

6 February 2019

Department of Planning and Environment
Sydney NSW 2001

Attention: Director - Key Sites Assessments
Attention: Director - Sydney Central Urban Renewal

Dear DPE

Subject: St Leonards and Crows Nest 2036 Draft Plans, Draft Green Plan, Draft Special Infrastructure Contribution Scheme, Draft Character statement including St Leonards South rezoning Plan and OSD and Rezoning.

I am writing to object to the 2036 St Leonards and Crows Nest Draft Plans (Plans) including: Draft Green Plan, St Leonards and Crows Nest Draft 2036 Plans, Draft Local Character Statement with Built Form, Landscape, Place Movement, Land Use, Draft Special Infrastructure Contributions Plan, Rezoning of the Crows Nest and Metro over the Station.

I object to the Plans on the grounds that benefits will not be delivered for the majority of the proposed and eventually the Plans become hopeful recommendations difficult to realise. Within a few years the area will be a patchy quilt of unsupportable high density developments and still waiting on the much needed infrastructure and services.

At a high level the proposed Plans seem to be based on logical statements, valuable guiding principle and good planning outcomes. These Plans further identified opportunities for renewal and rezoning as well as identifying constraints. However, in some parts the Plans do not live to the promise and will fail to deliver on the needed outcomes and what really works for the area and community aspirations.

Most of the ideas and guidelines are concepts that are well set out but will not be easily attained or realised especially in the St Leonards area.

It is almost too late for St Leonards to realise any benefit from the Plans. St Leonards has been over developed and already suffers from the lack of amenity. The Plans will not apply to St Leonards or St Leonards South as it is too late to bring any meaningful change and improvements. Instead the same unfavourable Lane Cove Council Rezoning plan is included in the draft Plans giving Councils Rezoning Plan creed and legitimacy. Furthermore it is surprising that the Plans incorporate much of the facilities, open space and infrastructure suggested in the Council rezoning plan.

As such this submission will have to turn attention to St Leonards South included as part of the draft Plans. It is discreditable for the DPE to include a much hated St Leonards South rezoning plan in the 2036 Plans. This move has certainly diminished the DPE credibility and proved that appropriate planning is not a realised vision in the 2036 Plans. The St Leonards South rezoning plan fails on design principles, open space, set-backs and transitions

The spotlight on the St Leonards South Lane Cove Council rezoning plan and the interaction with the draft Plans should be severed. Yet the Plans are show casing these Council rezoning plans with all its deficiencies and shortfalls. The correct approach for

the draft Plans is to take out St Leonards South. To De-link and De-couple St Leonards South Council Plan and also take out any references for St Leonards South.

It is important to keep in mind that Lane Cove Council does not have a good strategy to augment amenities, infrastructure and services to the level that the community enjoys currently. Yet the draft 2036 Plans have voluntarily included the St Leonards South rezoning plan.

In addition the Plans leave out the fact there is a St Leonards suburb nearby to the St Leonards core. This suburb with 140 single dwelling houses has been around for many years and is at risk of being lost. The homes in St Leonards South are lovely character homes, in a sought-after neighbourhood filled mainly with single dwelling houses, with character and community feel. This should be kept as single dwelling homes in a mainly single dwelling suburb.

Whatever the Plans cover with guidelines it is too late to provide a better outcome for St Leonards South, St Leonards Suburb and St Leonards core. Lane Cove Council rezoning plan for St Leonards South has to be taken out of the draft Plans and not presented because that would mean that the DP&E is encouraging this rezoning plan before it has been properly considered.

Up-zoning in St Leonards and Crows Nest is further proof of poor planning practice. Increasing the amount of built space with clustered high-density tall buildings with no cap on building heights is not a good plan. Residential high-density development in St Leonards is unwarranted, excessive absorbing infrastructure, services and open space that will definitively have detrimental effects on the fabric of our community. It will take years to bring the level of amenity that St Leonards currently enjoys.

Services, facilities and infrastructure needs to be planned from the beginning and should be considered upfront before density. It is not good enough to “work it out later” after the additional people show up on St Leonards door step. That time is now!

