



Greenwich Community Association Inc

**Submission to
NSW Department of Planning and Environment**

**St Leonards and Crows Nest
2036 Draft Plan**

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/>

The GCA welcomes the opportunity to make this submission.

Part 1.
Preliminary Comments

1.1 Importance of coordinated planning for the St Leonards and Crows Nest Precinct

The GCA welcomes the initiative to develop a plan to coordinate development in the St Leonards and Crows Nest Precinct through the St Leonards and Crows Nest 2036 Draft Plan (2036 Plan).

It is important that this coordination starts as soon as possible as the rate of development in the precinct appears to have out-paced the capacity of the Department of Planning to plan.

It is regrettable that planning proposals have continued to be processed whilst planning has been in progress. It is hoped that the Department of Planning will ensure that planning proposals that are in the pipeline will be amended to be consistent with the 2036 Plan (as finalised) as this offers the best hope of ensuring that the precinct retains and enhances features that goes to liveability and amenity.

Whilst the Crows Nest portion of the precinct (the “go to” area) has character and vibrancy, the St Leonards Station portion (the “go through” area) lacks cohesion and amenity due to the split of control between three LGAs. Developments near St Leonards Station have been undertaken by individual LGAs with little regard for the impacts on those in adjacent LGAs and this continues.

The GCA welcomes the focus of the 2036 Plan on establishing a clear development framework and associated assessment of infrastructure needs on a precinct wide basis, not limited by LGA boundaries.

1.2 Need for clarity around relationship of precinct’s employment hub objectives and Greater Sydney Commission (GSC) housing targets

The 2036 Plan is underpinned by the North District Plan’s identification of it as an employment hub. The area is densely settled with high property values, so it is not an appropriate area for large residential population increases that bring with them infrastructure demands, as there will never be the funds to adequately address them.

The housing **targets** that the GSC has set for LGAs to 2021, and will set by agreement to 2036, are not required to be reflected in the 2036 Plan. The quantity and location of housing in each LGA is entirely up to each LGA.

The Department needs to design a plan that recognises housing that will come out of the precinct development but it should set ground rules to meet employment targets and not contemplate LEP changes that drive further residential development.

1.3 Digression from development principles proposed for the precinct

It is understood that the framework for the 2036 Plan is as outlined in **Part 2** below.

The GCA is concerned that the 2036 Plan has digressed from some of the principles of the documents that underpin it, namely the North District Plan (NDP) and the St Leonards and Crows Nest Draft Local Character Statement (LCS). To a great extent, this may be because high levels of residential development have been able to proceed during the planning process. The shoehorning of these developments into an area that is ill equipped to cope with large residential population increases has limited the scope of the Department to plan for the primary objective of the precinct, namely growth as an employment hub.

This will be detailed further in our submission.

1.4 Complexity and inadequacy of exhibition process **Cumbersome submission process**

It is unfortunate that Department has undertaken simultaneous exhibition of separate, albeit related, plans for the precinct:-

- Local Character Statement (LCS)
- Draft 2036 Plan (2036 Plan) and related Green and Special Infrastructure Contribution plans
- Crows Nest Metro re-zoning proposal
- Crows Nest Metro SSD.

In addition to the above, the community has been required to incorporate into its responses the St Leonards South re-zoning proposal with no direction from the Department as to its view of the relationship between St Leonards South and the rest of the precinct.

Ideally, the LCS should have been exhibited in isolation at the commencement of the exhibition process as it is supposed to inform the 2036 Plan and related documents. This would have allowed the base document to have been finalised before the drafting of the plans that flowed from it.

The parallel Crows Nest Metro process added another layer of confusion to the process, at a time of year when people were under pressure in the pre-Christmas lead up or hoping to enjoy the holiday season, rather than working their way through hundreds of pages of detail.

As the relationship between the various plans/ applications was not clear, there has been a high level of confusion around what submissions are required by the Department.

The GCA has raised with Departmental officers the Department's complicated online submission process and it is pleasing to hear that this is being addressed.

