

SUBMISSION



FOREWORD

Willoughby City Council supports the draft vision, objectives and guiding principles of the Draft Plan for St Leonards and Crows Nest 2036 and looks forward to further collaboration with the NSW Department of Planning & Environment, North Sydney and Lane Cove Councils towards implementation.

Debra Just
General Manager
March 2019

A handwritten signature in black ink, appearing to read "Debra Just", written over the printed name.

General Observations

- Council commends the Department of Planning and Environment for the comprehensive suite of documents prepared for this exhibition.
- It is, however, a point of concern that insufficient focus has been placed on local and regional infrastructure for such a proposed increase in residential and working population in the Precinct. Considerably more work is required to address this.
- It is noted the population of the St Leonards/Crows Nest precinct will increase by about 60% with the implementation of the Plan.
- It is pointed out that the length of the exhibition period was originally nominated not sufficient for Council to fully consider and respond to such an extensive package of material. Council appreciates that an extension of time was provided.
- St Leonards / Crows Nest is a Strategic Centre in the North District Plan and is a key employment centre with the future Metro Rail Station at Crows Nest acting as a catalyst for potential growth, urban renewal and activation.
- With the increased population that will be housed in the Draft Plan area, and its increased accessibility on the Sydney transport network, it is important to promote further employment opportunities.
- There is also a need for the proposed rezoning areas to provide for the retail needs of the new population
- The need to increase open space, provide additional social infrastructure including education is critical.
- In order to ensure that infrastructure is provided in response to growth, a phased approach to the growth should be adopted.
- There will be a need to deliver a substantial component of affordable housing in line with the North District Plan.
- The Department of Planning and Environment has utilised a holistic approach to the planning of the transport, traffic and active transport system within the Precinct which is supported.
- The Draft 2036 Plan offers the opportunity for innovative transport measures (both pedestrian and vehicle) to sustain growth.
- A requirement to include energy efficiency green buildings should be added to the Draft 2036 Plan.

- Willoughby Council seeks to play a key role in ensuring the economic success of this Precinct whilst protecting the character of the existing residential neighbourhoods.
- Infrastructure needs should be provided in line with growth. Further State-local collaboration is required to provide clarity of how the intent of the Plan can be delivered including phasing and provision of infrastructure.
- A commitment by the Department of Planning and Environment to further collaboration with the three Councils and the community is recommended to refine the Final 2036 Plan in order to provide more certainty for the community.

The following sections refer to the various documents on exhibition.

Draft Local Character Statement

Comments:

- The Department is to be commended with the use of the Table which translates public comments through to how the Draft Plan responded. This is a useful summary / tool demonstrating how comments were considered and translated into the final plan.

Draft Plan St Leonards and Crows Nest 2036

Comments

Intensification of Uses

- Overall, Council supports the proposed increase in employment for the special area and recommends that the higher target of 16,500 new jobs as set by the North District Plan be the goal and not the lower target of 6,900 jobs which would displace more dwellings
- Council considers the importance of the role of Artarmon Industrial Area as a critical location for urban services for the North District to be paramount. The wording in the document (page 29) stating “..retain industrial zone to protect existing uses” is welcomed and supported.
- The notation on the same diagram on page 29 which states to “continue to support intensification of employment uses in the light industrial area including high technology and ancillary health uses on a site by site basis...” is rejected. The diagram copied below (from page 29) seems to define where the intensification of these uses will be considered (in gold colour). As these areas already permit high technology uses there is no issue with such uses. However, “employment uses” does not necessarily mean “industrial” and part of this area also includes IN1 General Industrial Land. To date, Council has supported 2 Planning Proposals for a “hospital” as an additional permitted use in this “gold” coloured section of the Diagram. However, proposals such as these must be carefully controlled as they displace vital and scarce urban services land and would drive changes over time associated with worker, patient and visitor accommodation and the service needs of a hospital. Hotel accommodation uses, even for

medical purposes are not considered to be suitable in an industrial area which appropriately includes car repairs, concrete batching and garbage recycling. Hotel uses are more appropriately located in the commercial core of St Leonards. Council would not support systematic, site by site erosion of the Artarmon Industrial Area which is regarded as not providing a clear strategic position.



