

The General Manager,  
Lane Cove Council  
Lane Cove 2066 NSW

Dear Sir/Madam,

**Re: Objections to St Leonards South rezoning SU5945**

I do not support the proposed rezoning to permit to illustrated development for the above project. There are many reasons for this. Following are just a few:-

1. Being a south-facing slope, the precinct is **eminently unsuitable** for this proposal.  
How can Council permit a process which, at the outset, provides such difficult circumstances to be overcome in design terms?

-The documents attempt to disguise - but do reveal - the many problems caused by the steep and south-facing slope eg:-

-minimum SEPP65 Apartment design guidelines for solar access can not be met for some units; an excuse for failure to meet guidelines is already being given by Council in its Gateway documents where it shows applicants can rely on flexibility permitted in SEP65 to argue that south slopes and desirable view directions can be used to allow almost no sunshine into many apartments.

-Landscape acknowledges significant problems with levels – see their Levels page attached, “The site presents significant challenges in terms of levels .....etc”

There are motherhood promises to “explore” ways to improve the situation, but even on their own document’s preferred E-W connection, they do not reveal the full extent of steps needed at intersections with the N-S Green Spines (see 2 attached markups).

-Shadow diagrams are misleading, difficult to read and at pains to emphasise in notations that some shade is already cast by buildings on the other side of the rail corridor.

Low angle sun from the west, which gets below existing tree canopies, is very important in the health of Newlands Park. See also point 4 below on why the shadow diagrams are wrong.

2. DCP proposal to moderate solar access to 1.5 hours midwinter is unconscionable.

Does Lane Cove council want to create the slums of the future?

Time does not permit an analysis of other below standard aspects, but it is highly likely that ventilation will be one, and that Key Worker or Affordable living apartments may be the ones which come out worst in the developer’s schemes.

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3. This precinct does NOT meet the LIVABILITY definition shown on your display panel no 13, to quote:

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“*Liveability - based on existing research, a liveable community is ‘one that is safe, attractive, socially cohesive and inclusive and environmentally sustainable; with **diverse housing** linked by convenient public transport, walking and cycling infrastructure to employment, public open space, **local shops, health** and community services, and leisure and **cultural opportunities**’.* (Source: *Creating liveable cities in Australia, 2017 presentation*) (emphasis added)

For over 4800 people, where is the diverse housing, the local shops, the health services, the cultural opportunities within this St Leonards South precinct? Where is the school? The big-sport playground?

The rest of Greenwich, about 5200 people, does meet this definition of liveability.

This proposal seeks to “suck up” the liveability of the rest of Greenwich and parts of North Sydney nearby, and call it its own – but only the developers, and property sellers in the precinct, get the financial windfalls which it relies on its’ neighbours to provide.

4. Overshadowing to Newlands Park is immense and is incorrectly shown on shadow diagrams.

The RL of Newlands Park is RL50, and the RL of apartments on Canberra Ave are 61 to 64 (see Levels drawing). The heights of the buildings opposite are 31m to 44m. This gives (61+ 31) and (64 + 44) ie. RLs will become RL92 and RL108 in these examples.

That is, above the park, the top of the lower one will rise 42 m.

The top of the next few will rise 58 m –above the park.

At 3pm in midwinter June 21, the sun’s altitude is 18.5 degrees above the horizon, bearing is 43.2 degrees, and produces a shadow length of 2.99 x the height differential. (Source “Sunshine and Shade in Australia: - CSIRO)

So we have, 2.99 x 42m above grass = **125.6 m** long shadow, for the lower building, and 2.99 x 58m = **173.4 m** long shadow for the mid-way building along Canberra Ave.

See attached pdf of a 122 m long red dashed line superimposed using Sixmaps website. It goes right across the park.

Compare it with the overshadowing shown in Council’s panels for the same 3 pm 21 June – you will see that the latter is **incorrectly shown** as the shadow length.

