

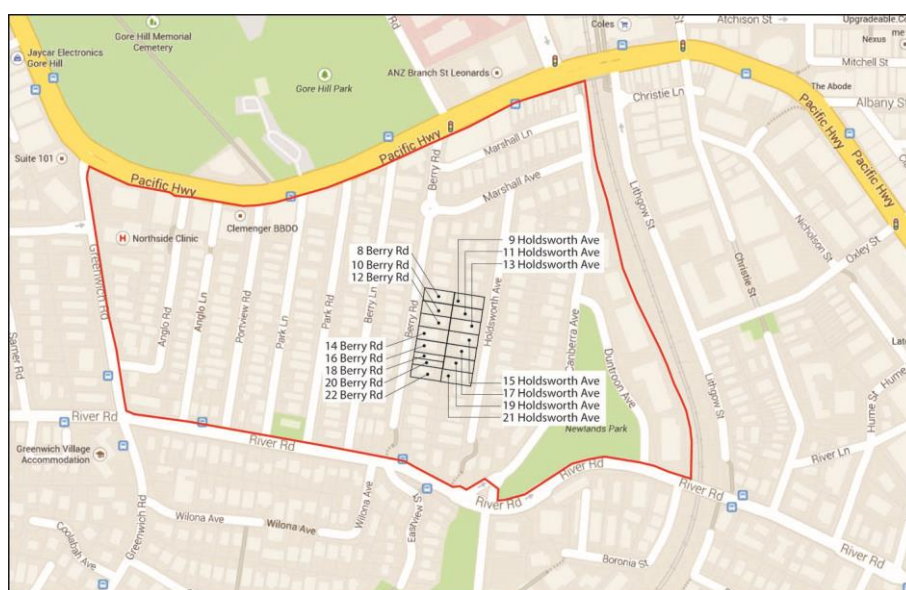
13 March 2015

The General Manager  
Lane Cove Council  
PO Box 20  
LANE COVE NSW 1595

**Draft St Leonards South Masterplan  
Submission for 'Centre Berry East/Holdsworth West' Group**

Dear Mr Wrightson,

This submission is prepared on behalf the 'Centre Berry East and Holdsworth West' group (see annexed list).



Map showing represented properties (Source: Googlemaps)

**Objective Statement**

Residents would like to see a plan which adopts a long-term, creative vision for the area and which responds to and builds on the area's strong attributes. They enjoy the proximity, amenity and views and would like to see improved building form, housing options, landscaped spaces and consideration of critical community infrastructure. They are concerned in relation to the information presented and the lack of objective economic feasibility modelling. The plan is considered to be narrow in vision and scope.

The *Draft St Leonards South Masterplan* ('the masterplan') provides a '*once in a lifetime opportunity*' (Council report 8 December 2014) to ensure that the redevelopment of St Leonards occurs in an economic and efficient way, making best use of land, opportunities and resources.

As detailed within this submission, the masterplan fails to provide confident objectives and outcomes and does not adequately justify critical points including feasibility, traffic and transport, community facilities, housing choice and affordability and environmental sustainability.

The masterplan needs to provide housing and employment growth in order to meet State Government objectives of growing jobs and the economy, sustainable development providing high quality places to work and live.

The plan does not provide for variety or form transitions or seek to encourage design excellence or flexible commercial re-invigoration. The plan acknowledges the challenge of site amalgamations but does little to foster incentives or ensure that redevelopment will happen in a reasonable timeframe.

It is requested that the draft masterplan be deferred and revised, pending a comprehensive and more strategic review. The current draft is out of step with critical planning documents and resident aspirations.

Thank you for work done to date and for considering the following planning points.