It is also uncertain that Councils would adhere to the draft Plans as Lane Cove Council has finalised all the plans and developments on their side of St Leonards that there will be nothing left to realise the vision.

Draft Green Plan: Pocket parks, part closed streets and landscaped pedestrian links should not be counted as open space. These do not provide the needed quality, expansive and generous open space for the residents. Open space should be a continuous stretch of high quality, unsegmented or in parts. The Draft Green Plan table (presented below) disappointingly included existing foyers space with some under 0.06ha, part of a commercial building, in the corner of a sterile area, segmented and overshadowed that will not be frequented by residents. Families cannot take their kids to play ball and have a BBQ. The Plan cannot include as open space. The Plans should strive to exceed the required open space in St Leonards to supersede standards due to the density of the area; in order to give residents in units some relief.

There is not one single example of an area that has been developed with such high density residential with an FSR of 2:75 or higher FSR that is not still fighting for more services, facilities and amenities as well as fighting to regain the area’s sense of community.

St Leonards will become among the 'most deficient suburb in open space' in Sydney. The open space ratio is very low in comparison with the guidelines and other precincts. It is also an inappropriate level for an area such as St Leonards that is quickly getting more dense and will soon be exceedingly overpopulated, as such the open space should be increased significantly upfront to make up for the environment that prevails.

The table below extracted from the Draft Green Plan document shows that out of boundary Open Space is included in the plans but that inferior quality of open space is included. This is not an ideal condition for a planned precinct that is need of more open space. The area also needs green park and large green open space which this is not taken into consideration.

Existing Open Space	Size (ha)	Function
01 Gore Hill Park	4.53	Active - Sports
02 207 Pacific Hwy	0.06	Passive - Open Space
03 The Forum Plaza	0.27	Passive - Recreation
04 Christie Street Plaza	0.11	Passive - Open Space
05 Plunkett Street	0.03	Passive - Open Space
06 Talus Street Reserve	1.94	Active - Hard Court
07 Herbert Street	0.17	Passive - Open Space
08 Ella St - Dalleys Rd	0.07	Passive - Open Space
09 Tennis court at Wheatleigh St	0.34	Active - Hard Court
10 Brook Street	0.05	Passive - Open Space
11 Saint Thomas' Rest Park	1.93	Passive - Recreation
12 Mitchell / Albion Plaza	0.09	Passive - Open Space
13 Hume Street Park	0.24	Passive - Open Space
14 Ernest Place	0.19	Passive - Recreation
15 Cahill Park	0.03	Passive - Playground
16 Hayberry Street	0.03	Passive - Open Space
17 Christie Street Reserve	0.14	Passive - Open Space
18 Lithgow Street	0.05	Passive - Open Space
19 Newlands Park	1.01	Passive - Playground
20 Berry Road	0.04	Passive - Open Space
21 Propsting Playground	0.09	Passive - Playground
22 Portview Road Reserve	0.08	Passive - Open Space
23 Reserve Road	0.54	Passive - Open Space
24 Taylor Lane	0.22	Passive - Open Space
25 Punch Street	0.44	Passive - Open Space
Total within Boundary	12.70	
26 Thompson Park	1.65	Active - Sports
27 Parkes Road Reserve	0.32	Passive - Open Space
28 Artarmon Park	1.01	Passive - Open Space
29 Naremburn Park	3.42	Active - Sports
30 Naremburn Community Garden	0.03	Passive - Recreation
31 Mafeking Ave	0.06	Passive - Open Space
32 Coronation View Point	0.37	Passive - Open Space
33 Ronald Park	0.36	Passive - Open Space
34 Smoothery Park	0.42	Passive - Open Space
35 Wollstonecraft Recreation Club	0.25	Active - Sports
36 Pacific Hwy / Lithgow St	0.02	Passive - Open Space
37 Newlands Reserve	0.18	Passive - Open Space
38 Hazelbank Rd	0.10	Passive - Open Space
39 194 Pacific Hwy	0.13	Passive - Open Space
Total outside Boundary	8.31	
Total Open Space	21.01	

The Plans only allow for 12.70ha of open space (including foyers of commercial buildings) within boundary of the area and the 8.3ha outside the boundary which is erroneous. Outside the boundary space is inaccessible and will require travel time to get to and will not be frequented by St Leonards' residents due to the distance.