5. Inadequate public parks and other infrastructure

The FAQs section of Council’s display states that Council’s approach is entirely consistent with preferred practice for parks, but it is reliant on using Newlands Park and otherwise does not have a 1 hectare park available.

6. Land acquisitions - Ratepayers are paying top dollar to buy land back for a smallish park and for a road.

These things are only necessary to make the scheme work – even with all its faults being “DCP’d away”.

Moreover it is stated that

*“High land prices would significantly impact upon Council’s ability to purchase these properties at current market rate and it is unlikely that the proposed developer bonus scheme would provide the funds necessary to purchase those properties.”*

7. Errors and misleading documentation should be withdrawn, redrawn/rewritten with apologies and clarifications, and re-exhibited.

For example:

- Council’s Original Request Gateway Submission p3 states that the Landscape Master Plan’s “acceptance is of critical importance ....” But who can accept errors?
  - see Site Topography page – erroneously lists buff areas as having grade of >1:50 - clearly nonsense.
- The Aerial View montage makes the site look flat whereas it is clearly very steep over much of the area. This drawing with its many trees, appears repeatedly in various offerings, to make it look flat and easy of access whereas really many of the buildings are only connectable via multiple stair flights.

- The council's Original Request for Gateway on page 3 falsely stated a Visual Corridor would link the new western park with Newlands Park; the red mark-up on the accompanying extract of this pedestrian link shows that it is false – see mark-up attached.
8. North South connectivity links, ambitiously called “Green Spines” will not live up to expectations, once real-world level changes are considered in the design instead of hiding them in flowery drawings. These level changes will eat into the so-called green space. See mark-ups attached where pedestrian E-W link fails to show the steps to levels of the N-W green spine, both above and below the E-W links.
  9. The LEP Incentives chart is not a reliable document and should be withdrawn.

The Incentives rely on meeting conditions by reference to the Landscape Master Plan which is a flawed document. It contains inaccuracies (eg not showing stairs on N-S green spines, wrong shadow lengths, deep soil zone flaws, etc) and embodies aims expressed in such a way as to permit significant laxity in interpretation. The whole thing is unworkable and open to gross manipulation.

10. Traffic will increase on River Road, traffic generation is not addressed in an honest transparent way for the layperson, and 2021 is only 3 years away.

The Cumulative Traffic Study gives the impression that there will be hardly any difference in the traffic due to the rezoning. This is misleading as it also states that the traffic models initially had traffic in gridlock at certain intersections, once RMS traffic generation figures were introduced. Traffic could not be got out of gridlock without taking certain measures to solve the situation – such as removing on-street parking along Greenwich Road, and along other nearby streets, and altering timing and phasing of lights at Shirley Rd/Pacific Highway intersection.

There is no information on whether this signal timing change has been discussed with RMS, nor on what will be the traffic impact once Crows Nest Priority Corridor density is added to the system. Traffic signals are also proposed on a blind corner of River Rd when approached from Duntroon Ave side – yet who has agreed to this idea? What has RMS said?

11. Deep soil planting is not achievable the way it is shown yet given the levels of ethics of some Principal Certifying Authorities, they will read the plans from the INSIDE of the walls of carparks only.

Basement carparks have thick walls, and piers outside. They are shown as straight below the building walls but they will be at least 500 mm thick. So the deep soil areas will in reality reduce, despite the grandiose rules in place. And, at only 1 m deep as permitted, there are many trees which will not grow properly.

12. River Road and its surrounds will suffer the sound repercussions from the high buildings on the precinct.
13. This proposal is not really “sustainable” because it relies on its neighbours to function; , it is now out of date, as is some of the background documentation.

