



Greenwich Community Association Inc

**Submission to Independent Planning Commission
Planning Proposal for the St Leonards South Residential Precinct**

27 May 2019

Contact details

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OVERVIEW

Status of Greenwich Community Association Inc

The Greenwich Community Association Inc (GCA) welcomes the opportunity to make a submission to the Independent Planning Commission in respect of a request for advice on the St Leonards South Residential Precinct as outlined in the Minister's letter of 20 December 2018.

As an incorporated association for over 73 years, the GCA maintains a website www.greenwich.org.au and distributes 2000 newsletters to local households. The GCA's primary object is to enhance the amenity of Greenwich residents and owners.

Relationship between Greenwich and St Leonards South

To all intents and purposes Greenwich and St Leonards South are part of a single community:-

- they are both located in the East Ward of the Lane Cove LGA
- children in SLS are in the Greenwich Public School catchment area
- the communities of Greenwich and SLS access the retail, medical and other services in the Greenwich village as their local shopping centre
- the area from Park Lane to the rail-line was known as Greenwich North as recently as 2006.

GCA Resolution of 7 December 2017

The St Leonards South re-zoning proposal (SLS Plan) has been the major focus of GCA meetings, from the time we became aware of it in February 2015 to the 13 July 2015 Extraordinary Meeting of Lane Cove Council (when the SLS Plan was adopted) and in the period October 2017 to the present, following exhibition of the SLS Plan.

Noting that the SLS proposal had the potential to effectively add 4,800 new residents to a community of 5,613, with consequent strain on limited infrastructure, the following resolution was passed at a GCA general meeting on 7 December 2017:-

The GCA calls on Councillors to resolve to:

a. cancel the Master Plan and put the community first, including by providing community consultation and not allowing more density without more infrastructure.

b. to include consultation with residents in all of East Ward that have been excluded to date and work with

(i) the whole community,

(ii) other LGAs and

(iii) NSW government authorities

to formulate a sustainable and liveable precinct that does not place unacceptable pressure on the infrastructure, amenity and character of Greenwich and all other areas included in the St Leonards/Crows Nest Planning Precinct.

This resolution underpins all responses of the GCA to the SLS development and its progress through Department of Planning and Lane Cove Council processes.

Terms of Reference of the IPC Panel review

We note the terms of reference for the review as follows:-

1. Advice on the (planning) proposal's consistency with the draft 2036 Plan for St Leonards and Crows Nest in respect of:-
 - the overall vision (at p 4 of 2036 Plan)
 - guiding design principles (at pp 10 - 11)
 - specific design principles relevant to the planning proposal (p 63)
2. Consideration of technical studies and submissions received during exhibition of the draft 2036 Plan
3. Inquiry into outcomes of a community workshop held on 12 December 2018
4. Consideration of the scale of residential development contained in the proposal and whether the whole site needs to be rezoned to meet housing targets identified by the Greater Sydney Commission
5. Advice on whether staging of the proposal is appropriate.

We will address the above terms individually.

Additional Documentation

In addition to many hundreds of items of correspondence, the GCA has made several submissions in relation to the SLS Plan, the North District Plan, the various strategic plans for the St Leonards and Crows Nest Precinct and the draft 2036 Plan.

| | | |
|----------------------|----------------------------------|-------------------------------------|
| 10 March 2015 | GCA to Lane Cove Council | SLS Master Plan |
| 10 March 2015 | GCA to Lane Cove Council | SLS Master Plan Active Transport |
| 31 March 2017 | GCA to Greater Sydney Commission | Draft North District Plan |

| | | |
|-------------------------|----------------------------------|--|
| 6 September 2017 | GCA to Greater Sydney Commission | Interim Statement St Leonards and Crows Nest Station Precinct |
| 5 January 2018 | GCA to LCC | St Leonards South Master Plan |
| 27 March 2018 | GCA to Dept of Planning | Green Open Space Active Transport Medium Density Design |
| 29 January 2019 | GCA to Dept of Planning | Special Infrastructure Contribution |
| 7 February 2019 | GCA to Dept of Planning | Local Character Statement |
| 7 February 2019 | GCA to Dept of Planning | Green Plan |
| 8 February 2019 | GCA to Dept of Planning | Draft 2036 Plan |

The GCA will provide copies of the above submissions if so requested by the IPC.

TERM OF REFERENCE 1

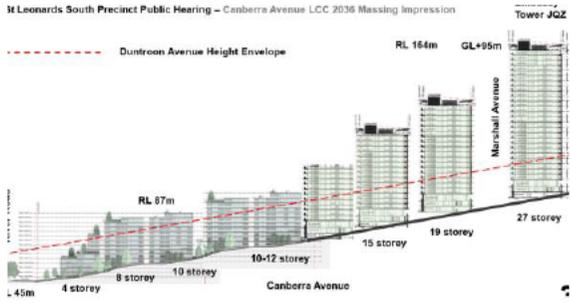
Advice on the (planning) proposal's consistency with the draft 2036 Plan for St Leonards and Crows Nest in respect of:-

