

St Leonards and Crows Nest 2036 Draft Plans

29 January, 2019

Department of Planning and Environment
GPO Box 39, SYDNEY, NSW, 2001

Attention: Department of Planning and Environment
Attention: Director - Key Sites Assessments
Attention: Director, Sydney Central Urban Renewal

Submission for The St Leonards and Crows Nest 2036 Draft Plans

St Leonards and Crows Nest 2036 Draft Plans

This submission is made to the NSW Department of Planning and Environment ('DP&E').

This submission will cover the St Leonards and Crows Nest Draft 2036 Plans, Draft Green Plan, Draft Local Character statement (the guiding principles of Place, Landscape, Built Form, Land Use and Movement), Draft Special Infrastructure Contribution Scheme, Crows Nest Metro Rezoning and Crows Nest Over Station Development.

GSL Action Group writes in relation to the 6 separate Draft Plans for the St Leonards and Crows Nest Draft 2036 Plans ('Draft 2036 Plans') and the inter play with Lane Cove Council's St Leonards South Rezoning Master Plan ('Council Rezoning Plan').

As well GSL Action provides detailed comments and raises concerns relating to St Leonards, Greenwich and Crows Nest areas. GSL Action Group **objects** to the St Leonards and Crows Nest Draft 2036 Plans, Draft Green Plan, Draft Local Character statement (the guiding principles of Place, Landscape, Built Form, Land Use and Movement), Draft Special Infrastructure Contribution Scheme, Crows Nest Metro Rezoning and Crows Nest Over Station Development.

Representation

This report is prepared on behalf of the Greenwich / St Leonards Action Group, a community based resident group in the St Leonards area.

GSL Action Group has been actively representing the views of the St Leonards and Greenwich area for many years. GSL Action Group strives, in a variety of ways, to ensure the quality of life in our community does not deteriorate from inappropriate planning, super arching guidelines flawed decisions that compromise the area and unsustainable development.

This submission reflects the views of countless residents in the community and should be afforded due consideration.

The Draft 2036 Plans and Planning Fundamentals

The Draft 2036 Plans have presented an overall picture with useful studies with regard to the strategic planning framework. This is the first time an attempt such as this has been undertaken. The Draft 2036 Plans have merit and provide detailed analysis of the direction that the DP&E intends to pursue for the next 20 years.

The Draft 2036 Plans while are welcomed need to be revised as these fail to provide appropriate outcomes that are interconnected with the current conditions for the area. St Leonards has already undergone major changes and upheaval stemming back to 2016 taking on excessive high density and accommodating Lane Cove Council high density plans. It is almost too late for the St Leonards area in the Lane Cove LGA to enjoy any of the planning outcomes and benefits that the Draft 2036 Plans may bring.

The emphasis in the Draft 2036 Plans seems to be directed in a relatively small part in the precinct with clustering high density rather than looking at the entire surrounding LGAs to realise a better result for the community. There are missed opportunities to achieve a better outcome for St Leonards and Crows Nest as the Draft 2036 Plans have incorrect interpretations and conclusions of the area's requirements and constraints.

St Leonards and Crows Nest 2036 Draft Plans

In some cases the Draft 2036 Plans become echoes of previous segmented notions already presented by Lane Cove Council, especially for St Leonards South Rezoning Plan. It is surprising that the appropriateness of Lane Cove Council Rezoning plan is not questioned even in light of these Draft 2036 Plans.

The Draft 2036 Plans and in turn Lane Cove Council do not accurately consider the cumulative impact on Greenwich, St Leonards, Crows Nest, Wollstonecraft, Cammeray and Lane Cove failing to take any account of the impact of total developments in these areas.

Some of the guiding principles set in the Draft 2036 Plans are breached for St Leonards and the St Leonards South Rezoning. It is surprising that the St Leonards South Council Rezoning Plan was provided airplay with its shortfalls, myopic outlook and breaches of every guiding principle set; even with failing aspirations of the Draft 2036 Plans for Local Character, Place, Landscape, Land Use, Movement and Built Form.

It is not clear how Lane Cove Council's St Leonards South Rezoning Plan could fit with the Draft 2036 Plans especially when the two plans contradict each other at each step. For example, Lane Cove Council is pushing its own scheme in order to increase the residential floor space in St Leonards which reduces the amount of commercial space available; this contradicts the Draft 2036 Plans. Also Lane Cove Council intends to rezone St Leonards South into high rise residential area which contradicts the Draft 2036 Plans for diverse housing mix. Moreover, Council Rezoning Plan in St Leonards South will lead to high density residential towers which are not in context with the area of St Leonards Suburb and are not supported by current infrastructure, services, facilities and open space.

