Dear Commissioners,

At a recent Lane Cove Council Sustainability Advisory Committee meeting, Chris Pelcz (LCC Coordinator of Strategic Planning) gave an interesting presentation on the range of sustainability initiatives proposed in some of the St Leonards South draft planning documents. The Committee was invited to review these documents and provide feedback to Council and the NSW Independent Planning Commission.

The charter of the Sustainability Advisory Committee (SAC) is to "assist Council in the formulation, prioritisation and implementation of strategies and initiatives to achieve sustainability as primarily set out in the Sustainability Action Plan". The Committee acts as the formal interface between Council and the community and comprises representatives from the residential and business communities, Council as well as the Lane Cove Bushland Management Advisory Committee.

The SAC reviewed the St Leonards South Draft Master Plan and St Leonards South Draft Landscape Master Plan and has attached a submission with feedback on the two documents in regards to the area of Sustainability.

In reviewing this submission, the following should be noted:

1) The submission is structured in five broad parts - i) Strengths of Plans Reviewed; ii) Weaknesses of Plans Reviewed; iii) Recommendations; iv) Conclusion; and v) Addendum One.

2) Definition of "St Leonards South Precinct" (SLSP): As defined in the SLSP Draft Masterplan, the SLSP is the "area bounded by the rail line south of St Leonards Station, Pacific Highway, Greenwich Road and River Road". The submission makes reference to development in this Precinct as St Leonards South Development (SLSD).

3) Definition of "Sustainability": Also noted in the SLSP Draft Masterplan, "Sustainability has environmental, economic and social aspects". The submission examines the breadth of sustainability in terms of environmental, economic and social considerations and impacts.
The SAC acknowledge and applaud the hard work and efforts contributed by LCC and State Government agencies yet there is still considerable work to be done before these draft documents are finalised. The SAC urges LCC, State Government and other key stakeholders to 1) collectively develop a clear, holistic and integrated vision; and 2) be pro-active leaders in setting ambitious objectives and goals with sustainable environmental, economic and social outcomes for the prudent development of the SLSP over the next 10-50+ years.

The SAC look forward to receiving your response on our submission and working further with Council and State Government on the Sustainability front.

Should you require further information or wish to discuss any of the matters raised in the SAC submission, please contact either Ms. Jane Blackmore (jane.blackmore@gmail.com) and/or myself (mlglastris@gmail.com).

Yours sincerely,

Dr. Michelle Leong Glastris
Deputy Chair, LCC SAC

Ms. Jane Blackmore
Chair, LCC SAC

CC:  Mr. Chris Pelcz, Lane Cove Coordinator of Strategic Planning

Ms. Fiona McCleary, Lane Cove Council Sustainability Coordinator

Encl.: “St Leonards South Development: St Leonards South Draft Master Plan & St Leonards South Draft Landscape Master Plan - Feedback on Sustainability Initiatives”
Thank you for the opportunity to provide feedback on the sustainability provisions for the St Leonard’s South Development (SLSD). This document lists specific strengths and weaknesses in the current plans in relation to sustainability, and provides recommendations for Council as this important project progresses. The SAC would welcome further discussion on the contents of this document and look forward to your response to our recommendations.

Documents Reviewed:
- St Leonards South Draft Master Plan.
- St Leonards South Draft Landscape Master Plan.

1. Strengths of Plans Reviewed

1.1. The depth of thinking in the Landscape Master Plan is clear, and sustainability features as an integral part of this plan

1.2. The considerations within the Landscape Master Plan for deep planting, green set backs, communal gardens, mature tree retention, green walls and roofs, wildlife corridors etc are all worth supporting / retaining in future iterations

1.3. The focus in both documents on walkability / cycle ways and accessibility are also strengths of this plan

1.4. The connection to public transport (TOD) and potential this provides for reduced car usage is an inherent strength gained by location of the site

2. Weaknesses of Plans Reviewed

2.1. Absence of a dedicated sustainability plan

2.1.1. A development the scale of SLSD requires a dedicated sustainability plan that articulates a sustainability vision, focus areas and targets for SLSD that guide both landscape and built form design. Reference to sustainability within the landscape plan alone is insufficient to inform design decisions of the apartment and other buildings. More detail regarding sustainability requirements of future buildings is required.
2.1.2. SAC would expect a development of this scale to have a detailed sustainability plan with significant expectations clear for all buildings as well as the spaces between buildings. This is standard practice for projects of similar scales. Master plans and tender documents for projects such as Sydney Metro stations, Barangaroo all came with clearly articulated sustainability requirements. Quality developers will expect to be asked to respond to a dedicated sustainability plan.