The current guidelines for the Department of planning in many parts of NSW is a rate of 2.8ha per 1000 people and more often than not, planners opt to apply the existing standard of 3.7ha per 1000 people. Therefore, the proposed for St Leonards is unacceptable in comparison to other suburbs. It is also unacceptable that the Plans do not aspire to better and exceed the open space levels for such a cramped and dense area such as St Leonards. It is difficult to accept the premise that the new precinct will be highly livable and attractive to new residents when it suffers from a shortage of quality open space and eventually lead to lack local character.

The existing Newlands Park, is already earmarked for use by the other new developments in St Leonards. Therefore, Newlands Park should not be considered as open space for St Leonards South. Currently Newlands Park is already busy on most weekends especially in summer for existing residents.

Consent to build high density towers had already been provided based on Newlands Park availability as a park for the new residents. In other words the near-by developments with a multitude of residents, listed below, based their approval from Council on Newlands Park availability

- 1-13 Marshall Avenue, St Leonards (with 100 meters – Loftex)
- 15-25 Marshall Avenue, St Leonards (with 40 meters - Loftex)
- 472-476 Pacific Highway St Leonards (with 91 meters and 115 meters - Mirvac)
- 504-520 Pacific Highway, St Leonards (with 138 meters - New Hope)
- 75 Lithgow Street, St Leonards (with 144 meters - Winten)
- Northern Terrace 88 P/L, St Leonards (100 meters)

The availability of large open parks and recreation facilities is an important quality-of-life factor. Measures for augmenting green expansive open-space environment are missing from the Plans. The Plans do not allow for sufficient large sunny open parks but pocket (dog) parks and linear (useless) parks, yet it encourages a sharp increase in the number of residents with no real increase in large parks. 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”.

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.

The solar protection guidelines do not adequately protect our limited public open space from overshadowing and feeling hemmed in by high rise.

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.

There are several streets in the area with no available open space. There are not enough recreational parks, natural environment and green large sunny areas provided, even with Newlands Park which is always busy on weekends with existing residents. There is some allowance for some landscaping, deep planter boxes, closed roads and small green pocket portions which never work for the residents and are often frequented by graffiti artists and hoodlums at night.

Furthermore, Plazas and parts of buildings are not true open space as it is mainly for paying customers that use the seats in cafes. Pocket parks and small inconspicuous areas cannot be considered as open space. It is not recreational and not a place where residents can play with a ball or have a picnic or barbeque. It is not quality continuous open space where children can throw a ball and families have a BBQ.

Local Character: The Plans introduce so much uplift and density that it will not be a highly liveable precinct with local character but congested and overcrowded losing its local character. The precinct will not be the walkable, connected and safe precinct, as more cramming and massing of built form with endless stretches of high density will take over St Leonards and Crows Nest.

The new Plans violate the character of the area with clustered high rise developments that are inappropriate. The sense of community identity and belonging will slowly be lost with the high residential density.

It becomes obvious from looking at the Plans that there is insufficient regard to good levels of amenity, effective urban design, open space, suitable pedestrian flow, better public transport and easing of traffic as more residential units are crammed into the available space.

There are large portions of residents that would like to stay in the area without overdevelopment that do not believe that their homes should be demolished. The homes in St Leonards South are lovely character homes, in a sought after neighbourhood filled mainly with single dwelling houses, with character, soul and community feel.

The loss of amenities will be more extensive than anticipated with less schools, day care, council services, roads, policing, parks, parking and infrastructure, green space, open public areas and public seating, as an example. The St Leonards/Greenwich areas will be fighting for services that should have been planned from the start, for many years in the future.

The Education Department has identified no current means (no funding) for the establishment of a new school in the area due to the difficulty and expense of acquiring suitable property.

There will also be limited budgetary allowance for infrastructure (even with SIC) to be built in St Leonards and hence residents will suffer a decline in amenities to the detriment of the community.

