

1 Aug 2019

Professor Mary O'Kane AC

Chair

Independent Planning Commission NSW

Level 3, 201 Elizabeth Street

CHATSWOOD NSW 2057

Dear Ms O'Kane,

**ST LEONARDS SOUTH RESIDENTIAL PRECINCT PLANNING PROPOSAL –
INDEPENDENT PLANNING COMMISSION ADVICE TO MINISTER**

I refer to the Commission's recent advice to the Minister for Planning and Public Space concerning the St Leonards South Residential Precinct Planning Proposal prepared by Lane Cove Council. Greaton is a significant land owner within the subject area with two land parcels totaling approximately 22% of St Leonards South.

I would like to express our sincere disappointment in respect of the advice provided by the Commission in relation to this matter.

While it is appreciated that the Commission was asked a very specific set of questions by the Minister at the time, the advice provided raises more questions about the future of St Leonards South than it answers.

Our key concerns with the advice include:

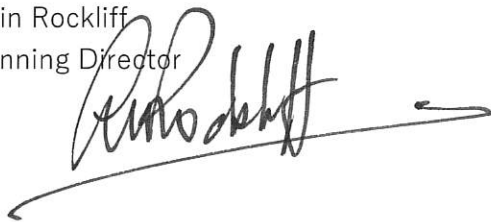
- That the advice provides no comment on the strategic merit of the proposal notwithstanding the Precinct's evident suitability for higher density development demonstrated by it being consistent with key strategic planning documents and policies, access to public transport, services and employment and ability to deliver the government's vision of achieving a '30 minute city' for Sydneysiders to live, work and play.
- That the composition of the Commission itself did not include an expert planner or any Commissioner with experience in strategic planning matters therefore bringing in to question its capacity to provide expert advice in relation to this matter which is in essence, a strategic planning project.

- The advice's clear focus on assessment against the 'existing character of the area' in the absence of recognising that it is impossible to provide additional housing supply (commensurate with the capacity of the land) without changes to the existing character of an area. In this respect the key, as established by government policy, is to provide for new housing in highly accessible locations and to do it well, creating new communities that are active, connected and have high levels of amenity.
- The advice's failure to recognise the need to plan for future housing demand for a planning horizon of greater than 2 years simply because there are no targets prepared beyond 2021 (demand for housing will continue notwithstanding there have been no targets prepared) and to optimise the use of land near jobs and key infrastructure that the Government has invested billions of dollars in such as the Sydney Metro.
- The advice's heavy reliance on hearsay and opinion rather than the 'evidence base' provided by the appropriate planning authority (Lane Cove Council), and available from other sources, including the DPIE.

Unfortunately, the Commission's advice, rather than contributing to the valid debate on how (and to what density / height) the development of St Leonards South should occur, has added further uncertainty and confusion. This is regrettable, and in our opinion represents a lost opportunity for the Commission to provide guidance on the appropriate way forward for this significant precinct.

Yours sincerely,

Colin Rockliff
Planning Director

A handwritten signature in black ink, appearing to read 'Colin Rockliff', with a long horizontal flourish extending to the right.

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The Hon. Rob Stokes MP, Minister for Planning and Public Spaces