



# Greenwich Community Association Inc

PO Box 5057, Greenwich, NSW 2065

For current committee contact details see [www.greenwich.org.au](http://www.greenwich.org.au)

12 February 2019

Ms Ilona Millar  
Chair  
Independent Planning Commission  
Level 3  
201 Elizabeth Street  
SYDNEY NSW 2000

Dear Ms Millar

## **Planning Proposal for the St Leonards South Residential Precinct**

The Greenwich Community Association (GCA) is a non-profit incorporated community association dedicated to gathering and promoting the views and interests of the residents of Greenwich. The GCA was established over 70 years ago and distributes bi-monthly newsletters to over 2000 residents. Meetings of the GCA are open to all and are held in alternate months. The AGM of the GCA will take place on Wednesday February 20.

The GCA and the Greenwich community generally welcomes the referral of the St Leonards South Residential Precinct re-zoning proposal (SLS plan) to a panel review by the Commission.

We ask that the following be taken into account when determining the structure and duration of the panel's review

### **Impact on Greenwich**

A portion of Greenwich (west from Park Lane to Greenwich Road) lies within the scope of the area originally designated by Lane Cove Council for consideration in the Master Plan process that ultimately led to the SLS Plan.

When the detail of the proposed SLS Plan was released in early 2015, it was apparent that the Greenwich portion of the area under consideration had been excluded from the re-zoning proposal.

However, the SLS Plan proposal of 2400 dwellings (replacing 138 detached dwellings) posed significant potential amenity and infrastructure impacts on the Greenwich community and this remains its great concern.

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### **Consultation**

Lane Cove Council convened a Community Liaison Committee in November 2012. However, the GCA and Greenwich residents were not included in the committee or the Master Plan process.

After pressure from the GCA and as part of the Gateway process, Lane Cove Council undertook a consultation process over Christmas 2017. The GCA has prepared its own summary of the results of that consultation process (as noted further below). The Council has not issued a public report on the results of that consultation.

One of the key themes in the community responses is that the planning for the SLS area should not be considered or developed in isolation from the broader surrounding area, which is the history of the way in which the proposed SLS Plan was developed. This reflects the fact that the SLS Plan was formulated 6 years ago, before the GSC undertook its work on the St Leonards Crows Nest precinct.

We see the panel's review as part of the consultation process on the recently released 2036 draft plan for St Leonards and Crows Nest (2036 Plan). This will be the first opportunity for the community to comment on how the SLS area should be planned and developed in the context of plans for the broader surrounding area.

### **Draft 2036 Plan objectives**

We welcome the broader approach of the 2036 Plan which highlights the shortcomings of the proposed SLS Plan. We are of the view that the proposed SLS Plan is seriously inconsistent with the objectives of the 2036 Plan.

We understand that you will await a report from the NSW Department of Planning and Environment on the submissions made in response to the 2036 Plan to inform the structure and duration of your review.

In this respect, we draw your attention to the fact that the area comprised in the SLS Plan appeared as a blank space in the 2036 Plan. This aspect of the 2036 Plan was a source of confusion to many who made submissions to the DoP on the 2036 Plan, leaving them to understand that, as the SLS Plan was to be dealt with by the panel, this would be the time to make submissions on it.

We trust that the panel will be mindful of this confusion in its preliminary review of submissions.

### **Existing Community and Council reviews of the SLS proposals**

We hope that the panel will also review other key documents in advance of settling on the structure of the review:-

*Submissions made to Lane Cove Council during SLS Plan exhibition Dec 2017 – Jan 2018.*  
These are the submissions made in December 2017 – January 2018 in response to the exhibition of the SLS Plan as part of the Gateway process.

It is noted that the Minister's terms of reference to the panel state that Lane Cove Council has been asked to make these submissions available to the Commission.

We are of the view that it is most important for the panel to see these submissions. As these submissions have not been made available to the community (or, as we understand, to the Department of Planning and Environment) the GCA sought access to them in a GIPA access request. After several months, the GCA received copies of what we believe to be most of the submissions, albeit with identifiers and large portions of content redacted.

We are happy to provide to the panel our copies of the submissions as they will give the panel an insight into the level of concern there is around the detail and impacts of the SLS Plan.

It is hoped that the processes of the panel will allow the appropriate opportunities for these concerns to be presented fully.

In the meantime, we attach for your information our summary of the comments in the submissions that we were able to analyse.

*Report on Lane Cove Council's SLS Plan Design Review Panel*

We hope that the panel will seek from Lane Cove Council the report on the findings of its SLS Plan Design Review Panel conducted on 4 July 2018. The GCA was not invited to present to this panel, nor was it permitted to attend as an observer. We understand that Councillors were not permitted to do so either.

We are unaware of exactly who appeared before the panel although we understand that it was confined to a few invited community members and owners of some of the SLS sites. We are not aware of the composition of the panel or of its remit.

Council has not published a report on the panel findings, nor has it reported back to the community members who appeared before it.

*Greenwich Community Association website*

The GCA publishes a bi-monthly newsletter, copies of which are accessible on our website [www.greenwich.org.au](http://www.greenwich.org.au).

These newsletters offer a comprehensive insight into the concerns related to the SLS Plan.

**Public meeting**

We hope that, given the clear level of interest in the SLS Plan on the part of the Greenwich community and the broader community, the panel will give serious consideration to the conduct of a public meeting in relation to the SLS Plan, as requested by the Minister.

