

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 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



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 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.

Director - Key Sites Assessments  
Department of Planning and Environment  
GPO Box 39, SYDNEY, NSW 2001

[http://planspolicies.planning.nsw.gov.au/index.pl?action=view\\_job&job\\_id=9247](http://planspolicies.planning.nsw.gov.au/index.pl?action=view_job&job_id=9247)

### **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.

- The proposal in its present form provides no guarantee that money collected will be quarantined for its intended purpose, and no guarantee that it will actually be spent at all. If past experience is any guide, the funds collected will go into consolidated revenue where it will be lost in the perpetual arguments between state and local government to release funds.
- 

(CAPS)                    REDACTED  
                                  CONFIDENTIALITY  
                                  REQUESTED

ADDRESS: .....

(CAPS) .....

EMAIL: .....

U

DATE: ..... 2/21 .....2019