

ADDRESS TO INDEPENDENT PLANNING COMMISSION

ST LEONARDS SOUTH PROPOSAL - 20TH MAY 2019

SUZANNE YELLAND

I have lived in Wollstonecraft for 25 years and my family owns an apartment in Duntroon Avenue, just across Newlands Park from the St Leonards South proposal.

You are probably familiar with the Duntroon Avenue development from site inspections of the St Leonards South area. It consists of 4 buildings of 5 – 7 storeys – just under 200 apartments.

There are also several images of the Duntroon Avenue apartments in the 2036 Draft Plan documents, with comments such as “**Duntroon Avenue: a good example of development with setbacks and height transition**”. Or, on page 18 of the Draft Local Character Statement, “**Some of the community has identified development along Duntroon Avenue as a good example for new development in the area.**” I also notice the Department of Planning upload to the IPC site a couple of days ago also includes an image of the Duntroon Avenue development.

Seeing these inclusions in the Draft Plan documents, I was quite hopeful that any new development in the SLS area would be along the scale of that of Duntroon Avenue.

Apparently there were many years of consultation between Lane Cove Council, the community and the developer before final plans were agreed for Duntroon Avenue. So from what started with the developer wanting towers of up to 16 stories, the end result is a well designed medium density development, with good setbacks, and which avoids the appearance of a monolithic street wall effect. And most people in the community seem happy with the development.

Now, what the residents of Duntroon Avenue, and those in the other three perimeter streets, and indeed those in the adjoining communities, are facing is the type of development which will significantly diminish the amenity of the area, and the quality of life of both existing and future residents.

The Minister for Planning has specifically asked you to advise if this proposal is consistent with the overall vision and design principles of the draft 2036 plan.

One of these design principles is that taller buildings be contained between St Leonards Station and Crows Nest station – clearly, this proposal is NOT CONSISTENT

The SLS proposal is for high rise towers of between 8 and 19 storeys in a currently low-rise residential area - it is, therefore, not contained between St Leonards and Crows Nest stations. What is proposed is on a scale not contemplated for any other part of the draft 2036 Plan area. It is the only low-rise area in the Draft Plan which is slated for this type of development.

Having mentioned Crows Nest station, I also note that the Minister for Planning has asked you to consider **accessibility to St Leonards and Crows Nest stations.**

There are many references, in a variety of documents associated with the proposal, as to how close the SLS development is to the proposed Crows Nest Metro. One of the developers, in documents they have produced, says the new Metro is 450m from their site.

As a local resident, I can say this is clearly inaccurate and a false representation of the facts. I also did three separate searches for three separate addresses in SLS on whereis.com to find how far it is to walk to the Crows Nest Metro from St Leonards South. For each case, the walking distance is around 1 km.

What this distance does not reveal, however, is the topography of the area. It's quite steep – once again there are many references to the topography of the area in various documents.

For instance, the Cardno Strategic Transport Study, prepared for the Department of Planning for the draft plan area, refers on Page 39 to what they call the Pedestrian Experience and describes it this way: **“To the south of the Pacific Highway, steep grades affect all north-south routes.”** In another section of their report, they refer to the **“challenging topography”**. Therefore, because of the steep grades, Crows Nest Metro station may not be as accessible, or usable, from SLS as many might think.

Another design principle of the draft plan is to **Ensure new development contributes to a range of dwelling types in the area to cater for all life cycles** - once again, NOT CONSISTENT

The only dwelling type included in this planning proposal is high rise apartments. There are no proposals, other than tokenistic offerings to make the plan sound more palatable, for low-rise or medium density dwellings such as townhouses and terraces, which would give families and downsizers more long-term options. The last thing this area needs is more stock standard high rise apartments - there are already almost 2,000 high rise apartments in towers up to 48 storeys approved and under construction in the Lane Cove Council area on the Pacific Highway near St Leonards station.

Not to mention those that have been constructed in the last couple of years in North Sydney Council area, also near the station - more are also planned in the North Sydney Council area.

Apart from not providing any variety in dwelling types, the **cumulative impacts** of these developments on the area are yet to be realised. We don't need more high rise apartments.

The next design principle I will refer to is that of - **Ensuring appropriate transitions to lower scale buildings** - NOT CONSISTENT

The draft 2036 plan is clear that appropriate transitions in scale (to existing lower scale areas, including areas not proposed for height changes) are to be taken into account. This appears to be a very important consideration in the planning framework.

