

Draft North District Plan

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Greater Sydney Commission
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Dear Sir/ Madam

Submission - Revised Draft Greater Sydney Strategic Plan

GSL Action provides this submission in relation to the Revised Draft North District Plan ('**Plan**') and the inter play with the St Leonards South Master plan from Lane Cove Council (rezoning).

GSL Action is a community organisation engaged with the St Leonards community and active in representing the views of the St Leonards and Greenwich community for many years. GSL Action strives, in a variety of ways, to ensure the quality of life in our community does not deteriorate from inappropriate development. GSL Action views the District Plan as unable to provide a clear view of how the objectives interconnect with current conditions on the ground to achieve the desired objectives.

As well, it is not clear how Lane Cove Council proposal fits with the North District Plan especially when these contradict each other. For example, Lane Cove Council is pushing with plans which reduce the amount of commercial space available to increase the amount of residential floor space; this contradicts the North District Plan. Also Lane Cove Council intends to rezone St Leonards (St Leonards South) into high rise residential area which contradicts the North District Plan for diverse housing mix. Moreover, the proposed rezoning will lead to development which is not in context with the area, is not supported by current infrastructure and has no real set-backs with existing residential areas, to name a few. Thus Lane Cove Council proposed plans are not in keeping with the vision or objectives in the North District Plan.

GSL Action provides a more detailed response, comments and raises concerns with the North District Plan particularly as it relates to St Leonards.

Planning Fundamentals

Open and Outdoor Space Constraints

The Draft Greater Sydney Strategic Plan Objective 31: *Public open space is accessible, protected and enhanced.*
Also Objective 12: *Great places that bring people together.*

The Plan fails to set any guidelines as to what is to be defined as public open space. While we appreciate that this can be considered "as detail" to be provided at a later stage however given the significance of this point it is important to set a definition at this stage to avoid inappropriate behaviour and misinterpretation of what can be classified as open space.

For example we refer to the rezoning plans of Lane Cove Council for St Leonards South where critical scrutiny of some facts as presented reveals that there are several inconsistencies with the Plan. For example in some diagrams and tables Gore Hill Oval in St Leonards is presented as open space while in other sections/tables the oval is noted as a Park. To be clear Gore Hill is a sports oval and does not have any picnic areas or ability to have

kids play due to the nature of the venue and as sports are held on an increasing basis. As well, the oval is planned to be a sports facility. Hence it is not clear how this fits with the Plan.

Moreover, Newlands Historical Park is noted as Newlands reserve. By its nature this is a small park and the only park in the area which is heavily frequented by existing residents and is already earmarked as open space for the high density development in Marshall Avenue, St Leonards. Newlands Park will receive reduced amounts of sun light after the Marshall Avenue high density residential development (Tower) is constructed. Hence this park cannot cater for more population in the area. There is only so many times and ways that this open space can be double counted as open space for any current and future development in the area ("over sold") to the residents before it becomes a flawed argument.

Infrastructure Provision and Timing (Objective 1, 2, 3 and 4)

The Plan does not appear to set any guidelines in relation to the link between population growth and the availability of associated infrastructure i.e. the timing of the infrastructure and services provided before or after the towers are constructed in the area. That is, should schools and trains be built first then the towers constructed or should the towers come first then residents endure suboptimal services awaiting schools to be constructed, which could be few years down the track.

Mix of Housing Choice/Constraints

The Draft Greater Sydney Strategic Plan Objective 11: *Housing is more diverse and affordable.*

The Plan discusses the need for a mix of housing variety but does not take into account that there is a large need for single dwelling houses. Refer to statistics from Core Logic which shows demand for "Houses" is greater than for "Units". The Plan also focusses on achieving an increase in high density residential targets rather than setting quality levels of the housing to be provided. Furthermore the Plan does not deal with maintaining houses where possible but rather aims to achieve targets than consider minimising demolition of houses to make way for high density towers. Certainly a priority to infill vacant sites around highways, train stations etc. will be easier to deal with rather than demolishing established houses. Overcrowding high rise residential buildings into suburban neighbourhoods in St Leonards does not make a good plan.

Type of Housing Choice/Mix

The Plan discusses the need for a mix of housing variety but does not take into account that population needs changes over time and consequently the need to have the type of units mix adapt to this change. For example developers tend to favour studio and single bedroom units but when considering any population increase then there will be the need for larger family oriented units (i.e. 2, 3 and 4 bedrooms) and hence there might be a need to mandate the mix of units in order to cater for future requirements. Again the population in the area is not made out of single 20 something residents who do not have any children or a car.