## Summary

- The purpose of a masterplan is to evaluate particular areas that are of such strategic significance that site specific controls could be adopted to achieve the best outcome. The draft masterplan recognizes the strategic importance of the precinct but the suggested recommendations and controls do not correspond to this importance.
- The masterplan is not consistent with its stated purpose (page 7) in terms of providing certainty. The plan is not considered to detail the full growth, density, viability and amenity potential. The plan is not considered strong in its objective to *'minimise the winners and losers effect' between areas changing and those not changing, and balance change with provision of new facilities.'*
- As a pre-cursor to statutory planning change, the masterplan should have a more robust or appropriate evidence base. The plan is not informed by in-depth, objective, critical strategic studies on economics, access, public domain and social infrastructure.
- The St Leonards/Crows Nest area is a mixed commercial and residential area and is as an important 'Strategic Centre' under the *Plan for Growing Sydney, 2014*. A new rapid transit system is planned to service St Leonards. The State Government expects boosts in the economy, business, at least 10,000 jobs and accelerated housing supply.
- The *St Leonards Strategy 2006* ('the 2006 strategy') is a visionary document which aimed to see the area develop as an employment centre, capitalizing on its location within Sydney's 'Global Arc' and ensuring the area is balanced in a unified way to provide a high quality public domain and urban form. The strategy sought to plan for diversity, vibrancy, sustainability and to meet housing and employment targets.
- The 2006 strategy referred to the area bounded by the Pacific Highway (north), Greenwich Road (west), River Road (south) and the railway line (east) as the 'Greenwich North Precinct'. This whole area is not included in the masterplan and the scope proposed is considered a greatly missed opportunity to achieve effective transit oriented development ('TOD').
- The entire precinct should be considered for renewal given the pattern of existing development, potential for transport connections, to achieve appropriate space and road linkages and to achieve responsive form transitions/reduce zone interface impacts.
- The 2006 Strategy contained dwelling and employment targets and aimed to achieve: social inclusion, environmental sustainability, economic growth, public safety and increased housing choice. The masterplan does not address or detail consistency with these objectives.
- The scope of the masterplan is limited and does not detail critical aspects of community infrastructure, form and design, transport/traffic/parking, sustainability, open space and housing choice and equity.
- The plan is not based on a detailed front-end economic feasibility or market analysis addressing commercial and residential uses and needs.
- The masterplan does not include solid justification for the 'preferred option' and does not strongly tie in with previously prepared strategic documents and community aspirations.
- A masterplan should create the vision for a high quality, balanced area, without such a focus on residential development of a single typology. The vision and discussion of options is very limited. There are alternative 'design excellence' provisions which could be used to attract investment and achieve a better outcome.
- The scale/form proposed is not considered to result in the best solar access outcome or appropriate 'stepping down' of building form across the precinct.

- Zone interface, housing choice, affordable housing, community infrastructure and access aspects are poorly resolved and could be improved.

## Document Review

The submission is based on a detailed review of the following documents and discussions with local residents and staff at Lane Cove, Willoughby and North Sydney Councils.

*Metropolitan Strategy - A Plan for Growing Sydney, Department of Planning and Environment, 2014*  
*NSW State Infrastructure Strategy (Updated), November 2014*  
*St Leonards Strategy 2006, David Lock and Associates, National Economics, Cityscape Planning, PBAI, 2006*  
*St Leonards South Precinct Strategy Report, David Lock and Associates, Straight Talk, Brown Consulting, 2012*  
*Draft Lane Cove Community Strategic Plan to 2025, Lane Cove Council*  
*Lane Cove Council Meeting Agenda December 8 2014 (St Leonards Public Domain Masterplan)*  
*Draft St Leonards South Masterplan, Annand Associates Urban Design, 2014*  
*Final Independent Economic Review Hills PDA, February 2015*  
*St Leonards Public Domain Masterplan, December 2014*  
*St Leonards Placemaking Design Study (North Sydney Council) SJB Design, 2014*  
*St Leonards/Crows Nest Market Feasibility Study (North Sydney Council), SGS Economics and Planning, 2014*  
*St Leonards/Crows Nest Access Planning Study (North Sydney Council) ARUP, 2014*  
*St Leonards and Crows Nest Planning Study Precincts 2 and 3 (North Sydney Council), SGS, SJB and Arup, 2014*  
*North Sydney Council Report, 14 November 2014*  
*A Guide to Preparing Planning Proposals, Department of Planning and Infrastructure, 2012*  
*Section 117 Ministerial Directions, 2015*  
*Environmental Planning and Assessment Act, 1979 - Objectives*  
*Lane Cove, Willoughby and North Sydney Local Environmental Plans (2009, 2012, 2012)*

## Inconsistency with Background Planning Aims and Strategies

The masterplan is considered out of step with the following strategic documents which aim to see St Leonards develop as a strategic entre and transport hub with good jobs and housing choices.

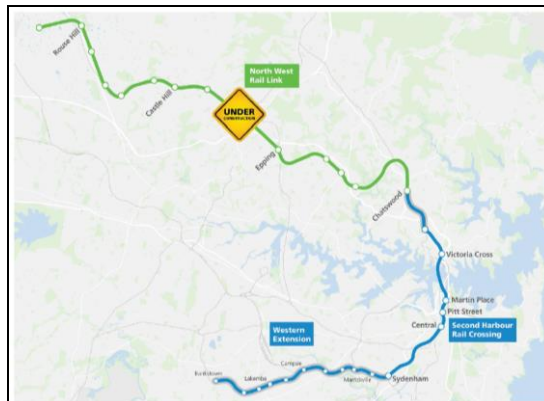
### Metropolitan Strategy - A Plan for Growing Sydney ('the metro strategy')

The metro strategy aims to create 'A competitive economy with world-class services and transport, a city of housing choice with homes that meet our needs and lifestyles, a great place to live with communities that are strong, healthy and well connected and a sustainable and resilient city that protects the natural environment and has a balanced approach to the use of land and resources' ('vision' from the Planning and Environment Website - A Plan for Growing Sydney, Planning and Environment Website, March 2015).

