

25 May 2019

Ms Mary O’Kane,  
Chair, Independent Planning Commission of NSW  
Level 3, 201 Elizabeth Street,  
SYDNEY, NSW, 2000.

Dear Ms O’Kane,

**Re: OBJECTION TO St Leonards South Planning Proposal**

I STRONGLY OBJECT to the St Leonards South (SLS) Planning Proposal (PP). It has been prepared without one mention of population density, open space ratio and their impact on public amenity and infrastructure. The result is suboptimal and would result in overcrowding, overshadowing, congestion, poor public amenity and no open space – negatively impacting on PLACE and LIVEABILITY, the very things that make Crows Nest a desirable place to live.

## LOCAL CHARACTER

The Department of Planning has deemed Local Character so important that it hosted a number of workshops on THE IMPORTANCE OF LOCAL CHARACTER and published Local Character Guidelines in February 2019. Why?

- Because there is economic value in paying attention to liveability indicators.
- Because improving the identity of a place and SUPPORTING ITS LOCAL CHARACTER has a positive effect on liveability.
- And ultimately improving liveability makes an area more desirable which improves profitability.

Local character was **deemed so important** that PLACE was added as a Design Guideline. Sadly this Planning Proposal fails that design guideline along with many others.

## PLACE

The Planning Proposal doesn’t BUILD COMMUNITY - let alone vibrancy. It isolates people in high rise buildings without adding any nearby public amenities such as cafes, playgrounds, a local grocery store or significant new outdoor space. It would result in Newlands Park being subject to unacceptable cumulative overshadowing in the afternoon.

With Newlands Park there is the opportunity to provide for more group and resident activities by building a grass amphitheatre on the south and east park slopes that would provide wonderful spaces with afternoon and evening sunshine coming through reduced height buildings.

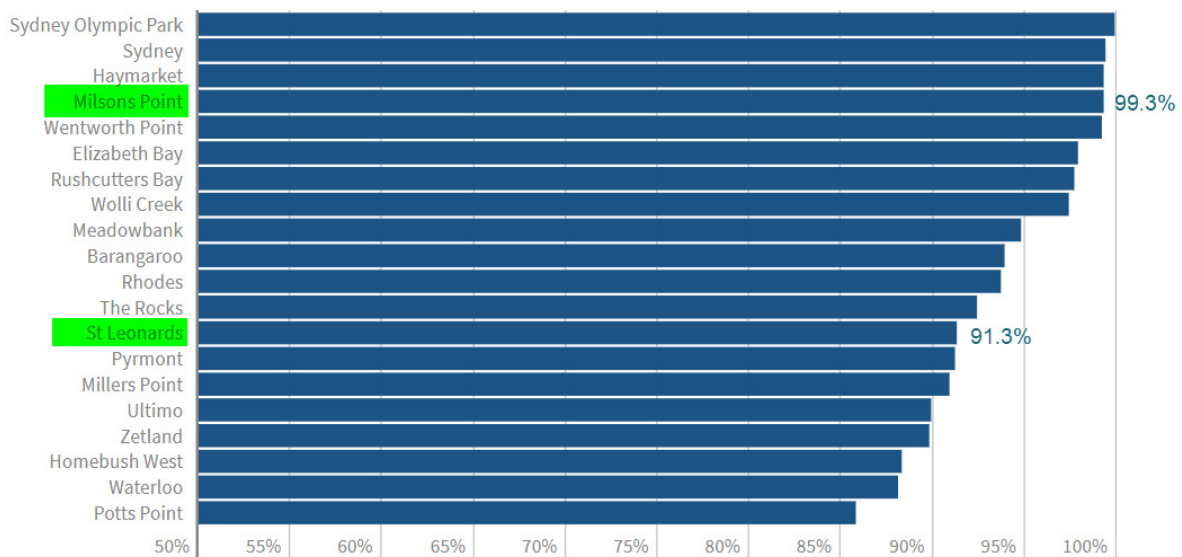
## SCALE

The scale and height of proposed buildings are vastly excessive. Development needs to be appropriately scaled to reflect existing Duntroon Avenue apartment buildings.

