



Greenwich Community Association Inc

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

St Leonards and Crows Nest Draft Green Plan
Submission by Greenwich Community Association Inc
Final date for submissions 8 February 2019

Status of Greenwich Community Association Inc

The Greenwich Community Association (GCA) is a non-profit incorporated community association dedicated to gathering and promoting the views and interests of the residents of Greenwich. It was established over 70 years ago and has extensive experience in the planning issues affecting the community – see our website: <http://www.greenwich.org.au/>

Overview

An extract from the Arup Report – A Liveability Framework for Sydney 2017 – prepared for the Greater Sydney Commission (GSC) - sets the tone of this submission.

“there are concerns that many of these ‘liveability assets’ (open space etc, Ed) are not distributed equitably and that Sydney’s population growth (anticipated to increase by 1.7 million people over the next 20 years²) will put further pressure on quality of life and the social infrastructure that underpins this”

The current supply and quality of open green space in the St Leonards Crows Nest 2036 Precinct is of major concern to the GCA and, without revision, will impact materially on the wellbeing and welfare of existing and future residents in the area.

The ratio of quality open space to people is forecast to deteriorate rapidly as many of the proposed increases in green space to offset population densification are either low quality, (pocket parks, linear parks, over rail plazas etc), or for green spaces for which there is no assured funding plan. Ambitious Special Infrastructure Contributions may not be realised and land acquisition for open space may not be finalised.

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The Draft Green Plan (the Plan) fails to respond to two key underpinning documents:-

Draft Local Character Statement

The GCA has made a separate submission in respect of the draft Local Character Statement, seeking more extensive and targeted community consultation with a view to informing a revised Statement.

In terms of the current Statement, it is noted that there is extensive community concern at the lack of green open spaces appropriate for a mix of active and passive recreation.

The Plan has not addressed this concern, nor has it been reflected in the 2036 Draft Plan.

GSC parameters

The Plan needs to be assessed against the GSC's parameters for Open space of Quality, Quantity and Diversity (GSC Web Site). Refer **Attachment A** graphic.

Also, for consideration, is the pre-amble on the Department's web site regarding the Plan for St Leonards Crows Nest 2036 and how it relates to the issues and objectives raised by the GSC and the draft Local Character Statement.

"What does the draft Green Plan for St Leonards and Crows Nest include?"

*The draft Green Plan has been prepared to guide the planning and design of open space and tree canopy across the St Leonards and Crows Nest study area. **The Green Plan is guided by the Greater Sydney Commission's ten key directions to establish principles that respond to the draft Local Character Statement.** Key recommendations include:*

- *Expand Hume Street Park to create a true 'village green' in the heart of the area;*
- *Expand an existing pocket park along Lithgow Street;*
- *Introduce setbacks on the sunny side of Oxley, Mitchell and Chandos Streets to provide space for more trees;*
- *Require setbacks for avenue tree planting in front of new buildings along Pacific Highway;*
- *Retain and enhance street trees on Willoughby Road; and,*
- *Establish new green links south towards Berry Island and Greenwich Point Reserve and north towards Tunks Park.*

For the sake of completeness, it is informative to set out the GSC's "**10 key directions**" referred to by the Department to see how these must guide the Plan:

1. A city supported by Infrastructure
2. A city for people
3. Housing the City
4. A city of great places
5. Jobs and skills for the city
6. A connected city
7. **A city in its landscape**
8. An efficient city
9. A resilient city
10. A collaborative city.

Source : GSC Web site

In respect of the Plan, the only relevant direction is “7. A city in its landscape”.

The North District Plan establishes the following Planning Priorities for “A city in its landscape”:

N15. Protecting and improving the health and enjoyment of Sydney Harbour and the District’s waterways

N16. Protecting and enhancing bushland and biodiversity

N17. Protecting and enhancing scenic and cultural landscapes

N18. Better managing rural areas

N19. Increasing urban tree canopy cover and delivering Green Grid connections

N20. Delivering high quality open space

N21. Reducing carbon emissions and managing energy, water and waste efficiently

N22. Adapting to the impacts of urban and natural hazards and climate change.