664,000 additional homes and 689,000 new jobs are required for Sydney by 2031 which requires co-operation between government levels and 'partnerships' with the community and development industry.

Under the latest metro strategy, St Leonards is classified as a 'Strategic Centre' and the Department of Planning and Environment aims to 'work with council to retain a commercial core in St Leonards for long term employment growth, to work with council to provide capacity for additional mixed-use development in St Leonards including offices, health, retail, services and housing, support health-related land uses and infrastructure around Royal North Shore Hospital and work with council to investigate potential future employment and housing opportunities associated with a Sydney Rapid Transit train station at St Leonards/Crows Nest.' At least 10,000 jobs (page 141) are expected.

The metro strategy refers to a proposed 'rapid transit station' at St Leonards/Crows Nest and the *NSW State Infrastructure Strategy 2014* the NSW Government is also focusing on a Sydney Rapid Transit system (with a second Harbour crossing and Western extension). Additional future stations are envisaged at North Sydney (Victoria Cross) and St Leonards (refer to the following map).



'Rebuilding NSW', Fact Sheet 3, June 2014, NSW Government – Sydney Rapid Transit

### Recommendation

Infrastructure NSW recommends that the Government give further consideration to non-capital options to relieve pressure on the system during peak periods prior to the Western Sydney Rail Upgrade program being fully delivered.

#### 2.4.2 Building future capacity: Sydney Rapid Transit

The Premier has identified Sydney Rapid Transit (SRT) as a strategic priority for consideration in the 2014 State Infrastructure Strategy Update.

This major project, currently estimated to have a capital cost of between \$9.6 billion and \$11 billion (factoring in planned property sales), proposes to extend the North West Rail Link rapid transit service under Sydney Harbour, through the Sydney CBD and west to Bankstown. Funding of \$3.4 billion is already earmarked for the project in Transport for NSW's 10 year capital plan; \$10.4 billion represents a reasonable mid-range estimate of the project's total costs.

The project comprises:

- Northern Corridor Works – a three kilometre above ground section of new track in the existing rail corridor between Chatswood and the St Leonards area
- Sydney Harbour Crossing – a 12.5 kilometre tunnel section from the St Leonards area under Sydney Harbour to Sydenham, including new underground rapid transit stations on the North Shore (Crows Nest and Victoria Cross) and in the CBD (Pitt Street), and rapid transit platforms at Martin Place and Central stations
- A Western Extension to Bankstown – upgrading the existing 13.4 kilometre rail line from Sydenham Station to Bankstown Station to support rapid transit operations.

Infrastructure NSW | 2014 State Infrastructure Strategy Update

NSW State Infrastructure Plan, Recommendation 2.4.2, page 48

Given this commitment to invest resources in transport infrastructure, the NSW Government will focus on making the most of redevelopment opportunities around transport networks and stations. This part of St Leonards already enjoys great public transport connections and services and this underpins its redevelopment importance.

The proposed masterplan refers to TOD however does not provide the in-depth planning analysis which drives this concept. Far more could be done to maximize the opportunity to increase densities, use the entire study area/precinct and connect the station with bus lines at the outer boundaries of the precinct (River and Greenwich Roads). More TOD 'strategy' could be applied to provide a central link through the area, boost housing varieties, provide a cycleway/pedestrian spine and to 'design in' reduced car transport via planning and design controls.

The masterplan does not discuss or address job creation nor appropriately detail incentives to boost the viability or interest in developing the mixed use/commercial core. The plan focuses on residential of a single typology which is not considered to 'reference' the greater St Leonards locality.

It is noted that North Sydney Council has conducted in-depth market research into commercial/residential viability and have included a detailed discussion of design options/incentives for boosting commercial development within the *North Sydney St Leonards/Crows Nest Study 2014*.

For the North Subregion, the metro plan envisages: *'Increases in the supply of housing and jobs will be focused on centres with good access to public transport. The subregion will offer a growing diversity of high amenity living and working environments.'*

Direction 3.1 (p 83) says *'higher density development that is matched by local infrastructure improvements and good design enhances liveability. It allows more people to live close to work and services, makes the best use of existing infrastructure and provides greater choice in transport around the city'*. The masterplan could do more to vary building types and increase the calibre of buildings by moving towards form and setback controls as opposed to Floor Space Ratio ('FSR') controls.

Action 2.3.3 (p 18) requires Local Environmental Plans ('LEPs') to factor in affordable housing, according to local demand. This has not been achieved within the draft masterplan and there are specific needs for affordable, student and medical staff housing.