Yours sincerely  
Resident,  
Northwood  
5 January 2018

[Note- See Attachments x 4; documents reproduced are as fair use for comment purposes: Markup of Levels x 1, Markup of E-W connection x 1, Extract markup of Council Gateway submission p3, Sixmaps 113m red dashed line across Newlands Park]

# EXTRACT: COUNCIL "ORIGINAL REQUEST FOR CATEGORY 4"

- Open space:

The Landscape Master Plan's acceptance is of critical importance for the achievement of the St Leonards South's model for urban density with liveability and amenity, as it provides pedestrian permeability, view corridors and recreation spaces. The LEP's FSR bonus scheme underpins that plan. Key components are:-

\*  
THIS  
VISUAL  
CORRIDOR  
IS A  
FABRICATION  
— SEE  
SIGHT LINE  
TO NEWLANDS  
PARK DRAWN  
ON OCVLVS'S  
E-W  
ACCESSIBLE  
SECTION

- An open space network from a new park of 3,500m<sup>2</sup> at the western end is connected by a visual corridor of East-West open space links to Newlands Park in the east. The community facilities and child care centres are situated within this network.
- Green spines of common open space with reciprocal rights of way across north-south recreational areas, approximately 24 x 200 metres in area, between all apartment blocks. The aim is to provide a diversity of quiet and active spaces promoting social interaction.
- Conversion of the culs de sac in Berry Road and Holdsworth Avenue to pocket parks.

- Community infrastructure is planned to comprise:

- Two community facilities and two childcare centres
- Open space and East-West links as above
- The centre closest to Newlands Park is to provide an accessible lift as a component of the pedestrian network.

- Key worker housing:

This is to be provided on a site-by-site basis to ensure that the building envelopes have regard to solar access. This approach is a more nuanced response to topographical factors rather than applying a blanket requirement (e.g. 4% of all units). It also enables slightly higher building envelopes to contain more key worker housing.

- Solar access:

To facilitate these outcomes, the solar access standard is moderated in the DCP to 1.5 hours midwinter, consistent with SEPP 65 Apartment Design Guide's flexibility permitted for south-facing slopes and the anticipated orientation of units to capture views to the south. The standard of over 2 hours will apply for eleven months of the year.

