



Greenwich Community Association Inc

**Submission to
NSW Department of Planning and Environment**

**St Leonards and Crows Nest
2036 Draft Plan**

8 February 2019

Status of Greenwich Community Association Inc

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. It was established over 70 years ago and has extensive experience in the planning issues affecting the community – see our website: <http://www.greenwich.org.au/>

The GCA welcomes the opportunity to make this submission.

Part 1.

Preliminary Comments

1.1 Importance of coordinated planning for the St Leonards and Crows Nest Precinct

The GCA welcomes the initiative to develop a plan to coordinate development in the St Leonards and Crows Nest Precinct through the St Leonards and Crows Nest 2036 Draft Plan (2036 Plan).

It is important that this coordination starts as soon as possible as the rate of development in the precinct appears to have out-paced the capacity of the Department of Planning to plan.

It is regrettable that planning proposals have continued to be processed whilst planning has been in progress. It is hoped that the Department of Planning will ensure that planning proposals that are in the pipeline will be amended to be consistent with the 2036 Plan (as finalised) as this offers the best hope of ensuring that the precinct retains and enhances features that goes to liveability and amenity.

Whilst the Crows Nest portion of the precinct (the “go to” area) has character and vibrancy, the St Leonards Station portion (the “go through” area) lacks cohesion and amenity due to the split of control between three LGAs. Developments near St Leonards Station have been undertaken by individual LGAs with little regard for the impacts on those in adjacent LGAs and this continues.

The GCA welcomes the focus of the 2036 Plan on establishing a clear development framework and associated assessment of infrastructure needs on a precinct wide basis, not limited by LGA boundaries.

1.2 Need for clarity around relationship of precinct’s employment hub objectives and Greater Sydney Commission (GSC) housing targets

The 2036 Plan is underpinned by the North District Plan’s identification of it as an employment hub. The area is densely settled with high property values, so it is not an appropriate area for large residential population increases that bring with them infrastructure demands, as there will never be the funds to adequately address them.

The housing **targets** that the GSC has set for LGAs to 2021, and will set by agreement to 2036, are not required to be reflected in the 2036 Plan. The quantity and location of housing in each LGA is entirely up to each LGA.

The Department needs to design a plan that recognises housing that will come out of the precinct development but it should set ground rules to meet employment targets and not contemplate LEP changes that drive further residential development.

1.3 Digression from development principles proposed for the precinct

It is understood that the framework for the 2036 Plan is as outlined in **Part 2** below.

The GCA is concerned that the 2036 Plan has digressed from some of the principles of the documents that underpin it, namely the North District Plan (NDP) and the St Leonards and Crows Nest Draft Local Character Statement (LCS). To a great extent, this may be because high levels of residential development have been able to proceed during the planning process. The shoehorning of these developments into an area that is ill equipped to cope with large residential population increases has limited the scope of the Department to plan for the primary objective of the precinct, namely growth as an employment hub.

This will be detailed further in our submission.

1.4 Complexity and inadequacy of exhibition process **Cumbersome submission process**

It is unfortunate that Department has undertaken simultaneous exhibition of separate, albeit related, plans for the precinct:-

- Local Character Statement (LCS)
- Draft 2036 Plan (2036 Plan) and related Green and Special Infrastructure Contribution plans
- Crows Nest Metro re-zoning proposal
- Crows Nest Metro SSD.

In addition to the above, the community has been required to incorporate into its responses the St Leonards South re-zoning proposal with no direction from the Department as to its view of the relationship between St Leonards South and the rest of the precinct.

Ideally, the LCS should have been exhibited in isolation at the commencement of the exhibition process as it is supposed to inform the 2036 Plan and related documents. This would have allowed the base document to have been finalised before the drafting of the plans that flowed from it.

The parallel Crows Nest Metro process added another layer of confusion to the process, at a time of year when people were under pressure in the pre-Christmas lead up or hoping to enjoy the holiday season, rather than working their way through hundreds of pages of detail.

As the relationship between the various plans/ applications was not clear, there has been a high level of confusion around what submissions are required by the Department.

The GCA has raised with Departmental officers the Department's complicated online submission process and it is pleasing to hear that this is being addressed.

It is hoped that, when reviewing community feedback, the Department will have regard to the complexity of the documentation in the various plans and the confusion around exactly what submissions were required

1.5 Need for genuine community consultation

From experience, the community is naturally wary of the progress of development from draft plans such as this one through LEP, DCP, DA and into the finished built form. In the past, many of the aspects that the community has commented on and expressed preferences for in a consultation process get lost or are watered down over time. This happens through a negotiation and appeals process between councils and developers. The community has little or no visibility of these activities and little weight has been given to its views when they are expressed.

To retain the confidence and support of the community it is incumbent on the Department and the Minister to review the existing processes so that the outcomes of the community consultation are in fact delivered in the finished project. These processes have been lacking in developments such as Green Square, Rhodes and Ryde and it is important that community confidence in the NSW planning system be restored.

It is clear that many in the community in St Leonards Crows Nest and the surrounding areas are extremely concerned about the growth in population and the over development inherent in the 2036 Plan and the proposed Rezoning of the Crows Nest Sydney Metro Site.

To demonstrate that the Department is listening to the community and is engaging in genuine community consultation, clear and demonstrable changes must be made to the 2036 Plan.

1.6 Integrity of planning system undermined by planning proposals

The Lane Cove LGA portion of the St Leonards and Crows Nest precinct has been severely impacted by planning proposals with a consequent erosion of the character of the area.

The ongoing ability for developers and Councils to bypass planning controls through planning proposals undermines the integrity of the planning system and, if they are allowed to continue, will undermine the achievement of the Vision for the 2036 Plan.

Part 2

Context of St Leonards and Crows Nest 2036 Draft Plan

It is understood that the Plan responds to and/or is informed by the following documents:-

North District Plan

- Strategic centre
- Health and education precinct
- Key employment centre in Greater Sydney

| Actions | Responsibility |
|---|--|
| 34. Strengthen St Leonards through approaches that: <ul style="list-style-type: none"> a. leverage the new Sydney Metro Station at Crows Nest to deliver additional employment capacity b. grow jobs in the centre c. reduce the impact of vehicle movements on pedestrian and cyclist accessibility d. protect and enhance Willoughby Road's village character and retail/restaurant strip e. deliver new high quality open space, upgrade public areas, and establish collaborative place-making initiatives f. promote synergies between the Royal North Shore Hospital and other health and education-related activities, in partnership with NSW Health g. retain and manage the adjoining industrial zoned land for a range of urban services. | NSW Department of Planning and Environment, State agencies, Greater Sydney Commission, NSW Health, Lane Cove Council, North Sydney Council and Willoughby City Council |

| St Leonards | Jobs |
|----------------------|--------|
| 2016 Estimate | 47,100 |
| 2036 Baseline Target | 54,000 |
| 2036 Higher Target | 63,500 |

<https://gsc-public-1.s3-ap-southeast-2.amazonaws.com/north-district-plan-0318.pdf> p 65

St Leonards and Crows Nest Station Precinct Interim Statement

Draft Objectives

1. Leverage world-class health and education uses to provide opportunities for future employment growth.
2. Protect and strengthen the Precinct's commercial role supported by complementary uses to capitalise on renewed confidence in the commercial market.
3. Create future employment opportunities leveraging off the increased transport capacity of the new metro station.
4. Strengthen and enhance opportunities in the Artarmon employment area to fulfill the important urban service needs of the wider North District.
5. Create a network of new and existing useable and diverse open spaces which prioritise walking, cycling and access to transport, promote a healthier urban environment and encourage social interaction.
6. Incorporate opportunities for transit oriented development including commercial and mixed use development that takes advantage of existing and future transport.
7. Develop high quality and diverse residential areas that create sustainable and liveable communities.
8. Preserve, strengthen and enhance the existing diverse character areas.

St Leonards and Crows Nest Draft Character Statement

Guiding Principles



Draft Local Character Statement

GUIDING PRINCIPLES

| | | |
|---|--|--|
|  <p>PLACE</p> <ol style="list-style-type: none"> 1. Retain and enhance the village atmosphere in and around Crows Nest, particularly Willoughby Road. New development in St Leonards should incorporate street level improvements such as wide footpaths, street trees and active uses for a more energetic atmosphere. 2. Ensure new development close to heritage conservation areas and items is designed to maintain the feeling of connection to the areas history. 3. Protect access to sunlight where possible, especially for open spaces and important parts of the public domain. 4. Ensure busy pedestrian routes to and from key destinations are well lit and offer passive and active surveillance to promote a feeling of safety. 5. Minimise wind impacts from new development for more comfortable and enjoyable places. |  <p>LANDSCAPE</p> <ol style="list-style-type: none"> 1. Identify opportunities for more open space, particularly around Crows Nest and St Leonards station. 2. Improve tree canopy, particularly along busy streets to increase the sense of connection to the natural environment. 3. Design new development to fit in with the varied topography of the area. 4. Improve connections to surrounding green spaces to enable more choice and use of other open spaces. |  <p>BUILT FORM</p> <ol style="list-style-type: none"> 1. Concentrate taller buildings and higher densities around St Leonards Core and along the Pacific Highway. 2. Protect the village atmosphere and low scale built environment around Willoughby Road in Crows Nest and ensure that new development does not impose upon these areas. 3. Provide building setbacks and podiums where possible to create a more human scale feel at street level. 4. Ensure new development models reflect best practice design, picking up the best elements of surrounding building types. 5. Provide gradual sensitive height transitions from high-rise to low-rise areas and minimise overshadowing of public open space. |
|---|--|--|



LAND USE

1. Provide a supportive environment for learning with new schools and creative spaces.
2. Ensure a range of community facilities are available to support in the area.
3. Provide a mix of housing types at different price points to ensure that households at all stages of life are encouraged to live in the area.
4. Continue to provide a high standard of health services into the future.
5. Protect essential industrial activities in Artarmon as these service the area and much of the North Shore.
6. Protect the diverse range of employment opportunities available in the area and allow for a better mix of office spaces for different business sizes and types.



MOVEMENT

1. Deliver connectivity improvements to and around St Leonards and Crows Nest stations to make it easy to travel to schools, work, shops and meet up with friends both within the area and further afield.
2. Investigate new and improved cycleways and walkways to make it easy, safe and comfortable to move within the local area.
3. Consider more opportunities to safely cross the Pacific Highway.
4. Consider a coordinated parking strategy to manage the community's needs, while minimising traffic congestion.

Part 3

GCA submissions on documents included in the Plan

The GCA has made submissions under separate cover in respect of the following documents:-

- Local Character Statement
- Green Plan
- Special Infrastructure Contribution Plan.

These submissions, together with this document, comprise the GCA response to the 2036 Plan.

In March 2018, the GCA made preliminary submissions to the Department of Planning in anticipation of release of plans for the St Leonards and Crows Nest precinct.

These submissions form part of the current GCA submission.

These submissions are:-

- Medium Density Development (**Attachment B**)
- Open (green) space (**Attachment D**)
- Pedestrian and cycle Paths (**Attachment A**)

The GCA has also made submissions in respect of the Crows Nest Metro re-zoning and SSD.

Part 4

GCA responses to the Plan Themes

The GCA responses to the themes in the 2036 Plan are outlined below.

Our response in respect of St Leonards South is included later in this submission.

4.1 PLACE

4.1.1 Reduced heights near Willoughby Road and the Five Ways Intersection

Willoughby Road and the Five Ways Intersection are both highlighted under this theme.

They will suffer significant erosion of character and amenity with proposals for inappropriately high-rise developments adjacent to them. Heights should be reduced consistent with recognition of the village atmosphere in and around Crows Nest.

4.1.2 Impacts of building height on highway

The proposed building heights along the Pacific Highway ridge line from St Leonards Station to, and including, the proposed Metro SD0 will create wind impacts and overshadowing effects that will detract from a sense of place.

4.1.3 Height limit on significant sites

The sites nominated as Significant Sites should have height limits consistent with those adjacent to them. Notwithstanding a proposal to implement a Design Excellence assessment, building heights in excess of 50 storeys are inappropriate along a ridge line and along a thoroughfare as narrow as Pacific Highway.