Source :5 Sustainability

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Greater Sydney Commission | North District Plan

In respect of St Leonards Crows Nest the key relevant Planning Priorities are:

- N19. Increasing urban tree canopy cover and delivering Green Grid connections
- N20. Delivering high quality open space

The GCA supports both these objectives.

Our specific comments on each in terms of the Plan follow.

N 19 Urban tree Canopy

The Plan is detailed in respect of tree canopy cover, noting that it is a high priority for residents. The success of the Plan will be an % increase of canopy cover in the precinct area. Increasing tree canopy should not be hard to execute apart from requiring well informed engineers, horticulturists and arborists, sympathetic local councils and strict DA approval conditions.

N 20 Delivering high quality open space

The GCA questions the effectiveness of the Plan to address “delivering high quality open space” needs of all residents, without severely impacting the amenity of existing residents and those in adjacent areas – particularly Greenwich.

The GSC makes the following observation in respect of the North District Plan:

“Active open space is in high demand across the District, with limited opportunity to provide additional capacity in response to population growth. Utilisation rates are high. with some sporting clubs unable to access fields as needed, and providers such as local councils finding it difficult to fund upkeep and maintenance. A trend towards greater participation in sport by women and people aged over 35 is beginning to appear, as well

as a trend towards indoor sports, and sports requiring less space such as futsal, changing patterns of demand for sports fields and facilities.

*The Northern Sydney Regional Organisation of Councils' (NSROC) Regional Sportsground Management Strategy (2011) aims to improve coordination of sportsground management across the region and is in the process of being reviewed. Future open space planning relies on collaboration and innovative re-use of shared spaces **in response to the rising demand for active open space.*** (Ed: Underlining and bold)

The GCA's position is further reinforced in the **Actions and Responsibilities Table at page 114 of the North District Plan** where, inter alia, is noted a key requirement of green space planning:

c. requiring large urban renewal initiatives to demonstrate how the quantity of, or access to, high quality and diverse local open space is maintained or improved

Submission

GCA **objects to the Plan** in that it fails to achieve the GSC objective of an urban renewal plan objectively demonstrating how the quantity of, or access to high quality and diverse local open space will be maintained or improved. The reasons for this are detailed below:

Objection 1 – No Benchmarking

The GSC – refer to **Attachment A** - refers to Land Area percentage and Land area per capita green open space. This is a key metric for discussion, but it gets little attention in the Plan– and no benchmarking.

The Plan, therefore, does not address the GSC per capita test adequately.

No benchmarks are given, yet they appear well established globally as one means of assessing adequacy of open space. The literature is extensive on the topic and it is disappointing that there is no reference to the default DPE ratio mentioned below. (We note that consultants on other precinct projects discuss the hectare to population ratio in detail).

Examples include:

Department of Planning – 2.83 ha per 1,000

Lane Cove Council – LGA 1.86 ha per 1,000 – GLN Planning Pty Ltd

Greenwich -East Ward – 2.9ha per 1,000 – est – Author

Britain – 2.43 ha per 1,000 (Fields in Trust)

USA – 4 ha per 1,000 (National Recreation and Parks)

It is noted that in NSW many densification and urban renewal projects have fallen pathetically short of these with the Forum, St Leonards only allowing 0.194 ha per 1,000 residents by way of the open

terrace and cafes etc. before overflow usage and Sydneygate, Waterloo 0.07 ha per 1,000 residents (source NSW Dept of Planning – Kellyville Precinct Open Space and Community Facilities report)

Importantly, the Plan is misleading in deriving per capita ratios calculations.

p. 21 shows:

Existing Population	15,591	Proposed Population	26,400
Existing Open Space	21 ha	Proposed Open Space	29.57ha
Open Space ratio per 1,000 residents	1.34 ha	Open Space ratio per 1,000 residents	1.12ha

This is misleading as it includes, in the existing open space total, **8.31 ha of open space that is up to 200 metres outside the precinct boundary**. It does not, however, include in its calculations the population total for residents within this 200m perimeter catchment area beyond the precinct boundary.