The following diagrams provide conflicting information in this respect:

- Page 34 – this diagram below shows the health and education section in green. The white hatching refers to “priority for job intensification” however clarification is required if this shape should coincide with the areas recommended for intensification of employment uses on the diagram on page 29 above.

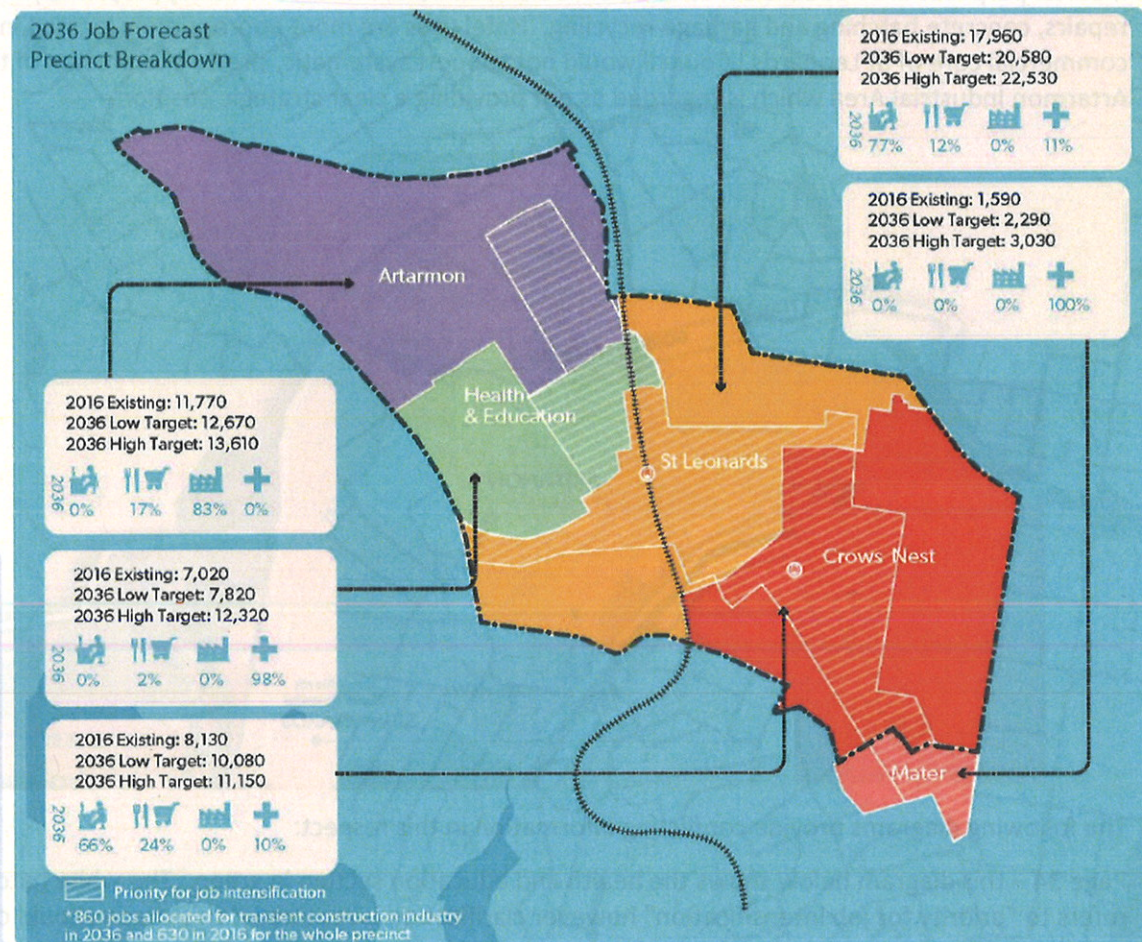


Figure 17: GSC employment forecasts

- In addition, the “hatching” on the following diagram copied from Page 43 which relates to “intensification of employment uses on a case by case basis.” This is different from that indicated on the diagrams