We are already seeing the tunnel-like impact of the Mirvac St Leonards Square development which is only at 20 storeys of a 35 storey height and this is without a corresponding 50 storey building on the other side of the road.

Height additional to 50 storeys for any building – noting the 65 and 50 storey towers proposed for 601 Pacific Highway - will exacerbate wind impacts and overshadowing of public places, both of which are factors identified under this theme.

In summary

- ***Building heights adjacent to Willoughby Road and the Five Ways intersection to be reduced***
- ***Proposed building heights between St Leonards Station and the Crows Nest Metro to be reduced to avoid wind impacts and overshadowing***
- ***Heights of Significant Site developments to be consistent with adjoining buildings***
- ***Maximum building height 50 storeys (subject to assessment of wind and solar access impacts).***

4.2 BUILT FORM LAND USE

4.2.1 Shortfall in required commercial accommodation

The 2036 Plan will fail the main objective outlined in its Vision, namely provision of commercial accommodation to meet demand.

The 2036 Plan notes under Land Use that the GSC target is for 16,500 additional jobs in the next 20 years (ie 2019 -2039) in St Leonards Crows Nest. Based on 15 m2 per person this gives a lettable space requirement of nearly 250,000 m2 over the period. This is a very large requirement and equates to nearly 90% of the area of the three International Towers recently constructed at Barangaroo. This is additional space to accommodate the growth in jobs projected.

The Land Use section of the 2036 Plan outlines the upper employment targets for each of the employment areas of Artarmon (1840), Health and Education, adjacent to RNSH (5300), St Leonards (4570), Crows Nest (3020) and Mater Hospital (1440). These translate into additional areas (m2) of commercial space in Artarmon (27600), Health and Education, adjacent to RNSH (79500), St Leonards (68500), Crows Nest (48000) and Mater Hospital (21600).

Section 8.6 *Distribution of Non-Residential Floor Space Ratio Controls* in the Urban Design Study document shows the increase proposed in FSRs to accommodate the median jobs growth targets. It is not possible to translate these FSRs into actual floor space provisions without further detail, but the maps indicate a very diverse, even piecemeal approach to achieving the targets. As such it is unlikely to succeed without some major commercial developments in the precinct especially in the Health and Education and St Leonards areas.

In the current climate in St Leonards Crows Nest, developers seem to have a strong preference for residential projects over commercial. Thus, it is unlikely that the market alone will drive the development of a large amount of commercial space in the precinct. The most likely outcome is that the available FSR in the precinct will be gradually taken up by residential development and the projected jobs which the commercial space supports will not be delivered.

The Department of Planning should take all steps to ensure the viability of the precinct as an employment hub. This means taking positive action to ensure that substantial landmark commercial developments are facilitated especially in the St Leonards and the Health and Education areas rather than leaving it to unfettered and uncontrolled market forces.

The re-zoning of developments designated for commercial development should not be subject to alteration through the planning proposal process.

In summary

- ***It is essential the Precinct remain a major employment hub.***
- ***The piecemeal and hands-off approach to ensuring commercial space is delivered is unlikely to be successful.***
- ***Landmark major commercial developments with appropriate protection against re-zoning are required to ensure the higher jobs targets are met.***

4.2.2 Area to the West of Park Road St Leonards

This area is included in the 2036 Plan but there is very little if any detail given. There appears to be no uplift in zoning or any other substantial changes. The only conclusion that can be drawn is that it is intended that this area remain unchanged for the life of the Plan, that is until 2036. Indeed, if this is the case then the Department should make a clear statement about its future.

In summary

The 2036 Plan should make a clear statement of its intended use for the properties west of Park Road.

4.2.3 Pacific Highway from Berry Road to Greenwich Road (South side)

At the moment all the buildings in this area are zoned B3 Commercial Core. They could be changed to B4 Mixed Use provided that the commercial FSR remains the same. That might encourage redevelopment of the strip as it appears to be in need of renewal and better utilised. One downside of this would be the buildings would invariably be higher and cast greater shadows over the residential areas down the hill.

In summary

The south side of the Pacific Highway has unrealised potential for further development.

4.3 MOVEMENT

4.3.1 Road network

The road network around the precinct is largely fixed. No new major roads are planned or likely. The existing road network will undoubtedly be put under great pressure by the development envisaged in the plan.

River Road is a key arterial road and serves the precinct as a major east west link. It takes pressure off the Pacific Highway. The current configuration of the road provides poor service.

Of particular concern is the increased number of car movements with people bringing children to the expanded Infants' School on Greenwich Road.

The high-rise developments around Burns Bay Road and Lane Cove have increased the traffic and residents are already complaining about the time it takes to travel out of Greenwich particularly in the morning and afternoon peaks. Key impediments to the performance of River Road are:

- The bridge over the railway is one lane in each direction
- One lane in each direction continues from the bridge to Canberra Avenue
- Two lanes reduce to one westbound at St Vincents Road and continues to the start of the Lane Cove Country Club

The opportunities for improvements to River Road would assist both through and local traffic and will go some way to absorb the additional traffic generated by the developments envisaged in the 2036 Plan.

The improvements should include:-

- Two lanes in each direction from Northwood shops to Crows Nest available in morning and afternoon peaks
- Two lane rail bridge at the River Road bridge near Duntroon Avenue
- A shared bike/pedestrian path to one side of the road from Northwood shops to Crows Nest
- A pedestrian refuge opposite the Lane Cove Country Club
- A *railway underpass* at the River Road bridge to enable pedestrians and cyclists to get across River Road safely from the Lithgow Street/Duntroon Avenue side to the Boronia Street side.

Traffic lights on River Road at Canberra Avenue are proposed in the 2036 Plan. These will cause severe disruption to traffic flows on River Road and add significantly to peak hour congestion. The approach to the intersection travelling west on River Road is a blind corner and will have a high risk of accidents. A better solution would be to upgrade the Duntroon Avenue/River Road intersection in conjunction with the improvement works outlined above with a set of traffic lights located at the improved intersection. Canberra Avenue from Duntroon Avenue to River Road should be closed and the pavements returned to landscaping to add to the usable area of Newlands Reserve.

Note – the GCA’s submission on Active Transport (see 4.3.2 below) discusses this further and outlines additional proposals for safe crossings over River Road for pedestrians and cyclists.

The Council’s traffic study is faulty. It assumes that the number of people driving to work will be one quarter of that in the City of Sydney where people live close to and are more likely to walk to work. The study also assumes there had not been any and will not be any development along the Pacific Highway. These are highly questionable assumptions that will lead to traffic chaos and the isolation of Royal North Shore Hospital.

In summary

- ***River Road should be upgraded to provide better service in the morning and afternoon peaks and to accommodate the growth in traffic from the increase in population in the Precinct.***
- ***The intersection of Duntroon Avenue and River Road should be improved and have traffic lights installed as a major access to the SLS area.***
- ***Traffic lights should not be installed at Canberra Avenue.***
- ***Canberra Avenue should be closed from Duntroon Avenue to River Road and the pavements returned to parkland.***

4.3.2 Active Transport

Overview

The GCA welcomes and supports the focus of the 2036 Plan on Movement for pedestrians and cyclists.

Generally, the GCA supports the 2036 Plan responses to the pedestrian and cyclist issues raised by the community (pp36-37, 39) and the Movement Actions and Recommendations (pp58-60).

There are 3 key issues which the GCA submits should be addressed differently in the final Plan:

- *Implementation funding* – do not rely just upon SIC; ensure there is adequate funding allocated in Agency and Council budgets and in the Precinct Support Scheme.
- *Make P3/P9 effective* – extend the pedestrian and cycle route south from St Leonards station along Lithgow Street all the way to Wollstonecraft station.
- *Canberra Avenue traffic lights are a poor choice* – take the route up Duntroon Avenue instead to join the path from the railway underpass to Wollstonecraft station.

Implementation funding

The 2036 Plan identifies the Special Infrastructure Contribution (SIC) as the sole funding source for most of the pedestrian and cyclist infrastructure improvements.

This is inadequate for the work required.

Much of the infrastructure is already required for current pedestrian and cyclist movements between and through the St Leonards and Crows Nest area and its surrounds before taking into account the increased population and traffic movements from any proposed development.

Councils and Agencies should not be allowed to avoid or delay implementing these infrastructure requirements on the grounds of inadequate SIC.

Councils should be obliged to include these infrastructure improvements in their local environment and development control plans. Specific allocations should be required from Agency and Council budgets and the Precinct Support Scheme, as well as the SIC.

Make P3/P9 effective

The southern linear park from St Leonards along Lithgow Street to the bridge over the train line at River Road (P3) and improving the railway overpass for pedestrians and cyclists (P9) are both strongly supported. Together with the Oxley Street (P7) and Herbert Street (P1) connections they will help link Greenwich to the new Crows Nest metro station and to St Leonards station.

But they need two additions to make them work.

First, there needs to be a *railway underpass* to enable pedestrians and cyclists to get across River Road safely. Widening the bridge (P9) will not do this.

There is currently no safe place for a pedestrian, wheelchair or bicycle to cross River Road between Greenwich Road and Shirley Road, a distance of more than 1 kilometre. This is effectively the whole of the alignment between the southern side of the 2036 Plan and Greenwich/Wollstonecraft.

The railway overpass is already used (dangerously) as a pedestrian cross over point. It is a natural traffic point for an underpass for both pedestrians and cyclists.

Second, the *green pathway should be continued* on the Boronia Street side of the train line from the River Road bridge along the Boronia Street alignment and then across or around the Russell Street bridge, entering into Smoothey Park and through to Wollstonecraft station. This will then connect with the pathways on the west side to Shirley Lane (which is a safe route through to Crows Nest) and via Shirley Road to Berry Island and Balls Head. This will require work with TfNSW on the pathway next to the train line and on or around the Russell Street bridge. The 2036 Plan should require TfNSW and Lane Cove and North Sydney councils to undertake this work.

Bridge not traffic lights

The 2036 Plan developments make it essential to provide further crossings over River Road between Greenwich Road and the River Road bridge to allow adequate pedestrian and cyclist movement between St Leonards South and Greenwich.

The proposed traffic lights at the Canberra Avenue/River Road intersection (P4) are a poor solution. They will be in the valley at the bottom of the hill running down on the one side to the railway overpass and on the other side to the Greenwich Road/River Road intersections. That is dangerous for motor traffic, particularly for the traffic coming down from the overpass around the blind spot above Newlands Park.

It will be disruptive, leading to further congestion at peak hours on a road that is already banked up for a kilometre at those times.

The crossings over River Road must be grade separated; ie a bridge or underpass. Anything else is not safe or practical.

A crossing at the Canberra Avenue/River Road intersection fits with current street configurations and for that reason has been included in previous bike plans. However, the 2036 Plan allows better solutions.

To fit better with the topography of St Leonards South we suggest that the connection from the north side of St Leonards South should run from the Berry Road roundabout along the East/West green path to the northern section of Canberra Avenue and then into and along Duntroon Avenue to join the River Road bridge improvements and the pathways to Wollstonecraft station, Crows Nest and Greenwich.

In light of the expected population densities and transport demands, there should be a further pedestrian and cyclist bridge crossing over the stretch of River Road from the River Road bridge to Greenwich Road. There are a number of options including Holdsworth

Avenue/Russell Street and Berry Lane/Wilona Avenue. These need to be investigated further with thorough community consultation, particularly with affected residents in and near the relevant streets.

A key principle is that the planning for the crossing, and for the East/West green path, should be driven by the topography of the area, not the current configuration of the streets. This is a 50 year plan and the area is set to be transformed radically. The 2036 Plan should maximise gentle gradients for pedestrians, prams, wheelchairs and cyclists.