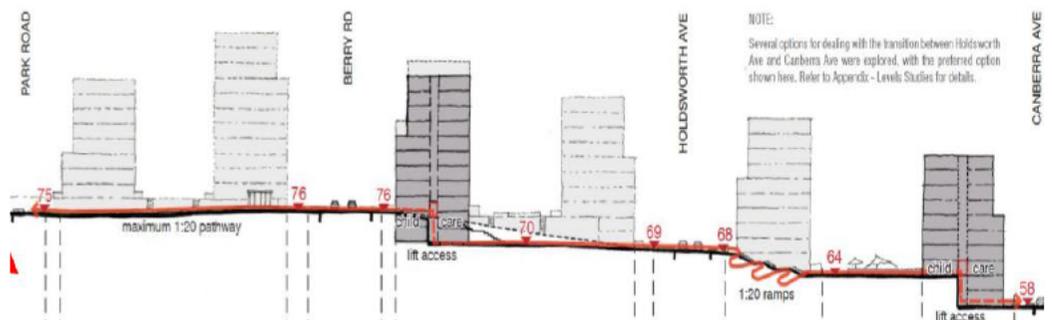
- **the overall vision (at p 4 of 2036 Plan)**
- **guiding design principles (at pp 10 - 11)**
- **specific design principles relevant to the planning proposal (p 63)**

Please turn over

| Term of Reference | Consistent with 2036/ Not Consistent with 2036/ Not applicable/No comment | Comments |
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| Overall Vision (Page 4 St Leonards Crows Nest Draft 2036 Draft Plan) | | |
| <p>Place – A vibrant community New development around the Crows Nest Sydney Metro station will provide energy and life along the Pacific Highway and St Leonards. The existing vibrancy and liveliness of the Crows Nest Village and Willoughby Road will provide a foundation for the revitalisation of the St Leonards Core.</p> | Not consistent | <p>In its submission to the Department of Planning in respect of the draft 2036 Plan and the Local Character Statement, the GCA expressed concern that both documents are very Crows Nest focussed. This may have derived from the fact that the survey that underpinned the Local Character Statement and, by implication, the draft 2036 Plan, was similarly Crows Nest Village focussed.</p> <p>Whilst we understand that the IPC must respond in terms of the current draft 2036 Plan, we submit that each defined precinct should have within it vibrancy and liveliness that will make the precinct more than a dormitory.</p> <p>SLS is a very defined precinct bounded by a rail-line, and busy roads. It will lack the services and infrastructure to make it a vibrant and self -sustaining community in its own right.</p> |

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| <p>A place that protects its past- Heritage Conservation areas and buildings are to be retained and celebrated as an important connection to the past.</p> | <p>Not consistent</p> | <p>It is regrettable that the entire area from Greenwich Road to Canberra Avenue was not designated as a Conservation area, given that the streetscape and dwelling types share much in common with the Conservation areas of Crows Nest and Naremburn.</p> <p>The dwellings from Park Road West to Greenwich Road, that lie outside the SLS Plan, are identical in their scale and housing types to those in Naremburn. For this reason, the transition to these dwellings should be addressed with the same care as is demonstrated in Naremburn.</p> <p>In terms of the heritage properties on the Western side of Park Road, their significance will be totally diminished by their proposed context. They will be dwarfed by high rise developments across the road and more generous setbacks will do nothing to ameliorate this impact.</p> <p>Furthermore, the proposed park that is also supposed to ameliorate the impacts of the high rise may need to be reviewed or re-configured with suggestions by some developers that they may wish to negotiate non- cash trade-offs against the Section 7.11 levies Council needs to buy the park.</p> |

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| <p>Movement- An accessible place An attractive and easy place to walk cycle and move through, with improved local and regional connections</p> | <p>Not consistent</p> | <p>The topography of the SLS site makes it a difficult place to move through. The aerial view of depictions of the active transport links on a plan obscure this fact.</p> <p>True N to S gradients are reflected in this elevation below.</p>  <p>The Department's Strategic Transport Study (Cardno 3 October 2018) confirms that the topography of the site poses problems with links N to S.</p> <p>3.3.1 The Pedestrian Experience (p.39) <i>"The St Leonards sub-precinct presents different pedestrian experiences, dependent on location. To the south of the Pacific Highway steep grades affect all north-south routes."</i></p> |

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| | | <p>3.4.1 The cycling experience</p> <p><i>The Precinct features challenging topography and high volume roads reducing the attractiveness of cycling as a mode option for many users</i> https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/st-leonards-and-crows-nest/technical-studies/st-leonards-and-crows-nest-precinct-strategic-transport-study-2018-10-15.pdf</p> <p>Lane Cove Council has created E to W links but, as a speaker mentioned at the presentations, there is nowhere to go to E to W. At some point it will be necessary to go N to S.</p> <p>And it is hard to understand how Council can conclude that it has made SLS an “accessible place” if stairs and lifts are required.</p>  |

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| <p>Built Form – A well -designed place New buildings that model the highest quality design, respecting and enhancing the existing local character of the area</p> | Not consistent | <p>In summary the SLS proposal is not a well designed place, and it pays no respect to nor enhances the existing local character of the area. It is a grab by developers to jam as many units as possible into a small space, without thought or relevance to surrounding properties and Newlands Park.</p> <p>It appears to be rows of tower blocks of 8 to 19 stories, on a south sloping site, where overshadowing will therefore dominate.</p> <p>The local character and heritage of the area will be totally destroyed which has not been acceptable around Naremburn within the 2036 Plan, and therefore should not be acceptable for SLS.</p> <p>Once and if the need for additional residential units are confirmed (in addition the high rise blocks already completed, underway or approved along the highway), a new design needs to be completed that will address suitable building scale, overshadowing, green space, traffic, pedestrian connections and transitions to surrounding homes (many of which have heritage value).</p> |
| <p>Land Use – An employment Hub Providing 16,500 additional jobs over the next 20 years to support a growing and</p> | Not consistent | <p>SLS contributes nothing to employment in the industrial, professional, creative, retail, health and education sectors as outlined under the 2036 plan.</p> |