Guiding principles – Local Character and Place

St Leonards and Crows Nest currently enjoy a village atmosphere and local character that is unsurpassed. This is changing due to the increased density and Lane Cove Council plans. For a considerable amount of time St Leonards has been losing its village like atmosphere and slowly eroding its sense of community due to the high density that has been introduced so far.

The Draft 2036 Plans (and the St Leonards South Rezoning Council Plan) will not be able to enhance or retain the village atmosphere around St Leonards or Crows Nest as there are no immediate plans to do so. The Draft 2036 Plans should have upfront and a better approach at strengthening the current village atmosphere because it will diminish with the proposed density. If this is lost then it will be lost forever and cannot be regained.

At a high level, the Draft 2036 Plans fail on a number of fronts including Place and Local Character since these do not take a comprehensive view of Lane Cove LGA.

It is important to note that Lane Cove Council assessment reports fail to take any account of the impact of further developments that is still ongoing in the area. Yet the Draft 2036 Plans follow Councils plans without any exploration of the facts on St Leonards South rezoning plan.

If good planning practices were adopted, then the Draft 2036 Plans would include assessment of external factors that will have a bearing on the proposed St Leonards South Council Plan Rezoning. Lane Cove Council advisers (shadow, traffic etc.) appear to have rushed (or curtailed) their assessment or were not allocated sufficient time (or had limited scope) to provide a comprehensive accurate assessment of the impact of the proposed rezoning since almost all the assessment reports fail to address obvious shortcomings. We recommend that the Draft 2036

St Leonards and Crows Nest 2036 Draft Plans

Plans investigate these matters more carefully before including St Leonards South Council Rezoning Plan.

Furthermore the extension of the St Leonards South rezoning boundary from East of Berry Road to the East of Park Road (i.e. extended by one street) was approved against the advice of Council Officers (Council meeting on the 13 July 2015). This is further justification that the St Leonards South rezoning as presented should be rejected on principle due to the lack of any real sound assessment/justification and should be rejected on merit as it will provide a worse outcome for the area.

Tourism and Heritage aspects have been down played. The Draft 2036 Plans do not appear to set targets for increasing tourism or maintaining heritage aspects in the area. As a minimum, Lane Cove National Park should be given a tourism priority area to encourage tourists driving some 10 km from the CBD to access a national park. As well, the heritage aspects of the area should be considered as a priority in order to enhance the tourism appeal. The Draft 2036 Plans should clearly have elements to protect any heritage aspects of the area to further encourage tourism as a priority (e.g. heritage of some houses and buildings).

Guiding Principle - Built Form

The Draft 2036 Plans do not offer a genuine detailed view on the cumulative impact of reduced infrastructure and services from the additional developments that have been progressing for some time in the area. The clustering of inappropriate developments in the precinct shadows open space, green space and the public domain. The Draft 2036 Plans should quickly investigate the bulk and scale of the already approved high density residential towers in the area which have considerable shadow before embarking on their plans.

Moreover, steep South facing landscape which is the natural topography in St Leonards South is NOT an ideal area for rezoning to such a high density scale. The South sloping nature of the St Leonards precinct makes any large scale development in the area unattainable. The diagrams provided in Appendix 1 are sourced from Council's shadow report and demonstrate the extent of the overshadowing by the blue/dark shading cast on the entire precinct, including on the proposed green space virtually every hour of the day (refer Appendix 1). Hence no vegetation is expected to grow as a good amount of direct sunlight is required.

These overshadowed areas will remain cold and inhospitable. It is important to also note that Council shadow diagrams, as presented for the Rezoning plans, were not based on incentive heights and taller buildings through the Voluntary Planning Agreements (VPAs). So the diagrams do not accurately portray the extent of shadowing and shadowing in reality will be worst. These high towers will also be shading and self-shading each other and this has been ignored in any analysis.

The community has already stated that the preference is for low rise buildings. Gradual sensitive transitions are Not provided in the Lane Cove Council area or the Draft 2036 Plan with high rise of up to 50 storeys overlooking low-rise areas. This is not acceptable for St Leonards or for Crows Nest. Keep in mind that most of the high density developments do not achieve minimum sunlight as stipulated under SEPP 65 and such most residents will have to escape their units seeking outdoor relief in the sunlight.