on pages 29 and 34. Moreover, the “intensification of employment uses” wording is very broad and could be interpreted as encouraging consideration of non industrial employment uses thus jeopardising the strategic direction set in the North District Plan to ‘Retain and manage industrial and urban services land’. A stronger message is required that will clarify that this is not the intention and it is recommended that the diagram be changed.
- The Heritage Conservation Area hatching on this diagram on page 43 should also include the Naremburn Conservation Area.

Proposed Changes

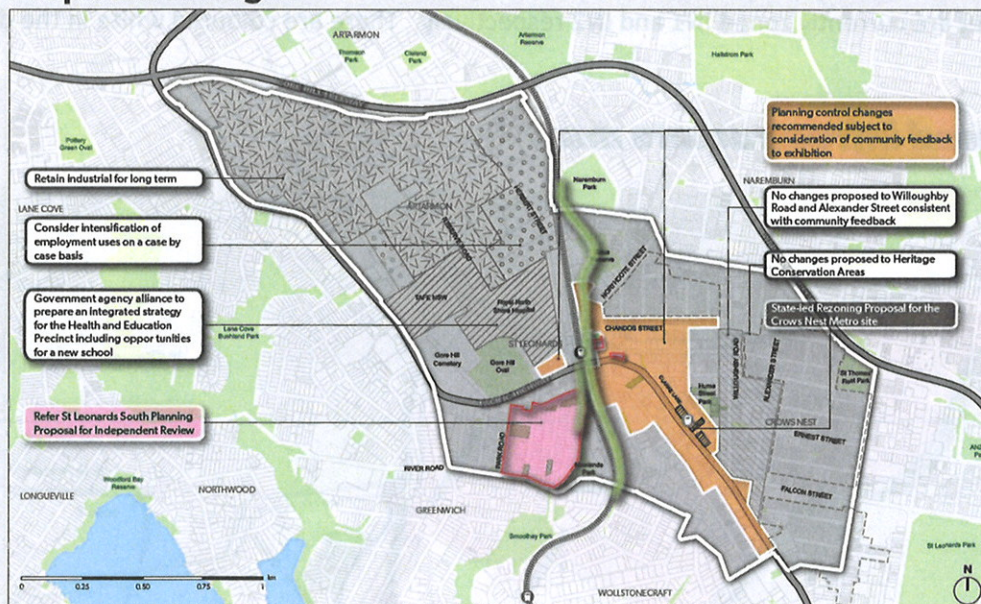
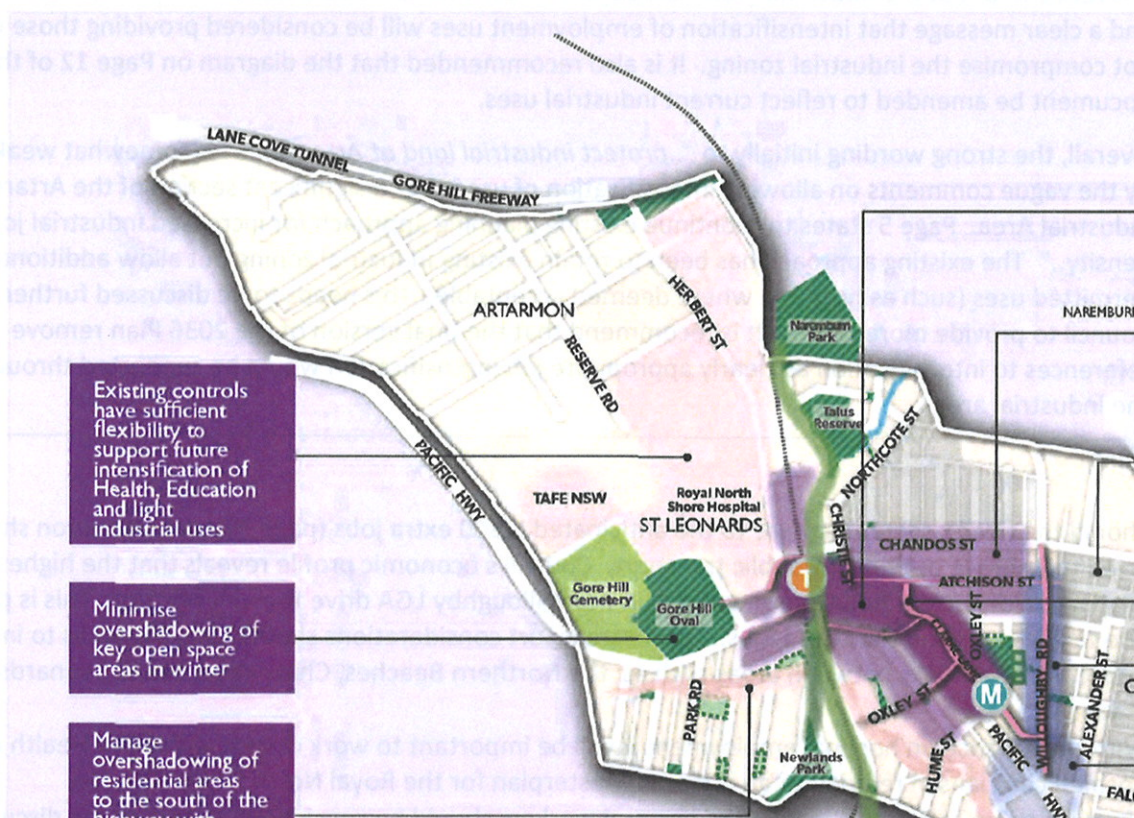


