

Speaking Notes for IPC Meeting- St Leonards South Planning Proposal

1. Thank you, Madam Chair and Commissioners, for the opportunity to speak to you today. I am a Director of City Plan Services and represent Country Garden Australia who are major landowners at St Leonards.
2. Country Garden's site is bounded by Park, River and Berry Roads in the south western corner of the planning proposal area. It is currently 19 lots occupying 6856m² and is the largest consolidated holding in the proposal area. It is also called Area 23 in the Council's masterplan.
3. We have made a detailed submission and I will not attempt to go through it all in my speaking slot. Rather, I will focus on three key issues.
4. **First**, Country Garden welcomes the Draft 2036 Plan for Crows Nest/St Leonards and supports the vision for the precinct generally as well as that for St Leonards South in particular. Specifically, we support:
 - The proposed development standards that would go into the new LEP, noting that they are designed to achieve "best practice" development outcomes.
 - The planned upgrades to infrastructure, community facilities and open space which will be funded by a State Infrastructure Contribution or SIC. We note that at St Leonards South this will include new open space, pedestrian and cycle links, a multi-purpose childcare centre and a community hall.
5. We are confident that the standards set by the Draft Plan will achieve best practice development and be of community benefit, thus helping to achieve key principles in the Plan. We have undertaken massing and ADG compliance testing of our development proposal against the standards and believe that the resulting development will both provide high quality housing and address community concerns about suitable transitions in scale and avoiding overshadowing and traffic problems. Specifically:
 - Shadowing will comply with ADG requirements for solar access and not increase shadowing on any existing or proposed parkland nor any residential areas;
 - Traffic growth from our development will be negligible being only 0.4-0.9% of current volumes on River and Greenwich Roads respectively.
6. There is only one small point that I want to draw your attention to in relation to the development standards. There is an anomaly between the draft DCP and LEP in relation to building height in a small section of our site- the north east corner. Here the DCP says buildings should be up to 10 stories high while the LEP imposes a limit of 31m. To achieve 10 stories 37m is needed. We have confirmed with Lane Cove Council that 10 stories is the intended outcome in all documents since the 2015

masterplan and that the anomaly is an error- 37m is the correct proposed height limit.

7. Moving now onto my **second point**. We strongly support the Draft Plan's goals of promoting greater housing choice and price range. We also note the support from the existing community for housing as a preferred land use- it is ranked 3rd out of 6 preferred land uses.
8. Notwithstanding, we note a number of issues in relation to housing:
 - Few zoning changes are proposed to introduce new housing, particularly medium density housing. The Draft Plan says: "Identify areas suitable for medium and higher density housing; Concentrate higher density housing along the Pacific Highway and potential to provide a mixture of densities at St Leonards South"(p54);
 - St Leonards South is the only area proposed for new medium density housing (see Figure 28) and only about half of the planning proposal area is allocated to medium density- the Park Road-Berry Street block and the area adjoining River Road (see Figure 25);
 - All the other new residential zones are to be high density, mostly mixed use;
 - The forecast growth in local employment (16,500 new jobs) is much larger than that for new housing (7,525 new dwellings). This discrepancy alone will increase housing stress;
 - Achieving the employment growth targets will be difficult if not impossible if sufficient and an appropriate range of housing is not provided.
9. The implication is that achievement of key goals of the whole Draft Plan is dependent on a positive outcome for the St Leonards South planning proposal, that is the housing mix, affordability and employment growth goals. Without St Leonards South there will be only high-density housing and little price range.
10. My **third and final point** is about the Minister's request to the Commission that you advise on "some staging of the proposal" (letter of 20 December 2018). In this regard I first note that staging is not mentioned in any of the planning documents that have been prepared for the area- the masterplan endorsed by council in July 2015, the Draft Crows Nest/St Leonards Plan, the LUIP, the North District Plan and the council's planning proposal itself. This means there is no strategic planning basis for staging the proposal.
11. The converse applies. Staging would jeopardize the previously mentioned key planning goals for housing and employment, as well as the planned new infrastructure, community facilities and open space all of which depend on the SICs which in turn are based on the planned housing yield for the area.

12. In addition, staged rezoning would not be practical and for this reason is not accepted practice in NSW. Staging of development normally follows rezoning whereby consent is sought for an overall concept plan and then detailed DAs are submitted for subsequent stages over time. Any decision to stage rezoning would, in reality, be an indefinite deferral of a zoning decision (ie in effect a decision to not rezone). Such a decision would be inconsistent with the many years of strategic planning that has been undertaken for this area and be unjustified at this very late stage in the planning process (ie post the gateway approval given in September 2016).
13. In my experience the only possible means of staging the zoning would be to include a “satisfactory arrangements” clause in the new LEP that would apply to specified areas. Such clauses are only normally used to ensure that essential infrastructure is in place before development occurs, a circumstance that does not apply to St Leonards South due to the approach of the SIC. Therefore, using this provision would be cumbersome and achieve no public interest benefit; it would have the reverse effect of introducing unnecessary complexity.
14. Accordingly, we ask the Commission to endorse well established planning practice and recommend against staging of the proposal and provide advice that supports the implementation of Council’s planning proposal.
15. To **conclude** I would again like to thank you and note that we have made a detailed written submission which we ask you to consider fully as I have not been able to present all of its contents today.

