

To the NSW Independent Planning Commission,

Re: Submission on St Leonards South Development Plan

Thank you for the continued opportunity to provide feedback on the current St Leonards South Development Plan. My name is Chris Watson, and I am a resident and committee member of the Pavilions apartment complex, on Duntroon Avenue, adjacent to the proposed St Leonards South redevelopment. I have provided previous submissions on various stages of this proposal, and some of my comments below echo these, but I believe are worth repeating at the current time. I am sorry not to be able to attend the NSW Independent Planning Commission public meeting in person, but am currently overseas.

I am not opposed to redevelopment to higher-density residential, but am opposed to the type of over-development that has recently and predictably degraded high-quality neighborhoods (e.g. Chatswood, North Ryde, Epping, etc) and is being proposed in St Leonards South. The density and height of these developments is routinely mocked in these communities as kowtowing to developers and not catering to community needs or neighborhood aesthetic, and we are only just now starting to see the effects of these, in terms of transportation difficulties and social needs. In contrast, the size and aesthetic of the Pavilions complex, amongst others, is a reasonable model to use. We have an opportunity here to learn from recent mistakes.

It is my opinion that the planning of the St Leonards South precinct was eminently premature, and was rushed to take advantage of the (then) favourable property market. Initial justification for development from Lane Cove Council was derived mostly from residents who stood to make a lot of money from selling their properties. The community that remains - unsurprisingly - are those who are much less supportive of over-development. I cannot fault families who sold properties to developers: the offers were simply too good to turn down. But for developers to have bought hundreds of millions of dollars of property without the land being zoned for their proposed purpose is a commercial venture done at their own risk. We simply cannot allow this to become a fait accompli based on the miscalculation and hubris of these companies. Perhaps now that the real estate market has softened and residents have some supportive representatives in Council, a more reasonable approach can be brokered.

I have extensive experience in environmental consulting and have given a thorough review of the publicly available documents. While there are some laudable elements to this plan, there are some aspects that I am strongly opposed to, and seem extremely short-sighted and driven by developer influence. Some of these pertain specifically to impacts on Pavilions residents; others pertain to the general neighbourhood.

My primary concerns with the current St Leonards South Plan include:

- Greatly excessive building heights
- Impact on local traffic and transport
- Shading and privacy
- Lack of consideration to nearby residents
- Excessive long-term disruption

I have provided more detail on these below.

Excessive building heights

The proposed heights of 31 to 65m are outrageous. I note that these heights do not include community levels, or rooftop terraces, hence these heights are likely to push up even further. I understand the desire to have house more residents and/or provide more incentive to developer to fund public amenities, but the proposals are truly astonishing. This is not The Forum, or adjacent to the highway. Keep heights modest in St Leonards South. This has been the primary public concern for these developments and the community's voice continues to be ignored.

[Appendix A](#) to the Draft St Leonards South Master Plan concludes that 8 stories maximum to maintain solar access within the precinct, much less outside it. Even eight stories is too high for the region. One gets the distinct impression that a strategy has been employed of proposing over-the-top building height in order to "negotiate" a lower, but still extreme, result. This has certainly been the case in recent St Leonards and Crows Nest developments.

It is important to not sacrifice long-term quality for short-term gain. I do not support changing the LEP to allow building heights of above 30m. There is the potential to make this precinct an example for others to follow, rather than an eyesore and mistake. Building heights are at the very core of this. In the past few years, the inflated property market has driven this short-sighted trend for overly tall residential development. Now that the market has softened substantially, I propose that this plan be substantially adjusted in order to maintain the character and value of the region.

Impact on local traffic and transport

The findings of the publicly available traffic report - that traffic increases will be 'very moderate' are in some places counter-intuitive, and in others patently incorrect. It seems that RMS initially identified some of these blunders as well. The models do not even reflect the existing reality on traffic demand (e.g. morning backlogs on River Rd that even now extend daily beyond the subject precinct). Confidence in these models is lowered by predictions of traffic declines based on erroneous assumptions - that new development is replacing existing residences. Put simply, increasing residents by several thousand in the immediate area will undoubtedly increase the traffic demand will increase many-fold without major changes to controls and road design. Any suggestion to the contrary suspends belief and places mistrust on the the entire proposal.

