

Director , Sydney Central Urban Renewal  
Department of Planning and Environment  
GPO Box 39 Sydney NSW email: malcolm.mcdonald@planning.nsw.gov.au

Dear Sir/Madam,

**Re: Re: Objection Submission – St Leonards Crows Nest 2036 Draft Plan**

**I have objections and concerns about the 2036 Draft Plan:**

I consider the suite of Character, Green and 2036 Draft Plan should be amended and re-exhibited prior to production of the final versions.

1. **Lack of genuine collaboration with relevant local councils and lack of sufficiently-broad community stakeholder consultation in development of the draft plan prior to its exhibition.** Whole subject areas, such as impacts on bushland- are ignored. Local councils are listed first as having ‘responsibility’ for delivering on many of the lofty “actions” of the District North Plan, yet they appear to have not had the input which was initially envisaged.
2. **Local Character Statement “Engagement Summary” p6 is testament to the very limited out-reach efforts made to get the opinions of the catchment stakeholders.** Consultation with the Lane Cove community has obviously been limited because there is almost no consideration for Lane Cove shown in the findings.
3. **The Character Statement underpinning the draft 2036 Plan is a flawed document,** for the above reasons. It has errors –eg. P14 Topography states that “Atchison St and Chandos St are steep” when these streets are actually gentle, running along contours, so are not steep.
4. **Character Statement’s Guiding Principles on p28-29 do not all have corresponding, meaningful nor actionable “Draft Plan Responded” actions in the Draft Plan.** Eg its p12 “minimising overshadowing” is rather meaningless in the high-density context as proposed, and does not “Protect access to sunlight”; “no wind impacts” – there is not a measure or rule developed for measuring wind impact; p16 – there is no test or action to measure the vague aspiration that “consideration has to be given to topography”; -p22 – there has been additional overshadowing to Willoughby Rd despite introducing the “key planning principle” of no additional overshadowing.
5. **2036 Draft Plan does not accord with the GSC’s North District Plan Planning Priority N10 for St Leonards as a strategic jobs growth centre** – the latter’s p67 states that *“Employment growth is the principal underlying economic goal for metropolitan and strategic centres.”*
6. **The excessive residential component in 2036 Draft Plan, including the St Leonard’s South Proposal, proposes an oversupply of residential capacity at the expense of commercial space.** The residential component is not supported by adequate plans for employment, transport, open space, social infrastructure or utilities.
7. **Social infrastructure, community services and community spaces have not been provided for in the Draft Plan.** These are needed to support the already-growing residential areas being constructed nearby.
8. **Connectivity failure between St Leonards Railway Station and Crows Nest Metro. This must be corrected.** Synergy between the stations of these two separate transport lines was one of the

underpinnings of the priority precinct, but has been lost because the location of Crows Nest Station entry has been moved from where it was at Corner of Oxley St/Pacific Hwy.

