

Director, Sydney Central Urban Renewal,  
Department of Planning and Environment,  
GPO Box 39,  
SYDNEY, NSW, 2001.

[http://planspolicies.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=9243](http://planspolicies.planning.nsw.gov.au/index.pl?action=view_job&job_id=9243)

### **St Leonards and Crows Nest 2036 Draft Plan - Submission**

The decision to develop a coordinated plan for St Leonards Crows Nest is supported, as development in this area has long been uncoordinated as the area is controlled by three separate Local Councils. However, I would like to raise the following objections:

- The **proposed building heights along the Pacific Highway must be reduced**. Such heights will seriously impact residents in the area, and cannot be supported.
- The Draft **Plan fails to ensure the necessary infrastructure needed for population increase** (especially open space, schools, healthcare, and traffic management) is planned and provided for before further development occurs.
- The Draft Plan fails to deliver on a key Land Use objective of the Plan, namely **commercial premises to support the development of an employment hub**.
- The Plan fails to deliver on a key Land Use objective of the Plan, namely the **provision of a mix of housing**. There are already more than enough high-rise apartment developments in the area. The St Leonards South area provides the opportunity to plan for medium density R3 development.
- **Building controls for the designated Significant Sites should be specified**. These heights must be set in consultation with the community.
- The **triangle site** bounded by Falcon Street, Alexander Street and the Pacific Highway **should be excluded as a Significant Site**. This site is adjacent to Crows Nest village, and high-rise development on this site would seriously impact your stated objective of protecting the village character of Crows Nest. The inclusion of this site also contradicts another of your stated objectives to concentrate high-rise development between the St Leonards and Crows Nest stations.
- The Draft Plan has failed to address what it regards as proper planning in the St Leonards South Planning Proposal area. The **St Leonards South Planning Proposal as submitted fails many of the design principles outlined in the plan**, including confining high-rise development to the Pacific Highway.
- To ensure public trust in the fairness and administration of the planning function, **all Planning Proposals must cease** if the 2036 Plan is adopted.

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### **St Leonards Crows Nest Draft Local Character Statement – Submission**

I support the content of the Draft Local Character Statement in principle, but feel the Plan is not delivering on the majority of the Guiding Principles.

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. This compares with a predicted population increase for the North District Plan area over the same period of 22%, and for Greater Sydney 36%. **A more realistic, acceptable and sustainable population target needs to be set for St Leonards Crows Nest.**

#### **For the PLACE Guiding Principles:**

- Significant sites, high-rise buildings and inadequate solar protection are hemming in Crows Nest and residential areas in Wollstonecraft and the low to medium-rise residential area of St Leonards. **Access to sunlight and wind impacts need to be prioritised**

#### **For the LANDSCAPE Guiding Principles:**

- **More public open space needs to be created, funded, and delivered as a matter of urgency.** The area is already well below reasonable open space guidelines, especially when considering many of the population live in apartments.

#### **For the BUILT FORM Guiding Principles:**

- **Taller buildings** and higher densities should be concentrated around St Leonards Core, and **must stop at Oxley Street**. Development of sites between St Leonards station and Oxley Street should be designed to avoid a solid wall of tall buildings and wind tunnels and protect solar access. We do not want high rise anywhere along the Pacific Highway south of Oxley Street so that Crows Nest Village will be protected.
- “Gradual sensitive height transitions” are not being provided in the Lane Cove Council area of the Plan – **high rise of up to 50 storeys overlooking low-rise areas is not acceptable. Equally so for Crows Nest.**

#### **For the LAND USE Guiding Principles:**

- There **should be significantly less provision for high rise residential** – more needs to be done to provide for the “diverse range of employment opportunities”, “better mix of office spaces for different business sizes and



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### **St Leonards Crows Nest Draft Green Plan Submission**

I object to the St Leonards Crows Nest Draft Green Plan for the following reasons:

- The Green Plan **denies residents even the basic requirements for public open space and is well below any reasonable guideline.** In NSW, the DoPE has used a guide of 2.83 hectares/1000 population, which the Green Plan does not come close to achieving.
- The **figure of 21 hectares of open space and parklands said to be available to residents and workers of the Draft Plan area is misleading.** The correct figure of currently available open space is 12.7 hectares of open space – the remaining 8.3 hectares are outside the boundary of the Draft Plan area.
- The Draft Green Plan has **not adequately assessed open space requirements given the high-density apartment environment that is St Leonards Crows Nest.** More open space is essential to compensate for the lack of private open space, to support active living, to provide a more liveable neighbourhood, and to give children living in high density housing green spaces for play, and social and physical development.
- The solar protection guidelines **do not adequately protect our limited public open space from overshadowing and feeling hemmed in by high rise.**
- The **creation of new open space should be a priority.** To say that the recommendation for increased open space is “aspirational”, “to be used as a guide”, and that it is “not binding”, as set out on page 46 of the Green Plan, is not satisfactory.
- **New open space must be proportional to population growth** and should occur as the population increases, not afterwards.
- **Much of the open space identified in the plan is not of the size or quality required to meet and accommodate a range of recreation activities and needs.** For example, page 14 of the Draft Green Plan identifies that “Parks aligned with drainage corridors (such as Talus Street Reserve and Newlands Park) are difficult to access due to steep landform and arterial roads, limiting recreational opportunities and placing greater pressure on parks with better accessibility”. Talus Street Reserve is nearly 2 hectares and Newlands Park is about 1 hectare – these are two of the largest pieces of open space in the Green Plan area.

