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Independent Planning Commission of NSW

via email: ipcn@ipcn.nsw.gov.au

Submission to the Independent Planning Commission of NSW

Planning proposal for the St Leonards South Residential Precinct

1. Introduction

I live close to the area covered by the St Leonards South (SLS) Plan and am deeply concerned at the impacts Lane Cove Council's plans will have on our community. The plan forces highly unnecessary population densities on St Leonards, which is already struggling to cope with the impacts of existing approved high-rise residential developments on Pacific Highway. Insufficient thought has been given to these impacts, actual community needs, and the enormous burden it will place on existing green spaces, infrastructure, schools, public transport and the hospital.

I am not opposed to development. I live in a medium density, well-considered development in Duntroon Ave. My understanding is that the success of Duntroon Ave, which is often cited as an example of good planning, was achieved only after significant public input and debate. If buildings of a similar scale had been proposed for SLS, the community opposition would no doubt have been far less.

But this is not what has been proposed. The SLS Plan will see nearly 5000 people crammed into less than 9 hectares, creating a population density greater than any city in Australia.

2. Addressing IPC terms of reference

The terms of reference for the IPC were set out in the letter from the Minister for Planning on 20 December 2018. My submission addresses the individual terms in that letter as follows:

2.1. Consistency with overall vision for the area as set out in the St Leonards and Crows Nest draft 2036 Plan (the 2036 Plan) (p. 4)

SLS Plan fails to be consistent with any of the five factors in the 2036 Plan's vision for the area as follows.

Place: Residential towers up to 19 storeys high, with narrow green spines and just 0.5 ha of new parks, will not provide 'vibrancy and liveliness' within the SLS area. The proposed layout will result in rows of 'homogenous blocks marching down the hill', as one resident described the plan to the IPC hearing last week. The green spaces will be overshadowed by the towers, as evident in Council's own overshadowing diagrams. There are no new services or infrastructure planned of note. With 2400 residential apartments, the area will be a daytime dormitory area where workers are forced to travel outside the area and return at night.

Movement: Given the steep topography of the area, it is hard to imagine it will be an easy place to walk or cycle through. At present there is no cycle infrastructure in this area, and the two main roads which form two of the boundaries (River Road and Pacific Highway) do not and are not planned to have any new cycle access. Cyclists like myself already struggle to leave or enter the area safely, given the high traffic volumes and narrow lanes. The SLS Plan does not address this in any meaningful way.

Given the topography and access difficulties, and despite the proximity to St Leonards station, it is most likely that people will still need to drive their cars to access services which do not exist near them (eg. supermarkets, schools, recreation, retail shopping, etc).

Built form: By proposing a series of 8-19 storey high-rises it is clear no consideration has been given to 'respecting and enhancing the existing local character of the area'. There are currently 138 single dwellings of a low rise nature and character which promotes family orientated homes. Council's 3D drawings have been interpreted by two speculative planning proposals put forward by developers recently (Top Spring and Greaton). These speculative proposals clearly show that developers will be aiming to build to the fullest extent of the building envelope, with box-like towers completely out of character with neighbouring Duntroon Avenue, River Road south or Park Road west. This will not be a sensitive transition.

Land use: The entire proposal is for high density residential use, with potentially a community centre and child care centre (subject to developer contributions). Where is the relationship of this proposal to the 'employment hub' the 2036 Plan envisaged for this area?

Given the anticipated prices of the new units to be built (needed for developers to make their investments profitable), they will likely be out of reach of the general population. The reality is their most likely purchasers will be 'downsizers', as one developer suggested at a recent Lane Cove Council Planning Panel hearing. Downsizers are retirees. They will put further strain on existing medical services, and are more likely to drive in and out of the area. The lack of diversity in the type of housing proposed will not encourage a range of people to live here.