The Draft 2036 Plans for housing calls for a variety of housing mix and diverse housing types, yet the Draft 2036 Plans provide the same oversized and enormous high density towers and do not take into account that there is a considerable demand for single dwelling houses. Core Logic

St Leonards and Crows Nest 2036 Draft Plans

statistics shows demand for “Houses” is greater than for “Units”. The Council Rezoning Plan also focusses on achieving an increase in high density residential targets rather than ensuring diverse range of housing and setting quality levels.

Developers tend to favour studio and single bedroom units in high towers but when considering any population increase then there will be the need for larger family oriented units (i.e. 2, 3 and 4 bedrooms) and hence there might be a need to mandate the mix of units in order to cater for future requirements. The population in the area is not made out predominantly of single 20 something residents who do not have any children or a car but there is a mix of other residents that are families with children.

The Council plan for St Leonards South Rezoning does not maintain single dwelling houses where possible but rather aims to achieve targets to demolish homes to make way for high density residential towers. Certainly a priority to infill vacant sites around highways, train stations etc. will be easier to deal with rather than demolishing established houses. Overcrowding high rise residential buildings into suburban neighbourhoods in St Leonards does not make a “good plan” but runs into a danger of being hollow and inappropriate.

A shortfall of the Draft 2036 Plans is the lack of infrastructure and services that supports the additional population and aligns with forecast growth. These Draft 2036 Plans do not distinguish the actual capacity levels applicable for different areas. That is, an already concentrated and congested area will have less capability to accommodate more than its share of an increase in density. While a less densely populated area will have a better opportunity and better capacity to cater for a population increase.

Let us consider an area such as Roseville (one stop past Chatswood) which is more capable of catering for an increase in density around the train station when compared to St Leonards or North Sydney which are already heavily populated; and will not cope with increased population targets. Roseville has a train station (TOD), has less density and is closer to the Chatswood - Epping line and hence better positioned for north-west travel than St Leonards.

Increasing concentration around already condensed areas will require considerable expenditure on infrastructure far greater than envisaged and will cause significant demand on services than if the increase in population was spread more evenly away from already high density areas. The 30 minutes travelling target can be measured from any 2 points and cannot be a viewpoint to justify increasing population in already densely populated areas.

The proposed Metro station in Crows Nest is expected to cater for a population influx. However, the Draft 2036 Plans do not take into consideration that the Metro station will simply just cover the over demand from the existing train line which is operating above 100% capacity (please refer to Sydney Train statistics that show capacity levels is beyond expectations) and cover the general growth in the area from the additional high density residential towers. Added to this point are the buses which have recently been pulled out of services due to the blocking of George Street in the City. As such more Crows Nest residents will use the new Metro and there will be less excess capacity for additional residents in the area.

St Leonards and Crows Nest 2036 Draft Plans

The Draft 2036 Plans should take the above points into consideration and attempt to exceed communities' expectations for services and infrastructure. Above all the Draft 2036 Plans need to state exactly and upfront the funding earmarked for the precinct. As such this is a big breach in the plans.

Guiding principles - Land Use

The associated impacts from increasing density under the Draft 2036 Plans on transport, amenity, overshadowing, services and infrastructure will be felt beyond 2036.

The predicted population increase for the North District Plan area over the 20 years to 2036 is 22% and for Greater Sydney is 36%. The predicted population increase in the St Leonards Crows Nest area over the 20 years to 2036 is almost 100% up to 26,400 people. It is astonishing that the Draft 2036 Plans did not call for an acceptable and sustainable population target for St Leonards Crows Nest. This is a failing in the Draft 2036 Plans where the DP&E should have rejected more density for St Leonards.

Community outcomes to achieve the future needs for good-quality amenities in the local area should be a priority in any plan be it from the DP&E or Lane Cove Council. The Draft 2036 Plans suffer from shortcomings that are already affecting the area and the added impact of further high density developments as there are insufficient services, infrastructure and amenities even after considering the Special Infrastructure Contributions (SIC) contributions.

The high density residential developments are imposing and extreme with very tall and oversized buildings in St Leonards; which is certainly out of scale to the surrounding area. Yet the Draft 2036 Plans do not provide substantial guidelines to ease this burden on the locality. Residents of St Leonards, Greenwich and Crows Nest would like to see lower scale built form. As such low scale built environment should be an objective clearly marked and detailed for St Leonards. There is already an over built feel in the area and basically no space left to develop.

Lane Cove Council has permitted existing developments to breach the rules in order to fit the biggest and largest footprints in St Leonards. The Draft 2036 Plans have followed the same path. Transition and set-backs are very minimal and not generous for any of the developments in the area. This is very important requirement in order to soften the impact of high density, as such all set-backs need to be increase and multiplied by a factor of ten. There is no evidence of the needed transition in the plans.