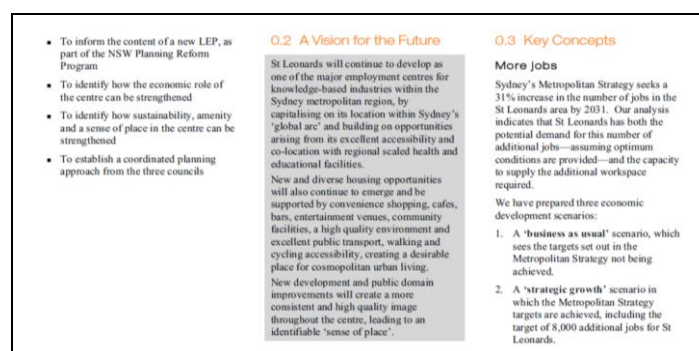
#### St Leonards Strategy 2006 ('the 2006 strategy')

The development of the St Leonards areas is challenged being divided between the local government area of Lane Cove, North Sydney and Willoughby. It is a planning challenge to grow the strategic centre in line with the metro and 2006 planning strategies.

The 2006 strategy sought to coordinate effort between Councils to create a 31% increase in jobs for St Leonards by 2031 (8,000 additional jobs) to create housing to boost social inclusion, environmental sustainability, economic growth, public safety and increased lifestyle choice (page 7).

The plan recognized the need to improve public transport access through the provision of a bus interchange and pedestrian upgrades. The strategy recognized to plan for the retention and encouragement of land development/renewal for commercial uses.

The vision of the strategy was:



St Leonards Strategy, 2006 page 6

The proposed Masterplan is not considered to address the vision, or discuss the 2006 targets.

The precinct bounded by the Pacific Highway (north), Greenwich Road (west), River Road (south) and the railway line (east) (referred to in the current masterplan) was referred to as 'Greenwich North' and is referred to in the masterplan as the 'study area'.

The 2006 strategy identified the need for community infrastructure and the shortage of childcare in Lane Cove. Page 55 referred to the need to plan a 'large scale child care facility'. The area referenced was on the other side of the Highway. Given this recognized need in Lane Cove, this aspect could have been considered in more depth within the masterplan.

The masterplan does not address the various types of housing and densities suggested in the 2006 strategy such as aged care housing, nurse/student accommodation, medi-hotels or the shortage of hotels suggested on page 52. Providing these housing options would create economic benefits for the

area and increase the range of affordable housing types within proximity of the Royal North Shore teaching hospital and TAFE. This would also meet metropolitan objectives.

Creative housing options should be considered to reinforce a TOD scheme together with planning strategies to reduce the car transport reliance. The significant parking pressure in the locality identified in the 2006 strategy is not extensively resolved by the draft masterplan.

By comparison, the *St Leonards and Crows Nest Planning Study 2014* by North Sydney Council ('the North Sydney study') provides a detailed analysis of access opportunities and constraints and is based on a specific and up to date Access Study (by Arup in 2014).

The 2006 strategy discussed parking management and policy, work place travel plans, road networks improvements and pedestrian and cycle improvements. These have not been addressed in detail in the masterplan.

The North Sydney study explores traffic, transport, pedestrian/vehicular/cyclist movement in far more detail and suggests viable development strategies such as: purchasing/renting housing and parking separately, restricting on-site parking, green travel plans and car share/shared parking schemes. The masterplan misses the same opportunity to drastically improve issues in the area and to match in with North Sydney's proposed initiatives.

The North Sydney study contains clear objectives to: establish a liveable, high amenity and mixed use centre, support creative/innovative industries establish and grow, improve urban design and street level amenity, improve building design and residential amenity and increase investment in St Leonards. This is not matched by the proposed masterplan.

The 'preferred approach' does not embrace innovation, creativity or design excellence and does not incorporate discussion on 'lifestyle ingredients', transport initiatives or public domain improvements recommended by the 2006 strategy.

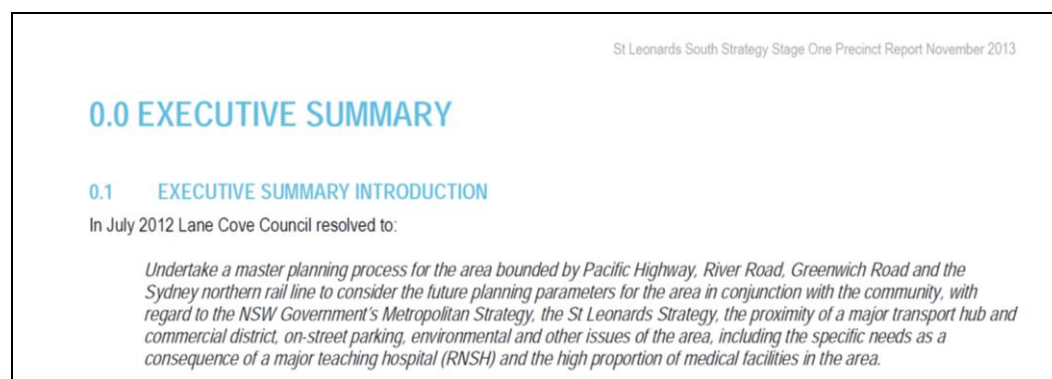
The 2006 strategy discussed the concept of key sites and FSR increases to selected sites to 'target change' page 42. The masterplan does not relieve FSR controls and promote form controls as suggested in the 2006 strategy.