Capacity Constraints

The Draft Greater Sydney Strategic Plan Objective 1: *Infrastructure supports the three cities and Objective 2: Infrastructure aligns with forecast growth – Growth Infrastructure Compact.*

The Plan does not appear to distinguish or take into account the actual capacity levels applicable for different areas. That is, an already concentrated and congested area will have less capability to accommodate more than its share of an increase in density. While a less densely populated area will have a better opportunity and better capacity to cater for a population increase.

Let's consider an area such as Roseville (one stop past Chatswood) which is more capable of catering for an increase in density around the train station when compared to St Leonards or North Sydney which are already heavily populated; and will not cope with increased population targets. Roseville has a train station (TOD), has less density and is closer to the Chatswood - Epping line and hence better positioned for north-west travel than St Leonards. Increasing concentration around already condensed areas will require considerable expenditure on infrastructure far greater than envisaged and will cause significant demand on services than if the increase in population was spread more evenly away from already high density areas. The 30 minutes travelling target can be measured from any 2 points and cannot be a viewpoint to justify increasing population in already densely populated areas.

Existing Constraints

The formed view in the Plan that all areas need to increase their population does not take into regard existing constraints that already prevail. For example, an area which already experiences heavy traffic congestion will not be able to cope with an increase in traffic regardless of the assumptions (such as that people will not be using their cars) because this traffic is not generated within the area but often from outside the area. Hence again, not all areas can accommodate an increase in their population because they are close to a train line.

Car Usage Constraints/Patterns

The Plan makes reference to reduced car usage patterns for sites located near a train line as well as the availability of some car sharing facilities that will lead to a reduction for the need for cars (reduce the need for cars and relying more on public transport). While this view might be superficially true for working days, the same cannot be true on weekends as this view ignores the increased demand on car usage on weekends. This view also does not take into account that:

- a. Traffic levels increases on weekends in Sydney.
- b. There is a greater need for cars on the weekend, such as visiting friends who live in areas which do not have access to good transport.
- c. Shopping is an activity that relies heavily on car usage.
- d. Families that need a car seat for babies which are not immediately available in car sharing.
- e. Growing population implies growing size of families which require more than one car.
- f. Kid's sports and activities which require transport to fields outside the immediate area (Not all residents are 20 something with no children or any family to visit compared to families with a need to visit friends and relatives).

Planning and Transport Constraints in St Leonards

The Draft Greater Sydney Strategic Plan Objective 6: *Services and infrastructure meet communities' changing needs.*

The proposed Metro station in Crows Nest is expected to cater for a population influx. However, the Plan does not take into consideration that the Metro station will simply just cover the over demand from the existing train line which is operating above 100% capacity (please refer to Sydney Train statistics that show capacity levels is beyond expectations) and cover the general growth in the area from the additional towers. Added to this point are the buses which have recently been pulled out of services due to the blocking of George Street in the City. As such more Crows Nest residents will use the new Metro and there will be less excess capacity for additional residents in the area.

Key Consideration Constraints

The Plan does not seem to cater for commuters that do not live within walking distance to the current train station and the new Metro station. This is a key consideration for the Plan and should not be ignored. Put simply, where

will the out of area commuters park their cars or how will the Pacific Highway cope with more buses along the Highway to even pick up passengers? This a central challenge that critically affects the St Leonards area.

Commercial Space Constraints

Objective 21: *Internationally competitive health, education, research and innovation precincts* and Objective 23: *Industrial and urban services land is planned, protected and managed* and Objective 24: *Economic sectors are targeted for success.*

The Plan does not define commercial space or the types of commercial property. It is interesting how many new developments approved by Lane Cove Council simply refer to a Gym, a Coffee shop and Serviced apartments as commercial space. Surely, these do not lend themselves to a long term commercial hub nor is conducive to be offices or complex business operations which create long term employment in St Leonards.

Parking Constraints

No consideration is included in the Plan to parking for the commercial hub and the Royal North Shore Hospital e.g. staff, Doctors, employees and visitors as St Leonards is a specialised medical/health Precinct.

Liveability Constraints

The Draft Greater Sydney Strategic Plan Objective 7: *Communities are healthy, resilient and socially connected.*

St Leonards is a very windy area (please refer various wind reports from Lane Cove Council which show St Leonards as one of the windiest areas in Sydney). The wind speed and gusts create various wind tunnels. Additional towers will increase the wind effect and intensify the wind tunnel effect thus reducing the use as well as usability of the open space around buildings. The open space and potential activation areas will be wind swept areas that are not user friendly and might become less useful. Liveability principles then will not apply to St Leonards as depicted in the Plan.