Employment opportunities are quickly disappearing in the St Leonards commercial area that has been for many years precinct for medical, IT and professional business. St Leonards is also meant to be incubation for start-ups and be internationally competitive health, education, research and innovation precinct.

The Draft 2036 Plans refers to that commercial space in economic sectors targeted for success with urban services that are protected and managed, yet this becomes echoes and undertakings that are not applied in this area. St Leonards is one of the few areas in Sydney that could have a vibrant commercial centre to provide long term employment and services. However the reality and the facts is that none of this is coming to fruition. Instead all DP&E and Lane Cove Council are planning for even more residential high density under the banner of mixed development.

St Leonards and Crows Nest 2036 Draft Plans

The Draft 2036 Plans neglect to effectively set targets and dates for St Leonards to become a health and employment precinct that creates significant opportunity to drive economic activity. As such this lack of clarity might not result in well-designed Draft 2036 Plans around such principles to generate long term sustained employment.

There is also planning, economic and development uncertainty and inconsistency of objectives and outcomes in the Lane Cove Council Rezoning Plan which filters through to the Draft 2036 Plans. This is a disconnect between the St Leonards vision and the actual St Leonards Specialised Precinct as depicted by the DP&E.

The Draft 2036 Plans and the St Leonards South Rezoning Plan does not define commercial space or the types of commercial property. It is interesting how many new developments approved by Lane Cove Council simply refer to a Gym, a Coffee shop and Serviced apartments as commercial space. Surely, these do not lend themselves to a long term commercial hub nor is conducive to be offices or complex business operations which create long term employment in St Leonards.

Lane Cove Council in various reports/communiques refers to “Department of Planning” pushing to rezone the precinct especially since it is a Transit Oriented Development (TOD) area. Other than a general principle for the entire State of NSW, our investigations and analysis exposed no support for these views. In fact reports provided note that the area has low TOD value due to the steep south facing slopes which make movement very restrictive and dangerous.

Moreover, Council advisers (traffic, shadow, wind, etc.) appear to have rushed their assessment or had limited scope to provide a comprehensive assessment of the impact of the proposed St Leonards South rezoning since almost all the assessment reports fail to address obvious shortcomings and deficiencies.

Our assessment reveals that neither the Draft 2036 Plans nor Lane Cove Council adequately dealt with the current constraints in education and schooling services. Council had discussions with the Department of Education but did not present the full extent of the expected increase in the area and the wider catchment area. Hence, any acknowledgement provided by the Department of Education is out of context and is not a solution to the already over stretched system in addition to known increases in demand.

The increases in the education services currently expected in the area is aimed to accommodate the population levels expected under the Greater Sydney Commission growth targets and not the significant expansion in population planned under the Draft 2036 Plans and increases in the wider catchment area. In short, the DP&E needs a more detailed and comprehensive assessment as there is lack of quality services and schools in the area which is already above capacity levels and any potential expansion of those facilities is merely to accommodate current demand levels and small increases in population.

Guiding principle - Movement

The view in the Draft 2036 Plans is that all areas need to increase their population but the Draft 2036 Plans do not take into regard existing constraints that already prevail. For example, an area which already experiences heavy traffic congestion will not be able to cope with an increase in traffic regardless of the assumptions (such as that people will not be using their

St Leonards and Crows Nest 2036 Draft Plans

cars) because this traffic is not generated within the area but often from outside the area. Hence again, not all areas can accommodate an increase in their population because they are close to a train line.

The Draft 2036 Plans make reference to reduced car usage patterns for sites located near a train line as well as the availability of some car sharing facilities that will lead to a reduction for the need for cars (reduce the need for cars and relying more on public transport). While this view might be superficially true for working days, the same cannot be true on weekends as this view ignores the increased demand on car usage on weekends. This view also does not take into account that:

- Traffic levels increases on weekends in Sydney;
- There is a greater need for cars on the weekend, such as visiting friends who live in areas which do not have access to good transport;
- Shopping is an activity that relies heavily on car usage;
- Families that need a car seat for babies which are not immediately available in car sharing;
- Growing population implies growing size of families which require more than one car;
- Kid's sports and activities which require transport to fields outside the immediate area (Not all residents are 20 something with no children or any family to visit compared to families with a need to visit friends and relatives).