In summary

- ***extend the pedestrian and cycle route south from St Leonards station along Lithgow Street all the way to Wollstonecraft station***
- ***take the route up Duntroon Avenue instead to join the path from the railway underpass to Wollstonecraft station.***
- ***ensure there is adequate funding allocated in Agency and Council budgets and in the Precinct Support Scheme***

4.3.4 **LANDSCAPE**

Please refer to GCA submission submitted under separate cover (**ATTACHMENT C**)

Please refer to GCA preliminary submission Open (Green) Space (**ATTACHMENT D**)

Part 5

Additional GCA responses

5.1 St Leonards South

5.1.1 Density and Population

There is no detail provided as to how the number of housing units proposed in the St Leonards South (SLS) area was derived. The total number of units is given as 2400 and this would give a population of 4800. This number is excessive and should be substantially reduced as everything else flows from this.

The population of the Lane Cove LGA was 36,000 in 2016. The East Ward of the Lane Cove LGA has a population of about 12,000. The additional population proposed in St Leonards South is 4800 which represents a 40% increase in the local population. This will have an intolerable impact on the surrounding areas and infrastructure. It will substantially impact on the amenity of the area and on the quality of life of the existing and future residents. SLS is 4800 plus the populations of the Western Gateway and Eastern Precinct developments within the Lane Cove LGA of 3938 gives a total of 8738. This is an increase of over 70% in the population of the East Ward of the Lane Cove LGA. This is the wider community's greatest concern with its impact on facilities, the road system, services and infrastructure.

It seems that the population/density of the current SLS Draft Master Plan developed by Lane Cove Council was based on applying a blanket of eight storeys across the whole area. This generated a total area on which to base the Plan. This total area was then used in the design process and distributed over the site to give a pattern of building blocks of varying heights in the Draft Master Plan.

The basis of this starting concept appears to be the developments along Duntroon Avenue which are 5-7 levels in height and were deemed to be the type of development acceptable to the Council and the community. Whilst these developments provide a reasonable standard solution in their location, it does not follow that they can be simply transplanted to SLS.

Such an ad hoc approach to future development lacks rigour and is poor planning. At the very least densities should be based from the start on clear and transparent housing targets that have been well communicated to and largely accepted by the community. Following that, design solutions can be investigated and tested against a series of measures including solar access, views, over shadowing, relationship to adjoining areas, adequacy of infrastructure to support the population etc, etc.

Where are the housing targets? The community needs to be able follow how the SLS plan develops from Greater Sydney Commission targets, to allocation to individual LGAs, to distribution within each LGA to application to precincts which affect individual sites. To set the overall areas/densities and then try to justify it is the opposite of prudent planning. The current population of the St Leonards South Master Plan is too high and should be significantly reduced.

In summary:

- ***The population in the current SLS Plan is too high.***
- ***There are no housing targets that apply to the 2036 Plan that support the SLS Plan population.***
- ***The SLS population must be clearly based on unambiguous growth targets that the community understands.***

5.1.2 Building Heights

The interface of the SLS Master Plan scheme with the adjoining residential areas to the west, south and south west is at odds with the approach taken in the Urban Design Study to the transition to the Naremburn Conservation Area. Naremburn and the area to the west of Park Road, St Leonards South are identical in their scale and housing types.

There is an identical justification that the area to the west of Park Road should be considered a Conservation Area and preserved. Therefore, the same care should be taken with the western side of the SLS developments as is demonstrated in the transition to Naremburn.

The interface should be “a two-storey interface with low scale detached dwellings....”. The configuration of the SLS development should “step envelope away from” Park Road towards Berry Road “up to the existing 20m height limit...”. The two-storey interface should be townhouses which would have a beneficial impact on the housing mix in the developments and provide a better housing option for families in the area.

The same approach should be applied to the River Road and Canberra Avenue edges of the development for the same reasons. The edge along Canberra Avenue also needs to take into account overshadowing of Newlands Park. This park is a precious piece of green open space and it must not be degraded by overshadowing from the SLS development. Green space is at an absolute premium in the SLS development and in the St Leonards Crows Nest precinct as a whole. It must be protected and enhanced if good quality outcomes are to be achieved.

Overall the high-rise high-density developments should be grouped closest to St Leonards Station and the Pacific Highway. The heights along Park Road should be reduced so as to not overpower the existing residential areas on the western side including the heritage properties.

The heights along Canberra Avenue opposite Newlands Park should be reduced to reduce the overshadowing of the park.

The heights along River Road should be reduced to allow some sun penetration into the residences in that part of the precinct. There should be medium density to all of the western, southern and south eastern boundaries of SLS. This would have the additional benefit of reducing the overall population of SLS as well.

Diversity of residential types is a requisite of good planning. We acknowledge that the current plans address essential worker housing and affordable housing requirements. However, there should be more medium density townhouses in the development, particularly along Park Road, River Road and Canberra Avenue. Two and three storey townhouses should be included to reduce densities, increase the diversity of housing types available and provide a better alternative long-term option for families than apartments.

These comments apply particularly to the southern end of Park Road, the whole of the River Road frontage and the Canberra Avenue frontage that abuts Newlands Park.

In summary

- ***SLS should be treated in the same way as Naremburn.***
- ***The building heights around the edge of the SLS area should be reduced to two storeys as a better transition to the adjoining residential areas, to be a reasonable scale on River Road and to minimise overpowering and excessive shading of Newlands Park along Canberra Avenue.***
- ***There should be more townhouses in SLS to better cater for families.***

5.1.3 Overshadowing

The logic around the orientation of the blocks north south in the SLS Draft Master Plan is to allow sunlight to penetrate into the area. The shadow diagrams show that this only occurs in the middle of the day with the mornings and afternoons heavily affected by overshadowing.

The current proposal causes overshadowing of Newlands Reserve and the new Local Park at 3.00pm in mid-winter, just when school children may be using the park. Lower buildings on Canberra Avenue and Park Road would have the effect of improving this to something closer to an acceptable standard.

The approach generally of considering overshadowing between the hours of 9:00am and 3:00pm in midwinter is too narrow. Children return home from school after 3:00pm and given that there are going to be many children with families in this development, more consideration should be given to creating open space that has solar access after 3:00pm in winter. This is just the time that children should have sunny outdoor spaces in which to play.

In summary

- ***The overshadowing of the scarce open space in Newlands Park is excessive.***
- ***The hours when overshadowing is considered should be extended beyond 3:00pm to cater for children after school.***

5.1.4 Open Space

The ratios of open space to population are inadequate and the attempts at justification weak.

Newlands Park is a vital asset to SLS and to the greater St Leonards Crows Nest Precinct. It must be protected and enhanced as much as possible. A linkage/landscaped walking path should be considered from Newlands Park to the upgraded Hume Park in Crow's Nest.

The new Local Park in Park Road should be increased in area and the pedestrian links widened to create additional pocket parks as destinations in their own right rather than merely transit spaces. This will be vital to the mental health of the residents in this densely populated area and will become a real focus point for community activities and relaxation.

The proposal looks like a storage park for shipping containers. There is no heart or central focus in the development which will help to create a sense of community. There needs to be a large open space in the centre with services and some small retail around it.

The topography is highly shadowed and full of fungal life forms. The proposal will virtually eliminate sunlight at ground level and lead to a highly unhealthy environment.

There should be 40% tree cover which means at least half the buildings should be below the tree tops. The highest buildings should be in the North East corner and heights should gradually reduce towards the South West.

Berry Road should be widened by 50% in the northern 30% of its length. The next 40% of its length should be a park through to Holdsworth Avenue, which should be widened by 50% for the southernmost 30% of its length. The widened roads should be used to create green walkways, larger setbacks and more sunlight at ground level.

The southernmost two blocks between Holdsworth and Canberra Avenues should be a park at a level so there can be a pedestrian flyover of River Road. A barrier free way should be created to Berry Island Reserve. This overbridge, which is discussed previously in the Road Network section above, would link SLS effectively with Smoothey Park and the foreshore walking tracks. This would provide additional options for residents to access green open space within easy walking distance from their homes.

There is an opportunity to add to the area of Newlands Park. This can be achieved by reconfiguring Duntroon Avenue as the main entry/exit to the SLS area and closing Canberra Avenue from Duntroon Avenue to River Road. In this way the existing road pavements can be landscaped, and the parkland increased.

Gore Hill Cemetery is a heritage asset but also has the potential to add to the stock of open space available to SLS and the Precinct as a whole. The central walkway of the Cemetery is already a linear park and with appropriate improvements can add more value and encourage greater utilisation. In the medium term a treatment of the cemetery similar to that done by North Sydney Council in St Thomas' Rest Park in West Street should be

considered to convert progressively to public parkland to increase the Open Space available to the Precinct.

In summary

- ***There should be more open space in the SLS Plan, the green spaces included should be increased in size.***
- ***An overbridge across River Road would provide a link and easy access to more green space in Smoothey Park and the Harbour Foreshore walks.***
- ***Newlands Park can be extended by closing part of Canberra Avenue and directing all traffic through Duntroon Avenue.***
- ***Gore Hill Cemetery has accessible green open space which could be significantly enhanced over time.***

Merri Southwood
President
Greenwich Community Association Inc
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8 February 2019

ATTACHMENT A

The St Leonards and Crows Nest Station Planned Precinct

GCA SUBMISSION ON PEDESTRIAN AND BICYCLE PATHS

EXECUTIVE SUMMARY

The Greenwich Community Association ("GCA") welcomes the opportunity to provide feedback to guide a draft plan for the St Leonards and Crows Nest Station precinct (**Precinct**).

GREENWICH & THE PRECINCT

Greenwich is part of the Precinct – the area in the Precinct bordered by Pacific Highway, Greenwich Road, River Road and Park Road that is sometimes called “St Leonards South” is actually Greenwich. More broadly, for planning purposes all of Greenwich is integrally connected with the whole of the Precinct. Schools, transport, open space, water and sewerage, telco and power infrastructure, community services, in the precinct – and the lack of them – all impact the whole of Greenwich.

WHAT ARE THE KEY PRIORITIES FOR PEDESTRIAN AND BICYCLE PATHS?

We ask that the Precinct Plan includes three initiatives:

- (1) **River Road crossings** – 4 more are needed between St Vincents Road, Greenwich and Shirley Road, Wollstonecraft
- (2) **Green pathways** – connected stretches of open space – between the centre of the Precinct and its surrounding peninsulas
- (3) **Supported by an integrated network of paths and facilities** – like veins to the green pathway arteries with plentiful bike racks and facilities to make the system work

The overriding theme of this submission is the Precinct Plan should create safe bicycle and pedestrian connections across the Precinct and with its surrounds.

WHAT IS REQUIRED?

Green pathways: the key priority is to create **green pathways** from the centre of the Precinct – particularly the St Leonards railway station and the Crows Nest Metro station – through to the peninsulas of Greenwich, Wollstonecraft and Waverton, as well as East/West from Waverton across to Lane Cove.

These green pathways will form the backbone of safe, liveable, productive pedestrian and bicycle access within the precinct and also between the precinct and the adjoining areas that feed into and are impacted by the precinct. They will link the precinct to, for example, the Bob Campbell oval, the foreshore bushwalks and the Harbour.

Integrated paths: they must form part of an **integrated** system of paths that ties in with existing parks, schools, shopping/restaurant areas and commuter routes – including, for bicycles, routes to the CBD, to Lane Cove and to Chatswood.