It is hoped that, when reviewing community feedback, the Department will have regard to the complexity of the documentation in the various plans and the confusion around exactly what submissions were required

1.5 Need for genuine community consultation

From experience, the community is naturally wary of the progress of development from draft plans such as this one through LEP, DCP, DA and into the finished built form. In the past, many of the aspects that the community has commented on and expressed preferences for in a consultation process get lost or are watered down over time. This happens through a negotiation and appeals process between councils and developers. The community has little or no visibility of these activities and little weight has been given to its views when they are expressed.

To retain the confidence and support of the community it is incumbent on the Department and the Minister to review the existing processes so that the outcomes of the community consultation are in fact delivered in the finished project. These processes have been lacking in developments such as Green Square, Rhodes and Ryde and it is important that community confidence in the NSW planning system be restored.

It is clear that many in the community in St Leonards Crows Nest and the surrounding areas are extremely concerned about the growth in population and the over development inherent in the 2036 Plan and the proposed Rezoning of the Crows Nest Sydney Metro Site.

To demonstrate that the Department is listening to the community and is engaging in genuine community consultation, clear and demonstrable changes must be made to the 2036 Plan.

1.6 Integrity of planning system undermined by planning proposals

The Lane Cove LGA portion of the St Leonards and Crows Nest precinct has been severely impacted by planning proposals with a consequent erosion of the character of the area.

The ongoing ability for developers and Councils to bypass planning controls through planning proposals undermines the integrity of the planning system and, if they are allowed to continue, will undermine the achievement of the Vision for the 2036 Plan.

Part 2

Context of St Leonards and Crows Nest 2036 Draft Plan

It is understood that the Plan responds to and/or is informed by the following documents:-

North District Plan

- Strategic centre
- Health and education precinct
- Key employment centre in Greater Sydney

Actions	Responsibility
34. Strengthen St Leonards through approaches that: <ul style="list-style-type: none">a. leverage the new Sydney Metro Station at Crows Nest to deliver additional employment capacityb. grow jobs in the centrec. reduce the impact of vehicle movements on pedestrian and cyclist accessibilityd. protect and enhance Willoughby Road's village character and retail/restaurant stripe. deliver new high quality open space, upgrade public areas, and establish collaborative place-making initiativesf. promote synergies between the Royal North Shore Hospital and other health and education-related activities, in partnership with NSW Healthg. 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

St Leonards	Jobs
2016 Estimate	47,000
2036 Baseline Target	54,000
2036 Higher Target	63,500

<https://gsc-public-1.s3-ap-southeast-2.amazonaws.com/north-district-plan-0318.pdf> p 65

St Leonards and Crows Nest Station Precinct Interim Statement

Draft Objectives

1. Leverage world-class health and education uses to provide opportunities for future employment growth.
2. Protect and strengthen the Precinct's commercial role supported by complementary uses to capitalise on renewed confidence in the commercial market.
3. Create future employment opportunities leveraging off the increased transport capacity of the new metro station.
4. Strengthen and enhance opportunities in the Artarmon employment area to fulfill the important urban service needs of the wider North District.
5. Create a network of new and existing useable and diverse open spaces which prioritise walking, cycling and access to transport, promote a healthier urban environment and encourage social interaction.
6. Incorporate opportunities for transit oriented development including commercial and mixed use development that takes advantage of existing and future transport.
7. Develop high quality and diverse residential areas that create sustainable and liveable communities.
8. Preserve, strengthen and enhance the existing diverse character areas.

St Leonards and Crows Nest Draft Character Statement

Guiding Principles

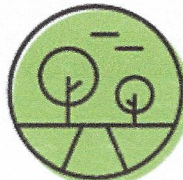


Draft Local Character Statement
GUIDING PRINCIPLES



PLACE

1. Retain and enhance the village atmosphere in and around Crows Nest, particularly Willoughby Road. New development in St Leonards should incorporate street level improvements such as wide footpaths, street trees and active uses for a more energetic atmosphere.
2. Ensure new development close to heritage conservation areas and items is designed to maintain the feeling of connection to the areas history.
3. Protect access to sunlight where possible, especially for open spaces and important parts of the public domain.
4. Ensure busy pedestrian routes to and from key destinations are well lit and offer passive and active surveillance to promote a feeling of safety.
5. Minimise wind impacts from new development for more comfortable and enjoyable places.