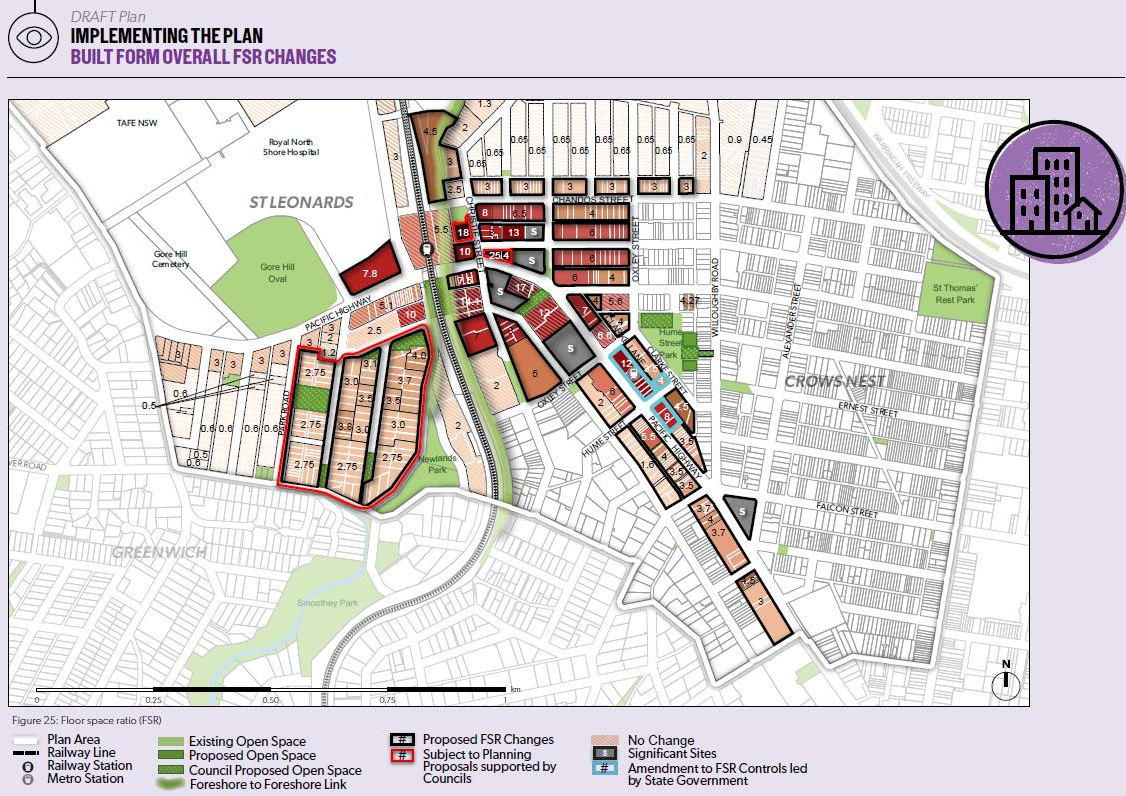


Figure 1: Extract of Figure 25 of the St Leonards and Crows Nest 2036 Draft Plan

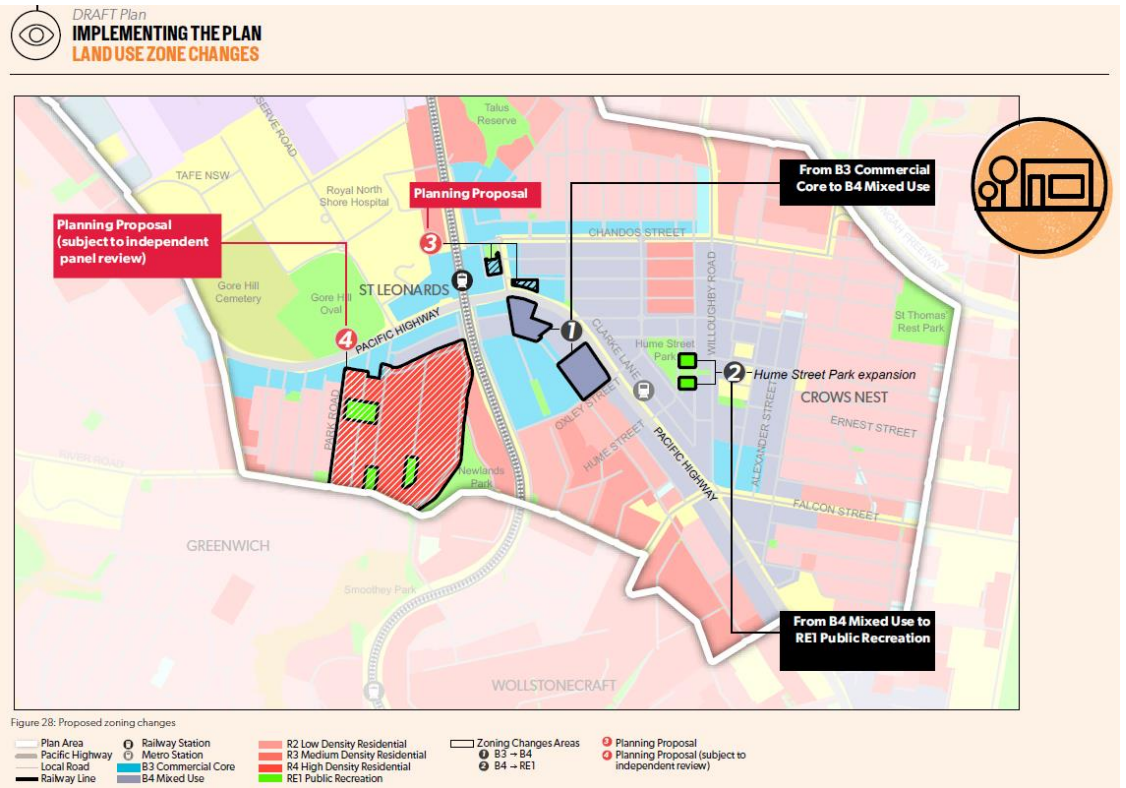


Figure 2: Extract of Figure 28 of the St Leonards and Crows Nest 2036 Draft Plan