One of the main failings of the traffic report is that it does not consider local impacts. Duntroon Avenue is already dangerous due to its increased use as a shortcut from the Pacific Highway to River Road. Despite recent widening, I have witnessed many minor accidents on this street, and some major ones, as well as several near misses involving children and pets. Pedestrian incidents are inevitable. Further, the congestion of River Road in the mornings will be a major regional black spot.

With regard to public transport, the rail network is already approaching capacity at St Leonards in morning commuting hours. Even with the proposed metro line, public transport will not be able to withstand the increased demand under with 4800 additional residents in this small area.

Shading and privacy

The proposed building heights present major impacts to users of Newlands Park and Pavilions residents through reduced sunlight hours. One of the joys of Newlands Park is the dappled sun through the trees on a Saturday or Sunday afternoon. Tall buildings will demonstrably shade the park - the existing models

suggest significant winter shading from 2pm. This impinges on existing public amenity, through loss of sunlight to park users. It will also result in less capability for the park to dry after heavy rainfall events, which is already a factor that impacts park use and increases maintenance costs – particularly in the winter.

From a residential perspective, west-facing Pavilions residents will lose more than two and a half hours of afternoon sun in summer under the current proposal. In winter (as demonstrated at community drop-in sessions), the shading to 2 Duntroon Ave commences at 1:30pm. This is an enormous loss for all Pavilions residents that face west, not to mention the cumulative effects from other developments (e.g. to the north of Pavilions, which will reduce early afternoon sun) and the typical increased issues with loss of sunlight (moisture, mildew, etc.) This complex was not designed to accommodate this level of shading.

One of the core designs of Pavilions is the provision of privacy to each apartment. Under the proposed development heights, all west-facing Pavilions residents will be visible to hundreds of additional neighbours, with no ability to screen or protect from view. This issue has not been addressed in any document that I have viewed and is unacceptable. Building heights must be heavily reduced to maintain the privacy of existing residents.

Lack of consideration to nearby residents

The focus of the various publicly-available documents is on the precinct, with respect to shading, privacy and other impacts on amenity. While this is clearly core to the project, little import is given to impacts to neighboring residents located outside of the precinct – specifically on Duntroon Avenue and west of Park Road. This is particularly shown in the shading diagrams, where mid-winter solar access is reduced to less than 2 hours for 2 Canberra Avenue and 2 Duntroon Avenue.

Given the proximity of Pavilions to the precinct, and the density of residents within Pavilions, a targeted meeting with our residents would go a long way to hear their concerns.

Excessive long-term disruption

The magnitude of this development means long-term disruption to all neighbours, in the form of noise, dust, and heavy traffic. St Leonards South residents have been experiencing what will be a prelude to disruption over the past 2 years months with the two Marshall Avenue apartment developments and

the current development at 2 Canberra Avenue. Pavilions residents will be subject to 5 years' worth of continuous development disturbance.

On top of the usual disruptions of construction noise, dust, traffic disruption, etc. the developments on Marshall Avenue have shown what the neighborhood can expect: increased litter from site workers, parking monopolisation from early morning to knock-off time.

Threatened species assessment

Powerful owl (*Ninox strenua*) is a threatened species and is known to occur in Newlands Park, adjacent to the precinct. It is virtually certain that powerful owls occupy large trees within the precinct - indeed I have personally heard them. This has not been adequately assessed.

Many of these elements outlined above have been identified previously, as early as the 2013 community consultation (http://ecouncil.lanecove.nsw.gov.au/TRIM/documents_TE/85710769/TRIM_Straight%20Talk%20Final%20Report%20St%20Leonards%20South%20Strategy%20Stage%201%20November%202013_857907.PDF). Even at this early stage, residents provided the following broad feedback:

- Ensure development is sensible
- Limit high-rise development
- Protect the village character
- Consider pressure on local services
- Avoid physical impacts on existing community
- Deliver benefits and make positive improvements
- Properly plan the type and quality of development (noting Pavilions as a good, unobtrusive model)
- Consider the wider context

Almost all of these elements have been ignored under the proposed plan, predominantly due to the outrageously excessive heights that are proposed. I urge the IPC to not forsake the amenity of local residents and the value of the

neighbourhood based on the premature speculation of developers. The community will not view this kindly, and it seems that they are starting to make this known at the polling booth. Yes, let's make this a dynamic precinct, but let's do it modestly and sustainably, with amenity for all.

I am happy to further discuss any elements of this submission.

Regards,

Chris Watson