

Independent Planning Commission - Submission

Overview

This submission summarises various of the points raised at the IPC hearing of 20 May 2019, plus some other considerations.

Park Road West Action Group

- It is apparent that there may be some confusion about the stance of the Park Road West and Portview Road Action Groups to the St Leonards South (SLS) development.
 - The genesis of the Group was the last minute decision of Lane Cove Council (LCC) (without notice or consultation with us) to extend the boundaries of the proposed development from Berry Road to Park Road East. That is a decision that LCC has consistently refused to move from notwithstanding its last-minute political genesis, and notwithstanding its significant impacts upon the remaining two and half streets of the precinct.
 - In our consultation with our local member, it was suggested that if we could garner widespread support across the remaining areas of SLS, there could be an opportunity to do a well-planned precinct-wide brown-fields development. This could be a show-case for development in Sydney, just minutes from the City. We consulted the residents of area. There was overwhelming support for the view that if the development would proceed as planned by LCC this would be disastrous for the remainder of the precinct and we would be better off exiting and leaving the whole precinct to be properly planned. Since then, residents have become so tired of this process that they just want to find some adequate basis on which to leave.
 - For the full history, please see our earlier submissions.
 - Hence our position is – either plan the whole of the precinct in a way which will allow us to exit on some reasonable terms, or wind the development back considerably.
 - As we have been consistently told by LCC that they will not plan for the whole precinct, and as the State has refused to proffer any plan for the area, the only remaining option would seem to be to wind the proposal back.
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Consultation

- LCC has made much of its efforts at “consultation”. The result of that consultation has been absolutely no change to what LCC has proposed all along, notwithstanding the overwhelming opposition to their proposal.
 - One would think the essence of consultation is that the consultative process should be conducted with some chance of input into the outcomes proposed. There is no evidence at all that this has occurred. The overwhelming impression from all residents is that the process of “consultation” by LCC has been a cynical exercise to shore up a foregone conclusion. In short, the number of meetings or numbers of submissions received is irrelevant unless there is some degree of openness to take into account the views received. We are not aware of this having occurred at all in the 5 years we have been dealing with this.
 - We also had multiple consultations with the Department of Planning plus submissions and a walk through the area to listen to concerns. The result of that “consultation” has been that the Department has put forward no plan at all for our area and has said it should be left to LCC’s original proposal. What then was the point of consultation with the Department, if the Department has simply washed its hands of the area?
 - In the circumstances where years of “consultation” have resulted in absolutely no change, an obvious inference is that the purpose of the “consultation” has not been to adapt the plans to feedback but with
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the intent of “white-washing” the original plan in the face of overwhelming opposition.

- In LCC’s public statements, it has been repeatedly suggested that the proposal was brought on by fears as to what would happen if plans for the area were left in the hands of the State. The State has repeatedly asserted that this is purely an LCC proposal on which they do not wish to opine. Discussions have occurred between the current Mayor of LCC and the State to seek agreement that the SLS proposal will meet LCC’s housing supply targets (across its broader area) for some period into the future. It is unclear what (if any) understandings have been reached in this regard. We sit in the midst of this political wrangling as the people most affected but with seemingly no meaningful say.

Design

- One of the main things the IPC is to assess is the design merits of the SLS plan. It seems to us that rows of monolithic rows of 8-10-12 story apartment blocks has all the design merit of Soviet-style and post-war apartment block construction which has led to such developments being demolished in other parts of the world. History has shown that such developments end up soulless, dark and windswept (especially with the solar access issues of the site).
- In terms of design itself, the Development Approvals already lodged show square block buildings like thousands of others across Sydney. It is apparent from developer submissions that they have already started the process of seeking extra heights, less set-back and amalgamation alterations which will increase their economic returns. We are struggling to see the design merits in the proposals as they stand.
- We are also struggling to see what principle of design/planning excellence would leave only half of the precinct planned, with 8-10 storey towers sitting across from 2 storey dwellings. We note the somewhat cynical approach in the plans to assert that the buildings opposite could be as high as 3 storeys, when none of them in fact are.
- The only redeeming feature of the proposal would seem to be the proposed park. However, LCC’s plans assert the relevant land should be able to be compulsorily acquired based on an acquisition price of \$8,500psqm. This pricing is based on a strangely skewed market sample which picked the three lowest prices achieved in the area, when houses next door to the proposed park have sold for \$12,200psqm. Economic data analysing this this was presented to the IPC at the recent meeting.
- What this suggests is that the proposed park will not be economically achievable, with the result that to finance it LCC will have to offer FSR concessions and other usual VPA offsets. If the plan is to go ahead, LCC should be specifically asked to confirm that the park will be achievable. To date they have been unable to confirm this – with the financial data clearly based on unrealistic pricing. This suggests that LCC’s plans are seeking to back-solve for a concluded plan rather than to realistically assess likely achievability within the parameters put. If LCC is already aware that the park plan will not be economically supportable at the current FSRs, it should asked to revise its plan to show what FSRs might need to be offered to achieve the result.

