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

I oppose the Planning Proposal for the St Leonards South Residential Precinct. It is a massive overdevelopment and is inconsistent with the Department of Planning and Environment's draft St Leonards and Crows Nest 2036 plan (which I'll call "the 2036 Plan").

The Independent Planning Commission has been requested by the Minister for Planning to have regard to specific principles outlined in the 2036 Plan when reviewing the Proposal.

Accordingly I will comment on:

1 accessibility to St Leonards and Crows Nest stations;

Access to St Leonards Station from St Leonards South depends on climbing to the high point of the area, the Pacific Highway. The concentric circles drawn on the Department's maps purport to show proximity to the Train Stations. But they fail to warn of the significant aerobic exertion needed to get up to the high point at St Leonards Station.

2 minimising overshadowing of public open space and streets with a significant public domain function within and outside the Plan boundary;

The Proposal for St Leonards South permits exemption from the minimum requirements for sunlight access in the name of providing low cost accommodation.

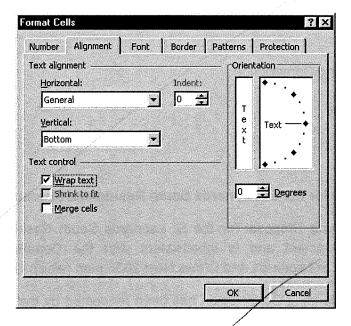
If additional overshadowing of St Leonards South was allowed, amenity would be compromised and the future liveability of the area as a modest, pleasant, domestic space would be greatly diminished. The conditions that now provide light-drenched solar access, green, small domestic gardens, and tree-lined wide-verge roads on the steep, south-sloping topography, should prevail.

The proposed tall buildings seem not to factor in the steep south slope of the land and the shadows they throw.

3 Minimising overshadowing of Heritage Conservation Areas and residential areas outside of the Plan boundary;

There is no evidence of the claim in the 2036 Plan that "a connection to the past will be maintained by protecting heritage conservation areas, celebrating the historic character of the area." The St Leonards South Proposal merely retains solitary heritage houses. These houses will be degraded when they are no longer located with their contemporary neighbours but are instead challenged by massive residential towers.

(d) Tick the $\underline{\mathbf{W}}$ rap text check box.



Once you have wrapped the text within the cell, you can align it to the left, right or centre of the cell.

Tip If you want to place a carriage return within the text (either wrapped or normal), use Alt Enter.

4.3 Merging Cells

You will often want to centre text across columns to improve the appearance of your worksheet. Typically this is necessary to place a heading centrally above the worksheet.

To center a heading:

- (a) Select the cell containing the text you want to center.
- (b) Extend the selection to include the cells over which the text is to be centred.
- (c) Select the Merge and Center button.

An alternative method is to use the **Format Cells** dialog box. Select the **Alignment** tab and then select the **Merge cells** option.

4.4 Hands on

In this exercise, you will merge the heading cells for the worksheet on your screen.

- (a) Select cells A1 to E1.
- (b) From the Formatting toolbar, choose the **Merge and Center** button.
- (c) Repeat the last two steps for the cells A2 to E2.

The 2036 Plan also desires that "The best bits of the surrounding leafy neighbourhoods that locals love will be brought into the heart of St Leonards for residents, workers and visitors to enjoy."

The irony is that the St Leonards South precinct currently provides a leafy neighbourhood and celebrates the historic character of the area. In sunny weather, workers enjoy their lunch on the Council's verge outside my home. The area has life, scale, personality and is an area where we love to live.

4 Ensuring new open spaces improve connections to existing surrounding open spaces;

There needs to be more green infrastructure – ie large parks and natural landscapes, quality public streets and a variety of usable, sunlight spaces. Gore Hill Oval (in Willoughby's local government area), Newlands Park and Smoothey Park should not be counted by each development as if they are somehow new green space. The oval and the parks have not increased in size. Both Gore Hill Oval and Smoothey Park are outside the proposed precinct and can only be reached by crossing the busy Pacific Highway or River Road. The 2036 Plan makes no provision for a pedestrian crossing to access Smoothey Park.

The proposed new park, between Berry Road and Park Road, is not large, is on a slope and would not be viable for sport or running. It can only be acquired if developers make contributions. In return, developers will demand increased bulk, height and overshadowing for their high-rise buildings.