This new proposed height and density as well as St Leonards South, will lead to a precinct with its clustered tall buildings, that contravenes the State Environmental Planning Policy No 65 - Design Quality of Residential Apartment Development (SEPP 65), as these clusters will be unable to adhere to the requirements or the compliance table in terms of Context, Scale, Built forms, Density, Resources, Energy and Water Efficiency, Amenity, Safety and Security, Building Separation and Setbacks and Open Space. The outcome with the Plans is that Council will not understand or implement the design quality principles of SEPP 65.

Land Use and Built Form Guiding Principles: The Plans present more challenges than opportunities for St Leonards with no relatively easy solution for increasing amenities.

There is already significant high density and significant residential high density that is underway in St Leonards which makes adding more residential units unsupportable and unjustified as a Plan in the next 20 years. St Leonards will be a clustered overdeveloped small area with very limited amenity that would take years to augment. The Plans also fail to consider the developments in the rest of St Leonards such as in North Sydney Council and Willoughby Council. The cumulative effect on services and infrastructure from other developments in St Leonards has not been taken well into consideration.

Developer	St Leonards Lane Cove LGA	Number of units	Number of residents
Loftex	15 -25 Marshall Avenue	111	280
Loftex	1-13 Marshall Avenue	276	720
Mirvac	472 - 476 Pacific Highway	505	1,263
New Hope	500 - 504 Pacific Highway	550	1,548
Winten	75 -79 Lithgow Street	789	1,657
Northern Terrace 88 P/L	84 - 90 Christie Street	380	1,140
	Total:	2,611	6,608

Table shows unit numbers excluding Crows Nest, RNS Hospital developments and the other developments in the Lane Cove Council LGA.

The Plans should have included medium and low rise in St Leonards and maintained the low-density character of the area especially for the St Leonard’s Suburb. Also medium density confined to the perimeter along the Pacific Highway is a good option. This is by far a better plan that should be included in the Plans.

The topography and terrain of the St Leonards and Crows Nest precinct is not amenable to building of high density of FSR 2:75 and it is even more unsupportable for higher FSR in any street in the area from overshadowing and limited solar access. To this extent there will be large sections of the precinct with no sunlight and overshadowing of residences in the lower lying sections, for many hours in a day.

With tall building clusters of units (akin to commodity houses) in a row and “boxing” a large part of the area. The planned clusters of lots, combined with the terrain means that some developments occur on steeper slopes shadowing other housing for a considerable amount of time.

The transition as suggested in the Plans is not adequate to offset the loss of privacy and the shadowing. Transition and setbacks should be more generous to compensate for the loss of sunlight and privacy.

There is no rationale for such higher clustered density developments in St Leonards South as the precinct has no natural boundary. This is a deficiency and can create adverse impacts on the rest of the streets in the area.

There is a total disregard of the effect from St Leonards South on the adjacent suburbs and streets. It seems that the DPE has decided to bury its head in the sand and ignore all the residents' opinions on this rezoning. The trust and confidence in the DPE draft plans quickly evaporating.

PLACE Guiding Principle: The Plans should be seriously considering rather than “attempting to encourage” more commercial than residential development in the St Leonards area. St Leonards area has been signaled as an area for IT, medical and commercial centre and offices that could maintain long term employment.

The Plans will lead to the erosion of the commercial core and further loss of jobs in St Leonards, undermining future employment. The Plans have encouraged little real long-term commercial (and employment) and medical precinct. There may be some commercial space allocated such as the first 2 floors in a 50 story high residential building but without a pool of office space to encourage commercial environment a whole range of businesses will be locked out of the area. Prior to the displacement of St Leonards and St Leonards South suburb the area used to have several buildings that had 8 or 10 floors of commercial space yet all this was demolished to make way for high density residential with commercial tokenism of 1 floor. It is obvious that the Plans are not matching the strategic target in the area.