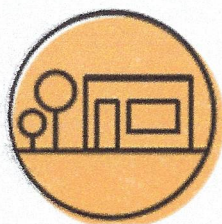
LANDSCAPE

1. Identify opportunities for more open space, particularly around Crows Nest and St Leonards station.
2. Improve tree canopy, particularly along busy streets to increase the sense of connection to the natural environment.
3. Design new development to fit in with the varied topography of the area.
4. Improve connections to surrounding green spaces to enable more choice and use of other open spaces.



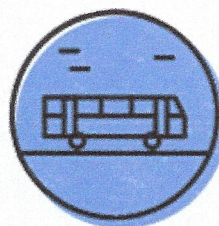
BUILT FORM

1. Concentrate taller buildings and higher densities around St Leonards Core and along the Pacific Highway.
2. Protect the village atmosphere and low scale built environment around Willoughby Road in Crows Nest and ensure that new development does not impose upon these areas.
3. Provide building setbacks and podiums where possible to create a more human scale feel at street level.
4. Ensure new development models reflect best practice design, picking up the best elements of surrounding building types.
5. Provide gradual sensitive height transitions from high-rise to low-rise areas and minimise overshadowing of public open space.



LAND USE

1. Provide a supportive environment for learning with new schools and creative spaces.
2. Ensure a range of community facilities are available to support in the area.
3. Provide a mix of housing types at different price points to ensure that households at all stages of life are encouraged to live in the area.
4. Continue to provide a high standard of health services into the future.
5. Protect essential industrial activities in Artarmon as these service the area and much of the North Shore.
6. Protect the diverse range of employment opportunities available in the area and allow for a better mix of office spaces for different business sizes and types.



MOVEMENT

1. Deliver connectivity improvements to and around St Leonards and Crows Nest stations to make it easy to travel to schools, work, shops and meet up with friends both within the area and further afield.
2. Investigate new and improved cycleways and walkways to make it easy, safe and comfortable to move within the local area.
3. Consider more opportunities to safely cross the Pacific Highway.
4. Consider a coordinated parking strategy to manage the community's needs, while minimising traffic congestion.

<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.pdf> pp 28-29

Part 3

GCA submissions on documents included in the Plan

The GCA has made submissions under separate cover in respect of the following documents:-

- Local Character Statement
- Green Plan
- Special Infrastructure Contribution Plan.

These submissions, together with this document, comprise the GCA response to the 2036 Plan.

In March 2018, the GCA made preliminary submissions to the Department of Planning in anticipation of release of plans for the St Leonards and Crows Nest precinct.

These submissions form part of the current GCA submission.

These submissions are:-

- Medium Density Development (**Attachment B**)
- Open (green) space (**Attachment D**)
- Pedestrian and cycle Paths (**Attachment A**)

The GCA has also made submissions in respect of the Crows Nest Metro re-zoning and SSD.

Part 4

GCA responses to the Plan Themes

The GCA responses to the themes in the 2036 Plan are outlined below.

Our response in respect of St Leonards South is included later in this submission.

4.1 PLACE

4.1.1 Reduced heights near Willoughby Road and the Five Ways Intersection

Willoughby Road and the Five Ways Intersection are both highlighted under this theme.

They will suffer significant erosion of character and amenity with proposals for inappropriately high-rise developments adjacent to them. Heights should be reduced consistent with recognition of the village atmosphere in and around Crows Nest.

4.1.2 Impacts of building height on highway

The proposed building heights along the Pacific Highway ridge line from St Leonards Station to, and including, the proposed Metro SD0 will create wind impacts and overshadowing effects that will detract from a sense of place.

4.1.3 Height limit on significant sites

The sites nominated as Significant Sites should have height limits consistent with those adjacent to them. Notwithstanding a proposal to implement a Design Excellence assessment, building heights in excess of 50 storeys are inappropriate along a ridge line and along a thoroughfare as narrow as Pacific Highway.

We are already seeing the tunnel-like impact of the Mirvac St Leonards Square development which is only at 20 storeys of a 35 storey height and this is without a corresponding 50 storey building on the other side of the road.

Height additional to 50 storeys for any building – noting the 65 and 50 storey towers proposed for 601 Pacific Highway - will exacerbate wind impacts and overshadowing of public places, both of which are factors identified under this theme.

