Metro's own Community Overview.

The GSC's North District Plan <https://gsc-public-1.s3-ap-southeast-2.amazonaws.com/north-district-plan-0318.pdf> p 65 lists the actions to be taken to enhance the St Leonards precinct as a Strategic Centre.

Actions	Responsibility
34. Strengthen St Leonards through approaches that: a. leverage the new Sydney Metro Station at Crows Nest to deliver additional employment capacity b. grow jobs in the centre c. reduce the impact of vehicle movements on pedestrian and cyclist accessibility d. protect and enhance Willoughby Road's village character and retail/restaurant strip e. deliver new high quality open space, upgrade public areas, and establish collaborative place-making initiatives f. promote synergies between the Royal North Shore Hospital and other health and education related activities, in partnership with NSW Health g. retain and manage the adjoining industrial zoned land for a range of urban services.	NSW Department of Planning and Environment, State agencies, Greater Sydney Commission, NSW Health, Lane Cove Council, North Sydney Council and Willoughby City Council

The first two items on the list relate to employment.

Even the Sydney Metro's own Community Overview (p 3) states that "*Crows Nest Station has been identified as a prime location for an integrated station development to strengthen the Crows Nest–St Leonards precinct as a strategic centre for **jobs, homes, education and health** in Sydney's north.*"

The development proposed is overwhelmingly residential. It is possible that even the "hotel" will be converted to apartments, if the jobs do not come.

It is inappropriate for a NSW government authority to join the throng of developers who build apartment blocks rather than taking a leading role in fostering the government's stated objective of delivering additional employment capacity and growing jobs in the centre. This can best be achieved by the development of quality commercial space over the station, not apartments.

N

Objection 2

Current infrastructure in the St Leonards and Crows Nest area is not adequate for residential population expected in developments already under construction or approved in the precinct. Infrastructure in urban renewal areas is likely to be inadequate relative to demand. NSW government authority should ameliorate, not exacerbate this pressure.

The Community Statement (p 8) describes the local community as *"the focal point in planning, designing and managing the public spaces within the Crows Nest integrated station development. Sydney Metro will continue to work closely with the community on how best to deliver precincts that are thriving, welcoming hubs for everyone to enjoy"*. It also tells us that *"(l)ocals will have access to shops, restaurants and commercial office space on their doorstep, as well as the potential for a new hotel"*.

We are unclear which locals the Statement is talking about. The Department of Planning's own Character Statement states that *"the population profile of the future is expected to see more children, diverse family types and an ageing population"*. A residential community like this, as opposed to a business community, needs open spaces and green spaces for active and passive recreation and sunlight. The Department of Planning's reports, including the Arup report for the Interim Statement for the St Leonards and Crows Nest Station Precinct, acknowledge that this infrastructure is already lacking. The proposed development does not address how it will supplement this existing poor infrastructure with an increased residential population.

Furthermore, the scale of the development will diminish the amenity of public spaces beyond the development with its overshadowing and solar access impacts.

Objection 3

The scale of the development is inconsistent with the objectives of the draft St Leonards and Crows Nest 2036 plan to enhance the village atmosphere of Willoughby Road.

The Department of Planning's draft Local Character Statement acknowledges the village atmosphere and the need to *"(p)rotect (the) look and feel of Willoughby Road"*.
<https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/st-leonards-and-crows-nest/st-leonards-and-crows-draft-local-character-statement-2018-10-19.ashx> p 9

It is noted that these objectives have been not been incorporated into the Community Overview. The overview does not seek to establish how these objectives are reflected in Sydney Metro's proposal or why they do not need to be.

It is, again, disappointing that Sydney Metro appears to operate without regard to the detailed community engagement that has been a feature of the planning process to date.

I ask the Department to reject this re-zoning proposal and require Sydney Metro to return with a proposal that reflects the good faith that the community has invested in the St Leonards and Crows Nest planning process to date.



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