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| <p>evolving economy, with opportunities for employment in the industrial, professional, creative, retail, health and education sectors</p> | | <p>The developers' argument that the 2,400 units in addition to the 1900 units (all these in the Lane Cove LGA) already completed or underway or approved along the highway, are necessary to support employment can only be described as nonsense.</p> <p>The residential supply already approved will provide substantial excess capacity. It is critical that sufficient land is set aside or identified for buildings related to employment creation.</p> <p>The Northern boundary of the SLS site lies directly opposite a large health and education precinct that is growing.</p> <p>The SLS site would be an ideal location for a mix of commercial and residential development. The northern part of the site is relatively accessible on foot, allowing for location of ancillary medical services and other services such as cafes, pharmacies etc that could be also be accessed by those who live in other parts of SLS.</p> |
| <p>A home for people of all ages – a greater mix of homes will be available to the diverse range of people who live in the area</p> | <p>Not consistent</p> | <p>It is disingenuous for Lane Cove Council to suggest that a choice between a 4 storey apartment building (not many of these), a 12 storey or a 19 storey building or a choice between a one BR, two BR or three BR apartment represents housing mix or diversity.</p> <p>There will be no housing choices in the SLS precinct – all development proposed will be high density.</p> |

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| | | <p>In the absence of the infrastructure and services needed to make the precinct liveable, the resident community will not see SLS as a long-term housing decision. Furthermore the topography and lack of green space will rule SLS out as a housing option for many.</p> <p>Diversity of residential types is a requisite of good planning. We acknowledge that the current plans address essential worker housing and affordable housing requirements but 34 key worker housing dwellings seems to be a very low proportion relative to total dwelling numbers proposed.</p> <p>However, there should be more medium density townhouses in the development, particularly along Park Road, River Road and Canberra Avenue. Two and three storey townhouses should be included to reduce densities, increase the diversity of housing types available and provide a better alternative long-term option for families than apartments.</p> <p>These comments apply particularly to the southern end of Park Road, the whole of the River Road frontage and the Canberra Avenue frontage that abuts Newlands Park.</p> |
| Landscape – A greener place | Not consistent | <p>The SLS proposal includes minimal green space for the additional 2400 units proposed. Apart from so called footpaths or access ways and planting along roads (that are already tree lined), the only green space offered is a small 3,775 sqm park in Park Road and some “pocket parks”.</p> |

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| <p>Parks and public green spaces will provide areas for local to be active, creative, and enjoy green leafy spaces throughout the area, away from built up areas in St Leonards</p> | | <p>Green space and play areas are critical to families and more and more research is confirming how critical these areas are to the development and well being of children.</p> <p>The pocket park can only be a small area in which to sit, not to run and play. Only 2 other areas (already existing) are proposed as green space areas.</p> <p>The first is Newlands Park which gets included each time a developer justifies the building of more residential units (e.g. those along the Pacific Highway). This park which has limited flat areas, will be over- shadowed in mid- winter by SLS high rise buildings at 3pm – just the time children come out to run and play after school.</p> <p>The second is the Gore Oval across the Pacific Highway and in Willoughby LGA. This newly recreated synthetic turf oval and child’s play area is already at capacity on weekends, so it cannot be a satisfactory amenity for the 1900 units (approx.) along the Pacific Highway and the 2400 units of SLS.</p> <p>Lane Cove asserts that it will be adding to the St Leonards and Crows Nest precinct just 38% of dwellings but providing 73% of all new open space.</p> <p>It has failed to take into account the 1900 apartments that it has approved along Pacific Highway – this takes it share of new housing to closer to 60%.</p> <p>Council officers have previously acknowledged that it is inappropriate to include Gore Hill Oval in their green space calculation so it is surprising that this facility has been included in Council’s recent presentation.</p> |

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| | | <p>Furthermore, the park in Park Road East is contingent upon the capacity or willingness of the SLS developers to pay the increased Section 7.11 contributions proposed by Lane Cove Council in its SLS Plan.</p> <p>As part of its objection 5/1/2018 to the exhibited SLS Plan, the GCA requested Lane Cove Council to convene a public hearing under the EP&A Act. No hearing has been convened.</p> <p><i>Inclusion of Gore Hill Oval in Open Space Allocation</i></p> <ul style="list-style-type: none"> • <i>Council has included in its calculation of open space Gore Hill Oval which is located in the Willoughby LGA.</i> • <i>This oval is undergoing major infrastructure work.</i> • <i>Conditions around the right of the general public to access the oval after completion of the works are unknown.</i> <p><i>The GCA seeks information from Lane Cove Council as to the agreements/understandings etc that it has reached with Willoughby Council to ensure that Gore Hill Oval and environs will be accessible as open space to the community of St Leonards South and the limitations, if any, around this use.</i></p> <p><i>Inclusion of Newlands Park as Open Space in Multiple Development Approvals /LEP amendment proposals</i></p> <ul style="list-style-type: none"> • <i>Newlands Park has been nominated as Open Space in the current St Leonards South Master Plan</i> • <i>It has been included in the Open Space calculations for other major developments that have been approved in the Lane Cove LGA</i> |

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| | | <i>The GCA requests Council to outline its policy in terms of including a single piece of open space in calculation of open space allocations for multiple development proposals.</i> |