In summary

- *Building heights adjacent to Willoughby Road and the Five Ways intersection to be reduced*
- *Proposed building heights between St Leonards Station and the Crows Nest Metro to be reduced to avoid wind impacts and overshadowing*
- *Heights of Significant Site developments to be consistent with adjoining buildings*
- *Maximum building height 50 storeys (subject to assessment of wind and solar access impacts).*

4.2 BUILT FORM LAND USE

4.2.1 Shortfall in required commercial accommodation

The 2036 Plan will fail the main objective outlined in its Vision, namely provision of commercial accommodation to meet demand.

The 2036 Plan notes under Land Use that the GSC target is for 16,500 additional jobs in the next 20 years (ie 2019 -2039) in St Leonards Crows Nest. Based on 15 m2 per person this gives a lettable space requirement of nearly 250,000 m2 over the period. This is a very large requirement and equates to nearly 90% of the area of the three International Towers recently constructed at Barangaroo. This is additional space to accommodate the growth in jobs projected.

The Land Use section of the 2036 Plan outlines the upper employment targets for each of the employment areas of Artarmon (1840), Health and Education, adjacent to RNSH (5300), St Leonards (4570), Crows Nest (3020) and Mater Hospital (1440). These translate into additional areas (m2) of commercial space in Artarmon (27600), Health and Education, adjacent to RNSH (79500), St Leonards (68500), Crows Nest (48000) and Mater Hospital (21600).

Section 8.6 *Distribution of Non-Residential Floor Space Ratio Controls* in the Urban Design Study document shows the increase proposed in FSRs to accommodate the median jobs growth targets. It is not possible to translate these FSRs into actual floor space provisions without further detail, but the maps indicate a very diverse, even piecemeal approach to achieving the targets. As such it is unlikely to succeed without some major commercial developments in the precinct especially in the Health and Education and St Leonards areas.

In the current climate in St Leonards Crows Nest, developers seem to have a strong preference for residential projects over commercial. Thus, it is unlikely that the market alone will drive the development of a large amount of commercial space in the precinct. The most likely outcome is that the available FSR in the precinct will be gradually taken up by residential development and the projected jobs which the commercial space supports will not be delivered.

The Department of Planning should take all steps to ensure the viability of the precinct as an employment hub. This means taking positive action to ensure that substantial landmark commercial developments are facilitated especially in the St Leonards and the Health and Education areas rather than leaving it to unfettered and uncontrolled market forces.

The re-zoning of developments designated for commercial development should not be subject to alteration through the planning proposal process.

In summary

- ***It is essential the Precinct remain a major employment hub.***
- ***The piecemeal and hands-off approach to ensuring commercial space is delivered is unlikely to be successful.***
- ***Landmark major commercial developments with appropriate protection against re-zoning are required to ensure the higher jobs targets are met.***

4.2.2 Area to the West of Park Road St Leonards

This area is included in the 2036 Plan but there is very little if any detail given. There appears to be no uplift in zoning or any other substantial changes. The only conclusion that can be drawn is that it is intended that this area remain unchanged for the life of the Plan, that is until 2036. Indeed, if this is the case then the Department should make a clear statement about its future.

In summary

The 2036 Plan should make a clear statement of its intended use for the properties west of Park Road.

4.2.3 Pacific Highway from Berry Road to Greenwich Road (South side)

At the moment all the buildings in this area are zoned B3 Commercial Core. They could be changed to B4 Mixed Use provided that the commercial FSR remains the same. That might encourage redevelopment of the strip as it appears to be in need of renewal and better utilised. One downside of this would be the buildings would invariably be higher and cast greater shadows over the residential areas down the hill.

In summary

The south side of the Pacific Highway has unrealised potential for further development.

4.3 MOVEMENT

4.3.1 Road network

The road network around the precinct is largely fixed. No new major roads are planned or likely. The existing road network will undoubtedly be put under great pressure by the development envisaged in the plan.

River Road is a key arterial road and serves the precinct as a major east west link. It takes pressure off the Pacific Highway. The current configuration of the road provides poor service.