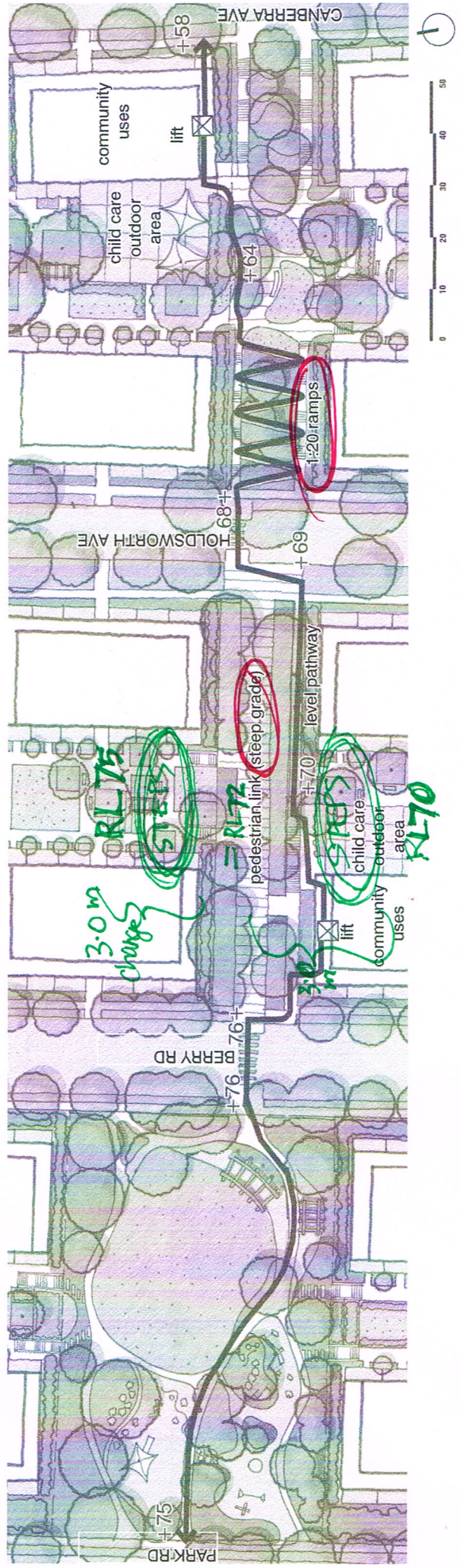
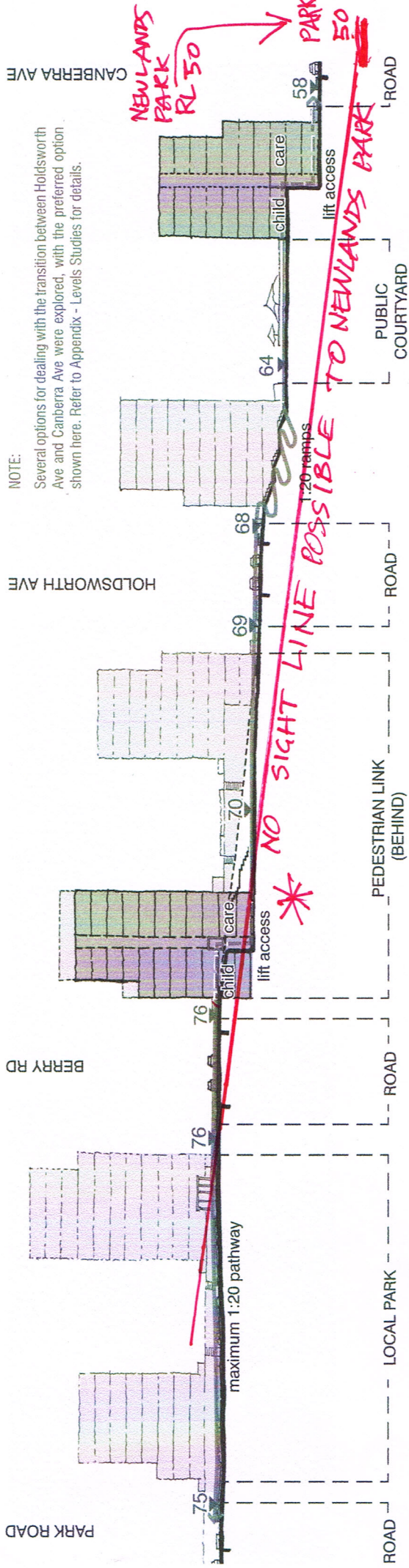
- Road:

A new link will be provided from Park Road to Berry Road, to enable access to the traffic lights at Pacific Highway, by site acquisition.

- Acquisitions:

Sites identified for the new road and park are significant for the amenity and functioning of the precinct. The location of a park between the high and low density areas provides transition and pedestrian access between Berry and Park Roads. It is important to note that property owners would be compensated in accordance with the Land Acquisition (Just Terms Compensation) Act 1991. These intended acquisitions are to be made transparent by their locations' inclusion in the Land Reservation Acquisition Map.