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| Guiding Design Principles (Pg. 10 and 11 St Leonards Crows Nest 2036 Draft Plan) | | |
| Area Wide Design Principles – Comprising: | | |
| Place <ul style="list-style-type: none"> Ensure new development retains and enhances important heritage elements by using sympathetic building materials and preserving key views and vistas | Not consistent | Please refer above A place that protects its past |
| <ul style="list-style-type: none"> Retain and enhance Village atmosphere in and around Crows Nest, | Not consistent | Please refer above A vibrant community |

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| particularly along /Willoughby Rd | | |
| <ul style="list-style-type: none"> Ensure no additional overshadowing of public open spaces and important places in accordance with solar access controls identified on pg. 49 of the Plan | Not consistent | <p>The 2036 Plan pp 26, 49 requires that Newlands Park is not overshadowed between 10 am and 3 pm. The SJB Urban Report May 2019 demonstrates that overshadowing of Newlands Park will occur during these hours.</p> <p>The proposed park in Park Road is new so there is no benchmark against which to measure solar access. However, the modelling by SJB Urban shows that it will be overshadowed almost all day.</p> |
| <ul style="list-style-type: none"> Apply casual surveillance and universal access principles to create a safe, inclusive and comfortable environment | Not consistent | The E to W links of varying levels, requiring lift and stair access, will impede casual surveillance. |

| Term of Reference | Consistent with 2036/Not Consistent with 2036/ Not applicable | Comments |
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| <ul style="list-style-type: none"> New development should have consideration to wind impacts demonstrated through a wind assessment | No comment | It is noted that this is covered in the draft DCP but the GCA has no resources to make comment on this |
| <p>Landscape</p> <ul style="list-style-type: none"> New buildings adjoining Hume St Park should contribute to the Village Green atmosphere. They should also provide an active frontage to the park and encourage connections between Willoughby and, Hume St park and Crowes Nest Sydney Metro Station | Not applicable | |

| Term of Reference | Consistent with 2036/Not Consistent with 2036/ Not applicable | Comments |
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| <ul style="list-style-type: none"> New development along Chandos, Oxley and Mitchell Sts should provide wider setbacks to enable the creation of greener streets | Not applicable | |
| <ul style="list-style-type: none"> New development adjoining the new green link should contribute to its landscape character. For example, planter boxes, lighting, green walls, deep planting, landscaped setbacks and forecourts | Not applicable | |
| <ul style="list-style-type: none"> New development in nominated areas along Pacific Highway should be set back 3 metres and incorporate elements such as avenue planting, below ground setbacks for deep soil planting | Not applicable | |

| Term of Reference | Consistent with 2036/Not Consistent with 2036/ Not applicable | Comments |
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| <ul style="list-style-type: none"> Incorporate new street trees to improve the overall coverage of the area | Consistent | But many existing, mature trees removed for construction of new unit blocks |
| <p>Built Form</p> <ul style="list-style-type: none"> Consider cumulative impacts of new developments on existing areas, including overshadowing, wind impacts and loss of views | Not consistent | <p>Please refer to concerns re transitioning to adjacent dwellings A place that protects its past</p> <p>View loss will occur for Embassy Tower</p> <p>The SJB Urban Report May 2019 shows that there will be overshadowing of properties on the South side of River Road from 9 am to 4 pm. This is inconsistent with the solar access plane outlined on p 26 of the draft 2036 Plan.</p> |
| <ul style="list-style-type: none"> Contain taller buildings between St Leonards Station and Crows Nest Station and nominated significant sites along the Pacific Highway | Not consistent | <p>Overall the high-rise high-density developments should be grouped closest to St Leonards Station and the Pacific Highway. The heights along Park Road should be reduced so as to not overpower the existing residential areas on the western side including the heritage properties.</p> <p>The heights along Canberra Avenue opposite Newlands Park should be lowered to reduce the overshadowing of the park. The heights along River Road should be reduced to allow some sun penetration into the residences in that part of the precinct.</p> <p>There should be medium density to all the boundaries of SLS. This would have the additional benefit of reducing the overall population of SLS as well.</p> |

| Term of Reference | Consistent with 2036/Not Consistent with 2036/ Not applicable | Comments |
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| <ul style="list-style-type: none"> In transition areas between low and high rise developments, new development should consider the prevailing scale and existing character in the design of their interfaces | Not consistent | <p>The interface of the SLS Master Plan scheme with the adjoining residential areas to the west, south and south west is at odds with the approach taken in the Urban Design Study to the transition to the Naremburn Conservation Area. Naremburn and the area to the west of Park Road St Leonards South are identical in their scale and housing types. There is an identical justification that the area to the west of Park Road should be considered a Conservation Area and preserved. Therefore, the same care should be taken with the western side of the SLS developments as is demonstrated in the transition to Naremburn. The interface should be “a two-storey interface with low scale detached dwellings...”. The configuration of the SLS development should “step envelope away from” Park Road towards Berry Road “up to the existing 20m height limit...”. The two-storey interface should be townhouses which would have a beneficial impact on the housing mix in the developments and provide a better housing option for families in the area.</p> <p>The same approach should be applied to the River Road and Canberra Avenue edges of the development for the same reasons.</p> |

| Term of Reference | Consistent with 2036/Not Consistent with 2036/ Not applicable | Comments |
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| <ul style="list-style-type: none"> New building design should provide high on-site amenity and consider street width and character by providing ground and upper level setbacks and awnings to achieve a human scale at street level. | Not consistent | The topography of the site mitigates against a human scale along River Road. |
| <p>Land Use</p> <ul style="list-style-type: none"> Ensure new development contributes to a range of dwelling types in the area to cater for all life cycles. | Not consistent | <p>Refer A home for people of all ages</p> <p>It is noted that this principle relates to new development only. All new development is high density apartment blocks. Apartments by any measure are apartments. They are not a range of dwelling types SLS is an area that is ideally suited to medium density development but Lane Cove Council has omitted this from the Plan.</p> |