Of particular concern is the increased number of car movements with people bringing children to the expanded Infants' School on Greenwich Road.

The high-rise developments around Burns Bay Road and Lane Cove have increased the traffic and residents are already complaining about the time it takes to travel out of Greenwich particularly in the morning and afternoon peaks. Key impediments to the performance of River Road are:

- The bridge over the railway is one lane in each direction
- One lane in each direction continues from the bridge to Canberra Avenue
- Two lanes reduce to one westbound at St Vincents Road and continues to the start of the Lane Cove Country Club

The opportunities for improvements to River Road would assist both through and local traffic and will go some way to absorb the additional traffic generated by the developments envisaged in the 2036 Plan.

The improvements should include:-

- Two lanes in each direction from Northwood shops to Crows Nest available in morning and afternoon peaks
- Two lane rail bridge at the River Road bridge near Duntroon Avenue
- A shared bike/pedestrian path to one side of the road from Northwood shops to Crows Nest
- A pedestrian refuge opposite the Lane Cove Country Club
- A *railway underpass* at the River Road bridge to enable pedestrians and cyclists to get across River Road safely from the Lithgow Street/Duntroon Avenue side to the Boronia Street side.

Traffic lights on River Road at Canberra Avenue are proposed in the 2036 Plan. These will cause severe disruption to traffic flows on River Road and add significantly to peak hour congestion. The approach to the intersection travelling west on River Road is a blind corner and will have a high risk of accidents. A better solution would be to upgrade the Duntroon Avenue/River Road intersection in conjunction with the improvement works outlined above with a set of traffic lights located at the improved intersection. Canberra Avenue from Duntroon Avenue to River Road should be closed and the pavements returned to landscaping to add to the usable area of Newlands Reserve.

Note – the GCA's submission on Active Transport (see 4.3.2 below) discusses this further and outlines additional proposals for safe crossings over River Road for pedestrians and cyclists.

The Council's traffic study is faulty. It assumes that the number of people driving to work will be one quarter of that in the City of Sydney where people live close to and are more likely to walk to work. The study also assumes there had not been any and will not be any development along the Pacific Highway. These are highly questionable assumptions that will lead to traffic chaos and the isolation of Royal North Shore Hospital.

In summary

- ***River Road should be upgraded to provide better service in the morning and afternoon peaks and to accommodate the growth in traffic from the increase in population in the Precinct.***
- ***The intersection of Duntroon Avenue and River Road should be improved and have traffic lights installed as a major access to the SLS area.***
- ***Traffic lights should not be installed at Canberra Avenue.***
- ***Canberra Avenue should be closed from Duntroon Avenue to River Road and the pavements returned to parkland.***

4.3.2 Active Transport

Overview

The GCA welcomes and supports the focus of the 2036 Plan on Movement for pedestrians and cyclists.

Generally, the GCA supports the 2036 Plan responses to the pedestrian and cyclist issues raised by the community (pp36-37, 39) and the Movement Actions and Recommendations (pp58-60).

There are 3 key issues which the GCA submits should be addressed differently in the final Plan:

- *Implementation funding* – do not rely just upon SIC; ensure there is adequate funding allocated in Agency and Council budgets and in the Precinct Support Scheme.
- *Make P3/P9 effective* – extend the pedestrian and cycle route south from St Leonards station along Lithgow Street all the way to Wollstonecraft station.
- *Canberra Avenue traffic lights are a poor choice* – take the route up Duntroon Avenue instead to join the path from the railway underpass to Wollstonecraft station.

Implementation funding

The 2036 Plan identifies the Special Infrastructure Contribution (SIC) as the sole funding source for most of the pedestrian and cyclist infrastructure improvements.

This is inadequate for the work required.

Much of the infrastructure is already required for current pedestrian and cyclist movements between and through the St Leonards and Crows Nest area and its surrounds before taking into account the increased population and traffic movements from any proposed development.

Councils and Agencies should not be allowed to avoid or delay implementing these infrastructure requirements on the grounds of inadequate SIC.

Councils should be obliged to include these infrastructure improvements in their local environment and development control plans. Specific allocations should be required from Agency and Council budgets and the Precinct Support Scheme, as well as the SIC.

