

01 February 2019

NSW - Department of Planning and Environment,
320 Pitt St, Sydney 2000
GPO Box 39, Sydney NSW 2001
Tel: 1300 305 695

Attention: Department of Planning and Environment
Attention: Director - Key Sites Assessments
Attention: Director - Sydney Central Urban Renewal

Dear Department of Planning and Environment

Subject: Response to the Draft Green Plan, Draft Local Character Statement with Built Form, Landscape, Place Movement, Land use, Draft Special Infrastructure Contributions Plan, Rezoning of the Crows Nest, Metro over the Station.

I am writing to express my opposition and objection to the DoPE Draft 2036 Plans (draft 2036 plans) including the St Leonards South Master Plan (St Leonards South plan). I felt that I had to comment on Lane Cove Council Rezoning St Leonards South plan as it has been presented in the draft 2036 plans. The community does not feel that this is the right approach by the DoPE and undermines our faith in the draft 2036 plans.

After reviewing the long awaited 2036 draft plans I was able to form an opinion of the Draft Green Plan, St Leonards and Crows Nest Draft 2036 Plans (which includes St Leonards South Rezoning Council plan), Draft Local Character Statement with Built Form, Landscape, Place Movement, Land Use, Draft Special Infrastructure Contributions Plan, the Rezoning of the Crows Nest and the Metro over the Station. It is disappointing that the DoPE chose to include the St Leonards South plan in the draft 2036 plan.

The draft 2036 plans impose excessive targets and density levels permitting undesirable consequences and failing to cultivate better outcomes. The draft 2036 plans failed to deliver upfront increased infrastructure, better facilities, more services, schooling, public transportation, more green open space, better utilities ahead of any population increase.

The predicted population increase in the St Leonards and 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.

The draft 2036 plans failed to recognize the immediate and present threat for St Leonards especially for the Lane Cove Council side. It is already too late for St Leonards to benefit from the draft 2036 plans as most of the high density has been built extorting the amenity that it once enjoyed. St Leonards South is exacerbating this problem and needs to be rejected outright as it is pursued by Lane Cove Council in an illogical manner in contravention with expected planning processes without the needed infrastructure, services, facilities, open space, utilities and public transport.

The DoPE draft 2036 plans should start with the real needs and priorities of long term residents and the community, deliver these upfront rather than evading promises for infrastructure, services and open space. The draft 2036 plans are poised to deliver more of the same FSR that can be built.

There is No need for additional development in St Leonards and certainly Not St Leonards South as our area has achieved its required quota up to 2036.

Much more public open space, than revealed in the plans, 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.

Draft Local Character Statement including Land Use, Landscape, Movement, Built form and Place

The Draft Local Character statement includes a draft vision, objectives, guiding principles and ten character statements that are to guide future development and infrastructure delivery in the precinct over the next 20 years. These read well and are acceptable. The DoPE made a good attempt at distilling the concepts to produce a character statement. However delivering on the ten character statements in St Leonards area would be very optimistic and illusive. As such this is fiction. Also many of the aspects of the Local Character Statement are not reflected in the Draft 2036 Plan which is disappointing.

Due to the high density residential towers that have already been approved and built in St Leonards, especially from the Lane Cove Council part of St Leonards, it will be difficult to instil these character statements. It would even be too late to put in place any of the recommendations as St Leonards is already full to the maximum and the growth has Not been sustainable growth. The draft 2036 Plans have failed to address proper planning in the St Leonards South. The St Leonards South Planning Proposal fails many of the design principles outlined in the plan, including confining high-rise development to the Pacific Highway. The DoPE has no room to move as such take out any reference relating St Leonards and St Leonards South as this is mere propaganda.

Lane Cove Council claims that the St Leonards South must be high density high-rise and sufficiently upscale so that developers can “afford” to build the public access. But the more high-rise the new developments are the less public space is available and the more likely that the public space becomes more exclusive.

Local character of St Leonards and St Leonards South needs to be strengthened as it is unique. It is the way a place looks and feels. It is defined by the community and is often the result of a mix of tangible and intangible things. To do so then the DoPE needs to react immediately and put measures in place to deliver on these concepts which includes cancelling St Leonards South rezoning plan, which should NOT have been included in the draft 2036 plans. This is the wrong signal to send to the community. As such there will not be any real support for these draft 2036 plans. Community identity, sense of place and sense of our community will be lost if such density plan is pursued.

It will prove even harder to achieve the strategies for the draft 2036 plans in St Leonards. In fact the high intensity of development and density has led to the loss of local character that will never be reinvigorated or redefined in another 20 years.

This applies to St Leonards South as it is very distinct to the rest of the St Leonards due to the dominance of single dwelling houses, the family oriented atmosphere, the low rise street scape and reduced density enjoying a village atmosphere. It is a pocket of intact single houses that form a lovely community and is engrossed in history as well as lots of local character.

There is already significant residential development (approved and yet to be approved) around St Leonards from 2016 which will add up to 19,000 new residents which is more than doubling the population in a short time.