To make it a seamless network:

- all pavements across the area should encourage active transport by being designed to be wide enough (2.5 metres) for shared use where that is safe – and where it is not, there should be separated paths designed into every new development;
- accessibility should be a standard consideration in the design – stairs are a barrier for all types of active transport: wheelchair users, bicycle users, mobility scooter users and those using walking aids; and
- end of trip facilities should be built into all new developments – accessible and sufficient bicycle storage should be included in all new commercial buildings and residential complexes in the area

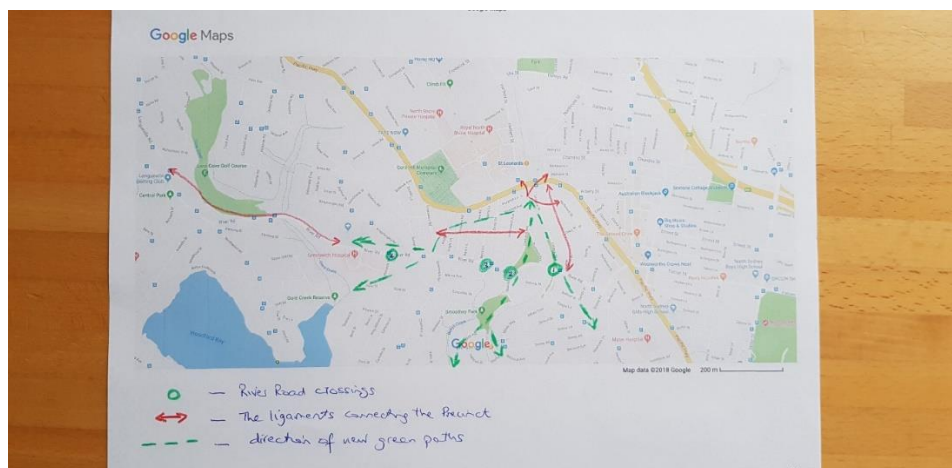
New crossings and paths should be created:

- River Road is currently dangerous and virtually impassable – green pathways across River Road need to be created for pedestrians and bicycles (1) at the River Road railway bridge, (2) at Canberra Avenue, (3) at Wilona Avenue/Eastview Street, and (4) at St Vincents Road –and they must be safe and separated from traffic; traffic islands are not safe, the crossings need to be underpasses (eg at the railway bridge) or overpasses,
- an East-West path is needed between Greenwich Road (between Pacific Highway and River Road) and Oxley Street/Nicholson Street,
- a safe path is needed from Greenwich Public School through or beside the Lane Cove Golf Course to Lane Cove shops,
- to the North, the connection from Canberra Avenue/Marshall Avenue to Herbert St needs to be improved – a tunnel passage under Pacific Highway could be a good solution here.

Safety is a key consideration in the design. High traffic areas need separated paths. So do hilly terrains where bikes can move too fast to be safe for fellow active travellers.

We have commented in more detail on these priorities in the attached submission. GCA would welcome the opportunity to meet with the Department to discuss this submission.

*An outline of the proposed new paths and River Road crossings (shown in larger format in **Attachment 1** at the end of this submission)*



GREENWICH COMMUNITY ASSOCIATION

Greenwich Community Association is a non-profit community forum dedicated to gathering and promoting the views and interests of the residents of Greenwich.

Greenwich has a population of approximately 5000 people with an average age of around 40 years. The community comprises residents of all ages with a wide range of work, social and sporting interests. There are many bicyclists in the community, representing all categories of bike users as discussed further below.

OUTLINE OF SUBMISSION

This submission sets out:

- ***How active transport will help*** restore a vibrant, diverse community and the employment and lifestyle objectives that have been identified for the Precinct – with a particular focus on the bicycle contribution
- ***Opportunities and cost savings*** that well-designed pedestrian and bicycle paths and facilities make available to the Precinct
- ***Existing bicycle paths*** and access points with which the new green pathways should be integrated
- ***Key principles for path sharing and design*** that should apply to any new development in this area
- ***Specific priorities and issues*** for the design of the pedestrian and bicycle network in the Greenwich part of the Precinct and adjoining areas.



(a “mama chari” from Japan – a welcome addition to the Precinct)



(New York, but it could be Greenwich, Crows Nest or St Leonards)

1. KEY THEMES

- 1.1 ***Greenwich and the Precinct are vital to each other.*** Greenwich is a source for St Leonards and Crows Nest of shoppers, employers and employees, rail and bus commuters, medical patients, restaurant and café clientele, and general street life. The Precinct is for Greenwich a medical and transport hub, a suburban shopping centre, a location for business and jobs, and a place of entertainment. Of course, part of the Precinct is in fact in Greenwich.
- 1.2 ***The Precinct needs connections and space to breathe.*** While St Leonards and Crows Nest have much to offer – both as a medical and transport hub and a shopping and restaurant destination – they are not well connected to their surrounding areas at a human scale. River Road is a barrier. There are few pathways out of the Precinct. The steep increase in density with the new high rise developments will put this in sharp relief. The new residents will want and need access to open space, nearby parks and the Harbour.
- 1.3 ***Active transport is part of the solution.*** Providing easy access and facilities for pedestrians, prams, wheelchairs and bicycles will extend the Precinct's catchment area for shopping and recreation to neighbouring suburbs. It will also promote the image of the Precinct as new, green, inner city urban living – a lower north shore hub servicing high-tech medical and wellness industries, minimising the adverse impact of cars and traffic with preferred and seamless alternative inner city transport options.
- 1.4 ***Bicyclists come in all shapes, sizes, ages and speeds.*** Sunday morning pelotons of Tour de France bicyclists are a popular image but only a very small proportion of the bicycle community. The bike users for the Precinct will be grandparents helping their 5 year olds ride to the park in the morning, young professionals shopping on a Saturday, primary school children hanging around with their friends on bikes after school, commuters going via St Leonards station or Crows Nest Metro, families going for an adventure on Sunday, tourists getting off the beaten track in Sydney and a myriad of other daytime and night time users. It is these bike users, rather than the pelotons, that the integrated bike paths need to serve.
- 1.5 ***Shared paths should be the default setting.*** The pedestrians and bicyclists going to and from the Precinct are for the most part going the same way. In any new development there is scope to set the footpath width wide enough to allow shared bike and pedestrian use. That should be the default standard. Any variation from that requirement should have to be well justified.
- 1.6 ***Designing safe solutions adds to the vibrancy of the community space.*** The pelotons can use the Pacific Highway but all other bike users want safety and, wherever possible, to be off-road. So do pedestrians. Provide safe paths and they will come – all of those daytime and night time users who want to shop, eat, work and play. They are the people who by their presence and activity will convert the aspirations for the Precinct into a reality.
- 1.7 ***Integration is easy – it just requires planning.*** St Leonards is already a transport hub and the Metro will make Crows Nest a complementary hub. There are already car and foot routes in and out. The main bike links between the Precinct and some of the neighbouring suburbs have already been established. The basic starting points for the design of a well-integrated system of pedestrian and bike paths and access are all in place. All that is needed is to include pedestrians and bikes in the planning in the same way as cars, and to have the commitment to make it work.
- 1.8 ***Separate to be safe.*** In any high traffic area bicycles and motor vehicles don't mix well. Proper separated bicycle paths are needed – for the benefit of the bicycles and the cars and the pedestrians.
- 1.9 ***E-bikes are coming.*** Sydney is a hilly city. Riding an e-bike up a hill is like riding on the flat. E-bikes are part of the design of a "30 minute city". The Precinct should be designed to meet their demands and to encourage their use.

2. THE BICYCLE CONTRIBUTION

There is a great opportunity to add value to the Precinct by making bicycles part of the image of the community.

- 2.1 **Aspirational:** For high density residential living, bicycles are an attractive image, especially for young singles and young families. They are ecologically positive. They create alternative commuter and recreational options. They offer a scope for shopping and café destinations that is much wider than by foot alone. There is a corridor of shopping, cafes and galleries developing from St Leonards station through Crows Nest to North Sydney – this is a natural bike route for weekend recreation.

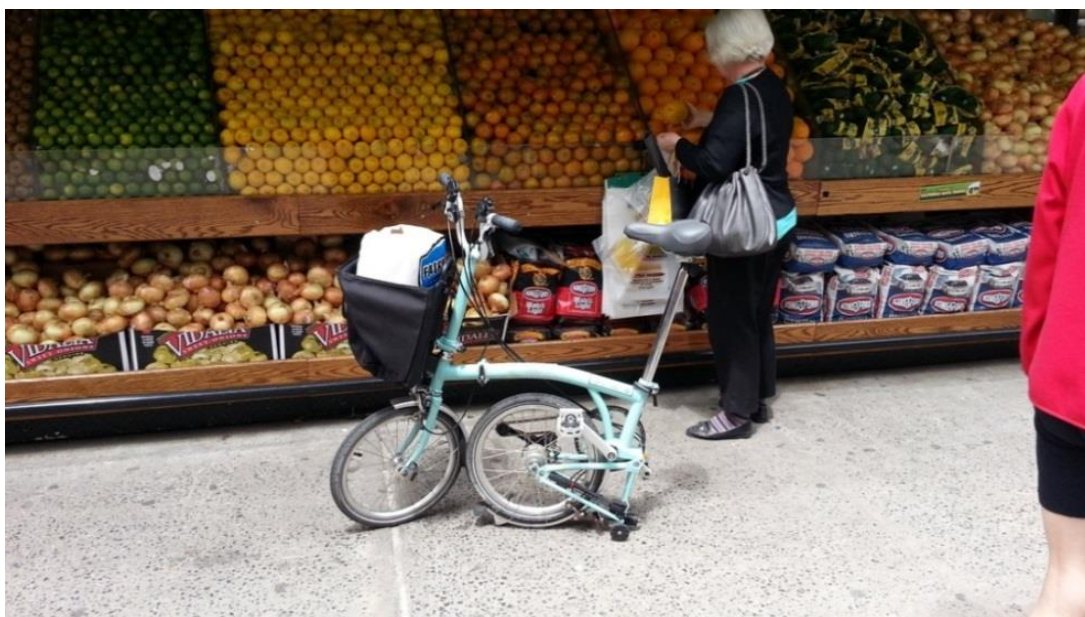


(notice the high heels)

- 2.2 **Good for business:** From a local business point of view, bicycles fit well with both the image and the reality of the medical, fitness, therapeutic, naturopath and other wellness businesses that are developing in St Leonards around the anchor of Royal North Shore Hospital.

Seeing bicycles on the streets and in the parks will fit well with the personal trainers and fitness gyms that are already in St Leonards and Crows Nest. Making bikes part of the usual day to day life in the Precinct will allow the depth of the range of bike users to become visible and to feel comfortably accepted.

Bike retail and bike repair shops will be able to contribute to the local business community.



- 2.3 **Cost effective and improved amenity:** The reality is that bikes are also practical and cost saving. There will be less car parking required to be available in new residential developments under the new planning guidelines. Congestion along Pacific Highway is already bad. Street parking is already at maximum capacity.

Encouraging the use of bicycles by making them part of the Precinct's lifestyle and transport hub will not only improve transport connections, street level amenity and residential amenity, it will also save the Council money. Bike paths are cheaper to build and maintain than roads. Bikes do not create the unfunded externalities of cars – such as traffic calming, accident prevention, road closure constraints, and pollution costs.

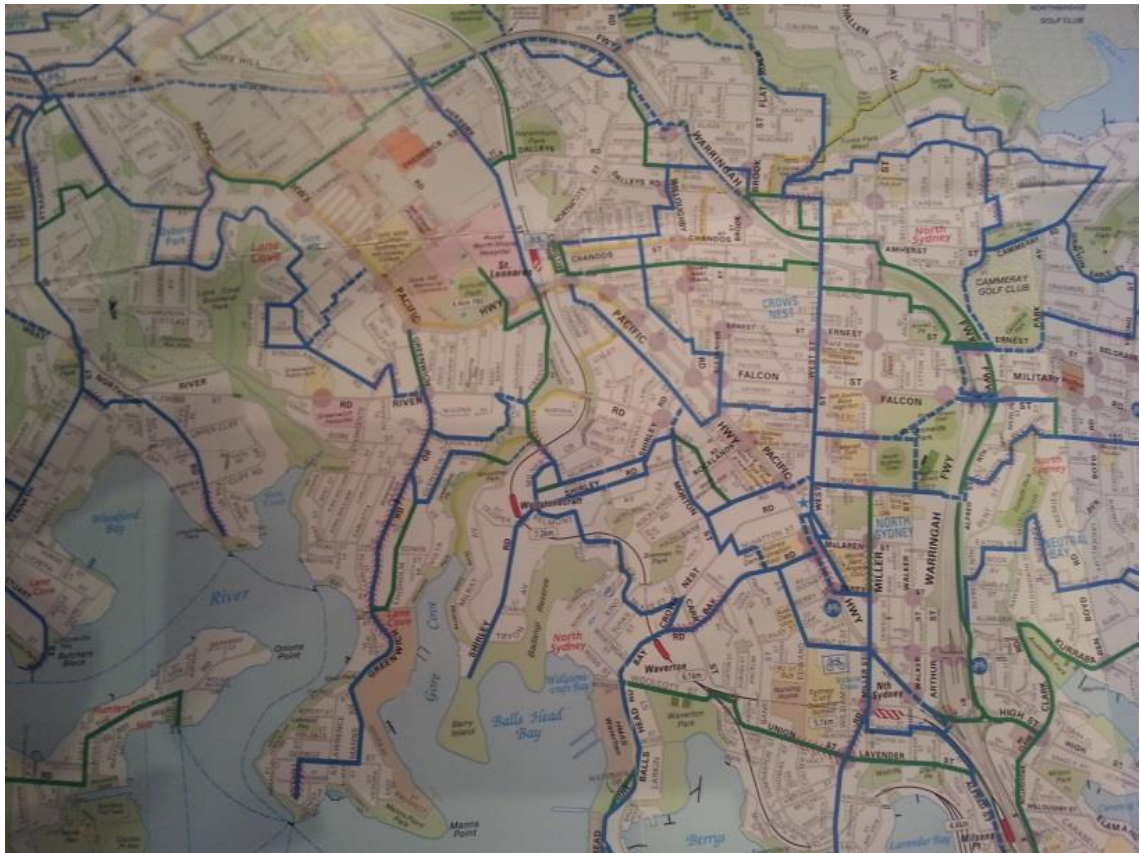
With the extra flexibilities added by bikes, the Precinct may be able to extend the areas of pedestrian plaza available in the precinct, capturing the best of the urban living styles evident in the old European towns and the major cities around the world.