Make P3/P9 effective

The southern linear park from St Leonards along Lithgow Street to the bridge over the train line at River Road (P3) and improving the railway overpass for pedestrians and cyclists (P9) are both strongly supported. Together with the Oxley Street (P7) and Herbert Street (P1) connections they will help link Greenwich to the new Crows Nest metro station and to St Leonards station.

But they need two additions to make them work.

First, there needs to be a *railway underpass* to enable pedestrians and cyclists to get across River Road safely. Widening the bridge (P9) will not do this.

There is currently no safe place for a pedestrian, wheelchair or bicycle to cross River Road between Greenwich Road and Shirley Road, a distance of more than 1 kilometre. This is effectively the whole of the alignment between the southern side of the 2036 Plan and Greenwich/Wollstonecraft.

The railway overpass is already used (dangerously) as a pedestrian cross over point. It is a natural traffic point for an underpass for both pedestrians and cyclists.

Second, the *green pathway should be continued* on the Boronia Street side of the train line from the River Road bridge along the Boronia Street alignment and then across or around the Russell Street bridge, entering into Smoothery Park and through to Wollstonecraft station. This will then connect with the pathways on the west side to Shirley Lane (which is a safe route through to Crows Nest) and via Shirley Road to Berry Island and Balls Head. This will require work with TfNSW on the pathway next to the train line and on or around the Russell Street bridge. The 2036 Plan should require TfNSW and Lane Cove and North Sydney councils to undertake this work.

Bridge not traffic lights

The 2036 Plan developments make it essential to provide further crossings over River Road between Greenwich Road and the River Road bridge to allow adequate pedestrian and cyclist movement between St Leonards South and Greenwich.

The proposed traffic lights at the Canberra Avenue/River Road intersection (P4) are a poor solution. They will be in the valley at the bottom of the hill running down on the one side to the railway overpass and on the other side to the Greenwich Road/River Road intersections. That is dangerous for motor traffic, particularly for the traffic coming down from the overpass around the blind spot above Newlands Park.

It will be disruptive, leading to further congestion at peak hours on a road that is already banked up for a kilometre at those times.

The crossings over River Road must be grade separated; ie a bridge or underpass. Anything else is not safe or practical.

A crossing at the Canberra Avenue/River Road intersection fits with current street configurations and for that reason has been included in previous bike plans. However, the 2036 Plan allows better solutions.

To fit better with the topography of St Leonards South we suggest that the connection from the north side of St Leonards South should run from the Berry Road roundabout along the East/West green path to the northern section of Canberra Avenue and then into and along Duntroon Avenue to join the River Road bridge improvements and the pathways to Wollstonecraft station, Crows Nest and Greenwich.

In light of the expected population densities and transport demands, there should be a further pedestrian and cyclist bridge crossing over the stretch of River Road from the River Road bridge to Greenwich Road. There are a number of options including Holdsworth

Avenue/Russell Street and Berry Lane/Wilona Avenue. These need to be investigated further with thorough community consultation, particularly with affected residents in and near the relevant streets.

A key principle is that the planning for the crossing, and for the East/West green path, should be driven by the topography of the area, not the current configuration of the streets. This is a 50 year plan and the area is set to be transformed radically. The 2036 Plan should maximise gentle gradients for pedestrians, prams, wheelchairs and cyclists.

In summary

- ***extend the pedestrian and cycle route south from St Leonards station along Lithgow Street all the way to Wollstonecraft station***
- ***take the route up Duntroon Avenue instead to join the path from the railway underpass to Wollstonecraft station.***
- ***ensure there is adequate funding allocated in Agency and Council budgets and in the Precinct Support Scheme***

4.3.4 LANDSCAPE

Please refer to GCA submission submitted under separate cover (ATTACHMENT C)

Please refer to GCA preliminary submission Open (Green) Space (ATTACHMENT D)



Part 5

Additional GCA responses

5.1 St Leonards South

5.1.1 Density and Population

There is no detail provided as to how the number of housing units proposed in the St Leonards South (SLS) area was derived. The total number of units is given as 2400 and this would give a population of 4800. This number is excessive and should be substantially reduced as everything else flows from this.