What consideration and priority is afforded in the Draft 2036 Plans to ensure that emergency services to the Royal North Shore Hospital are taken into account (i.e. as a priority)? The Draft 2036 Plans are tacit for this important issue in this area.

For example all the additional developments will add to traffic and congestion for ambulances. The Draft 2036 Plans do not really address that St Leonards is a specialised medical precinct with a priority hospital access and the requirements that should be set from the outset in these plans.

Where parking is concerned no consideration is included in the Draft 2036 Plans to parking for the commercial hub and the Royal North Shore Hospital e.g. staff, Doctors, employees and visitors as St Leonards is a specialised medical/health Precinct with Internationally competitive health, education, research and innovation precinct.

Draft Green Plan and Landscape Guideline

The Draft Green Plans have provides a better view on future Green space but falls below expectations. It fails to abide by the guidelines set for the minimum required green space and realistically achieving such aspirations. The Draft Green Plan as presented as a guide for planning and design of open space fails to provide the appropriate level for open space for St Leonards, Crows Nest and Greenwich.

The area is crying out for quality publicly accessible green expansive open space drenched in sunlight. This has been echoed repeatedly by the residents. As well given the significance of the area and high density it is an essential requirement to augment open space with the recent added population, it is important to exceed the requirement for such density in St Leonards.

St Leonards and Crows Nest 2036 Draft Plans

The St Leonards / Crows Nest precinct is not a Greenfield site (vacant/unoccupied) but has a rich history which can be traced back to the first population expansion to the North of Sydney. The area has long term residents (some houses have been passed on from one generation to the other) and old style character homes some dating back to the 1920s. The value of the current stock of character homes is further verified by the number of heritage listed homes in the area (Park Road and Anglo Road). Refer to Council heritage study which notes the significance of these homes stemming from their collective standing in the one locality.

It is not clear the extent to which the Draft 2036 Plans prioritises areas for development. The Draft 2036 Plans should pursue a real “Infill – Green Field” policy which aims to utilise vacant sites as a priority as compared to “Infill – Brown Field” demolishing existing liveable sites. It is easy to imagine that developers will rush to the easy Brown field sites compared to being guided to the Greenfield sites. In addition, this is a quicker method to add to the supply of houses (quicker to construction, less cost to demolish) and provides a real increase compared to a lower net increase (i.e. less the houses demolished).

The St Leonards precinct is currently defined as low density residential with single and two storey detached houses. However, due to the nature of the land (subdivisions prior to 1930s) all the blocks have small frontage and are small in size when compared to the average block sizes in Sydney. Hence this precinct already has higher density of population than other parts of Sydney/Lower North Shore (based on number of residents/population per hectare). Moreover, due to the small space devoted to open space in the precinct (only 1 park of any substance – Newlands Park and 3 very small pocket parks) the precinct is already over populated. Hence, while the official zoning is low density in fact upon close examination the precinct falls in the medium density range and consequently this fact highlights the high yield already extracted from this precinct.

More public open space needs to be created, funded, and delivered as a matter of urgency and upfront. The area is already well below reasonable open space guidelines, especially when considering many of the population live in apartments. Families need more open green space near the St Leonards and in Crows Nest locality to be very close, generous in size, accessible, continuous and inviting. Listing insignificant and meniscal spaces in the Draft plans to arrive at an open space number for the area is not acceptable. Deserted open space near commercial building and the foyer of the bottom of buildings is not an acceptable green space plan for St Leonards.

Also it is important to avoid calling open space an area when it is a concreted, an exclusive foyer space near a commercial building and mainly relating to retail outlets. This is a misinterpretation of a green open space that the St Leonards community would expect from the DP&E and Lane Cove Council. Connecting few dots of some small concreted overshadowed open space between commercial buildings and foyers such as that planned in the Draft 2036 Plan is insupportable and unacceptable.

The Draft 2036 Plans should not rely on concepts that are one sided but guard against unnecessary “too good of a picture” painted for St Leonards South. For example having two plazas in St Leonards does not drive success for the precinct or activation especially when the Forum plaza is near the train station, more accessible, popular and considered as a focus for St Leonards. In the interest of providing truly better amenity, investigating whether the Draft 2036 Plans will take account of the quality provisions in the area should be a major concern in these plans.

St Leonards and Crows Nest 2036 Draft Plans

There are acute Open and Outdoor Space deficiencies in the St Leonards and Crows Nest areas. It is a lost opportunity that cannot be regained by the DP&E as free space in St Leonards is quickly disappearing. There is a need for supplementary, broadened, generous green sunny open space close in proximity as the area for all.