- 2.4 **The necessary solution:** the Precinct is facing a new high density future. With several thousand extra residents, cars are not an option. Bicycles are not just a preferred solution to congestion, gridlock, costs and pollution – they are an essential solution.



3. AN INTEGRATED BICYCLE PATH SYSTEM

- 3.1 **Routes already exist:** There are existing marked and unmarked bike routes between Greenwich and the Precinct, and to and from the Precinct, as shown in the map below. These would form the basis for an integrated system of bike paths.



- 3.2 **Linking paths and lanes:** The design would link the paths through the laneways, pedestrian plazas and other areas to those existing bike routes. In particular, it would link the paths to the station, including providing a safe route through the proposed new tunnel under the Pacific Highway.
- 3.3 **Bike racks and access:** The design must include bike racks and require access points to and from, and storage in, the new residential developments.
- 3.4 **Match solution to traffic:** The design should be flexible in the solutions it provides, taking into account at each plaza and on each route the different types of pedestrian, bicycle and other “active transport” users at those points.

For example, shared pathways will generally be the best solution for pedestrians, for the frail and disabled on motorised scooters, and for children and family bicyclists, along the linking routes between Greenwich and the Precinct.

However, where the pedestrian traffic is very heavy (eg at the entrance points to St Leonards station, and around schools), separate cycleways are a safer solution. In some places the separation can be indicated by a coloured lane (as with the green lanes currently in Crows Nest). In other places, a stronger separation is required. In plazas, the bike path would generally be on the edge or bicyclists would walk their bikes through.

- 3.5 **Standard 2.5m paths:** In all cases, the approach should be to create pathways that are wide enough (the standard is 2.5 metres), that have slopes not steps, and that maximise the connections with other paths and with other transport options.



- 3.6 ***Above all, safe:*** Most importantly, in all cases, the pathway must be *genuinely separated and safe* from cars, trucks and other vehicles.

It is not good enough, for example, to paint a line on the road where cars park and add an occasional painted bicycle icon, as in Greenwich Road (see below). That is not separated or safe. It is not an effective part of an integrated system of bike paths.

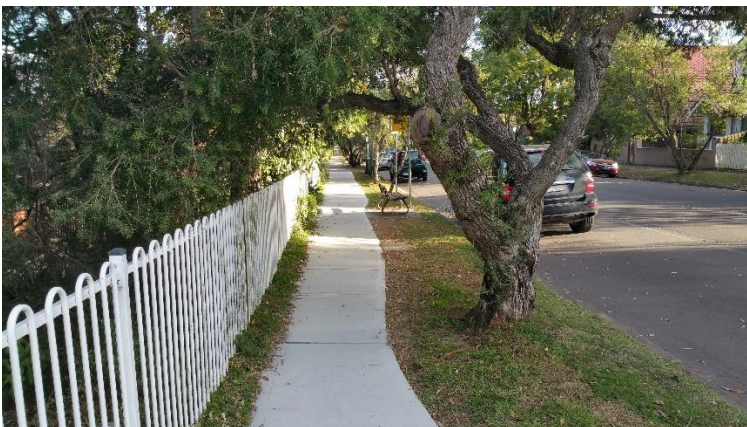


Greenwich Road "bicycle" lane – this is not safe – a real bike path must be separated from traffic as in the photo on the next page below



Similarly, a shared use path must be the appropriate width as well as in the right place. Below is another example from Greenwich Road of a path that was funded to be a shared user path but failed in implementation.

This started well - just on the 2.5 metre width



But then the purpose of the pathway was lost – it is less than a metre at this point – this cannot work safely as a shared use path

4. GREENWICH – CONNECTIONS TO THE PRECINCT ACROSS RIVER ROAD

- 4.1 To make the St Leonards & Crows Nest Station Precinct a true hub, there should be multiple pedestrian and bicycle path connections between Greenwich and the Precinct, reflecting the different users and different potential routes.

A critical requirement is to create new, safe pathways across River Road

- 4.2 River Road is currently dangerous and virtually impassable. There is no safe place for a pedestrian, wheelchair or bicycle to cross River Road between Greenwich Road and Shirley Road, a distance of more than 1 kilometre and effectively the whole of the alignment between St Leonards South and the rest of Greenwich.

Green pathways across River Road need to be created for pedestrians and bicycles:

- (1) at the River Road railway bridge,
 - (2) at Canberra Avenue,
 - (3) at Wilona Avenue/Eastview Street, and
 - (4) at St Vincents Road.
- 4.3 The River Road railway bridge will enable a direct connection between the proposed pedestrian plaza across the railway line to the green pathway through Smoothey Park. It is also one of the major pedestrian routes for walkers from Greenwich and Wollstonecraft to St Leonards, who currently wait for breaks in traffic on the eastern side of the bridge and then risk a run across. There is space for a pedestrian and bicycle underpass making this a key connection point.
- 4.4 One of the main pedestrian and bicycle links from the St Leonards South side of the Precinct to Greenwich is likely to be down at the bottom of the valley below the railway bridge through Canberra Avenue, across Russell Street and along the path in Smoothey Park. This will require a safe way of crossing River Road at the Canberra Avenue intersection and widening of the path through Smoothey Park.
- 4.5 Another link further up River Road will be through Marshall Avenue and Berry Street. This will be at a higher point of the area. It will require a separate, safe crossing over River Road to Wilona Avenue (and thence Greenwich Road) or Eastview Street, giving access via Greendale Road to the Greenwich community hall and library, Greenwich shops, and the infants school, and via Smoothey Park to Wollstonecraft.
- 4.6 On the west side of the Precinct a link is needed directly through to Greenwich Road enabling passage across at the River Road traffic lights. This will give access through that side of the Precinct to the Greenwich peninsula.
- 4.7 Another link is needed on the west side of the Precinct for bicyclist and pedestrians travelling between the Precinct and Bob Campbell oval and the bushland trail through to Northwood. This requires a safe crossing at the River Road/St Vincents Road intersection – one of the ten motor vehicle accident hotspots in the Lane Cove LGA¹. This crossing will also service pedestrians and bikes travelling from Greenwich to the Greenwich Public School in Kingslanglely Road and that part of Greenwich and Lane Cove.

¹ <https://inthecove.com.au/2016/04/06/council-names-top-10-motor-accident-hot-spots-in-lane-cove/>



5. CONNECTIONS TO THE PRECINCT – THE LIGAMENTS

- 5.1 As well as passage across River Road several new connections are needed to enable the Precinct and its surrounding areas to form part of an integrated framework of pedestrian and bicycle routes:
- (1) *East-West path*: an East-West path is needed between Greenwich Road (on the west side, in the section between Pacific Highway and River Road) and Oxley Street/Nicholson Street (on the east side) – currently the only east-west routes are along the Pacific Highway or River Road, neither of which is safe or separated;
 - (2) *Lane Cove Golf Course*: a safe path is needed from Greenwich Public School through or beside the Lane Cove Golf Course to Lane Cove shops – currently there is no safe way along River Road to Lane Cove or to Northwood or Longueville. Indeed there are parts of the pavement where it is not even possible for two pedestrians to pass. The only safe route to Lane Cove is to go inland around the other side of the Lane Cove Golf Course which is not practical for many destinations;
 - (3) *Herbert & Chandos Streets*: to the North, the bicycle connection from St Leonards South to Herbert St and Chandos St needs to be improved – a tunnel passage under Pacific Highway could be a good solution here, either a new tunnel or re-opening the former underpass that was blocked when the Forum was developed. This could be incorporated within the planning for the pedestrian plaza over the railway line;
 - (4) *Christie St and Christie Lane*: the redesign of these streets in light of the new high rise developments should ensure there is legal bike access to the Pacific Highway from the River Road end of Christie Street to the highway, and that the bike access is 2-way; and
 - (5) *Nicholson St*: to the east, the Precinct routes need to link into the North Sydney bike route along Nicholson St.

The diagram in **Attachment 1** illustrates the proposed new River Road crossings, “Ligament” connections and Green Pathways.



- 5.2 These are only some of the key connection points. To make the Precinct a true transport hub, the paths must be part of an integrated lower north shore system of pedestrian and bicycle routes.

GCA would be happy to provide more detailed input on the upgrades and improvements required for these connections.



CONTACT

Thank you for the opportunity to make this submission. The GCA contact person for any queries or further information on this submission is Michael Ryland T: 04 1919 2727

Greenwich Community Association
27 March 2018

Attachment 1 referred to above



ATTACHMENT B

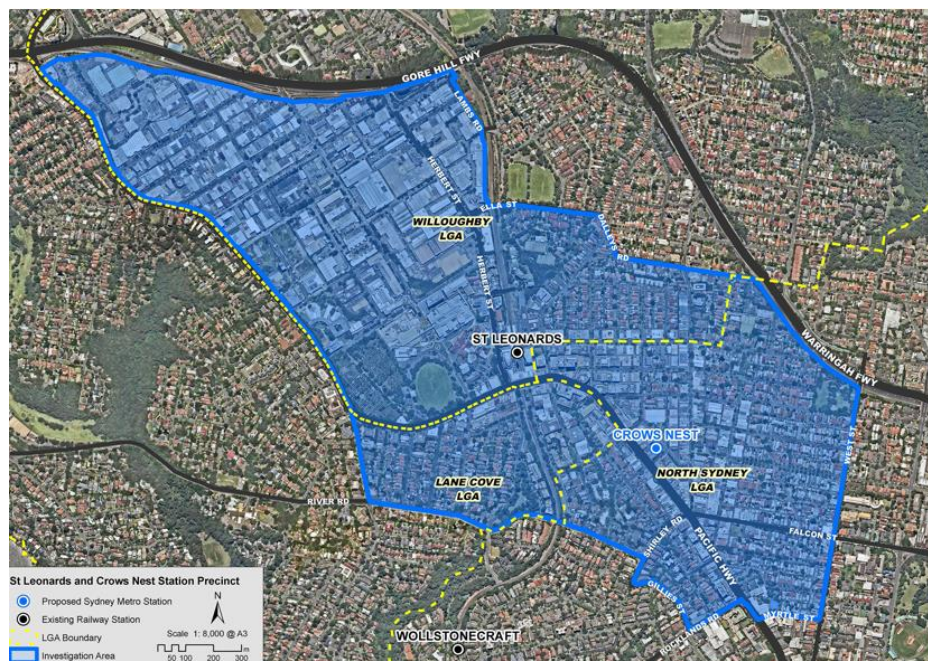


Greenwich Community Association Inc

Submission to NSW Department of Planning and Environment

St Leonards and Crows Nest Station Precinct

Medium Density Design – St Leonards South/Greenwich



28 March 2018

Greenwich Community Association Inc (GCA) welcomes the opportunity to make a submission to the NSW Department of Planning and Environment (DoP) in respect of planning for the St Leonards and Crows Nest Station Precinct (the Precinct). As an incorporated association for over 73 years the GCA maintains a website www.greenwich.org.au and distributes 2000 newsletters to local households. The GCA campaigns for change to Government Policy only where the policy is incidental to the GCAs primary object to enhance the amenity of Greenwich residents and owners.