The SLS proposal creates unacceptable transitions to adjoining low rise and medium rise residential properties.

SLIDE 2

Properties at the northern end of Duntroon Avenue are 5 storeys. Immediately next door, to the north, a 6 storey apartment building is under construction at 2 Canberra Avenue.

If this plan is approved as displayed, these homes will be directly opposite 19 and 15 storey towers. This is neither fair nor reasonable.

And I might add, these residences also have the railway line at their back door!!

Low density residential properties in Park Road West and River Road are opposite 8 storey buildings. Again not reasonable. And many of the residences in Marshall Avenue are 6 and 7 storeys. They will be opposite 10, 12 and 15 storey towers. Clearly inconsistent with the design principles of the draft plan.

The heights along all of the perimeter streets need to be significantly reduced so that existing residents are not swamped by new development.

Another design principle of the draft plan is - **No additional overshadowing of public open spaces** - NOT CONSISTENT

Overshadowing, and its **cumulative** effects, is mentioned in several of the Design Criteria.

Page 49 of the Draft Plan is **unambiguous** when it states “**amend planning controls to introduce solar height planes to prevent additional overshadowing of specific areas in winter**” between 10.00 am. and 3.00 pm.

Newlands Park is one of the specific areas included in the list of open space to be protected from additional overshadowing.

From approved, but yet to be built apartment towers, Newlands Park will already be seriously affected by **cumulative** overshadowing impacts in the morning.

SLIDE 3 - THE GREEN OUTLINED AREA IS NEWLANDS PARK

THIS IMAGE IS TAKEN FROM THE DEVELOPMENT APPLICATION FROM JQZ WHICH WAS APPROVED BY THE JOINT REGIONAL PLANNING PANEL LATE LAST YEA. IT IS FOR THE DEVELOPMENT ON THE SOUTHERN SIDE OF THE PACIFIC HIGHWAY ON THE EASTERN SIDE OF THE RAILWAY LINE - 3 TOWERS - UP TO 48 STOREYS - 654 APARTMENTS

YOU CAN SEE THAT MUCH OF THE SLS AREA AND MOST OF NEWLANDS PARK WILL BE IN SHADOW AT 9.00 AM

As if this level of overshadowing is not enough, the heights of the towers in the SLS proposal create entirely unacceptable additional overshadowing effects on Newlands Park in the afternoon.

SLIDE 4 - YOU CAN SEE THAT BY 3.00 PM THE PARK IS ALMOST ENTIRELY IN SHADOW

THE AREA NOT IN SHADOW IS ACTUALLY AN UNUSABLE STEEP BANK

Newlands Park is a small park of 1 hectare. It has already been identified as open space for many other new high density developments in the area. I have already drawn your attention to the 2000 high rise apartments currently being constructed near St Leonards Station. As well, the existing community from the immediate surrounding area, including Wollstonecraft, use this park.

Newlands Park must not be subjected to any additional overshadowing from the St Leonards South development – the draft plan is unequivocal on this.

While on this point, I would also note that Top Spring, one of the developers in the St Leonards South area, recently submitted their own Planning Proposal to Lane Cove Council for their landholding. Obviously realising their vulnerability to the overshadowing design principle of the draft plan, they asked for “any future controls related to overshadowing of Newlands Park to be able to be **flexibly applied**”. In their response to the Draft 2036 Plan, they devoted over one page of a five page submission to a section on Overshadowing of Newlands Park, again asking for flexibility in the application of this important principle.

I suppose if you are a developer, never intending to live in the area, overshadowing of precious open space will have no effect on your living amenity, but for members of the community who live here, it's not okay.

I would also suggest that access to sunlight **after** 3.00 pm in Newlands Park is also fundamental. Irrespective of whatever density is eventually approved for St Leonards South, there are going to be many many new residents in the area when all the construction that has started is completed. After 3.00 pm, when school is finished for the day, is just the time that children need sunny outdoor areas in which to play.

To conclude, the scale of development proposed in this plan is too much – too high, too dense, too many people. The plan must be reduced in height, density and number of people.