Recasting the numbers by deducting 8.31 ha to obtain an “apples to apples” comparison reveals the following:

Existing Population	15,591	Proposed Population	26,400
Existing Open Space	12.69 ha	Proposed Open Space	21.26 ha
Open Space ratio per 1,000 residents	0.81 ha	Open Space ratio per 1,000 residents	0.80 ha

Objection 2 - Quality of open space

The additional 8.57 ha in open space comprises no substantive quality open space to address many of the key needs of a growing population, in particular passive green open space for picnics, playing and resting.

The spaces identified as **new open space** in the Plan and our comments are as follows:

Previously Proposed New Open Space

Address	Area ha	Comments
St Leonards South precinct		
16-24 Park Rd	0.17	Subject to planning proposal
19-25 Berry Rd	0.17	Subject to planning proposal
13 Holdsworth	0.11	Subject to planning proposal
18 Holdsworth	0.12	Subject to planning proposal
10-12 Marshall Ave	0.15	Subject to planning proposal
2-8 Marshall	0.44	Query availability??
30-32 Berry Rd	0.07	Subject to planning proposal
29-31 Holdsworth Ave	0.06	Subject to planning proposal
27 Holdsworth	0.05	Subject to planning proposal
33 Canberra	0.04	Subject to planning proposal

Sub-total – St Leonards South	1.38 ha	Represents 0.2875 ha per 1,000 people for SLS forecast pop of 4,800
Mitchell St Linear Park	0.20	Small
Oxley St Linear Park	0.07	Small
Oxley St Linear Park	0.04	Small
Oxley St Linear Park	0.07	Small
St Leonards plaza West	0.30	Not yet agreed with TfNSW
101-111 Willoughby Rd	0.05	Small
Hume St Park Extension	0.79	Already planned by NSC
Ernest St /Alexander St	0.07	
Holterman St/Hospital In	0.16	
Willoughby Rd Sth	0.17	
Friedlander Pl	0.15	
Sub Total – Outside St Leonards already proposed	2.07	
Total Already Proposed open space St Leonards and Crows Nest	3.45 ha	Note discrepancy to additions

New Proposed Open Space

Address	Hectares	Comments
St Leonards Central	0.38	
Platform park	0.91	Not quality open space
Linear parks		
Hotham Pde 20-96	0.48	
Clarendon St	0.45	
Herbert St	1.04	Close to station – no parking
Westbourne St	0.26	
Lithgow St	0.44	Not readily accessible. Parking difficult
Green Rooftop		
2-4 Herbert St	1.40	Early days of planning
Total New Proposed	5.36 ha	Note discrepancy to additions

Total New Open space 8.81 ha

Comments

This lack of guaranteed quality open space is reinforced in Section 7 Conclusion of the Plan that notes approximately half of this new space comes from the utilisation of road reserves and air space over the rail corridor.

It is also noted that the St Leonards South Planning proposal by LCC is subject to an Independent Planning Commission review. On this basis and, given over whelming resident protest, any inclusion of SLS “open space” in calculations must be regarded as conditional as best, and unlikely at worst.

Objection 3 – Implicit Overflow to Neighbouring Areas’ Green open space

The Plan does not provide sufficient analysis of quality broad acre green open space requirements for the forecast increased population for both organised leisure activities or passive green space activities.

The North District Plan notes that most sports grounds are at full capacity. Gore Hill oval is undergoing re-development but its focus – with a synthetic turf surface - will be very much oriented towards organised sport rather than passive recreation on natural surfaces.

Elsewhere there are no ovals of any meaningful size in the precinct.

