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http://planspolicies.planning.nsw.gov.au/index.pl?action=view_job&job_id=9243

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

types”, and to “provide a mix of housing types.....to ensure that households at all stages of life are encouraged to live in the area”.

For the MOVEMENT Guiding Principles:

- **A detailed traffic management plan is needed** before further rezoning and high rise developments are approved.
- “Connectivity improvements to and around St Leonards and Crows Nest stations” and “opportunities to safely cross the Pacific Highway” must be prioritised to handle the expected 10,000 pedestrian movements per hour in peak hour.

As a final comment, the concept of the Draft Local Character Statement is to be applauded. But it appears a significant portion of the Draft 2036 Plan was written before this Character Statement was finalised, and many of the aspects of the Character Statement are not reflected in the Draft 2036 Plan.

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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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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.