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| <ul style="list-style-type: none"> • Protect key industrial land at Artarmon that services much of the North Shore. • Ensure new employment sites in the area cater to a range of business types and sizes. | <p>Not applicable</p> <p>Not applicable</p> | <p>Please refer to comments An employment Hub</p> |
| <ul style="list-style-type: none"> • Foster development of high technology and health related uses in the light industrial area to support the surrounding hospitals. | <p>Not applicable</p> | |
| <ul style="list-style-type: none"> • Investigate locations for a new primary and high school in the area to support the growing community. | <p>Not applicable</p> | <p>The decision as to the location of schools rests with the Department of Education This is still a critical issue.</p> |

| Term of Reference | Consistent with 2036/Not Consistent with 2036/ Not applicable | Comments |
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| New development in the mixed use zone should contribute to delivery of active streets by providing a range of uses at ground floor. | Not applicable | |
| <ul style="list-style-type: none"> Protect large commercial core zoned sites to ensure employment uses are protected into the future. | Not applicable | |
| <p>Movement</p> <ul style="list-style-type: none"> New development should contribute to the improvement of the walking and cycling network in the area as well as help to connect to wider regional areas. | Consistent with caveat | <p>Walking</p> <p>As noted in An accessible place above, the topography of the SLS site is an impediment to walking, particularly N to S. The E to W paths that are proposed in SLS will not be accessible to all by virtue of the proposed stairs and ramps.</p> <p>For many parts of SLS the distance to Wollstonecraft Station is significantly shorter and less hilly than to St Leonards or the Metro. Pedestrian are likely to use this station but it is unsafe to access, involving the crossing of River Road.</p> <p>The possible traffic lights at the cnr River Road and Canberra are in a dangerous location and the GCA does not support this. No agency has committed to these in any planning document.</p> |

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| | | <p>Urgent consideration should be given to the construction of a ramped bridge crossing River Rd, linking Berry Street St to Wilona Ave & the laneway leading to Greenwich Rd. This could be at a sufficient elevation to reduce uphill climbs that would be associated with a more dangerous crossing at Canberra Ave.</p> <p>Cycling The E to W path in SLS will be inappropriate for cycling, given the need for lift and stairs. Cyclists will need to use pathways adjacent to the road system within SLS.</p> <p>The ramped bridge over River Rd would provide a safer cycling option in lieu of the crossing at Canberra Ave.</p> <p>Whilst it is outside the scope of this review, improved cycling and pedestrian infrastructure within SLS must be supported with appropriate infrastructure beyond SLS. This was covered at the public meeting by Mr Don Murchison.</p> |

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| <ul style="list-style-type: none"> Identify opportunities to improve safety along existing pedestrian and cycling routes. | Consistent with caveat | Refer to previous comment |
| <p>New development should encourage use of public transport and reduce the need to use a private car. Innovative solutions such as car sharing are encouraged.</p> | Not consistent | <p>The topography of the site will make access to public transport difficult for those unable to walk or cycle.</p> <p>The SLS Plan makes no provision for shuttle bus pick up areas or similar services.</p> <p>In the absence of such transport options, many residents will need to use private cars to access services as they are not offered within the precinct</p> |
| <ul style="list-style-type: none"> New commercial developments should incorporate end of trip facilities to encourage more people to walk and cycle to work. | Not applicable | SLS is residential only |

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| Design Criteria (Pg. 10 and 11 St Leonards Crows Nest 2036 Draft Plan) | | |
| <ul style="list-style-type: none"> • Meet solar height planes in this Plan (identified in figure 11 on page 26). | Not consistent | Refer pp 17, 20 above Sites on the southern extremities of SLS will receive less than 3 hours of solar access per day. |
| <ul style="list-style-type: none"> • Consideration of quality streetscape aspects such as setbacks, street wall height and heritage buildings. | Not consistent | Setbacks opposite heritage properties will diminish heritage significance. Setbacks inadequate to address overbearing impact on sloping sites. |

| Term of Reference | Consistent with 2036/Not Consistent with 2036/ Not applicable | Comments |
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| <ul style="list-style-type: none"> Acknowledge key views and vistas such as key long distance vistas which offer sky views, and vistas where a building may terminate the view. | Not consistent | <p>Sky vista of residents in the Duntroon Ave development, 2 Canberra Ave, on the south side of River Rd and the West side of Park Rd will be reduced by height of buildings opposite</p> <p>Views of some residents in the Embassy Tower will be blocked by proposed 19 storey building cnr Canberra and Marshall</p> |
| <ul style="list-style-type: none"> Avoid a monolithic street wall effect through the distribution of higher buildings. | Not consistent | <p>The buildings in the SLS Plan as depicted in Council’s artist impressions show little regard for design excellence and total regard for maximisation of FSR to allow developers to recoup the inflated prices they paid for their sites. The Council has failed to engage with the community at all since the extensive feedback was provided in the exhibition period late 2017 to 5 January 2018. To our knowledge nothing has changed in the proposed design so the above comments stand.</p> <p>As a local architect has described it – the proposal looks like a storage park for shipping containers. It will not be place where residents actually live – they will just sleep there.</p> |
| <ul style="list-style-type: none"> Transition heights from high rise areas down towards existing lower scale areas, including areas not proposed for height changes, and Willoughby Road | Not consistent | Refer A place that protects its past |