Yours faithfully



Merri Southwood  
President  
Greenwich Community Association





## GREENWICH COMMUNITY ASSOCIATION

### REVIEW OF ST LEONARDS SOUTH MASTER PLAN SUBMISSIONS (OCT 2017/JAN 2018)

#### GENERAL REPORT

The GCA has reviewed the submissions in the anonymised and redacted package provided by Lane Cove Council on 30 April 2018 in response to the GCA's GIPA request.

#### *Submissions reviewed*

The package of 955 pages contained 339 submissions, including 10 from government agencies.

120 pages were blank and appeared to have been redacted. We understand from Council that these primarily comprised 3 large submissions.

In summary, our review found the following:

#### *Community opposition*

1. There is overwhelming community opposition to the St Leonards South Master Plan.  
**96% of the submissions were opposed to the Plan.**
2. Only 47% of the submissions formally expressed their opposition as an "objection". However, the submissions that did not formally object expressed their opposition clearly and often in strong language. Some of the politer expressions included: "I am appalled", "we are horrified", "stop this development NOW", "this is a disgrace", "please do not approve this travesty", "what have you been thinking?"

#### *Community concerns*

3. The submissions identified a wide range of concerns, relating both to (a) the quality of the precinct if developed as contemplated by the Master Plan, and (b) the adverse impact on the broader Greenwich and Lane Cove community.
4. The top 5 concerns were:
  - traffic and parking congestion (72%)
  - lack of infrastructure and adverse impact on amenities (64%)
  - lack of, and severe adverse impact on, open space (59%)
  - lack of schools and childcare, including playgrounds (53%)
  - overcrowding and unsustainable density (51%).
5. Other issues where submissions raised concerns or sought better outcomes included:
  - destruction of the character of the area (27%)
  - lack of community facilities (27%)
  - the levels and heights of the proposed rezoning, and the streets covered (and not covered) by the rezoning (23%)
  - adverse impact on the natural environment (including birds and trees) and lack of sustainability (21%)
  - overshadowing and privacy issues (19%)
  - public safety issues (18%)
  - lack of retail and commercial facilities within the precinct (18%)

- adverse physical and mental health effects (17%), and
- lack of pedestrian and bicycle paths and facilities (14%).

*Park Road West & Portview Road*

6. Of the 4% submissions in support of the Plan, most were from residents in the Park Road West & Portview Road Action Group who supported the Plan if it extended across the whole St Leonards South precinct. Under the plan those residents are sandwiched in a low density corridor between the high storey, high density zoning allowed along Pacific Highway/Greenwich Road and in the proposed rezoned part of the precinct.

*Submissions in support*

7. There were two submissions in support that related to specific areas within the proposed rezoned part of the precinct. Both sought increased FSR or height allowances in their areas. In one case this was to permit 47 metres (14 storeys) rather than the proposed 37 metres (as compared to the existing building height maximum of 9.5 metres), and in another it was to permit FSR of 4:1 rather than the proposed 3.5:1 (as compared to the existing FSR of 0.5:1).

*Government Agency reports*

8. The Government Agency submissions were generally compliance reports; ie advice as to whether the proposal complied with regulatory requirements. For example:
- Sydney Airport noted the requirement for cranes not to exceed permitted heights,
  - CASA referred the Council to Sydney Airports and the RNS Emergency Medical Service helicopter operators for their requirements
  - the Federal Department of Infrastructure and Regional Development commented only on airspace height restrictions, and referred the Council to Sydney Airport
  - Sydney Water noted that water and waste pipes would need to be upsized under the Water Supply Code and for the North Head Sewerage System.
9. Generally the Government Agency submissions did not comment on what would be required or desirable to enable the plan to meet the concerns set out in the community submissions, ie traffic, infrastructure, open space etc. There were no reports, for example, on traffic or parking, open space, general infrastructure, community infrastructure, or hospital and health facilities. There were three Government Agency submissions that touched on issues of community concern:
- the Department of Health recommended that the plan incorporate health promotion by way of:
    - active transport and connectivity (including specific bicycle pathways and facilities identified in their submission),
    - public open space and amenity,
    - smoke-free spaces, and
    - car parking
  - the Department of Education advised that the upgrades announced in June 2017 for Greenwich Public School's Kingslangley Road and Infants School campuses were based on enrolment projections incorporating the additional dwelling estimates for recent and proposed rezonings for St Leonards, including the St Leonards South precinct, but did not include any supporting data or analysis, and

- the Heritage Council of New South Wales advised that there are 3 heritage items of local significance across the road from the proposed rezoned part of the precinct, and that the proposed density of development has the potential to impact on the character of the streetscape and the setting of local heritage items. It recommended that Council review the location, height and massing of proposed development along the western boundary of the study area.

*Actions Requested*

10. Many submissions asked for the plan to be cancelled or rejected.
11. A number of submissions expressed concerns about the Council's consultation process.
12. A number of submissions referred to the need to develop instead an integrated plan for the whole St Leonards area as contemplated by the Greater Sydney Commission reports.

We would be happy to discuss the GCA's findings in further detail.

The GCA contact persons for this report are Merri Southwood [REDACTED] and Michael Ryland [REDACTED]

**Greenwich Community Association**

6 June 2018