Furthermore, in relation to open space for the St Leonards South Rezoning Council Plan, critical scrutiny of some facts reveals several inconsistencies and subsequently reiterated in the Draft 2036 Plans. We also refer to some diagrams, data and tables where Gore Hill Oval in St Leonards is presented as open space while in other sections/tables the oval is noted as a green park. This is a misrepresentation and a falsehood.

To be clear Gore Hill Oval is a sports oval and does not have any picnic areas for families or the ability to have children have fun (play) due to the nature of the venue mainly as sports activities are held on an increasing basis. As well, this Oval is undergoing alterations and a conversion to a sports facility. Hence it is not clear how this fits with the Plans. The new park proposed in Park Road, St Leonards may not eventuate if the S94 are not realised as per expectations.

The only park in the Greenwich/St Leonards area is Newlands Historical Park, noted as Newlands Reserve in the Council Rezoning Plan. By its nature this is a small park, the only park in the St Leonards area, is heavily frequented by existing residents and is already earmarked (in several of the DAs) as open space for the high density developments in Marshall Avenue, St Leonards and the four bulky developments on the Pacific Highway (including JQZ and Mirvac) in St Leonards.

It has not been highlighted well enough that Newlands Park will receive reduced amounts of sun light after these high density residential development Towers are constructed rendering it inadequate. Hence this park cannot cater for more population in the area as it is incapable of accommodating more residents. There is only so many times and ways that this open space can be double counted as open space for any current and future development in the area ("over sold") to the residents before it becomes a falsehood and a flawed argument.

The unfairness of the proposed Council Draft Rezoning Plan and carried over by the Draft 2036 Plans is even more obvious when comparing the area of St Leonards earmarked for rezoning which is only few hectares, with the very little dedicated open space (less than 5%). The Council Rezoning Plan provides even less than 1% of open space in an area with an already low open space per capita. The residents need green expansive sunny space for the community to enjoy for their activities and health.

The St Leonards South Council Plan attempts to introduce unusual and untested solutions (not tested in this context and in such large quantum) such as a shared road, roof top parks, pocket parks, private open space and walkways as open space. This is not quality open space that the community is crying out for. To complicate any assessment (and cast doubt on Council's own assessment) these solutions for open green space are counted in some areas as open space but not in other areas. For instance, Council's own maps for rezoning (refer diagram below) only show 3 new sites allocated as open green space (public recreation areas). This implies that the other areas do not meet this definition and thus should not be taken into account. Based on this account both the St Leonards South Rezoning plan and the Draft 2036 Plans do not meet the minimum adequate levels for public open space especially given that Newlands Park has already

St Leonards and Crows Nest 2036 Draft Plans

been earmarked/allocated to accommodate current high density residential developments in the area.



Liveability principles will not apply to St Leonards as depicted in the Council rezoning Plan. St Leonards is a very windy area (please refer various wind reports from Lane Cove Council which show St Leonards as one of the windiest areas in Sydney). The wind speed and gusts create various wind tunnels. Additional high density towers will increase the wind effect and intensify the wind tunnel thus reducing the use as well as usability of the open space around buildings. The open space and potential activation areas will be wind swept areas that are not user friendly and might become less useful.

The scale of the proposed development for high density in St Leonards does not promote any environmental qualities or sustainable outcomes. No guidelines are set in relation to the sustainability (i.e. green credentials) of developments / towers and long term use. Developers will be incentivised to build more units and less concerned in relation to long term energy consumption and liveability. The design of a building requiring mechanical ventilation and mechanical lighting due to poor solar access and cross ventilation will need to be compensated for by considerable amount of energy. Put differently, the long term energy requirements of a building (cost to the residents) need to be accounted in its green rating (not just water recycling).

The Draft Green Plan and the Draft 2036 Plans fail to mandate additional acceptable aggregates of green open space that would bring the level to the expected levels of 28.2ha. The suggested green space in the Draft Plans is well below any reasonable guideline. In NSW, the DP&E has used a guide of 2.83ha per 1000 population, which the Green Plan does not come close to achieving. There is a severe Lack of open space and green expansive parks in the St Leonards area.

Special Infrastructure Contribution Scheme Plan (SIC)

It appears that there has been very little (and in fact none that we could see) assessment undertaken for the proposed St Leonards South rezoning in relation to the impact/demand on essential services (electricity, Water, etc.) and infrastructure.

