

26 May 2019

Dear IPC Panel Members

I am writing to oppose the Planning Proposal for the rezoning of St Leonards South for a variety of reasons however I would like to discuss the following aspects.

### **Accessibility to St Leonards and Crows Nest station and Lack of Open Space**

The St Leonards South area is not suitable for rezoning since it is not conducive to providing good accessibility to the key nodes in the area (eg transport and shopping areas). Council's own report on the rezoning note:

"The current North-South connections within the precinct are sloping down from the Pacific Hwy towards River Rd. This does not encourage either pedestrians or cyclists to access the station."

Council's report goes further to state: "Linkages Outside the Precinct: Access across to Gore Hill Park would require a collaborative approach with RNSH, Willoughby Council and the RMS. To date there is no RMS support for new lights across the Pacific Hwy."

North Sydney Council report which noted "the Pacific Highway, only has a limited number of signalised crossings, and is too busy to cross elsewhere."

These quotes demonstrate the issue of Accessibility of the precinct to the new Metro Station and the current Train station. The main driver for this view is that the area is characterised by having a relatively flat aspect near the Pacific Highway at Marshall Avenue but this changes drastically closer to the River Road End. From that perspective the area has very steep slopes which are difficult to manage. This issue has been identified in consultant reports prepared for the Department of Planning and Council.

Hence, the precinct cannot easily access the current train station and the new metro station which are on the other side of the Pacific Highway and the resultant increase in population from the rezoning will add to pedestrian congestion crossing the Pacific Highway which only has only 2 crossing points.

The current rezoning plan set by Council seeks to maximise the amount of open space in the precinct given the constraints of the site including (sloping site, limited space, shadowing etc). However, because of these constraints it is impossible to deliver sufficient quantum of open space and green space. There has not been a cumulative study on the level of open space required for the area as a whole. This is required to avoid having reports from Council including Gore Hill sports facility as both open space and green space to support every development in the area. In addition, the same open space is being used by adjoining Councils to support developments in their LGA for example the RNS hospital site.

In considering the current proposed open space in the precinct by Council it is easy to see the open and green space more like patches of small not connected alleys that theoretically meet the definition of open space but are not practical or useful. Hence, the area does not have sufficient open space that is useful/useable for the residents. In particular, due to the hilly nature of the site North South connection will be of little value because it is steep.

East- West connections face similar issues. Because the area slopes North/South then these connections need to be levelled. While this improves their functionality for pedestrians (ie being flat for walking) it does add a dimension of having walkways characterised as being below the ground since the levelling will require retaining walls of varying height. This adds issues of safety and overshadowing which will make these walkways less appealing. In any event, traveling east-west does not lead anywhere since the hub of activity is on the north end which is sloppy as discussed above.

it is not clear if the open or green spaces can be connected because these areas will be owned by developers who will seek to have these areas levelled to suit their own development and fenced. I refer to Council report which notes "The 'green spines' of the AAUD model might be fenced". Hence, the north south links might not be possible.

Due to the issue of overshadowing these walkways cannot be built with any green elements and will have to be constructed from harsh material and end up looking like concrete paths that are not sympathetic to the environment or be green.

To this end locating open or green space in the precinct will not be possible since any open space will be hard to access and will require developer contributions which will come in the form of higher developments which will exacerbate the issues namely by increased population and overshadowing.

In summary, it is difficult to locate open or green space in the precinct due to overshadowing and other topography and hence if some areas are squeezed in they will not be connected and remain isolated.

### **Transport Connections**

The St Leonards South precinct is not suited for any TOD due to its topography and being on the other side of the Pacific Highway. This rezoning will add to the congestion across the Pacific highway. Traffic studies have already highlighted that additional pedestrian traffic will be difficult to manage and will impact car traffic flow.

St Leonards is a main traffic hub and should be considered as such, (connecting the North Shore to the Harbour Bridge and being a major route to come back from the City – consider current traffic jams as confirmation). Hence, in assessing traffic flows, future demands on the road network in the area considerations need to be given to growth in the wider area and feeder areas. That is additional demand is not just generated from the immediate area. This area is affected by developments that use the area to access the City.