Figure 21: Areas of change and no change

Plan Area	Existing Open Space	No Change Areas	Crows Nest Sydney Metro Site
Railway Line	Proposed Open Space	Potential Change to Planning Controls	Heritage Conservation Areas
Railway Station	Council Proposed Open Space	Areas Subject to Planning Proposals being Progressed by Councils	Intensification of Employment Uses
Metro Station	Foreshore to Foreshore Link		Industrial Uses for Long Term

St Leonards and Crows Nest 2036 / Draft Plan / 43

- The Diagram on Page 23 (copied below) also provides shading of an area that “..Existing controls have sufficient flexibility to support future intensification of Health, Education and light industrial uses..”



This comment does not reflect current controls as “Educational establishments” are not currently permissible in the IN1 and IN2 zones.

- In addition, a diagram on Page 12 of the SIC document (Proposed infrastructure map - copied below)

does not indicate correctly the current industrial zoning. The south section of 12 Frederick Street and 2 Herbert Street are currently zoned IN1 and IN2 respectively. There are coloured white in the diagram below.

Proposed infrastructure map



- It is requested that the above diagrams on pages 23, 29, 34 and 43 be amended to provide consistency and a clear message that intensification of employment uses will be considered providing those uses do not compromise the industrial zoning. It is also recommended that the diagram on Page 12 of the SIC document be amended to reflect current industrial uses.
- Overall, the strong wording initially to “..protect industrial land at Artarmon..” is somewhat weakened by the vague comments on allowing intensification of uses over a significant section of the Artarmon Industrial Area. Page 5 states to “continue existing planning approach for increased industrial job density..” The existing approach has been to retain existing industrial zoning but allow additional permitted uses (such as hospital) where deemed acceptable.. This needs to be discussed further with Council to provide more clarity. It is recommended that the final version of the 2036 Plan remove references to intensification as clearly appropriate job intensification would be supported throughout the industrial area.