#### *St Leonards South Strategy Precinct Report ('the precinct report')*

Stage 1 of the current master planning process occurred with the preparation of the *St Leonards South Precinct Strategy Report* prepared by David Lock and Associates, Straight Talk and Brown Consulting.

The precinct report discussed the local area in detail, commenting on existing form, zoning and infrastructure matters. This provided part of the evidence base for the masterplan.

The Lane Cove Council resolution in relation to the preparation of this document was as follows:





The exhibited masterplan does not incorporate a strategy for the whole area or address area specific needs. The result is a less than creative model which has a short term vision and misses the opportunity to plan well, with an appropriate and wholistic view.

The masterplan does not detail parking, environmental issues and the specific needs of the teaching hospital.

Page 6 of the precinct report indicates that the community indicated support for the area for expansion however wanted to ensure development was not 'piece meal' and that a range of housing types be provided.

Residents also suggested traffic improvements should be resolved well with any increased density.

The report indicated that opportunities should be explored for:

- increasing employment and community opportunities
- transitioning of scale from north to south and east to west to allow view sharing
- lack of parking/parking pressure and the need for transport improvements be addressed
- need for commuter parking
- provision of housing diversity
- improvement of deep soil planting
- improvement of cycling facilities

These aspects have not been considered in appropriate detail within the masterplan.

The masterplan does not discuss target delivery of 44,000 dwellings for the 'inner north subregion' (in section 2.0 of the precinct report). If the proposed limited section is re-zoned for dwellings with capped density requirements, where does it leave the rest of the precinct in terms of meeting future targets and in ensuring appropriate future infrastructure delivery?

#### Draft Lane Cove Community Strategic Plan to 2025 ('the community plan')

The community plan contains goals in relation to housing, assets, infrastructure, public domain, transport and mobility, parking and traffic and aims to develop the business precinct and foster partnerships between business owners, community and businesses to identify economic opportunities.

Strategies are to be implemented to '*create a diverse range of retail and commercial businesses to locate in Lane Cove*'. This document links to Goal 2.2 on page 25 of the 2006 strategy.

The community plan aims to '*promote a range of sustainable housing options in response to changing demographics*' and that this is to occur through local planning instruments and policies. This is not incorporated in the masterplan.

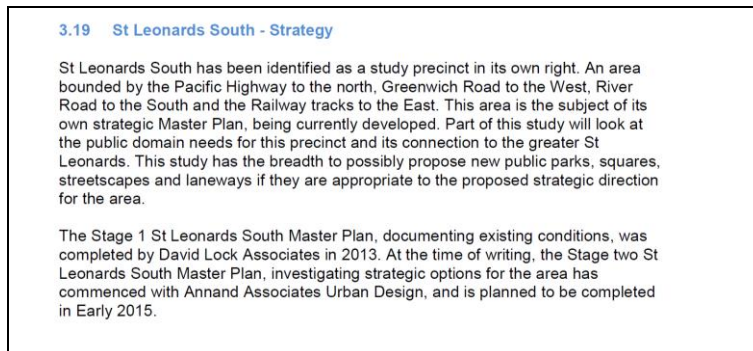
The community plan recommends the investigation of opportunities to improve the public domain, parks and open spaces and this is limited within the proposed masterplan. How will the conceptual open space link on page 46 of the masterplan be achieved if only part of the precinct is rezoned?

North Sydney Council commissioned a *St Leonards Placemaking Design Study* to inform their strategy and to plan for high quality 'places'. To achieve this goal, a similar base study is vital to create precinct wide, high quality spaces and to match in with the scheme being considered for the North Sydney side.

The level of detail provided in the masterplan as to car parking, landscape embellishment, business development, community facilities, housing choice or urban design does not connect appropriately with the community strategy.

### St Leonards Public Domain Masterplan ('urban design masterplan')

Lane Cove Council's objectives for urban design include to maximize: movement, safety, sense of place and innovative design. Page 18 of this document deferred consideration of these public domain elements to the *St Leonards South Masterplan*.



Extract St Leonards Public Domain Masterplan, Lane Cove Council December 2014

The *St Leonards South* masterplan does not consider the same public domain objectives and these documents should more strongly 'connect' to ensure beneficial and organized development.