9. **Opportunity to Re-orientate Station Entry – noted by ‘red arrow’ p45 of Draft Plan – MUST BE IMPLEMENTED.** Position of Metro entries all now favour land near Willoughby Rd/Pacific Highway near the Metro, and not land near St Leonards, along Pacific Highway east (and west) of the existing railway line.
10. **Inter-modal Transport Connectivity is not included.** A bus interchange site should be designated in the 2036 Plan.- for eg. feeder bus routes from Lane Cove River suburbs such as Longueville.
11. **The Metro station, the OSD and the street-level interface planning virtually turns its back on the St Leonards Core area,** ignoring the logic of connecting to it. Instead it tries to capture the existing Crows Nest Village as its chief draw-card.
12. **Misleading statements about, and depiction of, open space requirements.** There is only 12.7 ha of open space available at present. It is a fallacious practice to include the 8.3 ha which are outside the precinct boundary.
13. **Almost no new open space.** New open space provision should be in direct proportion to population increases and should occur at the same time as the increases. Some space is inaccurately claimed as ‘new’ when it is really re-allocated from, or re-designed, existing open space, eg. The proposed foreshore link between the railway and Lithgow St is currently a relaxing refreshingly-unstructured green open space which will become less green, more concrete, if redesigned as the “Linear Park” shown p 38 of Green Plan; the top of Hume St Carpark is already a recreational open space – it is not new open space if it becomes a green park; the south end of Berry St is already a park; the south end of Willoughby Rd becoming a plaza is simply taking away already public space which includes some useful road carparking.
14. **The high density living proposed will create an even-greater-than-usual demand for green open space due to its lack of provision in high-rise living.** New, high quality Open Space is not delivered – Nth District Plan’s Planning Priority N20 within the planned precinct itself. It is unreasonable to use “Foreshore link” to reach into beyond-precinct open green space to compensate for the Plan’s failure to provide sufficiently for open space in proportion-to-population and density-linked needs.
15. **It’s a huge failure in precinct planning when even the Green Plan, p46, acknowledges that public open space needs to be increased but there is limited scope to do this.**
16. **Unacceptable overshadowing is produced by tall buildings:** of Newlands Park by St Leonard’s South, of Nicholson St, Hume Street park, Ernest Place and Willoughby Road. St Leonard’s South overshadowing of Newland’s Park will virtually destroy it. This park has been relied upon excessively, almost becoming a ‘saviour’. In reality Newland’s Park is burdened with loss of sunlight, increased stormwater runoffs , over-intensification of use, and steep topography making much of the park of little use for active recreation. Both Newland’s Pk and Tallus St Reserve are steep, former drainage reserves which are not prime land for recreational open spaces.
17. **Revise Fig 4 -to make realistically workable-** the “Ground floor Setbacks for wider footpath” in Draft Plan p14 Fig.4. The diagrams clearly show trees will not work as shown, the ‘reverse setbacks’ are too shallow, the overhead built projections will stunt tree development, and the car passengers can not exit safely due to vegetation proximity to kerb.

18. **Adverse Environmental impacts are ignored.** North District Plan's Planning Priority N16, of "Protecting and enhancing bushland and biodiversity" is not even mentioned in the Draft Plan. Nor has Planning Priority N15, of Protecting and Improving the Health and enjoyment of ....the District's waterways. Figure 19 of North District Plan shows the Lane Cove River as an important waterway and catchment yet the cumulative impacts of the intensified development upon Berry Creek (as a tributary of the Lane Cove River) and on the creek's bushland do not get addressed. The Draft Plan touts the link to these natural areas, yet forgets that the stormwater changes and people-&-pets-intensified-use pose severe risks to these sensitive natural areas, such as Berry's Creek. The N16 Actions, 66 a, b, and c, have not been considered. Nor have N15 Actions 62 and 64. Further, high-density thermal mass, reflectivity, greater embodied energy and need for energy use created by proposed high density when built, and likely climate changes of flood/drought frequency, have not been addressed.
19. **Schools and Tertiary Education sites' actual positions must be locked into the Plan.** It is essential that the site for what is an already-needed new high school be designated, and funds provided for it. Then, traffic, pedestrian, and transport implications can be included in planning. The TAFE site should remain where it is, and be quarantined from poaching for a high school, to provide future Tertiary education facilities.
20. **The impact on traffic flow, parking and accessibility of new development and yet-to be-planned developments** (such as schools and community space) is very concerning and appears not properly addressed.
21. **Transitioning of heights from tall to low-rise are very abrupt.** Impact of high-rise on low-rise areas, such as west of Nicholson Street, will be overbearing.
22. **Height, RL's, bulk, density and scale resulting from the precinct proposal's changes to FSR and heights is excessive.**
23. **Visual impact study as viewed from surrounding suburbs has not been produced.** Eg impact on the skyline will be immense from Greenwich, Northwood and Longueville – it will permanently remove the trees from the horizon and replace them with buildings.
24. **Significant sites should be deleted.** They do not contribute to the Plan in a positive way, they do not provide a public benefit by contributing to the revitalisation of the planned precinct, removing jobs focus. The 'highest design' standard is impossible to define, and hence, ridiculous. The heights are excessive, and the sites should not be rezoned to mixed use development. The 'low scale near Five ways' is not achieved if the significant site is permitted on the triangle to its south.
25. **Laneway activation eg Clarke Lane is essential but already it is under threat from Clarke Lane's use as a delivery street.** – the Metro OSD has statements to the effect that it will control the use of the lane to prioritise service and delivery to the OSD.
26. **The plan does not deliver a diverse mix of housing types as required.**
27. **Land on Pacific Highway to west of St Leonards rail must remain commercial core and not become mixed use or residential.**

Yours sincerely

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08 February 2019