MOVEMENT Guiding Principle: The Plans do not present clever alternatives to ease traffic congestion, provide more parking spaces, build new schools quickly, provide new public services, increase quality open green space or have more medical facilities for the St Leonards and Crows Nest

- The streets targeted for high density residential rezoning are some of the highly-travelled streets throughout the area. Moving higher volumes of traffic through the streets will exacerbate the situation. These streets within the area are important for circulation of locals and visitors. There are several areas of dangerous conflicts, due to circulation and flows of cars and pedestrians and between vehicles and pedestrians. The area of circulation roadways will reach critical situation in a very short time especially the already gridlocked River Road around Greenwich Road.
- It is already very difficult to exit Berry Road to join Pacific Highway. There will also be more traffic generated in every street and most streets are narrow in the precinct.
- It is very difficult to leave Duntroon Avenue to join River Road. It is always congested and busy.
- The numbers quoted in the draft Plan assessment of traffic are lower than should be from the increase in residential units. Many rental units in this area often have more than one vehicle, and often bring many other vehicles to the area. Most residents have 2 cars per household. So the claim by Lane Cove Council that the increase in residents will not increase the number of cars is a fallacy.
- The Plans traffic assessment did not include all the high residential developments around St Leonards and in turn did not include the additional cars, foot traffic, traffic

flows from the new developments and ignored the developer incentives impact of additional units that will be added.

- Council traffic modelling for the proposed development of St Leonards South was conducted without reference to North Sydney Council, Willoughby Council or the NSW Road and Maritime Services and without taking into account, extensive residential development underway, and traffic effects flowing from North Sydney and Lane Cove Councils as well as visitor's traffic.
- There are no cumulative studies on the effect of traffic from the new developments in St Leonards. This has not been appropriately considered by the consultants. This is disappointing as the correct levels of traffic need to be considered.
- The suggestion that traffic from a further 2,400 units could be accommodated without the need for massive renewed infrastructure is unrealistic. The Plans do not have any strong basis to improve the traffic issues and does not have the funds to correct the problem either. Canberra and Duntroon Avenues are heavily accessed streets and connects Pacific Highway and River Road. The traffic will become even more congested in these streets with traffic with no easy solution.
- Residents of the area will quickly recognise the likely impacts of a further 1,000 (or more) cars, upstream and downstream from other nearby suburbs that are experiencing residential high density units, as well as the emerging cars from St Leonards South either onto River Road or the Pacific Highway.
- The interaction of airflow with solar radiation is an important consideration which needs to be addressed as it will affect the precinct.
- Shading for a considerable amount of time with less light and sunshine will affect the whole area due to higher density of many sites. Solar access will be restricted as tall buildings on steep terrain will exploit solar access.
- There are no solar gains provided in the draft Plan or air movement which creates a cooling effect but due to reduced airflow the circulation will be minimised creating very hot areas in summer and very cool in winter. Any rezoning will reduce the airflow by around 30% with no equivalent air flow. The energy usage will be high and houses will not be able to have energy sustainable options.
- The Plans do not identify or appraise noise problems that will affect the community.
- The Plans did not consider any noise minimisation. St Leonards and Greenwich by the nature of their location, close to the Pacific Highway and St Leonards train station as well as RNS Hospital, are one of the busiest, polluted and noisiest suburbs.
- Safety concerns from more traffic and cars, turning the streets into a busier location, have not been raised. The draft Plan does not have enough features to include protecting pedestrians and the community from risks of more traffic and cars.

Special Infrastructure Contribution Plan: The planning package in the draft Plan 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.
- 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.
- 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.

Wrap-up: The 2036 draft Plans should provide better outcomes for the community from the major clustering of residential high density. Any miss planning will become an issue with a multiplier effect in our area that will take decades to resolve.

The existing residents of the area deserve an excellent plan for amenities, infrastructure and services that can be delivered now before density. The existing residents deserve an excellent plan for roads, transport and traffic that would take into account their habits and preferences rather than impose new habits for the sake of having better statistics.

It is also imperative that Lane Cove Council piece of St Leonards cannot take on any more development. There should be a pause and no additional density approved.

Ultimately the correct approach is to reject St Leonards South and take it out of the 2036 Plans completely. So break the connection, De-link and De-couple St Leonards South Council Plan also taking out any references from the Draft 2036 Plans in order to reinstate the community faith in such Plans.

Thank you for reading my submission.

Yours Sincerely

REDACTED
CONFIDENTIALITY
REQUESTED