This submission relates to the housing design and density in the Precinct. In this respect, the GCA understand the Department's focus on ***"The Missing Middle"*** and increasing the availability of quality, low rise medium density housing as opposed to the current burgeoning high-rise construction across the Precinct.

This is the third and final part of the GCA's submission under this current round of community consultation. We look forward to further engagement in the process.

Merri Southwood

President

Greenwich Community Association Inc

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0412 361331

Context of this Submission

Greenwich lies in the East Ward of the Lane Cove Local Government Area (LGA). A portion of Greenwich is located within **the Precinct**, namely the area bounded by Pacific Highway, Greenwich Road, River Road and Park Lane. The balance of the Lane Cove LGA within **the Precinct** is known as St Leonards South.

A portion of St Leonards South, namely the area bounded by Marshall Avenue, Park Road East, River Road and Canberra Ave, is the subject of a Planning Proposal by Lane Cove Council to rezone the area from R2 Low Density Residential to R4 High Density Residential. This is known as the St Leonards South Master Plan (SLS Master Plan). As there are several developers who own the properties there is a concern that any design guidelines will result in disparate developments rather than one harmonious design as can be found in the Figtree development at Randwick, for example.

Since the exhibition of the draft SLS Master Plan in early 2015, the GCA has consistently expressed concern to Lane Cove Council that the lack of coordination between the three Councils that control the St Leonards Crows Nest Precinct threatens optimal planning for the precinct. Furthermore, the GCA has been concerned that the lack of infrastructure and services proposed for the SLS Master Plan will lead to damaging impacts and strain on the already stressed infrastructure of Greenwich and adjacent areas.

In December 2017 the GCA resolved to request Lane Cove Council to cancel the SLS Master Plan. Council has not yet voted on whether it will or will not approve the plan.

In the light of the above, this submission is made in the context of the development landscape of the Precinct is as is (ie the SLS Master Plan area zoned R2 Low Density Residential and with current development), in addition to developments under construction or already approved by the relevant consent authority.

Low Rise Medium Density Housing for St Leonards South

The GCA has referred to the guide to possible building structures that are included in the DoP's definition of low rise medium density housing as including:

- townhouses and terraces
- dual occupancies (two homes on one block of land)
- manor homes (small low-rise residential buildings containing only 3 to 4 homes).



PROPOSAL DoPs Medium Density Design Guide – 2016 (MDDG)

The GCA understand that the MDDG is not legally enforceable for Development Applications, rather it is intended to be used as a guide for local councils to encourage them to consider:

“ Proposed building and design standards include requirements for minimum setbacks, maximum building height, site coverage and landscaping...taking into account the topography ...and are designed to minimise privacy and overshadowing impacts on neighbours and preserve residential amenity.”

The GCA proposes that unless requirements are legally enforceable, local Councils will be vulnerable to the pressures which will be brought to bare by property developers, resulting in the local community suffering impacts of non-compliance.

PROPOSAL: GCA's view on further development along the Pacific Highway in the Precinct.

Any further high rise high density development should

1. Include, given the proximity to RNS Hospital a mixture of affordable residential premises, retail, commercial and medical premises, such that it may be possible for residents to live and work in the same locality.
2. Include cladding allowing vegetation to grow on the facades so as to soften the visual image.
3. Be designed so as to accommodate any design transitioning into low-rise low and medium density which may surround it.

PROPOSALS: GCA's view on any development of St Leonards South section of the Precinct.

1. Lane Cove Municipality already exceeds the housing targets. There is no requirement for St Leonards South to be included in any rezoning for increased density. If there are other opportunities to increase density elsewhere in the precinct, rather than destroying the quality housing stock currently in existence and intensifying the current infrastructure limitations.
2. There is an undersupply of green open space in the locality. St Leonards South could be partly developed for open space to improve access of office workers, hospital staff and apartment dwellers to replenishing parkland. The correlation between declining mental health and apartment dwellers is now understood. More green space in this area would complement the remaining garden suburb which currently exists and provide much needed amenity.
3. If there is an absolute necessity for the area to be rezoned it must be limited to **low-rise medium density** buildings incorporating:
 - a. Townhouses (max 2 story) and terraces (max 3 stories)
 - b. green (trees) transition from the high rise already in place along the Pacific Highway in keeping with the green garden suburb of Greenwich.
 - c. Terraced footpaths.
4. Light retail, bike racks, child and eldercare daycare facilities, a community centre and underground parking should be provided.
5. As with the developments in The Figree (Randwick), historic buildings (such as can be found in mansions at 3, 5 & 7 Park Road) should be preserved. There are also other fine examples of the historic architecture heritage in this area that the GCA want to see preserved. These buildings could provide for the community or light retail use.
6. The facades of any of the townhouses and terraces constructed must be obviously sympathetic, reflective and incorporate typical building materials that will complement the historic architecture. Eg. bricks, timber windows, rough cast rendering. The architectural heritage included Federation, Arts and Craft and Californian Bungalow designs.
7. We request that the Department of Planning will make this specific area a showpiece of sustainable residential development in the age where quality of life (mental, social and physical) is considered in the design. (access to open space, social interaction).
8. We expect that additional traffic lights in the area will be included and that under and overpasses be incorporated to manage the already increased traffic flow from Greenwich, crossing over River Road up to the Pacific Highway as well as from River Road crossing over Greenwich Road.
9. We expect that set-backs of a minimum of 10 metres would be observed with front vegetation suitable to enable the residents to maintain.
10. The GCA would request a GCA representative be involved in the design of the facades with chosen architects.

ATTACHMENT C



Greenwich Community Association Inc

Director, Planned Precinct Infrastructure Delivery
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

St Leonards and Crows Nest Draft Green Plan Submission by Greenwich Community Association Inc Final date for submissions 8 February 2019

Status of Greenwich Community Association Inc

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. It was established over 70 years ago and has extensive experience in the planning issues affecting the community – see our website: <http://www.greenwich.org.au/>

Overview

An extract from the Arup Report – A Liveability Framework for Sydney 2017 – prepared for the Greater Sydney Commission (GSC) - sets the tone of this submission.

“there are concerns that many of these ‘liveability assets’ (open space etc, Ed) are not distributed equitably and that Sydney’s population growth (anticipated to increase by 1.7 million people over the next 20 years²) will put further pressure on quality of life and the social infrastructure that underpins this”

The current supply and quality of open green space in the St Leonards Crows Nest 2036 Precinct is of major concern to the GCA and, without revision, will impact materially on the wellbeing and welfare of existing and future residents in the area.

The ratio of quality open space to people is forecast to deteriorate rapidly as many of the proposed increases in green space to offset population densification are either low quality, (pocket parks, linear parks, over rail plazas etc), or for green spaces for which there is no assured funding plan. Ambitious Special Infrastructure Contributions may not be realised and land acquisition for open space may not be finalised.

The Draft Green Plan (the Plan) fails to respond to two key underpinning documents:-

Draft Local Character Statement

The GCA has made a separate submission in respect of the draft Local Character Statement, seeking more extensive and targeted community consultation with a view to informing a revised Statement.

In terms of the current Statement, it is noted that there is extensive community concern at the lack of green open spaces appropriate for a mix of active and passive recreation.

The Plan has not addressed this concern, nor has it been reflected in the 2036 Draft Plan.

GSC parameters

The Plan needs to be assessed against the GSC's parameters for Open space of Quality, Quantity and Diversity (GSC Web Site). Refer **Attachment A** graphic.

Also, for consideration, is the pre-amble on the Department's web site regarding the Plan for St Leonards Crows Nest 2036 and how it relates to the issues and objectives raised by the GSC and the draft Local Character Statement.

"What does the draft Green Plan for St Leonards and Crows Nest include?"

*The draft Green Plan has been prepared to guide the planning and design of open space and tree canopy across the St Leonards and Crows Nest study area. **The Green Plan is guided by the Greater Sydney Commission's ten key directions to establish principles that respond to the draft Local Character Statement.** Key recommendations include:*

- *Expand Hume Street Park to create a true 'village green' in the heart of the area;*
- *Expand an existing pocket park along Lithgow Street;*
- *Introduce setbacks on the sunny side of Oxley, Mitchell and Chandos Streets to provide space for more trees;*
- *Require setbacks for avenue tree planting in front of new buildings along Pacific Highway;*
- *Retain and enhance street trees on Willoughby Road; and,*
- *Establish new green links south towards Berry Island and Greenwich Point Reserve and north towards Tunks Park.*

For the sake of completeness, it is informative to set out the GSC's **"10 key directions"** referred to by the Department to see how these must guide the Plan:

1. A city supported by Infrastructure
2. A city for people
3. Housing the City
4. A city of great places
5. Jobs and skills for the city
6. A connected city
7. **A city in its landscape**
8. An efficient city
9. A resilient city
10. A collaborative city.

Source : GSC Web site

In respect of the Plan, the only relevant direction is **"7. A city in its landscape"**.

The North District Plan establishes the following Planning Priorities for "A city in its landscape":

N15. Protecting and improving the health and enjoyment of Sydney Harbour and the District's waterways

N16. Protecting and enhancing bushland and biodiversity

N17. Protecting and enhancing scenic and cultural landscapes

N18. Better managing rural areas

N19. Increasing urban tree canopy cover and delivering Green Grid connections

N20. Delivering high quality open space

N21. Reducing carbon emissions and managing energy, water and waste efficiently

N22. Adapting to the impacts of urban and natural hazards and climate change.

Source :5 Sustainability

Pag 95

Greater Sydney Commission | North District Plan

In respect of St Leonards Crows Nest the key relevant Planning Priorities are:

- N19. Increasing urban tree canopy cover and delivering Green Grid connections
- N20. Delivering high quality open space

The GCA supports both these objectives.

Our specific comments on each in terms of the Plan follow.

N 19 Urban tree Canopy

The Plan is detailed in respect of tree canopy cover, noting that it is a high priority for residents. The success of the Plan will be an % increase of canopy cover in the precinct area. Increasing tree canopy should not be hard to execute apart from requiring well informed engineers, horticulturists and arborists, sympathetic local councils and strict DA approval conditions.

N 20 Delivering high quality open space

The GCA questions the effectiveness of the Plan to address “delivering high quality open space” needs of all residents, without severely impacting the amenity of existing residents and those in adjacent areas – particularly Greenwich.

The GSC makes the following observation in respect of the North District Plan:

“Active open space is in high demand across the District, with limited opportunity to provide additional capacity in response to population growth. Utilisation rates are high, with some sporting clubs unable to access fields as needed, and providers such as local councils finding it difficult to fund upkeep and maintenance. A trend towards greater participation in sport by women and people aged over 35 is beginning to appear, as well as a trend towards indoor sports, and sports requiring less space such as futsal, changing patterns of demand for sports fields and facilities.

The Northern Sydney Regional Organisation of Councils’ (NSROC) Regional Sportsground Management Strategy (2011) aims to improve coordination of sportsground management across the region and is in the process of being reviewed. Future open space planning relies on collaboration and innovative re-use of shared spaces in response to the rising demand for active open space. (Ed: Underlining and bold)

The GCA’s position is further reinforced in the **Actions and Responsibilities Table at page 114 of the North District Plan** where, interalia, is noted a key requirement of green space planning:

c. requiring large urban renewal initiatives to demonstrate how the quantity of, or access to, high quality and diverse local open space is maintained or improved

Submission

GCA **objects to the Plan** in that it fails to achieve the GSC objective of an urban renewal plan objectively demonstrating how the quantity of, or access to high quality and diverse local open space will be maintained or improved. The reasons for this are detailed below:

Objection 1 – No Benchmarking

The GSC – refer to **Attachment A** - refers to Land Area percentage and Land area per capita green open space. This is a key metric for discussion, but it gets little attention in the Plan– and no benchmarking.