Employment

- Should the health sector increase to the anticipated 5,300 extra jobs (page 34), consideration should be given to improve options for public transport. Council’s economic profile reveals that the highest proportion of current health care workers in the Willoughby LGA drive to work (45.1%). This is probably due to 24 hour nature of these jobs. Future transport considerations should consider ways to improve public transport links between areas such as the Northern Beaches, Chatswood and St Leonards Stations.
- With the reliance on hospital employment it will be important to work closely with NSW Health and the hospital clinicians in relation to an updated Masterplan for the Royal North Shore Hospital.
- The pedestrian safety and amenity of hospital workers should be considered as part of the discussions with NSW Health regarding the updated Masterplan for the Royal North Shore Hospital.
- It is expected that opportunities to ensure the most efficient use of the RNSH site will be maximised rather than eroding the equally important IN1 and IN2 land in Artarmon to provide new health facilities.
- The critical regional importance of the urban services land in Artarmon must not be underestimated and this valuable land lost to uses that can be better accommodated elsewhere in the precinct.

Affordable Housing

- The Draft Plan is light on affordable housing and it should take a stronger position. The area's status as a growth Precinct is an opportunity to "showcase" initiatives that will promote and enable affordable housing. The Plan states that there is "... an important opportunity to influence affordability by increasing supply and increasing the diversity of products..." (Page 31). The increase in supply does not result in enabling affordability. The growth that is anticipated for St Leonards / Crows Nest particularly for key workers in the health sector should warrant justification for requiring a significant proportion of genuinely affordable housing as in Willoughby's Affordable Housing program.

Education

- The Draft Plan looks to identify a new school site in the health and education section defined in Page 43. The need for a new school is supported and previous consultations have demonstrated a public request for such a facility. It is recognised that the precise location for a school is not determined and that this is a notional location at present. However, a Primary School would tend to generate a significant increase in private vehicle trips with implications for the Artarmon Industrial Area. These implications and requirements for new school open space will also require further consideration. In addition, the hospital precinct should be retained for medical purposes. Council does not support a school within the hospital lands.

Proposed Built Form recommendations

- The proposed height and Floor Space Ratio controls (pages 50-57) are noted for 110-120 Christie Street, 2-10 Chandos Street, 207 Pacific Highway and 14-104 Chandos Street.
- With regard to 14-104 Chandos Street, the proposed changes in controls from 20 metres (6 storey) and 2.5:1 to 3:1 (with 2:1 non residential) would require further testing in relation to the Naremburn Conservation Area.
- Tree planting along the Pacific Highway is supported however the proposed building heights will present a challenge to achieving successful tree growth and canopy spread.
- A 27 storey height limit along the Pacific Highway is recommended

Infrastructure List

- More detailed comment on infrastructure is provided under the Proposed Special Infrastructure Contribution document below. However, there appears to be a deficiency in any provision for community facilities generally. For example, the proposed new Crows Nest Station could include some form of community facility eg a library / youth centre.
- In order to ensure that infrastructure provisions are met to accommodate growth, a phased approach to the growth should be adopted.

Transport, traffic and active transport system improvements

- A more detailed analysis of traffic impacts is required prior to finalising the plan.
- The Plan and the companion documents *Strategic Transport Study* (October 2018), *Draft Green Plan* (October 2018) and *Proposed Special Infrastructure Contribution* (October 2018) considers and proposes changes to the transport, traffic and active transport system within, and connecting to, the Precinct that impact on safety, mobility and access of all modes.
- Land use changes relating to residential, commercial, retail, health, education and industrial will have an impact on the transport, traffic and active transport system including increases in trips and new desire lines. Whilst the Sydney Metro provides the highest increase in transport capacity, improvements to support all other modes including pedestrians, bicyclists, motor cars, buses, and service/ freight vehicles

will be necessary to provide an acceptable level of service.