2.1.3. We are aware there is reference to sustainability in the SLSD Master Plan, as well as the Landscape Master Plan. Section 1.5 of the SLSD Master Plan however presents a very weak vision for sustainability, referencing only ‘Transport Oriented Development’ (TOD). TOD is achieved by default of the location of the development. With no further vision articulated, there is no sustainability aspiration/expectation clear for anything that will be built in this location.

2.2. Climate Change Risk Analysis
2.2.1. We were unable to find any climate change risk analysis that has been conducted for the site. It is important to understand whether potential changes to temperature, rainfall, fire, storm and other weather patterns need to be addressed in design elements such as storm water management and thermal comfort requirements for buildings.

2.3. Social Sustainability
2.3.1. Currently no plans reference opportunities to drive important social sustainability outcomes in areas listed below. A development of this scale is a once in a life time chance to have a lasting positive impact on both the environment and society.
   2.3.1.1.1. Affordable / key worker housing
   2.3.1.1.2. Facilitation of social enterprise
   2.3.1.1.3. Training, skilling and employment targets for minority groups

2.4. Use of Ambiguous Language
2.4.1. Good ‘suggestions’ within the Landscape Plan sustainability sections are presented currently as ‘options’ / ‘recommendations’, rather than requirements, placing them at risk of being ignored or value engineered out of scope at a later stage. For example, it is currently possible to ‘comply’ with the Landscape Master Plan without providing any community gardens, green walls or roofs simply because of the way these ‘requirements’ are described. (see those highlighted from the plan in Addendum One).

2.5. Green Star References
2.5.1. Reference to ‘incorporating Green Star Community Guidelines’ within the Landscape Master plan without actual commitment to seeking a rating is both inappropriate (Green Star standards can only be referenced when a project has registered for certification) and lacks the rigour of third party assessment that commitment to a certification brings.
2.5.2. The Green Star Communities Rating referenced is an excellent tool for a precinct, particularly one that is developed and managed by a single entity. We are not aware of the commercial model Council plan to apply to the site and whether it will be packaged as single or multiple developments. Green Star Design and As Built ratings for each building may be more appropriate and will drive a higher level of initiatives for the actual buildings than a Community rating will.

2.6. Other Omissions in the Landscape Master Plan

2.6.1. The materials section of the Landscape Master Plan omits reference to reducing embodied carbon of materials chosen. Given 80% of the materials mentioned are high in embodied carbon (concrete and steel, responsible for >10% of the world’s carbon emissions), this is an oversight. Several lower embodied carbon options are highly suitable for landscape elements, including pre-cast geo-polymer elements.

2.6.2. Minimisation of light pollution at night does not feature in the plan. This will be important for occupant amenity and for wildlife.

2.6.3. We could not see any designated community garden spaces on the plans and worry this will make it difficult to implement.

2.6.4. Opportunities to respect and inform people about the traditional indigenous owners of this land through public art, programs, employment etc are missing from the plan.

2.6.5. The opportunity to provide public art does not feature in the plan.

2.6.6. Specific reference to the provision of car share parking spaces and electric charge points could not be found.

3. Recommendations

3.1. Precinct Sustainability Plan

3.1.1. SAC recommend LCC as a matter of high priority prepare a dedicated, precinct wide Sustainability Plan for the SLSD that:

3.1.1.1. Articulates a clear vision to achieve world class sustainability standards

3.1.1.2. Includes an independent specialist climate change risk analysis

3.1.1.3. Provides incentive and clear encouragement for over achievement and innovation in sustainability

3.1.1.4. Sets minimum and stretch sustainability targets/ requirements for both buildings and landscape space related to:

3.1.1.4.1. Carbon emission reduction (embodied and operational)

3.1.1.4.2. Climate change mitigation and adaptation

3.1.1.4.3. Provision of renewable energy

3.1.1.4.4. Water conservation
3.1.1.4.5. Waste minimisation
3.1.1.4.6. Bio-diversity and flora / fauna conservation
3.1.1.4.7. Inclusion of green walls and roofs
3.1.1.4.8. Travel and accessibility
3.1.1.4.9. Recognition of traditional owners
3.1.1.4.10. Social / affordable / key worker housing
3.1.1.4.11. Social enterprise and workforce participation
3.1.1.4.12. Third party accreditation set at stretch levels for BASIX, NatHers and Green Star (recommend minimum 4 Star Green Star Design and As Built for all buildings with incentives to achieve 5 and 6 star).

3.1.2. SAC recommends this plan is prepared for LCC by sustainability specialists with specific expertise in the property sector. SAC members can recommend suitable organisations and help LCC brief / review plans provided if desired.

