

7 February 2019

Our Ref: P-18289

Eva Klaic
Manager Urban Renewal
Department of Planning & Environment
SYDNEY NSW
Eva.klaic@planning.nsw.gov.au

Dear Eva,

**RE: SUPPLEMENTARY SUBMISSION ON DRAFT ST LEONARDS/CROWS NEST 2036 PLAN,
COUNTRY GARDEN AUSTRALIA (CGA)**

We act for CGA in making this submission which supplements our earlier submission made on 15 January 2019. It addresses two points in the Minister's letter to the Chair of the Independent Planning Commission (IPC) dated 20 December 2018 about the St Leonards South Planning Proposal (the Proposal).

The first point is the Minister's request that the IPC assesses the Proposal's compatibility with various housing targets. The letter nominates two such targets- Lane Cove Council's and that of the Greater Sydney Commission (in paragraphs two and eleven respectively). In our opinion nomination of two targets is confusing and neither of those given is the most appropriate reference point. We submit that the most appropriate target is that given in the draft 2036 Plan including its accompanying Economic Feasibility Review technical study. This target is the result of detailed and area specific strategic planning and is therefore directly relevant to the Proposal. We ask the Department to clarify the specific housing target the IPC should use as its reference point.

The second point is the Minister's request that the IPC advise on "some staging of the proposal". In this regard we note that such staging would be inconsistent with the comprehensive strategic planning that has been undertaken for the area including the draft 2036 Plan, the North District Plan and the proposal itself. Key outcomes of the draft Plan, particularly new infrastructure, open space and public landscaping, are based on a schedule of special infrastructure contributions in turn based on the specified new housing yield. Substantial change to the Proposal would necessitate revision of the infrastructure contributions and the benefits they would provide. Also, staged rezoning would be impractical and is not accepted practice in NSW. Staging of development normally occurs through progressive consents which follow rezoning of an area. The process normally starts with concept approval of a master plan followed by detailed consents for specific stages of the approved masterplan. We request that the Department notes this normal practice in its submission to the IPC and recommends against staged rezoning.

We trust that the above supplementary submission is self-explanatory and of assistance. However, if any clarification is needed please contact the undersigned.

Yours sincerely,



Paul Mitchell
Director, Major Projects