Landscape: With just 0.5 hectares of new public open space planned, the area will be significantly less green than it currently is. The construction will necessitate virtually all the existing mature trees being replaced destroyed and replaced by shallow plantings (to accommodate underground car parks) and token box plantings. The towers will overshadow the proposed 'green spines' and it will not be an 'active, creative' or 'green leafy space' as envisaged by the 2036 Plan.

I note that the SLS area does not physically include Newlands Park in its boundaries, yet mysteriously the plan includes Newlands Park in its open space calculations. This 1 hectare park is claimed by every new development in the area as part of their accessible open space, being counted multiple times over. With 1900 units underway on Pacific Highway, and 2400 planned for SLS, how can anyone reasonably expect this 1 ha park to provide adequate open space?

If the anticipated nearly 5000 people occupy the SLS plan area according to Lane Cove Council projections, this will deliver 0.1 hectares of open space per 1000 people. Given the rest of Lane Cove is 2.6 hectares per 1000 people and the generally accepted good practice is 2.83 hectares per 1000 people, how is this appropriate? Once again it is clear that the SLS Plan is about squeezing as many people as possible into a small space, with no consideration of the need for quality outdoor green space, infrastructure and community vibrancy.

2.2. Consistency with guiding design principals as set out in the 2036 draft plan (p. 10-11)

The SLS Plan fails on two key design criteria set out in the 2036 Plan.

One criteria was to 'avoid monolithic street wall effects through the distribution of higher buildings'. The SLS Plan originally envisaged a maximum 8 storey of buildings across the site but the latest versions supplied by council show up to 19 storey buildings and a predominance of 12 storey buildings. There is no stipulation for a healthy mix of buildings and from the grid street pattern it is clear the plan does not sensitively consider the site topography or respond to it in way which will reduce the anticipated monolithic street wall effect. The success of the Duntroon Avenue development relied heavily on good setbacks, building separation, and well-designed stepped facades which ensure residents have maximum privacy and the street frontage is less dominating. There are no assurances in the SLS plan that the buildings envisaged will not simply be straight-sided towers that cause extreme overshadowing of existing and new green space.

There is also supposed to be a 'transition of heights' from the high rise areas down to lower scale. As the plan currently stands, residents on Park Road west in their single storey dwellings will be faced with 8 storey or more buildings across the road from them. This is not a sensitive transition. The same applies to River Road, where the 8 storey towers will bear down on 1-2 storey single homes, or even the under construction 7 storey block at 1 Canberra Ave which may be facing a 19 storey tower directly across the road from it.

2.3. Consistency with the specific design principles relative to the SLS planning proposal as set out in the 2036 draft plan (p. 63)

A key error in this process has been the general exclusion of SLS from the overall 2036 Plan during the public consultation process. By not including SLS in the 2036 Plan, the Department and Council have failed to consider the best land uses for this area. The SLS area should have been examined in the complete context of the St Leonards Crows Nest area. By viewing the SLS Plan like an island, the impact on neighbouring areas and contribution to the community is ignored.

Despite the isolating of SLS, on page 63 of the 2036 Plan there are a set of SLS 'Design Principles', which the 2036 plan says should be considered by the IPC as follows:

Accessibility to the stations: it is clear that the SLS area features steep topography and the existing connections to St Leonards station are woefully inadequate. During the IPC site visit on 10 May, I wonder if the Panel attempted to walk from the top of Canberra Ave to Pacific Highway, adjacent to the west side of the train line? This area is already highly used and the state of the footpaths embarrassing and dangerous. No doubt Council will promise to improve this area, but residents have been living with this for many years. The narrow, interrupted footpath with numerous trip hazards leaves little confidence that anything will improve for residents.