The only conclusion is that surrounding areas outside the precinct will be asked to cater for the overflow caused by densification.

This outcome flies directly in the face of the GSC’s “Liveability” goals and is not acceptable to the GCA, where Greenwich residents will only see concentration of usage of their open space assets as a consequence of the population densification plans of St Leonards Crows Nest.

Objection 4 – Solar access

The Plan does not adequately address impacts of new and ongoing high rise development along Pacific Highway on solar access to the various new open space areas.

Objection 5 – Infrastructure Funding via Special Infrastructure Contribution (SIC)

The GCA has made a separate submission regarding the SIC.

In the SIC plan the following open spaces were identified for funding:

North Linear Park land (only Ed) acquisition	\$28,058,000
South Linear Park	\$1,701,000
Hume St Park expansion	\$25,900,000
Gore Hill regional hill playground	\$2,000,000
Total	\$57,659,000

The Draft SIC Plan (page 5) says it is predicated on all dwellings not yet DA approved or under construction being required to bear a \$15,100 per dwelling levy.

Yet at the final page (14) of that Plan is a “developer escape clause” which states that, where a planning proposal is lodged and the SIC charge has not been determined by the Minister, satisfactory arrangements will be made for the provision of State Infrastructure.

Currently there are 4,294 dwellings subject to a planning approval with no DA approved. Refer **Attachment B**. This “escape clause means none of these may have to pay a SIC.

If these are excluded, as indicated above, it leaves the forecast new dwelling total to Yr 2036 of 7,525 less 4,294 = 3,231 dwellings from which to raise the proposed SIC total of \$113.6m - or \$35k per dwelling. This is hardly achievable on top of Section 7.11 contributions, let alone VPAs.

Existing residents have paid taxes to develop and maintain existing open space. New residents' dwellings should also pay – via the SIC and Section 7.11 contributions - to ensure that existing amenity levels are maintained.

Conclusion

The Plan in its conclusion 7.0 p. 46 states:

"The Green Plan has determined that the existing public open space provision needs to be increased however there is limited available space to achieve this".

This conclusion buttresses against the GSC's goals of liveability requiring adequate land per capita ratios and the shortage of sporting space referenced in the North District plan.

The Plan's conclusion is also highly circumspect in referring to the planning recommendations as "aspirational" and to be used as a guide for the provision of open space over time. It goes on to suggest the need for ongoing negotiations for land acquisition and the SIC to achieve this.

This is totally unsatisfactory as it provides no assurances that any open space target will be achieved.

Against all reasonable open space ratio benchmarks of adjoining areas and the Dept of Planning's own green space ratio of 2.83 ha per 1,000, the open space ratio resulting in the area is wholly inadequate and has implications for neighbouring areas (Greenwich, Wollstonecraft, Waverton, Cammeray, Naremburn etc), to absorb the green space usage shortfall created by the Plan.

Accordingly, we call upon the Department of Planning to cancel the Plan in respect of its open space considerations to:

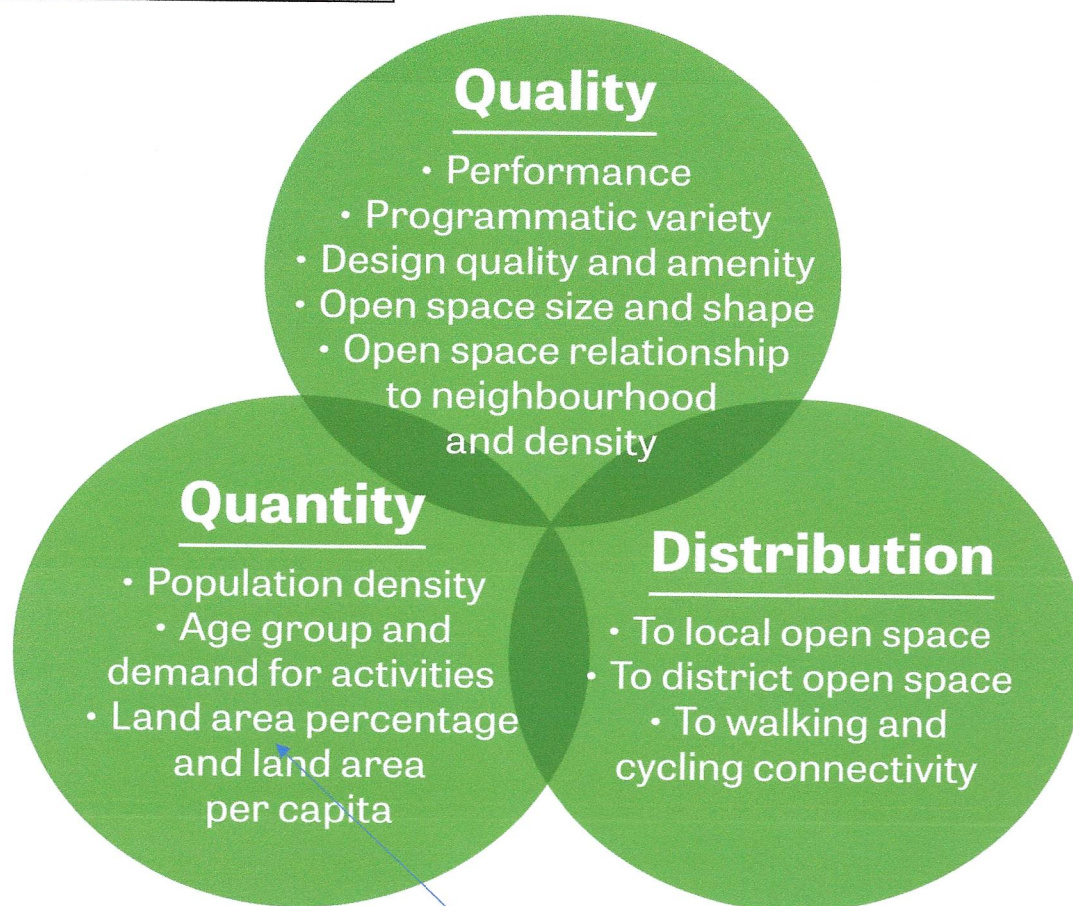
- collaborate and consult with the community as to what is an acceptable hectare to population ratio for open space
- collaborate and consult with the community on where it wants to see quality, accessible open space located
- ensure that plans for new quality open space to accommodate increased population levels maintain the amenity and accessibility current residents enjoy
- to have clear funding sources and commitment in place for all infrastructure before progressing the overall St Leonards Crows Nest 2036 plan
- to not exempt any non- DA approved planning proposal from liability to pay a fair SIC to maintain open space ratios.



Merri Southwood
President
Greenwich Community Association Inc
southwood@bigpond.com
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Attachment A – Green Open Space

Greater Sydney Commission
Parameters



Source: Greater Sydney Commission

This a key factor – not addressed by the Department of Planning or benchmarked.

Attachment B

SIC Calculations – Dwellings Presently subject to Planning Proposals

2,400	St Leonards Sth – subject to Independent Planning Commission review, resident opposition etc
654	88 Christie St – <u>JQZ whose DA was only approved on 28 November 2018</u>
500	601 Pacific Highway – “IBM building” – subject of a Planning Proposal
245	100 Christie St – subject to a Planning Proposal –
<u>195</u>	617 – 621 Pacific highway – Kwik Kopy building – subject to a Planning Proposal
3,944	Total

Developments identified, not DA approved, and not Subject to SIC

350	Metro Over Station Development Proposal – subject to review and scale strongly opposed by residents
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This leaves $7,525 - 3944 - 350 = 3,231$ dwellings to meet the SIC target of \$113.6m.

It is not clear anywhere in the plan how this will be achieved or where these dwellings will be located – even in the unlikely event of the Planning Proposal for St Leonards South being approved in its entirety