

2 February 2019

Director
Department of Planning and Environment
Sydney NSW 2001

Dear All

Re: NSW Planning 2036 Draft plans –St Leonards / Crows Nest

I have taken the time to write this letter to question the wisdom in the proposed draft plan from NSW Planning which includes St Leonards South Residential Precinct Plans for high density rezoning. The draft plan should sever all ties with St Leonards South plan. It is underhanded for the draft plans to include St Leonards South. It seems that Lane Cove Council has a big say with these draft plans from NSW Planning and as such these draft plans lose credibility.

This plan in effect is rezoning street after street of a pre-existing residential area. Most of us feel that our homes are worth preserving and the streets are worth saving from this carpeted rezoning. As residents we fear oversized generic structures that merely store more people and become just someplace that you sleep is an unacceptable situation and Greenwich and St Leonards deserve a better plan from NSW Planning and Council.

Council claim that Sydney is still expanding and that our area due to the state-wide rezoning plan had to meet a quota. This is not necessary. This is not true as our area has already met the targets set by the State Government. Look around you at the DA's approved by Councils.

Let's go back in history for a little bit and as you know the overwhelming reason was that few locals, looking after their financial interest would like to sell their homes to developers and in turn few hundred units can be built on these blocks.

There are compelling reasons why the St Leonards South rezoning is unacceptable since:

- ✓ It will put an unsustainable strain on our infrastructure;
- ✓ Rezoning will be adding a minimum of 2,400 units and a minimum of 5,000 new residents. This is more than 46% increase to the existing residents;
- ✓ There are more than 4000 units either proposed or just approved in the 3 councils LGA including Willoughby, North Sydney and Lane Cove Council.
- ✓ The size and scale of the rezoning will be an overdevelopment on each site;

- ✓ This area is not suited for high density due to the topography, inclination, street gradient and the blocks pitch;
- ✓ The high density will be overwhelming and unacceptable due to size and scale;
- ✓ It has been rushed through in a short-sighted and uncoordinated manner;
- ✓ Traffic will be directed onto Berry Road from these developments when it is already congested and to turn into the Pacific Highway is not easy;
- ✓ Traffic generated by the development will produce unacceptable consequences on the Pacific Highway;
- ✓ It will increase traffic and congestion in the entire precinct;
- ✓ There is a lack of expansive green parks that residents need;
- ✓ It will exacerbate the existing parking problems for all with commuters;
- ✓ Walking and bicycling paths are not planned well and safety will be affected;
- ✓ Education and health facilities will suffer more;
- ✓ The old buildings on the Pacific Highway have been deprived the opportunity to be rejuvenated;
- ✓ Inconsistent with State Government plans for this area;
- ✓ Need to preserve the character of residential single dwellings; and
- ✓ Our aesthetic enjoyment of our neighbourhood.

We would expect any rezoning plan to follow common sense guidelines that would look at housing density constraints consistent with the surrounding area and neighbourhood, with adequate setbacks and building heights to be consistent with current zoning.

There is no justification for this rezoning that is attempting to build more in an area that needs less chaos.

In this area due to the terrain of the land there is no validation that would justify this type of high density zoning.

I hope planners will consider each morning how residents can cope with all the additional high density, more people, less amenities, more commuters, less parking and much more.

I urge NSW Planning to exclude / reject St Leonards South and consider this in line with the context as explained above.

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.

I would like to raise the following objections for the St Leonards and Crows Nest 2036 Draft Plan

- 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.
- Building controls for the designated Significant Sites should be specified. These heights must be set in consultation with the community.
- 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.

I would like to object to the St Leonards Crows Nest Draft Local Character Statement – Submission

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.

St Leonards Crows Nest 2036 Draft Plan Special Infrastructure Contribution

I wish to make the following submission:

1. I support the concept of a Special Infrastructure Contribution as a method of addressing current and infrastructure needs arising from densification of the St Leonards and Crows Nest precinct.

2. I do not think the current model will work because:

- the level of development required to meet the \$113.6 mill fund target can only be achieved through unacceptably high levels of residential development
- this development will render impossible the delivery of the employment capacity foreshadowed by relevant planning documents
- the scale of residential development required to meet the \$113.6 mill target will create further massive infrastructure stress that will necessitate a full review of the Special Infrastructure Contribution funding model or major government investment to avoid a planning disaster in the precinct
- the proposed allocation of funds derived from the Special Infrastructure is not fair and equitable.

3. I request that the proposed Special Infrastructure Contribution model be reviewed to address my concerns outlined above.