In terms of accessing the new Crows Nest Station, SLS residents would need to head to River Road (very narrow footpaths, especially crossing the train line), then travel up very steep streets such as Christie, Oxley and Hume. Only the very able-bodied will be able to do this so the Crows Nest station is unlikely to be utilised. In fact the most accessible and closest station for SLS residents will be Wollstonecraft as it is downhill. However, this requires a dangerous crossing of busy River Road, which currently has no pedestrian crossing and few safe spaces to do so. River Road will become even busier with the 5000 new residents decide it is easier to drive everywhere.

Overshadowing: The Design Principles say overshadowing should be minimised. Take the example of Newslands Park: already the new high-rises on Pacific Highway shadow this park for many more

hours in the morning than previously. The 8-19 storeys proposed for Canberra Avenue will mean the park is shaded for most of the afternoon. Even the speculative planning proposals acknowledge this overshadowing. The only way to prevent this is to have lower height buildings, sensitively stepped back.

Open space: New open spaces are supposed to improve connections to existing open space. The SLS proposes green spines and walkways in a grid pattern, but many of these will be steep and require steps. This will not make them accessible, for example, for the elderly, disabled or those with young children.

Traffic: The SLS Plan also fails to meet the Design Principle of considering cumulative traffic impacts. The RMS in its submission (28 February 2018) highlighted the inadequacy of plans to date to consider cumulative impacts, calling it 'inadequate' and 'limited in scope'. It is also worth noting the flawed traffic impact plans that accompanied the two speculative planning proposals recently submitted by developers. Both plans said their developments would have virtually no impact on traffic. Any layperson can see that if you build a development with 200 units, there will be 200 or more new cars in the area and they impact on traffic flow.

We have evidence of this with the recently completed Embassy building on Marshall Ave. Prior to being built, reports said it would have no new traffic impacts as adequate parking would be provided on site. Why is that that just months after opening residents have been applying to Lane Cove Council for street parking permits? (Council meeting agenda 15 April 2019). This proves how inaccurate these traffic studies are. The cumulative traffic impacts from 5000 new residents with at least 3000 new cars is going to be enormous. Duntroon Ave is essentially one way and many of these new cars will be looking to use Duntroon to access River Road, creating significant delays.

2.4. Consideration of the scale proposed by the rezoning and the need to meet Greater Sydney Housing Commission targets

The IPC was asked to consider housing targets aspect of this planning proposal. My understanding from the documents I have reviewed is that Lane Cove Council has already exceeded its Greater Sydney Commission population targets with the construction of several high rises on Pacific Highway at St Leonards. There is not further set target and no clear justification for cramming another 5000 people into the 9 ha SLS site. At best it is cynically seen by many as a move by Council to protect the rest of spacious Lane Cove from overdevelopment, by forced unreasonable crowding the SLS area.

3. Conclusion

The rezoning of SLS is an opportunity for Council and the Department to do something world class which intelligently responds to society's needs and creates a community we would welcome.

In his book, *Cities for People*, world-renown Danish architect Jan Gehl explains how we need to factor people in the city planning processes and consider carefully the impact of the built environment. Gehl emphasises the importance of creating public open spaces which encourage people to be outdoors and be active. If we want lively, safe, sustainable and healthy cities, the key is thoughtful urban planning.

The SLS Plan shows little evidence of thoughtfulness. It was not developed in response to any specific community need or any urban renewal agenda. The Plan was the result of an idea from a group of residents who wanted to sell up and property developers who saw an opportunity for everyone to cash in.

I urge the IPC to send Council back to the drawing board. Ask them to give us intelligent, people-orientated planning. We do not want bland high-rise unit blocks with no sense of community and parks that never see the sun. We want smart planning that creates an environment which positively contributes to a healthy community and one we would all be happy to live in.

Please show the true independence of the IPC by acknowledging what all of us who live here can see – this is not a good plan. If you want to build confidence in the decision making processes for major developments which you say is your role, you need to listen to the people who live here. It is not about Council, developers, or the people who have sold up and moved. Those of us who live here and want it to be a great place we can be proud of.

Thank you for the opportunity to make this submission.

Name withheld on request.