The Plan, therefore, does not address the GSC per capita test adequately.

No benchmarks are given, yet they appear well established globally as one means of assessing adequacy of open space. The literature is extensive on the topic and it is disappointing that there is no reference to the default DPE ratio mentioned below. (We note that consultants on other precinct projects discuss the hectare to population ratio in detail).

Examples include:

Department of Planning – 2.83 ha per 1,000

Lane Cove Council – LGA 1.86 ha per 1,000 – GLN Planning Pty Ltd

Greenwich -East Ward – 2.9ha per 1,000 – est – Author

Britain – 2.43 ha per 1,000 (Fields in Trust)

USA – 4 ha per 1,000 (National Recreation and Parks)

It is noted that in NSW many densification and urban renewal projects have fallen pathetically short of these with the Forum, St Leonards only allowing 0.194 ha per 1,000 residents by way of the open terrace and cafes etc. before overflow usage and Sydneygate, Waterloo 0.07 ha per 1,000 residents (source NSW Dept of Planning – Kellyville Precinct Open Space and Community Facilities report)

Importantly, the Plan is misleading in deriving per capita ratios calculations.

p. 21 shows:

| | | | |
|--------------------------------------|---------|--------------------------------------|---------|
| Existing Population | 15,591 | Proposed Population | 26,400 |
| Existing Open Space | 21 ha | Proposed Open Space | 29.57ha |
| Open Space ratio per 1,000 residents | 1.34 ha | Open Space ratio per 1,000 residents | 1.12ha |

This is misleading **as it includes, in the existing open space total, 8.31 ha of open space that is up to 200 metres outside the precinct boundary.** It does not, however, include in its calculations the population total for residents within this 200m perimeter catchment area beyond the precinct boundary.

Recasting the numbers by deducting 8.31 ha to obtain an “apples to apples” comparison reveals the following:

| | | | |
|--------------------------------------|----------|--------------------------------------|----------|
| Existing Population | 15,591 | Proposed Population | 26,400 |
| Existing Open Space | 12.69 ha | Proposed Open Space | 21.26 ha |
| Open Space ratio per 1,000 residents | 0.81 ha | Open Space ratio per 1,000 residents | 0.80 ha |

Objection 2 - Quality of open space

The additional 8.57 ha in open space comprises no substantive quality open space to address many of the key needs of a growing population, in particular passive green open space for picnics, playing and resting.

The spaces identified as **new open space** in the Plan and our comments are as follows:

Previously Proposed New Open Space

| Address | Area ha | Comments |
|----------------------------|---------|----------|
| St Leonards South precinct | | |

| | | |
|---|----------------|--|
| 16-24 Park Rd | 0.17 | Subject to planning proposal |
| 19-25 Berry Rd | 0.17 | Subject to planning proposal |
| 13 Holdsworth | 0.11 | Subject to planning proposal |
| 18 Holdsworth | 0.12 | Subject to planning proposal |
| 10-12 Marshall Ave | 0.15 | Subject to planning proposal |
| 2-8 Marshall | 0.44 | Query availability?? |
| 30-32 Berry Rd | 0.07 | Subject to planning proposal |
| 29-31 Holdsworth Ave | 0.06 | Subject to planning proposal |
| 27 Holdsworth | 0.05 | Subject to planning proposal |
| 33 Canberra | 0.04 | Subject to planning proposal |
| Sub-total – St Leonards South | 1.38 ha | Represents 0.2875 ha per 1,000 people for SLS forecast pop of 4,800 |
| Mitchell St Linear Park | 0.20 | Small |
| Oxley St Linear Park | 0.07 | Small |
| Oxley St Linear Park | 0.04 | Small |
| Oxley St Linear Park | 0.07 | Small |
| St Leonards plaza West | 0.30 | Not yet agreed with TfNSW |
| 101-111 Willoughby Rd | 0.05 | Small |
| Hume St Park Extension | 0.79 | Already planned by NSC |
| Ernest St /Alexander St | 0.07 | |
| Holtermann St/Hospital In | 0.16 | |
| Willoughby Rd Sth | 0.17 | |
| Friedlander Pl | 0.15 | |
| Sub Total – Outside St Leonards already proposed | 2.07 | |
| Total Already Proposed open space St Leonards and Crows Nest | 3.45 ha | Note discrepancy to additions |

New Proposed Open Space

| Address | Hectares | Comments |
|----------------------|----------|---|
| St Leonards Central | 0.38 | |
| Platform park | 0.91 | Not quality open space |
| Linear parks | | |
| Hotham Pde 20-96 | 0.48 | |
| Clarendon St | 0.45 | |
| Herbert St | 1.04 | Close to station – no parking |
| Westbourne St | 0.26 | |
| Lithgow St | 0.44 | Not readily accessible. Parking difficult |
| Green Rooftop | | |
| 2-4 Herbert St | 1.40 | Early days of planning |

| | | |
|---------------------------|----------------|-------------------------------|
| Total New Proposed | 5.36 ha | Note discrepancy to additions |
|---------------------------|----------------|-------------------------------|

Total New Open space

8.81 ha

Comments

This lack of guaranteed quality open space is reinforced in Section 7 Conclusion of the Plan that notes approximately half of this new space comes from the utilisation of road reserves and air space over the rail corridor.

It is also noted that the St Leonards South Planning proposal by LCC is subject to an Independent Planning Commission review. On this basis and, given over whelming resident protest, any inclusion of SLS “open space” in calculations must be regarded as conditional as best, and unlikely at worst.

Objection 3 – Implicit Overflow to Neighbouring Areas’ Green open space

The Plan does not provide sufficient analysis of quality broad acre green open space requirements for the forecast increased population for both organised leisure activities or passive green space activities.

The North District Plan notes that most sports grounds are at full capacity. Gore Hill oval is undergoing re-development but its focus – with a synthetic turf surface - will be very much oriented towards organised sport rather than passive recreation on natural surfaces.

Elsewhere there are no ovals of any meaningful size in the precinct.

The only conclusion is that surrounding areas outside the precinct will be asked to cater for the overflow caused by densification.

This outcome flies directly in the face of the GSC’s “Liveability” goals and is not acceptable to the GCA, where Greenwich residents will only see concentration of usage of their open space assets as a consequence of the population densification plans of St Leonards Crows Nest.

Objection 4 – Solar access

The Plan does not adequately address impacts of new and ongoing high rise development along Pacific Highway on solar access to the various new open space areas.

Objection 5 – Infrastructure Funding via Special Infrastructure Contribution (SIC)

The GCA has made a separate submission regarding the SIC.

In the SIC plan the following open spaces were identified for funding:

| | |
|--|---------------------|
| North Linear Park land (only Ed) acquisition | \$28,058,000 |
| South Linear Park | \$1,701,000 |
| Hume St Park expansion | \$25,900,000 |
| Gore Hill regional hill playground | \$2,000,000 |
| Total | \$57,659,000 |

The Draft SIC Plan (page 5) says it is predicated on all dwellings not yet DA approved or under construction being required to bear a \$15,100 per dwelling levy.

Yet at the final page (14) of that Plan is a “developer escape clause” which states that, where a planning proposal is lodged and the SIC charge has not been determined by the Minister, satisfactory arrangements will be made for the provision of State Infrastructure. Currently there are 4,294 dwellings subject to a planning approval with no DA approved.

Refer **Attachment B**. This “escape clause means none of these may have to pay a SIC.

If these are excluded, as indicated above, it leaves the forecast new dwelling total to Yr 2036 of 7,525 less 4,294 = 3,231 dwellings from which to raise the proposed SIC total of \$113.6m - or \$35k per dwelling. This is hardly achievable on top of Section 7.11 contributions, let alone VPAs.

Existing residents have paid taxes to develop and maintain existing open space. New residents' dwellings should also pay – via the SIC and Section 7.11 contributions - to ensure that existing amenity levels are maintained.

Conclusion

The Plan in its conclusion 7.0 p. 46 states:

“The Green Plan has determined that the existing public open space provision needs to be increased however there is limited available space to achieve this”.

This conclusion buttresses against the GSC's goals of liveability requiring adequate land per capita ratios and the shortage of sporting space referenced in the North District plan.

The Plan's conclusion is also highly circumspect in referring to the planning recommendations as “aspirational” and to be used as a guide for the provision of open space over time. It goes on to suggest the need for ongoing negotiations for land acquisition and the SIC to achieve this.

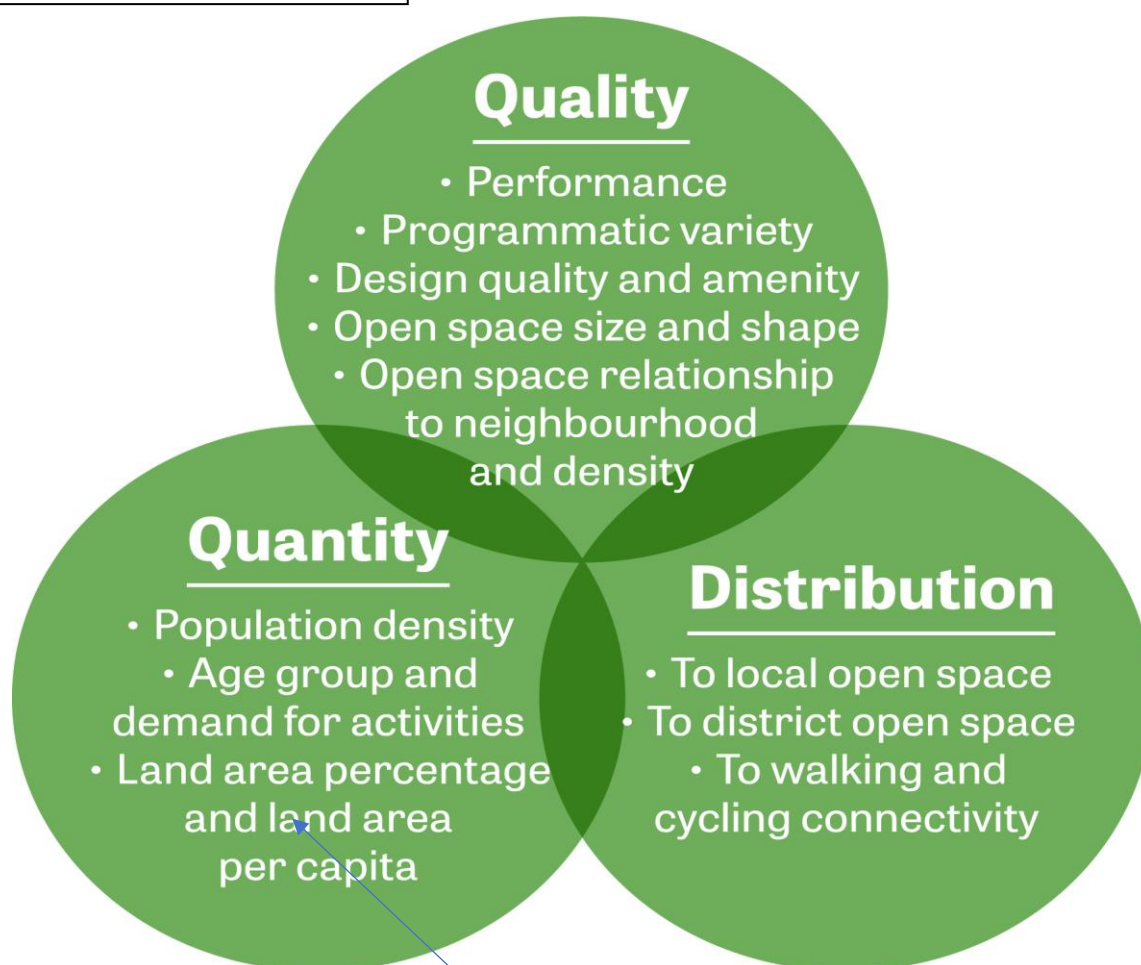
This is totally unsatisfactory as it provides no assurances that any open space target will be achieved.