A reduction in height, density and number of residents in this proposal, along with design that focuses on outcomes and not profit, could go some way in making the proposal achieve consistency with the draft plan on many of the design criteria I have spoken about - **especially overshadowing and transitions.**

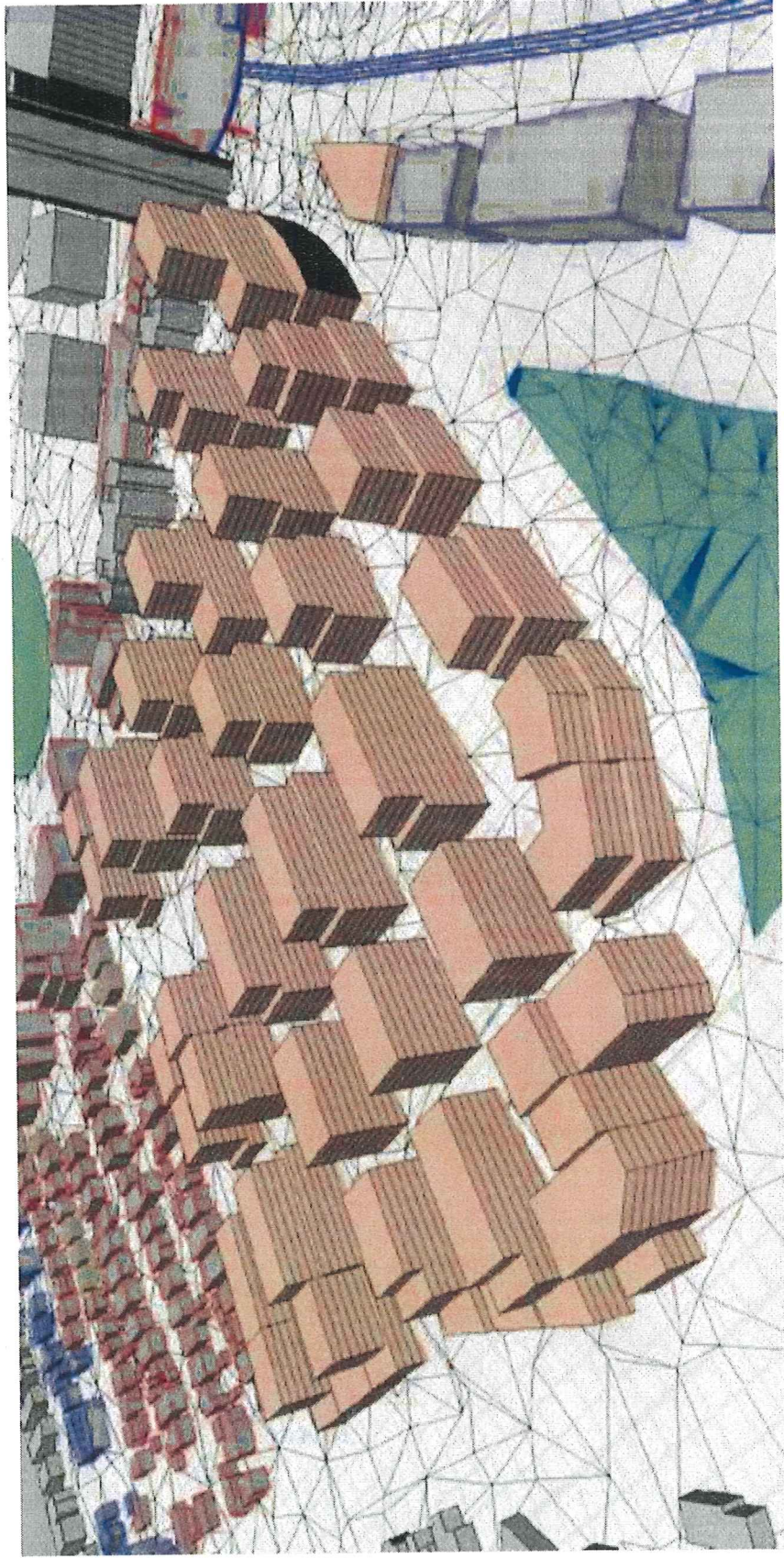
I also want to say that many of the impacts of this proposal will be felt by those in adjoining council areas. There has never been any notification about this plan to anyone living even just across the street, but in a different council area, so many local residents have only become aware of this proposal in recent months because of communication from community groups.

Those of us who belong to this community, and want to remain in this community, feel somewhat disenchanted that this plan was originally driven by people who no longer live in the area. Since then, the remaining community's voice seems to have fallen on deaf ears.

Please hear our voice, and in your review, make a recommendation to the Minister that this is the wrong plan for this area.