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Submission link

[http://majorprojects.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=9579](http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9579)

**Concept State Significant Development Application – SSD 18\_9579 Crows Nest  
Overstation Development - Submission**

I strongly object to the above application for the reasons outlined below:

- The proposed OSD, consisting of 2 x 27 storey residential towers, a 17 storey hotel and an 8 storey commercial tower will destroy Crows Nest. It completely ignores the requirements of the Placemaking and Principles Study that underpins the St Leonards Crows Nest precinct. It is a shameful grab for value capture whilst ignoring the community's preference for retention of the Crows Nest Village.
- The proposed OSD would encourage developers to submit planning proposals for adjacent sites, seeking to vary planning controls in the St Leonards Crows Nest precinct, thus further destroying the fine grain nature of Crows Nest.
- The DPE has vowed to protect Crows Nest village more simply described as the Willoughby Road strip, and this proposal destroys it. It is the duty of the DPE to reject the OSD proposal and insist on an alternative that meets the existing planning controls in the NSLEP 2013.
- The buildings above the Crows Nest Metro station should be designed to support our destination as a Health and Education Precinct and to bring more jobs into the area, enabling achievement of the jobs target set by the Greater Sydney Commission.
- I object to a change in planning controls for this site as proposed by the rezoning proposal. The proposed setbacks are designed to maximise the building footprints, not to enable Crows Nest to be a viable vibrant place.
- I object building any high-rise residential towers on this site. Residential developments do next to nothing to bring jobs and business to the area.
- I object to the proposed 17 storey hotel which, if history is any guide, would be doomed to failure just like the Ramada. That building has been recently converted to residential apartments, and has done nothing to help create jobs.
- There should be no building on Block C, thus leaving that site available for a pedestrian plaza directly near the station entrance/exit.
- I object to any parking on this site. We want the area to be as CAR FREE as possible.
- Rather than residential buildings, this site must continue as a vital employment and business generating retail/commercial/service district without the encroachment of residential development which does nothing for jobs or business.



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### **St Leonards Crows Nest 2036 Draft Plan - Special Infrastructure Contribution (SIC)**

The proposed SIC is a new approach by the Department of Planning to up-front funding to be paid by developers and to be used for priority infrastructure delivered by government at the same time development is occurring. The St Leonards Crows Nest precinct proposed SIC is set at \$15,100 per dwelling and is just another form of tax. Like planning, spending on Infrastructure is required before, not concurrent, with the construction of buildings. In the SLCN precinct the amount that is indicated to be collected is \$113,628,000. This suggests there will be 7,525 dwellings (the Draft Green Plan nominates 6,800 dwellings).

I object to the introduction of this proposed SIC because:

- The planning package for SLCN 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 plan is therefore theoretical and must be rethought entirely based on a lower population increase and a lesser number of apartments.
- 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.
- Government's role is to provide basic infrastructure funded from existing taxation and grant funds raised from things like Stamp Duties and Commonwealth contributions.
- The SIC is just another form of tax ultimately paid by consumers
- The SIC will not help provide affordable housing.
- The report from SEC is hardly an endorsement of the SIC. Instead it points to the finite nature of the ability to raise even more tax.
- Councils will lose the ability to raise money or In-Kind agreements by the abolition of Voluntary Planning Agreements.
- The proposal is designed to achieve or has the result of more central control by removing the ability of local government to perform its proper role.

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### **Crows Nest Sydney Metro Site Rezoning Proposal - Submission**

I object to the Crows Nest Metro Site Rezoning Proposal for the following reasons:

- The proposed heights **ignore your stated objective of protecting the village atmosphere** of Crows Nest.
- The proposed heights of the buildings will **create considerable overshadowing of Ernest Place, Willoughby Road and Hume Street Park**. These places provide the major open space for the area. Hume Park will be largely in shadow from around 4.00 pm for much of the year. Likewise, Ernest Place will be significantly in shadow for much of the year in the late afternoon. This area is critical to the vibrancy of Crows Nest.
- The proposed heights of the buildings **do not fit the local character** and community aspirations for Crows Nest Village. Buildings of this height are simply out of scale with the 2 – 5 low storey Crows Nest village. It is the low building heights that allow sunshine to the few green open spaces in Crows Nest.
- Buildings of the proposed height and bulk will create **significant visual impact** on Crows Nest, parts of Wollstonecraft and the surrounding area. They will visually close off Wollstonecraft from the village and create a barrier between by virtue of increased traffic congestion and road traffic.
- From all areas of open space in Crows Nest, but particularly Hume Park, these buildings will be overpower the Village and will **block off a large component of the light and sky from the west of the village**.
- There should be **no above ground parking on the Metro site**. Above ground parking does not meet the design excellence intent of the development. Why is any parking needed on the site when it is directly above a Metro station?
- The proposed rezoning and non-residential Floor Space Ratio controls are **inadequate to meet the employment goals set for the area** - there needs to be more commercial space.
- There is already **an excess of apartments in the St Leonards/Crows nest area**, and the residential targets contained in the District Plan are going to be easily achieved for this area without the need for the Metro over station proposed residential development. This is excess to requirement, and more to do with value capture than any real gain to the community.