Against all reasonable open space ratio benchmarks of adjoining areas and the Dept of Planning's own green space ratio of 2.83 ha per 1,000, the open space ratio resulting in the area is wholly inadequate and has implications for neighbouring areas (Greenwich, Wollstonecraft, Waverton, Cammeray, Naremburn etc), to absorb the green space usage shortfall created by the Plan.

Accordingly, we call upon the Department of Planning to cancel the Plan in respect of its open space considerations to:

- collaborate and consult with the community as to what is an acceptable hectare to population ratio for open space
- collaborate and consult with the community on where it wants to see quality, accessible open space located
- ensure that plans for new quality open space to accommodate increased population levels maintain the amenity and accessibility current residents enjoy
- to have clear funding sources and commitment in place for all infrastructure before progressing the overall St Leonards Crows Nest 2036 plan
- to not exempt any non- DA approved planning proposal from liability to pay a fair SIC to maintain open space ratios.

Merri Southwood
President
Greenwich Community Association Inc
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7 February 2019



Source: Greater Sydney Commission

This a key factor – not addressed by the Department of Planning or benchmarked.

Attachment B

SIC Calculations – Dwellings Presently subject to Planning Proposals

| | |
|------------|--|
| 2,400 | St Leonards Sth – subject to Independent Planning Commission review, resident opposition etc |
| 654 | 88 Christie St – <u>JQZ whose DA was only approved on 28 November 2018</u> |
| 500 | 601 Pacific Highway – “IBM building” – subject of a Planning Proposal |
| 245 | 100 Christie St – subject to a Planning Proposal – |
| <u>195</u> | 617 – 621 Pacific highway – Kwik Kopy building – subject to a Planning Proposal |
| 3,944 | Total |

Developments identified, not DA approved, and not Subject to SIC

350 Metro Over Station Development Proposal – subject to review and scale strongly opposed by residents

This leaves $7,525 - 3,944 - 350 = 3,231$ dwellings to meet the SIC target of \$113.6m.

It is not clear anywhere in the plan how this will be achieved or where these dwellings will be located – even in the unlikely event of the Planning Proposal for St Leonards South being approved in its entirety

ATTACHMENT D

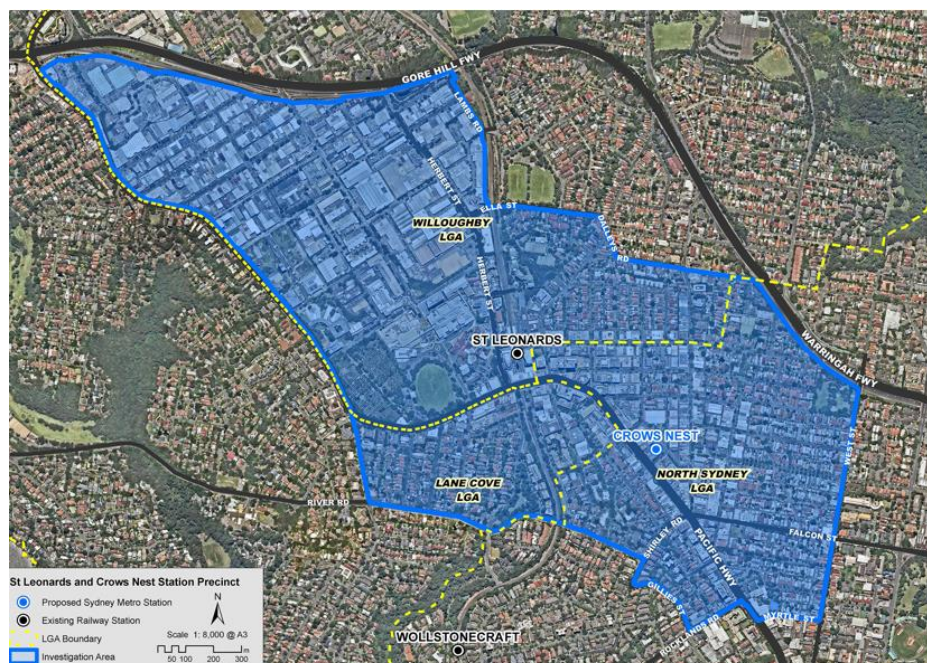


Greenwich Community Association Inc

Submission to NSW Department of Planning and Environment

St Leonards and Crows Nest Station Precinct

Open Space (Green Open Space)



27 March 2018

Greenwich Community Association Inc (GCA) welcomes the opportunity to make a submissions to the NSW Department of Planning and Environment (DoP) in respect of planning for the St Leonards and Crows Nest Station Precinct (the Precinct) and hopes for further engagement in the process.

This submission relates to Open Space considerations in the Precinct and arising from the Precinct.

In this respect, the GCA welcomes the statement in the DoP Project Update December 2017 that open space will be a key consideration in the LUIP.

The GCA will make additional submissions relating to other aspects of the Precinct Plan. These submissions will be forwarded under separate cover.

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Greenwich Community Association Inc

The GCA is an incorporated association, established for over 73 years.

The objects of the GCA are as follows:-

“The Association is established for community service purposes to do all things possible to further the interests of Greenwich and the Local Government Area of Lane Cove and to maintain and enhance the amenity of all residents and owners of property in Greenwich. The Association will not stand candidates for election to public office. It will not campaign for changes to the law or to government policy except where such activities are incidental to its primary object to enhance the amenity of Greenwich residents and owners.”

The GCA holds annual elections for its committee.

Public meetings are held every alternate month and are open to all residents of Greenwich.

The GCA maintains a website www.greenwich.org.au and distributes a newsletter to over 2000 households prior to each public meeting.

Context of Submission

The suburb of Greenwich lies in the East Ward of the Lane Cove Local Government Area (LGA) – refer following page.

A portion of Greenwich is located within the Precinct, namely the area bounded by Pacific Highway, Greenwich Road, River Road and Park Lane.

The balance of Greenwich lies outside the Precinct, divided from the Precinct by Greenwich and River Roads.

The balance of the Lane Cove LGA within the Precinct is known as St Leonards South.

St Leonards South has traditionally been regarded as part of Greenwich, with long standing links and identification with Greenwich starting with children from the suburb attending Greenwich pre-schools and Greenwich Public School and with families accessing Greenwich infrastructure and services such as shops and doctors across Greenwich Road from the Greenwich Infants School.

A portion of St Leonards South, namely the area bounded by Marshall Avenue, Park Road East, River Road and Canberra Ave, is the subject of a Planning Proposal by Lane Cove Council to rezone the area from R2 Low Density Residential to R4 High Density Residential. This is known as the St Leonards South Master Plan (SLS Master Plan).

Since the exhibition of the draft SLS Master Plan in early 2015, the GCA has consistently expressed concern to Lane Cove Council that the lack of coordination between the three Councils that control the St Leonards Crows Nest Precinct threatens optimal planning for the precinct. Furthermore, the GCA has been concerned that the lack of infrastructure and services proposed for the SLS Master Plan will lead to damaging impacts and strain on the already stressed infrastructure of Greenwich and adjacent areas.

In December 2017 the GCA resolved to request Lane Cove Council to cancel the SLS Master Plan. Council has not yet voted on whether it will or will not approve the plan.

In the light of the above, the GCA submission is made in the context detailed below:

1. the development landscape of the Precinct is as is (ie the SLS Master Plan area zoned R2 Low Density Residential and with current development), in addition to developments under construction or already approved by the relevant consent authority
2. comments made in this submission relate to the entire Precinct.



Analysis of Existing Conditions

This submission is based on the preliminary analysis of existing conditions contained in the report prepared by Arup dated 1 February 2017.

The GCA is not in the position to verify the data contained in the report, especially in terms of detail outside the Lane Cove LGA, but the GCA agrees generally with the analysis of open space in the Precinct.

GCA's Definition of Open Space – "Green Open Space"

Discussion at recent DoP community sessions have suggested that the DoP's definition of open space may differ somewhat from the GCA's perception of what open space should be.

The GCA acknowledges that plazas such as the one proposed (but, we understand not finally signed off) for over the rail-line at St Leonards or galleries may be classified as "open space". Spaces such as plazas and galleries can be easily incorporated into commercial and/or residential developments in the design and assessment process, through mechanisms such as VPA s or equivalent.

Whilst not wishing to undervalue the importance of plazas and galleries, the GCA is concerned that the DoP should not ignore the need for green open space that can be used for sport or recreational purposes. These spaces are vital for the physical and mental wellbeing of those who live and work in precincts of high density.

Such green open space would include:

- Parks
- Playgrounds
- Sporting ovals/playing fields.

Green open space will only be achievable through detailed and coordinated planning of a precinct in advance of consideration of individual development proposals.

The GCA is concerned that the amount of green open space in the Precinct is already well below what is required to meet the needs of the current population of the Precinct. This was reinforced by Arup.

The provisioning for adequate green open space must be a priority for planning of the Precinct.

Matching Objectives of the Precinct with Green Open Space capacity

The Precinct has been identified as an area for increased commercial and residential development.

Regardless of the focus of the GSC, the three LGAs in the Precinct have focussed on approving residential development, not commercial development.

It is intended that many of the new residents in the Precinct will rely on public transport – they will not have cars. Green open spaces will, therefore, need to be within walking distance of where they live.

This is a real challenge in the already intensely developed St Leonards/Crows Nest.

Constraints in Planning for Green Open Space in the Precinct

It is assumed that there are few parcels of land in the Precinct that could be regarded as “greenfields” sites, where the DoP can plan for green open space without the constraints of approved/current or completed development. Perhaps there may be some flexibility around the old ABC site which falls within the Willoughby LGA – this level of detail is not known to the GCA.

It appears to the GCA that the following general comments apply in respect of green open space in the Precinct:

- there is very little of it (Arup p 28)
- with the intense development in the Precinct already, there are few places to put it
- the development in the Precinct already has escalated property prices to the point that the cost of purchasing land to create adequate green open space is prohibitive
- the influx of workers foreshadowed by the GSC will generate demand for green open spaces for organised sporting activities at lunchtime and after work – just look at the Domain at lunchtime
- increased residential population will also add to demand for green open spaces
- if these people have no cars, as the government seems to envisage, the green open spaces surrounding the Precinct (Arup p 28) will not be easily accessible
- schools in and adjacent to the Precinct have almost no green open space that could be used by the general community (unlike schools in suburbs further away from the city) eg Cameraygal High has one basketball court on a busy corner of Pacific Highway, North Sydney Girls High has no large green spaces suitable for active/organised sport, North Sydney Boys has one reasonable area of green space in the middle of the school site.
- schools need to use existing parks for school sport (North Sydney Boys and Girls High use St Leonards Park regularly)
- this demand will increase as schools are built to accommodate the increased population
- concurrent and competing uses of a park eg school sport/ playgroups for toddlers may be dangerous
- topography of East Ward of Lane Cove is unsuitable for the creation of large recreational areas that can accommodate organised sport.

Present Situation – Some Green Open Space in Precinct but very little for active recreation

1. Gore Hill Oval

Arup notes that this oval is used for organised sport (p 28) with limited opportunity for informal recreation and play.

With the current program to replace the surface of the oval, it is likely that this space will be increasingly sought by organised groups, further eroding its potential for unstructured recreation

2. Gore Hill Cemetery

Good for reading and walking but inappropriate for active recreation

3. Pocket parks

These tend to be located at noisy corners on busy roads and are rarely used

4. Newlands Park

This park is on a sloping site and inappropriate for active sport

In the light of the considerations outlined in our submission, the GCA requests the DoP to:

1. finalise a clear benchmark for open space (including green open space) that has legislative force throughout NSW
2. include in the LUIPP open space (including green open space) provisioning of 2.34ha per 1000 population as per Lane Cove Council's Open Space Plan
3. designate in the LUIIP green open spaces (inside or outside the Precinct) that are suitable for concurrent use for active and passive recreation and are accessible by residents/ workers within 15 minutes by foot
4. designate as green open spaces only areas that have access to adequate sunlight and shade
5. ensure that the green open spaces are available to all within the Precinct regardless of which LGA is ultimately responsible for these spaces.

Failure to ensure access to adequate green open space in an area of high density like the Precinct will erode the liveability of the Precinct and will change the family oriented character that is valued by the Precinct communities.