| Term of Reference | Consistent with 2036/Not Consistent with 2036/ Not applicable | Comments |
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| <p>Specific Design Principles relevant to the (SLS) Planning Proposal (Pg. 63 St Leonards Crows Nest 2036 Draft Plan)</p> | | |
| <p>The following principles should be considered by an independent panel in its review of Lane Cove Council's Planning Proposal:</p> <ul style="list-style-type: none"> • Consider accessibility to St Leonards and Crows Nest Stations. | <p>Consistent with caveat</p> | <p>Refer p 25 Given that the walk to Wollstonecraft Station is a downhill walk and, for many parts of SLS, closer than St Leonards Station and the Crows Nest Metro, many SLS residents will choose to catch the train from Wollstonecraft Station in the AM and home to St Leonards in the PM.</p> |

| Term of Reference | Consistent with 2036/Not Consistent with 2036/ Not applicable | Comments |
|-------------------|---|---|
| | | <p>Access to Wollstonecraft Station will require the crossing of River Road. The proposed traffic lights at Canberra Ave are ill-conceived as traffic will be unable to stop after rounding the bend heading West or going downhill towards the East.</p> <p>A pedestrian overpass or underpass will be required to provide pedestrians with safe access across River Road.</p> <p>We are unaware if modelling has been done to assess the capacity of Wollstonecraft Station to handle increased passenger numbers coming from SLS.</p> <p>We ask also if revised modelling has been done of the Crows Nest Metro capacity. Strategic planning for St Leonards and Crows Nest was based on the creation of an employment hub here. This has not happened.</p> <p>If there are no jobs to get off the Metro for in Crows Nest, there may be no room for the large numbers of people who will soon reside in Crows Nest and St Leonards to get on.</p> <p>We submit that residential development in the precinct be halted to re-assess the capacity of the transport links to cope with demand.</p> |

| Term of Reference | Consistent with 2036/Not Consistent with 2036/ Not applicable | Comments |
|---|---|------------|
| <ul style="list-style-type: none"> Minimise overshadowing of public open space and streets with a significant public domain function within and outside of the Plan boundary | Not consistent | Refer p 17 |
| <ul style="list-style-type: none"> Minimise overshadowing of Heritage Conservation areas and residential areas outside of the Plan boundary. | Not consistent | Refer p 20 |

| Term of Reference | Consistent with 2036/Not Consistent with 2036/ Not applicable | Comments |
|---|---|---|
| <ul style="list-style-type: none"> • Ensure new open spaces improve connections to existing surrounding open spaces. | Not consistent | <p>The capacity of the SLS Plan to deliver the park in Park Road must be clarified. The SLS Plan designates that there will be restricted access to the green spines between buildings. It appears that the central thoroughfare E to W through the SLS site will link the park in Park Road to Newlands Park but not to the green spines.</p> |
| <ul style="list-style-type: none"> • Improve active transport connections. | Consistent with caveat | Refer pp 24-26 |
| <ul style="list-style-type: none"> • Consider cumulative traffic impacts. | Not consistent | <p>The potential impact of the SLS on traffic congestion is evident to all. The site is steep and SLS will have no services. Many people will elect use their vehicles to access services outside SLS rather than undertake a walk uphill.</p> <p>72% of 339 submissions made to Lane Cove Council in the exhibition period late 2017 -5 January 2018 (there could have been more but that is all we received after our GIPA access request) named traffic congestion and parking as a concern. The community does not need traffic studies to convince them there will be a problem.</p> <p>On 28 February 2018 the RMS expressed its concern about the traffic model used by Lane Cove Council to support its decision to proceed with the SLS re-zoning in July 2015. This letter is on the IPC website.</p> |

| Term of Reference | Consistent with 2036/Not Consistent with 2036/ Not applicable | Comments |
|-------------------|---|--|
| | | <p><i>“Until the Traffic and Transport Impact Assessment for the St Leonards / Crows Nest Precinct is finalised, Roads and Maritime considers the traffic modelling / analysis undertaken for the subject Planning Proposal as inadequate and limited in scope, identifying the traffic impacts associated with the proposed development and not the cumulative traffic impacts associated with full development uplift in the Planned Precinct. This approach potentially limits consideration of traffic impacts and attributes potential traffic infrastructure improvements to the subject area only and does not address the cumulative traffic impacts and the regional scale infrastructure response required for full development uplift in the St Leonards / Crows Nest Precinct”</i></p> <p>With the forthcoming IPC review in mind, Lane Cove Council wrote to the RMS on 3 December 2018 outlining two proposed solutions to traffic management in and out of SLS:-</p> <ul style="list-style-type: none"> • two lanes from Berry Rd to the highway • additional lane capacity on the northerly side of River Road (which becomes a single lane over the rail bridge shortly thereafter) <p>On 30 April 2019 RMS responded that it would have no objection to the SLS Planning Proposal proceeding provided there was in place the Special Infrastructure Contribution that is to be directed to state infrastructure.</p> <p>Lane Cove Council has already advised the Department of Planning that it does not support the levying of a Special Infrastructure Contribution on the SLS developers and the developers have made it clear that they do not wish to pay it.</p> <p>It is presumed that the RMS would have a different view about the SLS Planning Proposal if it was aware of this.</p> |

| Term of Reference | Consistent with 2036/Not Consistent with 2036/ Not applicable | Comments |
|--|---|--|
| | | <p>The following impacts seem to have been overlooked in all assessments to date:</p> <ul style="list-style-type: none"> • Access of emergency vehicles to RNSH • Access and egress from Greenwich Rd: the one way into and out of Greenwich south of River Rd • Dangerous traffic congestion around the Greenwich Infant and Primary schools in roads ill equipped to cope • Emergency vehicle access to the Viva Oil terminal in Greenwich |
| <ul style="list-style-type: none"> • Transition buildings appropriately to lower scale buildings. | <p>Not consistent</p> | <p>Refer p 22</p> |

TERM OF REFERENCE 2

Consideration of technical studies and submissions received during exhibition of the draft 2036 Plan

1. Technical studies

No current technical and agency reports released for exhibition of SLS Plan in October 2017

The lack of current technical reports exhibited in conjunction with the 2017 exhibition of the SLS Plan was of great concern.