### Draft St Leonards South Masterplan ('the masterplan')

The study area is logical and relevant given its position within the boundaries of the Pacific Highway and rail corridor to the east and Greenwich and River Road as wider roads to the north and west. River and Greenwich Roads have bus stops which could connect via an access spine through the precinct, to the station. These roads would form an appropriate 'zone interface', given their width.

A variety of housing types already exist within the area including older stock walk-up flats (River and Greenwich Roads) and older style townhouses (Greenwich Road Anglo Road).

A high density style boarding house has recently been approved by Council (fronting 22 Greenwich Road), as this area is already zoned R4 (high density – see extract below).



Zoning extract, The study area bounded by roads/yellow, Lane Cove Local Environmental Plan 2009

Given the existing R4 zonings along Greenwich Road and adjacent to the rail line, it is questioned as to why the whole precinct has not been considered for R4 and or more R3 (medium density – townhouse forms) to maximize on TOD.

The precinct forms a logical adjunct to the commercial centre and benefits from proximity to job opportunities and rail and bus connections to the Sydney CBD and other centres. This is well recognized by Council in the background documents. There is a great opportunity to masterplan this



precinct as a whole and set a high standard of urban design to be admired and studied by other LGAs. More importantly, this could lead to a high amenity area enjoyed by residents and users. The scope of the plan is limited.

We would like clarification on the different pink areas shown in Figure 4.8 (page 7) of the 'preferred option'. The key does not correlate with the colour variation.

Insufficient justification is provided as to the stark zone interface which will be created between R4 and R2 at Berry Road. The chosen interface is not discussed in detail or correlated with detailed discussion as to lower scaled housing typologies, parking, traffic and landscaping.

Different densities and housing typologies should be provided for the benefit of the community, to achieve good urban design/scale transitions and to promote an effective TOD outcome. Greenwich and River Roads already contain a varied built form so a reasonable opportunity exists for renewal.

Heritage/character items such as those in Park Road could be adaptively re-used using heritage incentives (eg. used as commercial/medical offices, to retain historical fabric/character).

SEPP 65 is referred to however there is little focus on 'design excellence' as a fundamental theme. Parramatta and North Sydney Councils are adopting design excellence provisions to achieve high quality design and planning outcomes (irrespective of normal LEP numeric development standards). A flexible and design based approach has the potential to allow the realization of strategies where merit is solidly demonstrated. This is a key incentive to attract redevelopment and meet strategic timeframes.

The area could be divided into key sites with 'gateway' buildings. Key sites are not discussed with in the masterplan, except to say they should be investigated (page 89). This should have occurred before modelling building types. Attracting good urban design has the potential to alleviate amenity and solar issues. Taller buildings would contribute to the skyline, provide great office and living spaces and maximize on unique and panoramic views available to sites along Berry Road and Holdsworth Avenue. This could increase available open space and planting.

As the masterplan is to inform an LEP amendment it needs to be paired with equal studies on economic feasibility/market research into the emerging need of the area, traffic environment, commuter behavior, infrastructure, social impacts/aspects and public facilities. This level of ground work and vision is not demonstrated. Such discussion within the plan is very general and non-specific to the area. The case studies are not relevant.

The conclusions and recommendations are not robust in relation to infrastructure, public open space, and roads and these are key components when masterplanning residential precincts.

Opportunity is available for limiting the provision of car parking per development and could be combined with on-street parking restrictions. North Sydney Council is considering this opportunity.

In line with the suggestions of the 2006 Strategy, thought should be given to no FSR control in the high density area with use of height and other building envelope and coverage controls to guide development. This could result in more creative and viable developments where combined with a design excellence requirement.

Parramatta Council is currently revisiting its planning framework for the CBD because economic testing of the current LEP controls has demonstrated that a significant number of sites cannot attain the yield necessary to make them financially viable and current controls are largely out of step with the strategic importance of the CBD and what the residents would like to see the area become.

Residents of St Leonards are understandably concerned at the lack of 'front end' market research and modelling involved with the masterplan and whether appropriately rigorous testing has occurred before ascribing the FSR of 2.75:1. The Hills PDA report was provided after the masterplan as a response rather than a study document.

There are some significant concerns and points requiring further clarification within the Hill PDA report.

It may have been beneficial to test a number of sites within each precinct as opposed to one, to bolster conclusions. The report concludes that 2.75:1 FSR is feasible but that there would be a higher return with an FSR of 4:1. This is important as it is premised in part, on a 30% market premium being paid for the land and that an uplift of 50% could be recovered by Council to put towards community facilities. Higher FSR could be considered to increase economic feasibility and assist in delivering/funding public interest benefits.

The testing could consider an alternate 'in-addition to' funding stream for community facilities which would make the rezoning a feasible public benefit exercise.

The matters of development contributions, joint voluntary planning agreements and bonuses/key sites development could have been detailed in the masterplan as a way of 'planning-in' the delivery of infrastructure (parking) and social infrastructure (child care, school, community facilities, open space).