- Area wide design principles have been developed and applied (Plan p11). The principles are acceptable although consideration should be given to expanding the principles to include road based public transport, parking provision (commercial and residential areas) i.e. reduced rates due to high level of public transport provision; service/ delivery vehicle management (commercial areas) i.e. night time servicing/ delivery only; and safe systems approach adopted for all transport systems and users.
- The success of the Plan will be dependent on the actions of Council, public and private sector agencies including RNSH and Department of Education as these agencies are responsible for major land uses that are traffic generators and, in the case of RNSH, have road and pathway networks that are needed for access within the precinct to/ from St Leonards Train Station and Crows Nest Metro.
- The Plan provides a draft 20 year infrastructure program which is applauded. However, the measures can only be considered preliminary as detailed planning, design and community consultation is required. Proposed improvements in Willoughby LGA have been reviewed and whilst a number are acceptable there are a number that may change as a result of current and future planning and development. Comments will be provided to Department of Planning and Environment on the draft 20 year infrastructure program.

Special Infrastructure Contribution

- The SIC lists a number of potential projects which it could include.
- Currently \$2M is allocated for the Gore Hill Regional Playground and this is supported.
- An additional \$8M is requested to be applied to the Gore Hill Regional Sports Centre. This will contribute to the construction of 6 new indoor sport courts for multi-use and an underground car park. Whilst the Draft Plan does not propose any significant residential increase for the Willoughby LGA, Gore Hill Oval will play an important role in meeting the recreational needs of the additional population of St Leonards across the whole Precinct. SIC funding is considered appropriate for this proposed regional facility which will have a heightened importance should a school be located in the health and education precinct. Detailed financial aspects of this project will be provided separately
- Willoughby Council has prepared a new draft 7.11 and 7.12 Contributions Plan which is due to be placed on exhibition very soon. It is noted from the exhibition material that such local funding mechanisms will still apply along with the SIC.
- The SIC document states that the SIC “....will be payable for all additional residential homes built within the contribution area...” This will include dual occupancies, multi dwelling housing etc (listed on Page 13). It seems inequitable that property owners in the area which are not subject to any planning changes will be subject to the SIC as well as the usual local 7.11 contributions. It is proposed the SIC should only apply to the “upzoned” areas.
- It should be noted that Council has summited a series of project application forms for the Precinct Support Scheme (PSS) for funding towards local projects to upgrade pedestrian and bicycle connections in and around the precinct area and support necessary pool upgrades at Willoughby Leisure Centre. A response to those applications is awaited.

Draft Green Plan

- The Draft Green Plan includes categories for Committed initiatives, initiatives for investigation and visionary initiatives. The need to provide enhanced open space opportunities and improved pedestrian /cycle links is imperative to support population growth of this scale.
- The draft green plan should be amended to include a variety of open space in order to provide a sufficient amount of both passive and active recreation options for the increase in population and shortfalls in costs should be identified and provided for.
- As mentioned in the comments regarding the SIC, it is considered that Gore Hill Oval will provide an important regional facility to support the growing population. This submission includes a request that the SIC funding be increased for Gore Hill Oval.
- The various initiatives listed for investigation are supported. The proposed foreshore to foreshore green link, embellishment of Talus Street Reserve along with various improved bicycle and pedestrian linkages are supported in principle. However, it is noted that funding of these projects are not confirmed and this would need to be further explored and clarified.
- The Draft Green Plan includes detailed concept plans for industrial area streetscape tree improvement

canopy and for a Platform Park over the railway land at St Leonards Station. The Platform Park is an ambitious project which as yet has no allocated funding. The final document should include concept plans for committed initiatives only.

- The industrial Streetscape tree canopy plans concept plans would require further discussion with Council in connection with our own street tree planting program. The Draft Concept plans suggest additional landscaping be provided on private land as well on the centre of the roadway. Providing improved pedestrian and cycle links in the industrial area will require widening of the road and this will need to be further investigated in conjunction with landscaping requirements and impacts on business operations.