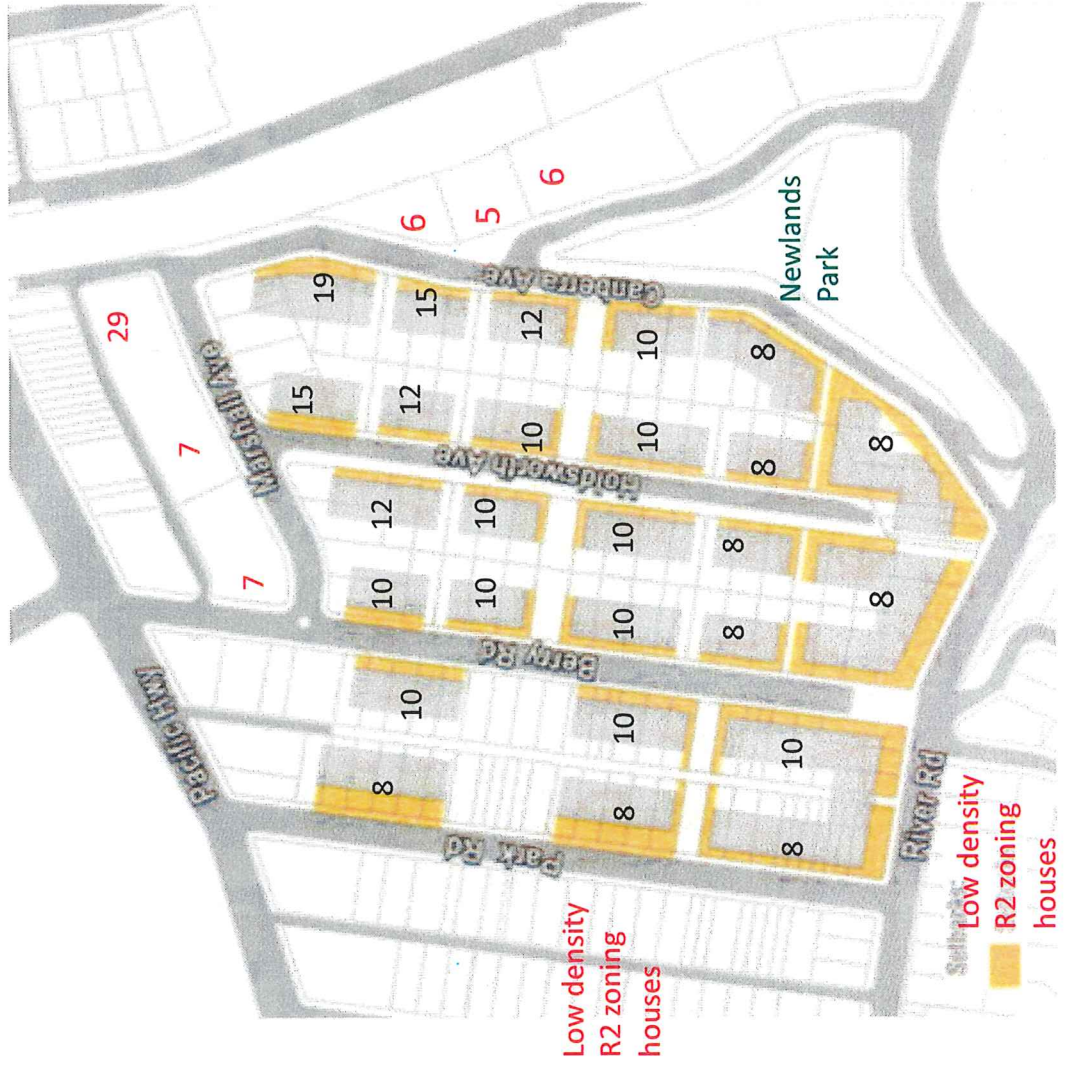
St Leonards South Planning Proposal

Image: Annand Supplementary Design Report 17th May 2016
Attachment M - uploaded to IPC website



St Leonards South Transitions

to existing lower scale areas



St Leonards South - Newlands Park
Cumulative Overshadowing from already approved developments
9.00 am - 21st June



Figure 70. Overshadowing impacts to nearby low-density residential development at 9am on 21 June (Source: Drawing No. DA-93-0101 Revision B, dated 15 October 2018, prepared by PTW Architects).

St Leonards South - Newlands Park
Overshadowing impacts on Newlands Park from proposed SLS development
3.00 pm - 21st June