There is no view provided on how the infrastructure and services will be catered for and the required levels across development sites especially as the Draft 2036 Plans and St Leonards South Rezoning Plan do not offer upfront financing for the:

- Lack of essential services
- Public transport overload
- Sewerage capacity
- Water, electricity and telecoms upgrades

Assessments undertaken of the records of North Sydney Council reveal that storm water run-off from St Leonards already trigger flooding to North Sydney infrastructure. This was not assessed by Lane Cove Council when pushing the rezoning for St Leonards South.

Sewerage network capacity for St Leonards and Crows Nest was built some 50 years ago and was based on the population growth experienced at that time. Assessment based on available information reveal that the sewerage network is well above expected usage levels given the current population growth. To this end, there is a high expectation that the sewerage network will not adequately cope with the expected increase in demand. The State government has no immediate plans to increase sewerage capacity in the area and hence this will result in inadequate outcome for the area.

Also there is no consideration for the actual costs for the electricity substations (transformers) or their location to cater for the increased demand from the proposed developments. What about if there were a heat wave or cold snap and the demand increased very quickly. Would these cope? Compensating for any of this will also take away considerable portions of the green space available. It will also take a considerable amount of time to bring the services up to the required levels that the community expects. There are no clear view provided in the Draft 2036 Plans in relation to easement for water, sewage, electricity, telephones and internet sewage supply.

Some of the expert's reports in the Draft 2036 Plans provided details on the water supply, sewer pipes, electricity and telco conditions. The reports are NOT encouraging and do not paint a good picture of the efficiency of services in coping with additional demand. In fact the reports state that if the area is developed further then need to relocate some of the existing services (such as communication towers) and required additional new that need land acquisition.

There will be deficiencies and shortfalls in most of the services in this area and the cost of upgrades is prohibitive. In some cases the service provider such as Sydney Water was not able to provide information to properly assess the upgrades needed. New space or land would have to be located and provided for. Electricity and Telco are of some concern as additional supply especially in peak times, times of very hot heat waves or cold winters would put pressure on supply. As well some of the services were unable to be assessed especially for the pies that feed into the St Leonards greater area in this case then the Draft 2036 Plans would have to be upfront about this and provide detailed costings. The expert report also revealed that Electricity upgrades and feeders would be very costly to upgrade as there would be limited and expensive

St Leonards and Crows Nest 2036 Draft Plans

space. Water service would require upgrades of pipes, reservoir and more land acquisition to set up new services. These deficiencies would need further clarification and more detailed costing in the Draft 2036 Plans. Cumulatively all this will be very costly and needs additional funding, more than expected.

Infrastructure provision and timing are not aligned and there are no guidelines in relation to the link between population growth and the availability of associated infrastructure i.e. the timing of the infrastructure and services provided before or after the high density residential oversized towers are constructed in the area. That is, should schools and trains be built first then the towers constructed or should the high density residential towers come first but then residents would endure suboptimal services awaiting schools to be constructed, which could be few years down the track. The residents prefer that the infrastructure is built first.

The Draft 2036 Plans should encourage Councils to move away from Voluntary Planning Agreements (VPAs) since these tend to skew and lead to worst planning outcomes. High rise buildings and developments tend to be much bigger than required and the benefits sold to Council tend not to materialise. Put differently, how can a Council officer determine if a 30 sqm library with one window is worth an additional 10 or 50 storeys to the developer? What if the affordable housing provided is of poor quality and location that it is virtually unusable hence how many rules (setbacks, SEPP 65) can the developer break? And how many additional storeys can be built?

The Council Rezoning Plans for St Leonards South do not set principles in relation to significant rezoning proposals. Especially those with questionable VPAs which should be reviewed through a more independent body than the authority receiving the VPA cash payment. With the VPAs applied in St Leonards South the need for accountability, analysis and scrutinisation becomes essential step from the DP&E.

The planning package in the draft Plan is based on a 100% increase in population from 13,250 in 2016 to 26,400 in 2036. This is non-sustainable and well above the increase in the Greater Sydney population of 36%, and substantially above the increase in the North District plans of 22%.

The number of apartments already approved by the Lane Cove Council or Independent Panels will significantly reduce the number of apartments that will contribute to the SIC over 20 years. This is especially so if the St Leonards South project does not go ahead as planned – which it certainly should not.

The proposal in its present form provides no guarantee that money collected will be quarantined for its intended purpose, and no guarantee that it will actually be spent at all. If past experience is any guide, the funds collected will go into consolidated revenue where it will be lost in the perpetual arguments between state and local government to release funds.

Spending on major infrastructure must be made well in advance of the developments proceeding. It ignores the basic requirement that infrastructure planning needs to be done well in advance and not on ad hoc developments proposed by developers for individual sites. That is why Councils are best suited to dealing with In-Kind agreements (VPAs) for particular community issues.