The community was constrained in terms of its ability to make informed comment on the SLS Plan when the only reports available at the time were sourced in advance of the 13 July 2015 Lane Cove Council meeting when the SLS Plan was adopted (with an unexpected addition of Berry Rd West to Park Road East).

These reports did not, therefore, relate specifically to the plan that had gone to Gateway. Furthermore, they were not reflective of significant development and consequent infrastructure impacts evident in the St Leonards and Crows Nest area between early 2015 and late 2017.

On 1 January 2018 (and several times thereafter) the GCA sought a delay in the exhibition of the SLS Plan until Council provided up to date agency reports relevant to the new plan configuration but the requested delay was refused.

The reports that we were seeking in October 2017 are just now starting to emerge as Agency Submissions on the IPC website, noting that they are still unavailable on Council's website.

Technical studies released with the draft 2036 Plan

The GCA welcomes the inclusion in the draft 2036 Plan documentation of recent technical reports to assist in the assessment of infrastructure needs and impacts of development in the St Leonards and Crows Nest precinct.

We are encouraged that they assess the cumulative impacts of development across the St Leonards and Crows Nest precinct as the reports available for SLS address its impacts in isolation.

This is unrealistic, given the undoubted infrastructure impacts of the 1900 apartments approved by Lane Cove Council between Berry Road and Oxley Street and the other developments in St Leonards and Crows Nest.

Concern re Cardno Strategic Transport Study

The GCA does not have access to the resources of a traffic consultant but it is clear that major congestion on key roads is already evident in the St Leonards and Crows Nest area, particularly in the intersections around Herbert Street, Pacific Highway, Christie and Chandos Streets.

This congestion will be exacerbated considerably with the increased vehicle numbers associated with the 1900 apartments under construction in the Lane Cove strip along the Pacific Highway.

The Cardno report affirms our perception that this part of the road network is at capacity but it fails to identify solutions. In the absence of solutions, we support the conclusion that detailed traffic modelling is required.

Developments of the scale of SLS, where the topography is such that vehicle movements will be necessary even for basic services, should not proceed until this modelling has been undertaken and solutions implemented.

2. Submissions received during exhibition of the draft 2036 Plan

The GCA's concerns in this respect have been fully outlined in our covering letter to the IPC.

TERM OF REFERENCE 3

Inquiry into outcomes of a community workshop held on 12 December 2018

Several GCA committee members attended the facilitated workshop hosted by Lane Cove Council on 12 December 2012 to review the draft 2036 Plan. Facilitation of the workshop was conducted by KJA.

The report of KJA is a fair assessment of the views expressed at the workshop.

However, as outlined below, Lane Cove Council reports and comments subsequent to the workshop are distorted and incorrect.

Workshop attendees were a fair representation of community sentiment

It is noted that Lane Cove Council's submission to the Department of Planning on the draft 2036 Plan contains the following statement:-

*"The predominant focus of the **self-selected sample group** was on issues associated with the St Leonards South Planning Proposal rather than the broader St Leonards / Crows Nest Draft 2036 Plans. As the Plan recommended referring the St Leonards South Planning Proposal for independent review during the exhibition period, which has not occurred, it is not proposed to make further comment in Council's submission."*

http://ecouncil.lanecove.nsw.gov.au/TRIM/documents_TE/33143057/TRIM_AT-1%20Draft%202036%20Plans%20-%20Council%20submission_1317527.PDF p 6

The workshop was an initiative of Lane Cove Council. It promoted the workshop by emailing 4,000 people on their subscriber list.

The GCA included an item about the workshop on p 2 of its December 2018 newsletter but it did not actively promote the attendance of a "self-selected sample group".

The workshop was held at an inconvenient time of the year and those who attended did so because they were interested in plans for the area.

Presumably this can also be said of the developer representatives who participated in the workshop that night.

Council's representation of the views expressed at the workshop are distorted as they do not reference the statistics at the conclusion of the KJA report.

The Community Consultation section on p 7 of Council's submission to the Department of Planning on the draft 2036 Plan misrepresents views expressed at the workshop. Council lists only 12 issues arising at the workshop (the KJA report outlines many more) and fails to reflect the strong views expressed by attendees.

Council's submission fails to include the actual data of Satisfaction Results published by KJA, a far more accurate reflection of community feeling about the 2036 Plan.

| Principle | How satisfied are you with the proposed Plan to address this Principle? | | | | |
|--------------|---|-------------|-----------|-----------|------------------|
| | Highly unsatisfied | Unsatisfied | Neutral | Satisfied | Highly satisfied |
| Movement | 28 | 8 | 5 | 2 | 0 |
| Landscape | 20 | 21 | 5 | 1 | 1 |
| Place | 23 | 16 | 5 | 2 | 0 |
| Built form | 27 | 15 | 2 | 1 | 1 |
| Land use | 22 | 18 | 2 | 3 | 1 |
| Total | 120 | 78 | 19 | 9 | 3 |

Over 86% of responses indicated that attendees were highly unsatisfied or unsatisfied with the proposed implementation of the five themes that underpin the 2036 Plan.