Priority Constraints

What consideration and priority is afforded in the Plan to ensure that emergency services to the Royal North Shore Hospital are taken into account (i.e. as a priority).

For example all the additional developments will add to traffic and congestion for ambulances. The Plan does not really address that St Leonards is a specialised medical precinct with a priority hospital access.

Voluntary Planning Agreements

The Plan should encourage Councils to move away from VPAs since these tend to skew and lead towards worst planning outcomes. High rise buildings and developments tend to be much bigger than required and the benefits sold to Council tend not to materialise. Put differently, how can a Council officer determine if a 30 sqm library with one window is worth an additional 10 or 50 storeys to the developer? What if the affordable housing provided is of poor quality and location that it is virtually unusable hence how many rules (setbacks, SEPP 65) can the developer break? And how many additional storeys can be built?

Minimal Plan Detail

The Plan offers little detail of the associated impacts from increasing density for St Leonards on matters such as actual infrastructure, transport, amenity and locality? Community outcomes to achieve the future needs for good-quality local area are very narrow in focus in the Plan. In some cases the Plan becomes echoes of previous segmented proposals already presented by Council and does not question the appropriateness of these Council plans in light of this Plan.

St Leonards - Health and Employment Precinct

The Plan neglects to effectively set targets and dates for St Leonards to become a health and employment precinct that creates significant opportunity to drive economic activity. As such this lack of clarity might not result in a well-designed Plan around such principles to generate more long term sustained employment.

Sustainability Outcomes

The scale of proposed development in St Leonards does not promote any environmental qualities or sustainable outcomes. No guidelines are set in the Plan in relation to the sustainability (i.e. green credentials) of developments / towers and long term use. Developers will be incentivised to build more units and less concerned in relation to long term energy consumption and liveability. The design of a building requiring mechanical ventilation and mechanical lighting due to poor solar access and cross ventilation will need to be compensated for by considerable amount of energy. Put differently, the long term energy requirements of a building (cost to the residents) need to be accounted in its green rating (not just water recycling).

Accountability

The Plan does not set principles in relation to significant proposals. Especially those with questionable VPAs which should be reviewed through a more independent body than the authority receiving the VPA cash payment.

Tourism and Heritage Aspects

The Plan does not appear to set targets for increasing tourism or maintaining heritage aspects in the area. As a minimum, Lane Cove National Park should be given a tourism priority area to encourage tourists driving some 10 km from the CBD to access a national park. As well, the heritage aspects of the area should be considered as a priority in order to enhance the tourism appeal. The Plan should clearly have elements to protect any heritage aspects of the area to further encourage tourism as a priority (e.g. heritage of some houses and buildings).

Infill and Easy Sites

It is not clear the extent to which the Plan prioritises areas for development. The Plan should pursue a real "Infill – Green Field" policy which aims to utilise vacant sites as a priority as compared to "Infill – Brown Field" demolishing existing liveable sites. It is easy to imagine that developers will rush to the easy Brown field sites compared to being guided to the Greenfield sites. In addition, this is a quicker method to add to the supply of houses (quicker to construction, less cost to demolish) and provides a real increase compared to a lower net increase (i.e. less the houses demolished).

Council Adoption of the Plan

It is not clear the extent to which Councils are required (say by law as compared to common sense) to adopt the Northern District Plan and ensure that their planning (in the pipeline especially) follows the Plan for the Northern District, as compared to merely just taking it into account.

There are several issues concerning the proposed rezoning by Lane Cove Council of "St Leonards South". We question the extent to which the Plan sets a requirement on the definition of a real open space and benefits to the community. Lane Cove Council claims that their plans for St Leonards include open green space. However, if one looks closely at Lane Cove Council's vision for St Leonards, it can be easily concluded that this open space is not accessible by the public and is not usable as the space is either small, bounded by fences, has retaining walls or at a slope. As such this space becomes redundant and useless for residents to enjoy. This space is open in name but will not have green lawn due to over shadowing in the area. As such, each claim by Lane Cove Council needs to be assessed (stress tested) and not taken at face value.

In closing, the Plan does not seem to provide a real blueprint of how the objectives can be achieved and ultimately the Plan fails to take into consideration the conditions on the ground that are applicable to the St Leonards area. The high level objectives as conveyed do not provide a complete picture and especially there is no testing carried out to determine if this is the correct action to be applied.

Thank you for the opportunity to provide this submission in relation to the problems and threats posed by the incorrect plans for the area. We are able to elaborate on any of the points listed above.

Greenwich / St Leonards Action Group

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