3.1.3. SAC recommends the above sustainability specialist also sit on the Design Review Panel referenced in Section 3.2 of the SLSD Master Plan.

3.1.4. SAC recommends the sustainability plan is made available for public comment.

3.1.5. SAC recommends the sustainability plan use specific, clear language so that mandatory and optional / stretch requirements are unambiguously described.

3.1.6. SAC recommends LCC ensure alignment of this plan with the LCC Sustainability Goals, the UN Sustainable Development Goals and Paris targets.

3.2. Economic Sustainability Considerations
3.2.1. The SLS Precinct has a strategic proximity to St Leonards Station and other key regional employment, economic, major infrastructure and residential drivers. It is critical to ensure the Precinct's economic sustainability as an integrated, comprehensive and robust model. This avoids future ill-conceived and ad hoc changes in land and infrastructure use, obsolescence and other unfavourable economic, environmental and social consequences. Therefore strong consideration should be given to:

3.2.1.1. Integrated Strategic Land Use & Consistent Zoning/Re-Zoning - Holistically examine all Precinct land uses (commercial, retail, transport infrastructure and parking, low-high density residential, community, recreational, open space/parks) that optimise land use, public transport use and support complementary, high order uses. Also, evaluate under utilised land uses and ensure consistent zoning/re-zoning. This prevents poor planning, inadequate provision for future needs, reduces waste in capital, infrastructure, energy, other resources and significant decreases adverse economic, environmental and social impacts.
3.2.1.1.2. **St Leonards as a "Strategic Centre"** by attracting a range of knowledge intensive industries and diversifying the economic base to provide sustainable economic growth over the next 5-30+ years.

3.2.1.1.3. **Alignment of Strategic Planning and Development Objectives** between Local and State Governments to develop a long term (10-50+ years) economic vision with commercially viable economic, employment, population and new dwelling growth targets. LCC should also adopt a structured evidence based market approach; examine land uses and development modelling options, impacts and key linkages between the Precinct and broader St Leonards/Crows Nest/North regions; and ensure integrated and coordinated development between NSW Government, Lane Cove, Willoughby and North Sydney Councils.

3.2.1.1.4. **Funding Mechanisms for New Infrastructure and Other Provisions** - Examine how higher yielding new developments can provide greater contributions to sustainably provide for future needs and fund local and state government projects e.g. transport, health/medical, education, affordable and social/public housing, community/social infrastructure.

4. **Conclusion**

The SLSD marks a significant opportunity for LCC to make a lasting impact. LCC has the potential, and a deep obligation, to ensure the impact is positive for all generations of all living things in the full breadth of sustainable living – social, environmental and economic. Sydney urgently needs examples of density done well – density that is enjoyable to live in and truly sustainable.

This is our chance to be that example.

Beginning with a clear sustainability vision and a thorough and ambitious plan is fundamental to achieving this. The SAC urges LCC to take the need for sustainable planning as a matter of urgent priority and to be bold in ambitions set.

The current plans lack sustainability vision, clarity and breadth and falls significantly short of current sustainability practice for a precinct of this scale and significance. Councils such as City of Sydney have demonstrated that Local Government can play a powerful role in driving significant improvement in sustainability performance, whilst maintaining highly profitable developments and facilities. It is entirely possible for LCC to be equally strategic and influential and SAC welcomes the opportunity to support efforts towards this critical goal.
**Addendum One:** Highlighted examples of ‘Ambiguous Language’ in the current Landscape Master Plan (at risk of being value engineered out)

**MASTER PLAN SUSTAINABILITY**

The approach to sustainability should be based on the following principles:

- The location and design of walking / cycling paths and outdoor spaces should promote active transport and physical activity;

- Water sensitive urban design measures should be incorporated within public and private open space. Examples include the provision of rain gardens within the parking lanes or in open space at the low end of public streets, and rainwater tanks to collect rainwater for reuse within buildings and/or for irrigation;

- Opportunities to provide communal gardens as part of the communal open space should be explored;

- Opportunities to provide extensive or intensive green roofs on new buildings should be explored;

- Materials used in the public and private domains should have low VOC content, low embodied energy, high recycled content, the ability to be recycled, and be locally sourced wherever possible;

- Retain or reuse existing sandstone walls. Where not possible to retain, they should be photographically recorded;

- All timber used in the public and private domains should be either sourced from sustainable sources (with relevant certification) or recycled;

- Energy efficient lighting such as LED and solar powered should be used;

- The use of a structural rootcell system along with drainage cell and other water storage / reuse elements in areas where appropriate is strongly encouraged;

- Permeable paving to reduce run-off and increase water reuse;

- Vertical gardens / green walls to reduce building temperatures where appropriate.