The population of the Lane Cove LGA was 36,000 in 2016. The East Ward of the Lane Cove LGA has a population of about 12,000. The additional population proposed in St Leonards South is 4800 which represents a 40% increase in the local population. This will have an intolerable impact on the surrounding areas and infrastructure. It will substantially impact on the amenity of the area and on the quality of life of the existing and future residents. SLS is 4800 plus the populations of the Western Gateway and Eastern Precinct developments within the Lane Cove LGA of 3938 gives a total of 8738. This is an increase of over 70% in the population of the East Ward of the Lane Cove LGA. This is the wider community's greatest concern with its impact on facilities, the road system, services and infrastructure.

It seems that the population/density of the current SLS Draft Master Plan developed by Lane Cove Council was based on applying a blanket of eight storeys across the whole area. This generated a total area on which to base the Plan. This total area was then used in the design process and distributed over the site to give a pattern of building blocks of varying heights in the Draft Master Plan.

The basis of this starting concept appears to be the developments along Duntroon Avenue which are 5-7 levels in height and were deemed to be the type of development acceptable to the Council and the community. Whilst these developments provide a reasonable standard solution in their location, it does not follow that they can be simply transplanted to SLS.

Such an ad hoc approach to future development lacks rigour and is poor planning. At the very least densities should be based from the start on clear and transparent housing targets that have been well communicated to and largely accepted by the community. Following that, design solutions can be investigated and tested against a series of measures including solar access, views, over shadowing, relationship to adjoining areas, adequacy of infrastructure to support the population etc, etc.

Where are the housing targets? The community needs to be able follow how the SLS plan develops from Greater Sydney Commission targets, to allocation to individual LGAs, to distribution within each LGA to application to precincts which affect individual sites. To set the overall areas/densities and then try to justify it is the opposite of prudent planning. The current population of the St Leonards South Master Plan is too high and should be significantly reduced.

In summary:

- *The population in the current SLS Plan is too high.*
- *There are no housing targets that apply to the 2036 Plan that support the SLS Plan population.*
- *The SLS population must be clearly based on unambiguous growth targets that the community understands.*

5.1.2 Building Heights

The interface of the SLS Master Plan scheme with the adjoining residential areas to the west, south and south west is at odds with the approach taken in the Urban Design Study to the transition to the Naremburn Conservation Area. Naremburn and the area to the west of Park Road, St Leonards South are identical in their scale and housing types.

There is an identical justification that the area to the west of Park Road should be considered a Conservation Area and preserved. Therefore, the same care should be taken with the western side of the SLS developments as is demonstrated in the transition to Naremburn.

The interface should be “a two-storey interface with low scale detached dwellings....”. The configuration of the SLS development should “step envelope away from” Park Road towards Berry Road “up to the existing 20m height limit...”. The two-storey interface should be townhouses which would have a beneficial impact on the housing mix in the developments and provide a better housing option for families in the area.

The same approach should be applied to the River Road and Canberra Avenue edges of the development for the same reasons. The edge along Canberra Avenue also needs to take into account overshadowing of Newlands Park. This park is a precious piece of green open space and it must not be degraded by overshadowing from the SLS development. Green space is at an absolute premium in the SLS development and in the St Leonards Crows Nest precinct as a whole. It must be protected and enhanced if good quality outcomes are to be achieved.

Overall the high-rise high-density developments should be grouped closest to St Leonards Station and the Pacific Highway. The heights along Park Road should be reduced so as to not overpower the existing residential areas on the western side including the heritage properties.

The heights along Canberra Avenue opposite Newlands Park should be reduced to reduce the overshadowing of the park.

The heights along River Road should be reduced to allow some sun penetration into the residences in that part of the precinct. There should be medium density to all of the western, southern and south eastern boundaries of SLS. This would have the additional benefit of reducing the overall population of SLS as well.

Diversity of residential types is a requisite of good planning. We acknowledge that the current plans address essential worker housing and affordable housing requirements. However, there should be more medium density townhouses in the development, particularly along Park Road, River Road and Canberra Avenue. Two and three storey townhouses should be included to reduce densities, increase the diversity of housing types available and provide a better alternative long-term option for families than apartments.

These comments apply particularly to the southern end of Park Road, the whole of the River Road frontage and the Canberra Avenue frontage that abuts Newlands Park.