Whilst this summary relates to views on the 2036 Plan generally, we are of the view that an SLS Plan-specific workshop would have yielded similar statistics.

Item 15 of Lane Cove Council's 2036 Plan submission is an accurate reflection of community sentiment as to both the 2036 Plan and the SLS Plan.

This item was included in the Council submission following unanimous support for it at Council's meeting of 4 February 2019.

15. Community Sentiment

Overall, residents in the Lane Cove LGA have expressed a high level of dissatisfaction with the Draft St Leonards and Crows Nest 2036 Plan in its current form.

Concerns raised by residents relate to:-

- a) The density, bulk and scale of the proposed changes in building heights and floor-to space ratios;*
- b) The impact of development on traffic flow, parking and accessibility;*
- c) Overshadowing of new buildings upon other buildings and green open space;*
- d) The overemphasis of residential development at the expense of commercial development;*
- e) The lack of open recreational space that includes use for sporting activities and sporting facilities.*

Were Greenwich residents to move a motion in respect of the SLS Plan, it would be in similar terms.

Source of Fact Sheet Response to community concerns in St Leonards South raised in 2036 Plan consultation workshop Dec. 2018

It is noted that the IPC has uploaded the above document. **This material is not derived from a KJA workshop report.** The document is not attributed to a source but we assume that it is a Lane Cove Council document.

TERM OF REFERENCE 4

Consideration of the scale of residential development contained in the proposal and whether the whole site needs to be rezoned to meet housing targets identified by the Greater Sydney Commission

The GCA has addressed this issue in the presentation of Merri Southwood to the Panel on 20 May 2019. A copy of this presentation was provided to the Secretariat. However, in the light of statements made in Lane Cove Council's presentation to the IPC on 23 May that SLS is its Housing Strategy, we submit the following additional comments:-

In summary

1. It is important to distinguish between targets and projections.
2. There is no requirement in the GSC's North District Plan to include housing in SLS by virtue of its inclusion in the St Leonards and Crows Nest draft 2036 Plan.
The North District Plan has designated St Leonards as a Strategic Centre for jobs in the health and education sector.
The North District Plan has set a **target for job creation**, but not for housing.
Notwithstanding that there is no housing target, the Lane Cove LGA portion of the St Leonards and Crows Nest precinct is small relative to North Sydney and Willoughby but it has or will deliver over 1900 dwellings along Pacific Highway.
There is no infrastructure capacity to deliver more.
3. The SLS site is listed as a potential Urban Renewal site.
It is adjacent to residential developments in the Lane Cove LGA that will provide over 1900 dwellings.
Existing infrastructure is at capacity and will be further eroded with the residential development in progress on Pacific Highway.

Constraints of the SLS site and environs make the provision of new infrastructure almost impossible.

Lane Cove Council has already indicated that it will not support the levying of a Special Infrastructure Contribution on developers in SLS.

Developers in SLS have indicated that they cannot or may be unable to pay Section 7.11 contributions, let alone the supplementary Section 7.11 contributions proposed by Lane Cove Council to pay for the Park Road East park and other infrastructure.

In effect, there will be insufficient funds to deliver infrastructure even if the SLS site could absorb it.

For this reason, SLS is not an appropriate Urban Renewal site.

4. **There is no housing target for Lane Cove LGA beyond 2021.
Lane Cove LGA will exceed its 2021 target by 2022.**

The Greater Sydney Commission and the Department of Planning's own data demonstrate that Lane Cove is set to deliver 2,800 dwellings by 2022 which will exceed Lane Cove LGA's 2021 target of 1,900 dwellings by 900.

The next housing target will be created after Lane Cove Council completes a Housing Strategy and this strategy is approved by the Greater Sydney Commission (or alternate responsible authority).

**Lane Cove Council has not completed its Housing Strategy (contrary to its statement to this effect in its presentation to the IPC on 23 May 2019).
The SLS Plan cannot be justified on the basis of a Housing Strategy that does not exist.**

To the knowledge of the GCA there has been no community or stakeholder engagement in respect of a proposed Housing Strategy.

The development of a Housing Strategy must be evidenced based and reflect the principles set out in the North District Plan.
The housing contemplated in the SLS Plan fails to address these principles.

TERM OF REFERENCE 5

Advice on whether staging of the proposal is appropriate

It is unclear if this term of reference is requesting the Panel to investigate if part of the SLS site could be developed to meet Lane Cove's housing target.

In the light of the submission made in respect of Item 4, the GCA submits that no part of the SLS site should be re-zoned as there is no housing target to which Lane Cove Council must respond.

If the request is made without reference to housing targets, we submit that staging of the proposal is inappropriate for the following reasons:-

- staging a bad plan does not make it a good plan
- the SLS Plan was conceived to meet commercial objectives, not good planning outcomes
- the development landscape in St Leonards and Crows Nest has altered so significantly since 2012 that the plan is now out of step with the overall strategic planning for the St Leonards and Crows Nest precinct in which it is located
- the Department of Planning has taken the initiative to develop a coordinated plan for the entire St Leonards and Crows Nest precinct, an area which has suffered from competing and incompatible developments by LGAs without regard to impacts on adjacent LGAs and their communities
- the SLS Plan is inconsistent with the overall 2036 Plan St Leonards and Crows Nest
- the SLS Plan should be cancelled and planning should start again, noting that the SLS area is part of a strategically important precinct, not an isolated development site.