In relation to public transport, the current train line is full (over capacity according to Sydney Trains capacity is at 141% as at March 2018 and is growing) and the metro will not be available for another 5 to 6 years then how will this extra demand be catered for over this period.

### **Appropriate Transitions to Lower Scale buildings**

The proposed setbacks and transitions on the East side of Park Road and River Road are inappropriate and insufficient given the ultimate height of the proposed developments after taking into account the topography of the area. The proposed setbacks only work at street level and if the area was flat (which it is not). The size of the proposed developments will be extenuated by the falling nature of the area and the impact of transitioning should not be simply assessed from a perpendicular perspective (ie looking the property head on) but viewed from the immediately adjoining homes down the hill as well. These houses will be impacted more than that shown in Council's single dimension reports. Moreover, the proposed setbacks of having the height pushed to the back of the proposed developments will again only work for a head on view not from a side view. Given the narrow aspect of the proposed blocks the setback will not be sufficient to make any setback meaningful.

The issue of transition should be carefully considered from the perspective of residents on Park Road which are situated on a considerable fall of the land and will be acutely exposed to this risk. The issue of transitioning and scale are exacerbated for the properties on the other side of River Road which have a lower elevation (due to the topography of the land) which would result in the houses on River Road facing over bearing developments, looking down at them (refer picture below which proves this point). This situation will be unbearable for the residents on River Road South and remains as one of the major flaws of this proposed rezoning.

There will also be excessive shadowing from the proposed developments on the residents on River Road. This point has been underestimated by Council's shadow consultants and there is no further mention of the loss of privacy for these houses.

The use of trees (including deep soil trees) as a mitigation by itself will be of limited benefit due to the sloping nature of the area. It can be argued that trees are the only option to deal with transition and minimising the visual impact of the proposed bulky developments then maybe small developments should be considered instead of accepting a suboptimal outcome.

As well, little or no assessment is provided on the impact of these developments on the issue of privacy for houses on Park Road which most (if not all) have bedrooms facing the proposed developments. As well, houses on River Road which will be dwarfed by the proposed developments on the high size of the road.

Moreover, the heritage listed items which are adjacent to the precinct cannot be taken out of context. That is even with setback and transition these heritage listed homes cannot be forced into a situation where they are isolated and facing/surrounded by high developments. These properties will become heavily impacted and not usable for their current purpose. That is, who will buy a heritage listed house surrounded by high rise, it will not work, these homes will be the only houses in the area. These

properties will become unusable/unliveable especially by families. How can you justify a family house isolated and surrounded by bulky developments?

**The site in question is isolated – where will the rezoning Stop.**

Residents across from the rezoning need to have their neighbourhood protected and not high jacked by high rise developments which significantly impact their quality of life and cause them to lose significant value in their homes. Deep soil planting does not provide an answer.

The precinct does not enjoy a natural boundary that could justify having the rezoning stop at a particular point. The area has narrow streets which make the properties facing the rezoned area significantly impacted. Hence, the answer is to consider good long term Planning outcomes. Stopping the development at Berry Road or say Park Road is also not the answer. Rezoning of the entire wider precinct to Greenwich Road is also not the answer because houses on Greenwich road will be impacted and those across River Road will be more than significantly impacted. Moreover, the overshadowing will be worst in the other streets because they have a greater slope and the traffic impact is not manageable, also more heritage listed houses will be impacted. Hence where do you stop the rezoning.

At present the area known as St Leonards South enjoys many natural barriers such as the train line on one side, the Pacific Highway on the other. The slope of the area falling away from the Pacific Highway implies that any high rise developments on the Pacific Highway will not be immediately visible and will not impact the area. Hence, a no development option provides the best long term solution for the wider area.

In closing we do not have an imperative to add so many residents in one area. The TOD aspect does not work and should not be justification to a bad town planning outcome. We should not be driven by what developers want but what is good planning.

The area does not have sufficient level of infrastructure and services, let alone adequate transport and is congested. What will happen to us after the rezoning. What quality of life will we have. Accordingly, the area should not be rezoned but in fact treated as a conservation area.

Regards,

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