Place

- A huge issue for this site is solar access.
- To address this, the site needs far more planning than has occurred to date. It may need different approaches or it may need to be concluded that buildings of this magnitude are unsuited to this site.
- Much has been made of not leaving public spaces in shadow, but what of the residences opposite? Why is it appropriate that they be given only one and a half hours of winter sunlight? Granted that this might need to be done in extremis, why are we in extremis here? One possible inference is that this is being driven by the fact that the relevant land has been bought by developers (encouraged by LCC’s premature rezoning announcements) and that LCC may have made representations to the purchasers about what they may be able to build? It is definitely the case that LCC’s approach from the start (please view original proposal documents) has been to approach this from the viewpoint of what FSRs might be palatable to developers to achieve their IRRs rather than whether such developments would

make sense on this site from a planning perspective.

Greenery

- The public documents describing this planning proposal are littered with photographs of trees and greenery in an effort to portray that the “leafy” character of the area will be maintained.
 - Clearly with development of the scale proposed this will not be the case. With the level of sunlight projected, the place will also be dank and unhealthy and not a good place for growing plants. A good example of this can be found in the pocket parks and “green” walkways that are already in the area on the lower side of the Pacific Highway buildings. These are not healthy areas.
 - We note one of the recent DAs argues (in support of the development and its shading effects) that in the future we will all need more shade from the harsh Australian sun – the proposal should certainly ensure that.
 - There is a level of cynicism in the presentation of the plans for the area that we would like to point out. It is not a forest that is being planted, but row upon row of tall concrete buildings. Any trees that are planted will be dwarfed by the size of the buildings proposed.
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Access

- We have pointed out previously the complete inadequacy of the traffic plan for the area, which suggests that an additional 5000 people can be added to the area (more than the current population of Greenwich) with negligible effects on traffic. What problems there are can be solved by replacing a roundabout with a Give Way sign to fix a traffic modelling software glitch.
 - Largely the analysis is based on the expectation that when the Sydney Metro starts in 2024, almost everyone will use public transport. This ignores the realities of existence in the area.
 - We would urge you to look at the traffic plans carefully and consider whether what has been done is realistic or adequate. Again, it would seem that anything inconvenient to the existing plan is not addressed in the way that would be expected if the plan were being conducted on a dispassionate basis.
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Conclusions

What the above suggests to us is that:

- A plan should be made which seeks to address the issues with the site on a holistic basis. This might be more possible if the whole of the precinct is taken into account.
- The plan should seek to properly address solar access, sense of place and design, to achieve something Sydney might be proud of, and a liveable place for the future.
- The imperatives to build a development of this magnitude on this site should be examined. It should also be explored why the Department of Planning has failed to plan this area and why – if the plan is not in accordance with the planning principles espoused in the rest of the plan or for Sydney, the answer should not be to proceed with it regardless, but to identify and fix the issues before they arise.

OR

- If none of this is possible we believe the size and scale of the development should be considerably wound back to allow the impacts of buildings to be assessed over time on the basis of what is built. Proper decisions can then be made based on proper information, and when the needs of the area are far clearer.
 - A series of entities have assessed SLS as one of the most difficult developments in Sydney. In our view, this is because the nature of the site is such that the plan works neither for developers nor for residents. For some reason we are being asked to make do with the best (or the worst) of
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a bad lot.

- One possible conclusion is that the site as proposed has just not been properly planned.
 - We would like to thank you for the opportunity to present our views in the hope that they may bring about some changes and some relief from what currently hangs over us.
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27 May 2019