The Hill PDA report was helpful in testing FSR in Areas B and C. FSR of 2.75:1 made development feasible and therefore incentivized amalgamation however an FSR of 2:1 was tested as not feasible. The Hill PDA report is important as it demonstrates that if 2.75:1 is feasible in Area A as well as B and C, then there is likely to be a poor built form with no appreciable transition in building scale to the south/south-west, away from the public transport and commercial hub of St Leonards. From a planning perspective, it is appropriate to have higher density, larger developments clustered around public transport, shops and employment to maximize walking and minimize car dependency. This was recognized in the masterplan however rigorous economic feasibility testing does not seem to have occurred to encourage orderly development within a reasonable timeframe.

The Hill PDA report notes the importance of amalgamation of sites to see redevelopment occur. The report tests scenarios based on a 20% and 30% market premium applied to land value. Property valuation propositions are largely based on sales history of houses and units within the precinct and the information concerns residents. It may be prudent to apply further testing to ensure accuracy. Additional submissions are provided by residents in relation to specific economic considerations.

Greater yield may be possible for the sites to the north adjacent to the Pacific Highway commercial ribbon with this area boosted as a diverse mixed use precinct with design to promote a range of uses. This could provide great benefits to the community and economy.

The Pacific Highway commercial ribbon could be expanded in depth to include mixed use development 3-4 sites back with an east to west road/lane provided parallel for servicing and access. This could also form a physical barrier to residential zoning in the remaining precinct/study area.

The R4 sites proposed to the east may be able to achieve higher yields and solar aspects could be addressed with a different built form, preferably delivered through a design competition process.

The approach of up-zoning to R4 with a prescribed FSR of 2.75:1 and a 25m or 8 storey height limit is not considered sufficiently grounded with full urban design and planning analyses or economic modelling. The plan does not detail potential site isolation, compromised design and the effect of 'wide' buildings on solar aspects.

It appears that higher densities and heights are being considered on the North Sydney side. The North Sydney study contains height modelling radiating out from the Forum (the highest building and focal point at 109m in height). It is considered that more could be achieved on the Lane Cove Side.

The plan discusses the multiplicity of property ownership and suggests this is a constraint. Other areas such as Parramatta, North Sydney and Ku-ring-gai have similar issues, however these are not considered insurmountable. Residents are already mobilizing with a common interest.

The masterplan does not demonstrate a guiding principle of sustainability. It does not seek to change on-site parking requirements in a significant way and does not consider water sensitive urban design or environmental performance of buildings, parking or open spaces. The plan does not strongly consider social aspects of high density living other than generalized SEPP 65 urban design principles.

To defer the rezoning of the rest of the precinct for a 5, 10 or 15 year timeframe undermines the strategic vision and is unlikely to achieve the highest and best use the land. This will not promote the consolidation sought by the State Government nor achieve sustainable infrastructure provision. The masterplan report contains conflicting information in relation to the timeframe for the remainder of the precinct which provides a lack of co-ordination and certainty.

Consideration of equity is required in rezoning and should be addressed via a comprehensive and multi-faceted strategic review. Planning needs to propose and rezone in an inclusive and logical manner within reasonable timeframes and in a substantiated order. Equity is not considered to be delivered with isolating areas for homogenous land uses and achieving narrow, short term goals.

Many of the ideas presented in the plan are deferred back to Council to 'investigate'.

### ***Points on 'Form'***

The built form section of the masterplan outlines different building types but does not apply them to the precinct.

The subject 'block' of streets allocated primarily for residential uses could be better created as a mixed use employment/residential area with higher densities, subject to design competitions. The creation of key sites could tie in with North Sydney and Willoughby developments and create high quality towers, appropriate renewal and attract investment.

It is noted that a number of Planning Proposals have been considered in the St Leonards area along these lines and that this has created the opportunity for creative and higher rise designs.

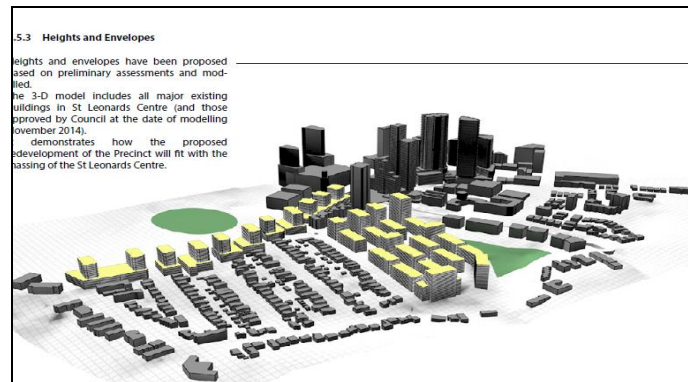
The Planning Proposal considered/approved for the 'Loftex' development at 1-25 Marshall Avenue referred to housing and jobs 'targets' and sought to vary the Council's statutory FSR. The building resulted in a split in FSR's across the footprint with density concentrated on the higher side. The design merits put forward included: reduced overshadowing, improved transition in scale and urban design, increased view sharing for Highway properties, improved internal amenity for future residents, increased open green spaces, improved public domain and activation of the proposed civic square.