Over supply of high density residential housing is contrary to the strategic future for St Leonards. St Leonards is identified as a specialised precinct in the Northern District plans with employment, economic, technology and research emphasis.

High density in St Leonards is pursued contrary to the wishes of the majority of the area's residents and inconsistent with the areas tolerance levels. It is also not in line with the creation of an area with health services and commercial/long term employment objectives.

The St Leonards South rezoning plan as well as the St Leonards core for higher density is likely to lead to a disrupted and dysfunctional precinct. The large-scale rezoning, unsupported by commercial demand will lead to piecemeal higher density development throughout the existing suburban area, with years of construction chaos affecting local residents and businesses and also commuters using River Road and/or the Pacific Highway.

Excess apartment capacity is likely to result, particularly if the current rate of residential development in St Leonards continues or housing demand eases for economic and other reasons. Vacant apartments create a 'dead' residential zone, and will lead to non-residential uses not conducive to effective community.

The draft 2036 plans for additional infrastructure and services are very patchy and unlikely to be delivered in time. There is very limited capacity with existing amenities to even cater for the existing residents. The high density development rezoning will bring a substantial number of residents (as well as from other developments from the North Sydney Crows Nest and Willoughby LGA) that will not be supported by a suitable level of amenities; already under pressure. Parking, traffic, infrastructure, access, schools, child care facilities, green space, parks (not pocket parks), open space (not the bus interchange) community centres are all amenities that need to be incremented and there is no vision to provide for these amenities at the mandatory levels.

Other consideration that need to be reviewed in the draft 2036 plans including for St Leonards South:

- The land use for high density is over exhaustive and also ignores street character.
- Urban design and sustainability are not well observed.
- The guiding principles do not allow for good quality living. Village atmosphere will be lost and we need to keep our sense of community alive.
- The draft plans fail to deliver on a key Land Use objective of the Plan, namely commercial premises to support the development of an employment hub.
- Existing and new business operators in the local area cannot work together to increase commercialism in the precinct and its surrounds.
- The vision is more concrete, FSR and built form rather than the Community well-being.
- Low rise and low scale development not clearly included upfront in the plans as a viable alternative.
- Even though our area is strategically located near the Sydney City the traffic and congestion would make the CBD harder to reach in the stipulated times in the plans.

- The draft plans miss out on truly enhancing the area to become an area with good public facilities.
- The DoPE has used a guide of 2.83 hectares per 1000, 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 precinct will no longer be distinguished by its high-quality living, good working environment or good amenities.
- Good and accessible community facilities will evaporate with each additional unit added.
- The solar protection guidelines do not adequately protect our limited public open space from overshadowing and feeling hemmed in by high rise.
- The draft plans allow overlooking and loss of privacy as towers and high rise go up.
- Shadowing will result and affect the whole area and deprive residents of sun light and day light.
- 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 and St Leonards South. Access to sunlight and wind impacts need to be prioritised.
- Transport, access, on-site parking and servicing for the greater area of Lane Cove and North Sydney Councils LGAs must be detailed upfront.
- The traffic is not really investigated. A cumulative detailed traffic management plan for the whole area is required before further rezoning and high rise developments are approved.
- Noise from cars and general noise will be exacerbated due to the increase in people numbers.
- Maximum development yield and SIC contributions will not cover the requirements but cause the area to suffer from shortfalls.
- The creation of new open space should be a priority and provided upfront. 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.
- 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.

St Leonards Crows Nest 2036 Draft Plan - Special Infrastructure Contribution (SIC)

I further object to the introduction of the 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.
- 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 DoPE draft 2036 plans have unsuitable planning decisions for the St Leonards and St Leonards South, Greenwich and Crows Nest areas due to high density required in the draft 2036 plans with little regard for amenity. This will lead to less school places, little green open space, no open parks, higher demand on facilities and services with no genuine immediate plans to increase amenity that will make the area below par. St Leonards South should be excluded from the draft 2036 plans and it is unethical to include this plan in the draft 2036 plans as it has not been decided on and also as it is against increased opposition from the community.

The precinct and St Leonards South will NOT be a **Place** for a vibrant community with **Movement** to be as an accessible place that has **Built Form** for a well-designed place as well as **Land Use** for an employment hub with **Landscape** for greener place and parks.

How about planning for sustainable growth, from the perspective of the long term community members and bring on the infrastructure and services from the outset and upfront! This will be good planning and a good DoPE plan.

All DAs and planning proposals must cease so that amenity, utilities, facilities, traffic, public transport, infrastructure and services levels are uplifted in order to ensure public trust in the fairness of the draft 2036 plans.

Above all the St Leonards South Council rezoning should be taken out of the draft 2036 plans and even stopped immediately so that the area can "catch its breath" from the residential high density that will take more than 20 years to absorb.

It is clear to everyone who lives in the area that increasing density is unwise and the draft 2036 plans could contribute to better planning outcomes.

Thank you for your time and consideration.

Yours Sincerely

Arlette Jubian