5 the cumulative traffic impacts;

The Proposal for St Leonards South will result in a huge increase in cars for various reasons – public transport congestion, health issues, major weekly shopping, sporting fixtures, family commitments and meetings. The traffic studies obtained by Council in 2015 show peak hour failure. In 2019 the traffic is worse. Congestion will be compounded by the emerging massive high-rise developments along the Pacific Highway in Willoughby, St Leonards and North Sydney.

It is delusional to attempt to address car flow issues in St Leonards South by merely providing one new, small road from Berry Road to Park Road and replacing one roundabout with a Give Way intersection.

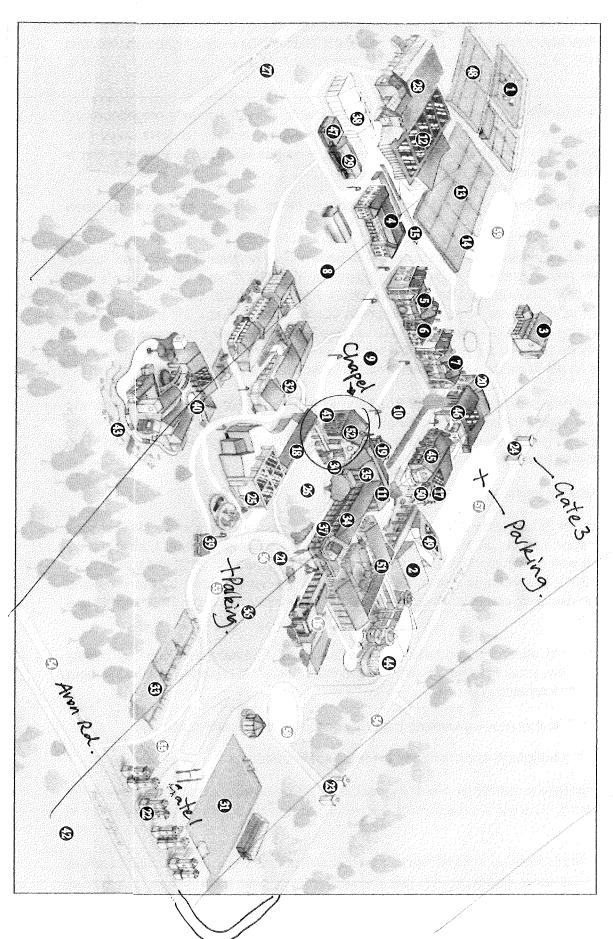
To approve a Plan that delivers extreme traffic congestion is an appalling outcome.

6 transitioning buildings appropriately to lower scale buildings.

The 2036 Plan fails to deliver on one of its key Land Use objectives, namely the provision of a mix of housing. There are already more than enough high-rise apartment developments in the area.

What is needed is medium density, with a mix of housing including social housing. Denser housing can be done creatively, not just row-upon-row of high rise. There is a golden opportunity here to show how development could be done sustainably and well.

The area already suffers from inadequate infrastructure (especially open space, parks schools, and traffic management). The Proposal for St Leonards South should not proceed until the infrastructure needed for the population increase is planned and provided in advance.



COLLEGE MAP

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The Commission is also requested to consider

1 the scale of residential development contained in the proposal

The scale of the St Leonards South Proposal is a major concern for many residents, as it will only exacerbate the over-development of St Leonards that is now underway. The initial Master Plan, which only went as far west as Berry Road (East), was presented to Lane Cove Council in 2015. Issues concerning topography, overshadowing, inadequate infrastructure, and the lack of provision of adequate social infrastructure (accessible green space, schools, traffic flow) loomed large in the debate at that time.

The current version of the Proposal extends to Park Road (East) and is unacceptable. It contemplates a dense, high-rise residential zone housing 4,800 residents. It does nothing to resolve the issues raised before and during 2015 and, in fact, makes them worse.

2 The whole site needs to be rezoned to meet housing targets identified by the Greater Sydney Commission.

Housing is important. Lane Cove Council is on track, even ahead of its present target. Given the number of residences currently approved or being built on the Highway in St Leonards, much less development or no development is required in St Leonards South.

3 advice on whether some staging of the proposal is appropriate would be appreciated.

Reducing the density and the height of the St Leonards South Proposal, and providing a genuine mix of housing types, may make the proposal more acceptable to the community including those in nearby properties not forming part of the rezoning proposal. They don't want to be looking at 10 and 8 storey apartment buildings, but instead should be able to enjoy gradual, sensitive, height transitions of modest, lower-rise neighbouring buildings.

The type and extent of any development should be informed by good planning, aiming for density done well.

Diane Willis

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