## DENSITY

As of the 2016 Census, more than 93% of St Leonards residents were living in apartments. Almost 2000 high rise apartments are currently under construction near St Leonards station. Surely that's enough apartments for St Leonards and it would be more beneficial if this land were used for other purposes.

Top 20 apartment dwellers in Sydney



Source: Census 2016

## LAND USE

This Planning Proposal fails to deliver on variety of land use, support of jobs growth or diversity of housing.

### VARIETY OF LAND USE

Given local councils are meeting housing targets this land could be used for the sorely needed new schools, open space and playing fields.

To assist with supporting jobs growth this land could become an **internationally competitive health, education, research and innovation precinct**. What about a world leading establishment for Dementia care? A research institute for medical nanotechnology? A solution for the 'missing middle' problem?

## DIVERSITY OF HOUSING

We need diversity of housing – affordable housing, social housing, 3 and 4 bedroom housing. We want local residents to be able to ‘age in place’. The area would be better served by increasing density with a mixture of terraces and 3-4 storey apartment buildings.

## BUILT FORM:

Local Councils are meeting or exceeding housing targets. There is no good reason to jump from a low-rise residential neighbourhood to a high-rise residential towers.

High rise buildings do not create a human scale residential neighbourhood. High-rise buildings do not create vibrant communities. They separate us from one another – and separate us from the street - increasing the level of alienation and isolation, creating public health problems. High buildings are not the answer.

## LIVEABILITY:

A mass of high rise buildings with NO OPEN SPACE does not make for a liveable community. We are looking for a well-designed mix of open space to buildings with plenty of open spaces for leisure, children and adults.

## TOPOGRAPHY:

The SLS precinct topography is quite steep. Some consideration needs to be given to providing basic community services / local corner shops within the neighbourhood.

## CUMULATIVE IMPACTs

As a Crows Nest resident, I am concerned about the CUMULATIVE IMPACT of the Planning Proposal for St Leonards South ON TOP OF THE enormous number of new high rise residential units currently being built or already approved in St Leonards Crows Nest.

### Schools

Local primary and high schools are already at capacity. With 2400 units in the SLS plan, there will a large increase in the number of school age children but there are no known plans for a new school to accommodate this demand.

### TRAFFIC and the SAFE DELIVERY OF SERVICES

I am particularly concerned about the potential for significant traffic congestion around the Royal North Shore Hospitals, the Mater Hospital and the North Sydney Fire Station. The Cardno Study does not consider the need for clear road access for critical emergency Services.

Also, the Cardno study does not consider the need for rapid response from the North Sydney Fire Station located near the intersection of the Pacific Highway and Falcon Street. This is a critical intersection that the IPC should be absolutely confident will not be blocked by increased traffic volumes.

### SOCIAL INFRASTRUCTURE:

The social infrastructure is not in place to support what is in the pipeline. Schools, hospitals, roads, open spaces, sports fields and swimming pools are already overcrowded. No further approval of residential units ought to be approved until we fully understand the implications of what is already in the pipeline.

### LOCAL HEALTH INFRASTRUCTURE:

Local GPs are closed to new clients. There are no close bulk billing departments. The hospital is already stretched and overcrowded and traffic impedes easy access to the Emergency department.

## What do we want

We want St Leonards South to be a healthy, vibrant community with a mix of small footprint shops and 4 to 6 storey residential activity - not an ever expanding group of high rise residential towers. We want buildings to remain human in scale with open spaces, beautiful street scapes, wide sidewalks, generous setbacks, lovely gardens and street seating.

We want more Open Spaces, more spaces for active and passive recreation – and gathering.

We want the social infrastructure requirements and impacts to be assessed in total – not development by development. And we want the supporting social infrastructure requirements to be in place before further residential towers are approved.

We must plan for the entire area – not building by building – not Planning Proposal by Planning Proposal.

I would request that the Commission recommend that the planning for this area be revisited and that no further Planning Proposal be approved until we understand the cumulative effects of the new residential developments already being built – and approved – in the Crows Nest St Leonards area.

I STRONGLY OBJECT TO THE EXISTING PLANNING PROPOSAL.

Thank you for listening.

*Barbara H DeGraff*

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