Council's Own Plan

There are several issues concerning the St Leonards South Council Rezoning Plan when the spot light is directed through the Draft 2036 Plans. As such, each claim by Lane Cove Council needs to be assessed (stress tested) and not taken at face value. We question the extent to which the Council Rezoning Plan sets a requirement on such definitions as real open space and the benefits accruing to the community?

Lane Cove Council claims that their plans for St Leonards include open green space. However, upon further examinations it can be easily concluded that this open space is not accessible by the public and is not usable as the space is either small, bounded by fences, has retaining walls or at a slope. As such this space becomes redundant and useless for residents to enjoy. This space is open in name but will not have green lawn due to over shadowing in the area. Stress testing all claims made by Lane Cove Council needs to be applied and such claims should not be taken at face value.

Conclusion

Substantial high-density residential development is already underway on several sites in St Leonards. Density targets for Lane Cove LGA and St Leonards based on the Northern District plans are already met and exceeded.

The Draft 2036 Plans have not planned for immediate additional infrastructure for the St Leonards area in the short term. Hence where will the additional infrastructure come from? and how long will this additional infrastructure take to be provided/constructed?

The Draft 2036 Plans reiterate the vision for St Leonards is as a 'Specialised Precinct' focussing on employment through commercial, technology and research with medical/health emphasis. St Leonards development priority is for mixed use with a commercial emphasis and a focus on medical and IT services. Lane Cove Council is not supporting this view but pushing to convert commercial buildings to more high density residential with very limited amount of so called 'commercial space' being gyms and cafes which do not support long term employment. It does not make sense to propose a Draft 2036 Plan which is not aligned with these objectives.

The push to develop the St Leonards precinct due to its proximity to a transit node (TOD) is not sufficient argument to support inappropriate development. The topography of the area (south sloping) does not support any movement to the train station and hence the TOD argument is not supported on merit.

Rezoning St Leonards South will destroy the heritage and character federation era homes in the area, which have stood for generations and carry the history of such a historically important area of the Sydney Lower North Shore.

The need to cater for the growing population of Sydney is one argument for additional density and rezoning plan, however, this need should be balanced with the cost and the loss that will be felt by an established area such as St Leonards Suburb with important historical significance; as well as providing a good outcome for the residents and the area collectively.

Any further development in the area should be held against the benchmark of creating a good outcome from a town planning perspective. The precinct, due to its unique features

St Leonards and Crows Nest 2036 Draft Plans

(topography) and constraints (hilly, limited narrow streets, traffic congestion, etc.) does not lend itself to high density development as proposed by the Draft 2036 Plans and Lane Cove Council. The proposed Council St Leonards South Rezoning Plan has a number of significant and severe limitations (including not meeting a number of the SEPP 65 principles) which render the proposed development as inappropriate and an inferior proposal.

The resultant developments will have significant shadow impact, reduced service levels and infrastructure and other negative effects that will lead to poor living conditions, additional costs (heating, lighting) and potential health impact. This is not environmentally prudent.

The Draft 2036 Plans and implied high density is not in the best interest of the residents of St Leonards, Crows Nest or Greenwich and will have a negative impact on the vitality and viability of the area for many years. Accordingly, the St Leonards South rezoning should be rejected on merit and excluded in its entirety from the Draft 2036 Plans.

In closing, the St Leonards South Rezoning Plan does not seem to provide a real blueprint of how the objectives can be achieved well and ultimately fails to take into consideration good planning and the conditions on the ground that are applicable to the St Leonards area.

Furthermore, the St Leonards South Council Rezoning Plan is not in keeping with the vision or objectives stated in the Draft 2036 Plans nor does it bring better outcomes for the community, yet it is still included as part of the plans for the DP&E. It seems that for St Leonards South the set guiding principles are ignored and deficiencies overlooked.

The DP&E should be very careful in including any of the concepts of St Leonards South Rezoning Plans in its own plans or consideration. The Draft 2036 Plans should not acknowledge any proposed changes or measures for St Leonards South as these plans are still a mere proposal and not approved by the consenting authority. As such it would be best if the St Leonards South plans were completely removed from the Draft 2036 Plans to be assessed separately by the appropriate authority unless the DP&E is attempting to influence planning decisions.

Thank you for the opportunity to provide this submission in relation to the challenges and risks posed by the incorrect plans for the area.

We are able to elaborate on any of the points listed above.

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Appendix 1