In summary

- ***SLS should be treated in the same way as Naremburn.***
- ***The building heights around the edge of the SLS area should be reduced to two storeys as a better transition to the adjoining residential areas, to be a reasonable scale on River Road and to minimise overpowering and excessive shading of Newlands Park along Canberra Avenue.***
- ***There should be more townhouses in SLS to better cater for families.***

5.1.3 Overshadowing

The logic around the orientation of the blocks north south in the SLS Draft Master Plan is to allow sunlight to penetrate into the area. The shadow diagrams show that this only occurs in the middle of the day with the mornings and afternoons heavily affected by overshadowing.

The current proposal causes overshadowing of Newlands Reserve and the new Local Park at 3.00pm in mid-winter, just when school children may be using the park. Lower buildings on Canberra Avenue and Park Road would have the effect of improving this to something closer to an acceptable standard.

The approach generally of considering overshadowing between the hours of 9:00am and 3:00pm in midwinter is too narrow. Children return home from school after 3:00pm and given that there are going to be many children with families in this development, more consideration should be given to creating open space that has solar access after 3:00pm in winter. This is just the time that children should have sunny outdoor spaces in which to play.

In summary

- ***The overshadowing of the scarce open space in Newlands Park is excessive.***
- ***The hours when overshadowing is considered should be extended beyond 3:00pm to cater for children after school.***

5.1.4 Open Space

The ratios of open space to population are inadequate and the attempts at justification weak.

Newlands Park is a vital asset to SLS and to the greater St Leonards Crows Nest Precinct. It must be protected and enhanced as much as possible. A linkage/landscaped walking path should be considered from Newlands Park to the upgraded Hume Park in Crow's Nest.

The new Local Park in Park Road should be increased in area and the pedestrian links widened to create additional pocket parks as destinations in their own right rather than merely transit spaces. This will be vital to the mental health of the residents in this densely populated area and will become a real focus point for community activities and relaxation.

The proposal looks like a storage park for shipping containers. There is no heart or central focus in the development which will help to create a sense of community. There needs to be a large open space in the centre with services and some small retail around it.

The topography is highly shadowed and full of fungal life forms. The proposal will virtually eliminate sunlight at ground level and lead to a highly unhealthy environment.

There should be 40% tree cover which means at least half the buildings should be below the tree tops. The highest buildings should be in the North East corner and heights should gradually reduce towards the South West.

Berry Road should be widened by 50% in the northern 30% of its length. The next 40% of its length should be a park through to Holdsworth Avenue, which should be widened by 50% for the southernmost 30% of its length. The widened roads should be used to create green walkways, larger setbacks and more sunlight at ground level.

The southernmost two blocks between Holdsworth and Canberra Avenues should be a park at a level so there can be a pedestrian flyover of River Road. A barrier free way should be created to Berry Island Reserve. This overbridge, which is discussed previously in the Road Network section above, would link SLS effectively with Smoothey Park and the foreshore walking tracks. This would provide additional options for residents to access green open space within easy walking distance from their homes.

There is an opportunity to add to the area of Newlands Park. This can be achieved by reconfiguring Duntroon Avenue as the main entry/exit to the SLS area and closing Canberra Avenue from Duntroon Avenue to River Road. In this way the existing road pavements can be landscaped, and the parkland increased.

Gore Hill Cemetery is a heritage asset but also has the potential to add to the stock of open space available to SLS and the Precinct as a whole. The central walkway of the Cemetery is already a linear park and with appropriate improvements can add more value and encourage greater utilisation. In the medium term a treatment of the cemetery similar to that done by North Sydney Council in St Thomas' Rest Park in West Street should be

considered to convert progressively to public parkland to increase the Open Space available to the Precinct.

In summary

- *There should be more open space in the SLS Plan, the green spaces included should be increased in size.*
- *An overbridge across River Road would provide a link and easy access to more green space in Smoothey Park and the Harbour Foreshore walks.*
- *Newlands Park can be extended by closing part of Canberra Avenue and directing all traffic through Duntroon Avenue.*
- *Gore Hill Cemetery has accessible green open space which could be significantly enhanced over time.*



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