MASTERPLAN  
LEVELS - EAST-WEST ACCESSIBLE CONNECTION

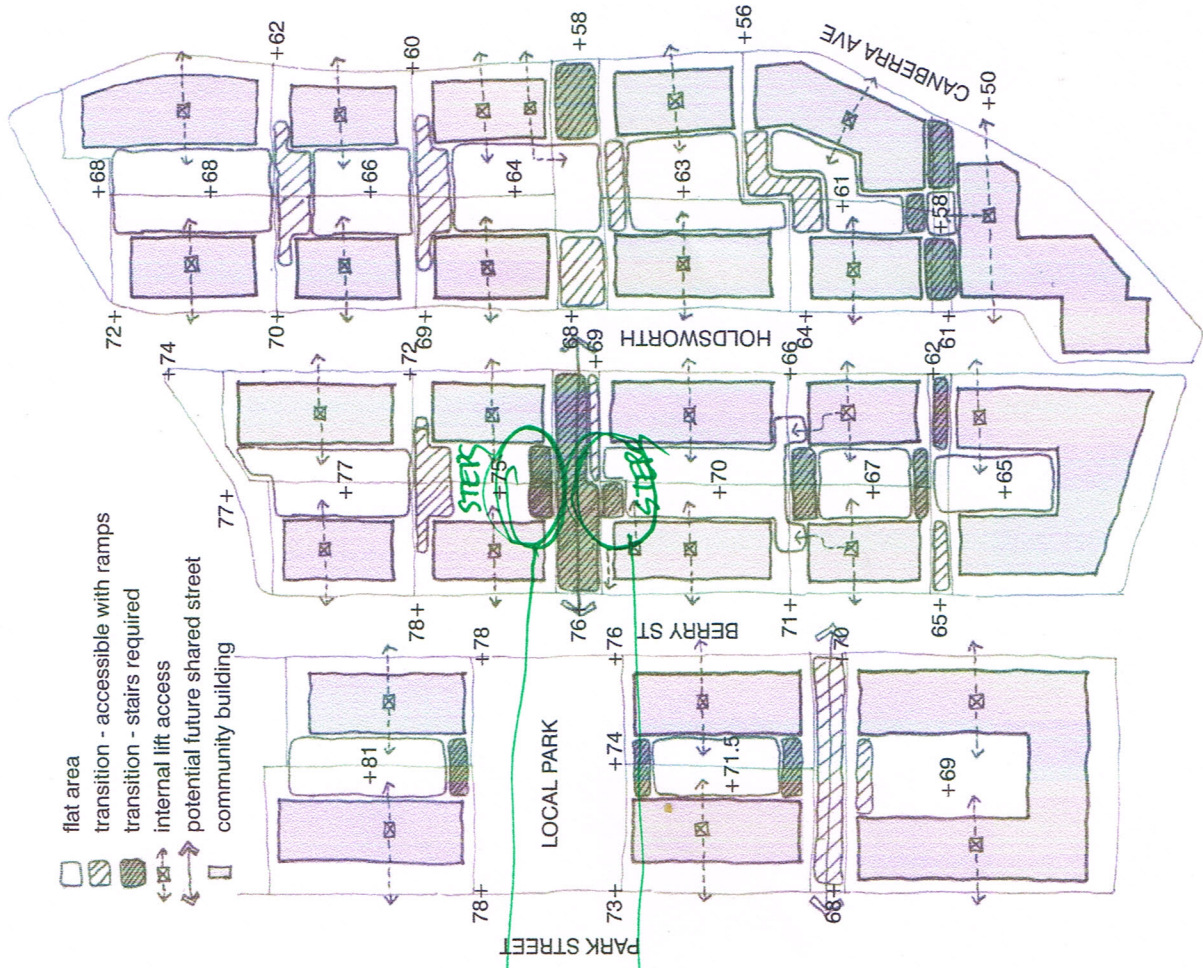


# MASTERPLAN LEVELS

The site presents significant challenges in terms of levels and as a result accessibility across the precinct. Most of the existing streets and proposed development sites have steep grades which exceed those required for universal accessibility.

The approach taken in the landscape masterplan has been to prioritise providing an accessible public route along the main east-west open space link between Canberra Ave and Park Road through the proposed new local park. The master plan also aims to provide as much accessibility as possible along the north-south green links between adjacent development sites.

Indicative proposed levels of the communal green spines are shown in the adjacent diagram, along with the existing street levels, whether transitions are accessible via ramps or stairs, and where lift access within buildings is required to provide access to external spaces.



PLAN SHOULD  
SHOW THESE  
STEPS ON  
THE  
E-W  
LINK AT  
INTERSECTIONS  
WITH  
N-S GREENY SPINES



Distance Tool

Total Distance: 113 m  
Last Segment Distance: 113 m

1:1,128

0 15 30m