Page 85 of the 2006 strategy notes the 'tired' nature of commercial buildings on Lane Cove side of the Pacific Highway and notes the 'sharp contrast' of the Lane Cove side with the 4-12 heights on the opposite side. The 2006 strategy suggests that potential exists to encourage renewal and that planning controls can discourage amalgamation. Careful consideration of heights was recommended to protect residential amenity (page 18).

The 2006 strategy discussed the replacement of FSR controls with built form controls (heights and setbacks) to entice the provision of commercial floor space and to promote redevelopment of 'underdeveloped sites' with height limits stepping down to the south-east. Performance controls were recommended in relation to overshadowing.

The masterplan raises the variation in FSRs controls adopted by Willoughby, North Sydney and Lane Cove Councils. The highest FSR available around the commercial core by the other councils is 5.5:-6:1 with Lane Cove at 5.1:1. This could be increased to be commensurate with the other parts of the centre, to provide attractive gateway buildings along the Highway and to benefit office/residential spaces. The masterplan suggests a potential increase in FSR to 4:1 where public benefits are demonstrated.

According to the modelling provided in the masterplan, the area could look like the following and suggests that more could be done to improve an even approach along the corridor.



St Leonards South Masterplan, Figure 6.10 Heights and Envelopes, page 69

It may be better to provide slender, taller tower blocks tapering down, transitioning in built scale towards the River Road boundary. This would provide more appropriate density and renewal and may allow for larger open spaces between to benefit solar access, utilize views and create the best amenity.

The form proposed is not considered well justified. It is homogenous and unimaginative and does not reasonably address interface impacts.

Has the opportunity of closing some of the lanes in the area to benefit density, amalgamations and open space linkages been considered?

The proposed buildings when constructed will appear as a close-knit series of wide monolithic 'blocks' along a ridge line, which do not respond well to the existing/planned fabric.

### **Procedural Concerns**

As discussed, the masterplan does not rely solidly on relevant strategic documents and appears to be based on minimal and insufficient 'informing' studies.

Without these documents, a future Planning Proposal for re-zonings could not be considered consistent with the State Government guidelines '*A Guide to Preparing Planning Proposals 2012*'.

Justification is required as to whether a Planning Proposal is based on strategic studies and whether it is 'the best way'. We consider that there are better alternatives and the resident group has commissioned Woods Bagot Architects and Urban Designers to devise an alternative design scheme.

The masterplan does not demonstrate the urban design, lifestyle ingredients, infrastructure and transport initiatives required to support new densities. No mention is made of the rapid transit system discussed in the *Plan for Growing Sydney* and *State Infrastructure Plan*.

Based on comments within the 2006 strategy and consultation documents, some of the points made by residents (traffic and housing types) have not been incorporated in the plan.

The proposal is considered inconsistent with Section 117 Ministerial Directions pertaining to housing, employment and the implementation of the metropolitan strategy. These would need to be justified further as part of any future planning/rezoning proposal.

For the reasons given in this submission, the masterplan is considered inconsistent with the objectives of the *Environmental Planning and Assessment Act 1979* as the public interest is not holistically promoted and the current plan may not utilize the land in the highest, most orderly and economic way.

The plan is therefore considered to be disadvantageous to the sustainable development of Sydney.

## Conclusion

The Draft St Leonards South Masterplan provides a start in the planning process for St Leonards however is not connect strongly with overarching planning strategies for St Leonards.

The plan adopts a limited scope in relation to environmental, social, housing, employment, design and access factors. The philosophy of TOD is discussed however strategies are not included to ensure the TOD opportunity is maximized for the precinct and that planned transport infrastructure improvements are effectively utilized.

Concern is raised over the absence of key studies and the lack of co-ordination with other relevant Councils, both critical to achieving the best outcome.

The draft plan lacks strategic intent and certainty. It does not fully address its aims and is considered inconsistent with State Government planning frameworks.

The plan does not include a comprehensive delivery regime in relating to funding and timing.

The residents appreciate the work done to date however do not support the plan in its current form. Residents insist on a masterplan which leads to St Leonards South as a showcase precinct comprising excellent environmental, social and economic features.

We request that Council defer consideration of the Draft St Leonards South Masterplan and consider alternative options, working with the community and landowners to finalize a revised outcome.

We are most willing to discuss these matters further and offer constructive assistance as required.

Yours sincerely,



Natalie Richter, Consultant Town Planner (BTP, UNSW)

### Attachment 1: Schedule of Properties Represented

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