



Greenwich Community Association Inc

OBJECTION

Lane Cove Council

**St Leonards South Master Plan
SU 5945**

5 January 2018

Overview

1. Community concern as to process and content of the St Leonards South Master Plan

On 6 December 2017 a general meeting of the Greenwich Community Association (GCA), attended by at least 70 members of the Greenwich and adjacent communities, considered in detail the St Leonards South Master Plan (the Plan).

Three resolutions were passed unanimously at this meeting (Attachment A).

These resolutions reflect a range of concerns about the development and consultation processes associated with the Plan, the scale of the proposed development, the lack of services and infrastructure within the development area, the impacts of the development on adjacent communities including Greenwich and the potential for the Plan to compromise sound planning for the St Leonards and Crows Nest Station Precinct.

It is apparent that there is a high level of community concern and anger around the manner in which Lane Cove Council has conducted the entire master planning process from its inception, presumably around 2012, to the current Community Consultation process.

The GCA holds copies of over 110 letters/emails that have been sent to Lane Cove Council/Councillors since December 29, 2017, all of which express concern around certain aspects of the Plan or Council's management of the process whereby it has evolved. The GCA will review these submissions and report back to the community as to the issues raised.

It is understood that there are many other items of correspondence sent to Council that have not been copied to the GCA.

The GCA trusts that each Councillor will receive copies of all correspondence sent to the General Manager as part of the current Community Consultation as it is vital that Councillors, as the final decision makers, are fully informed of all views and concerns articulated in relation to the Plan.

The GCA holds a petition signed by over 180 community members since 29 December, 2017 calling for cancellation of the Plan and is also in receipt of a petition signed by 500 community members in advance of the 13 July 2015 EGM of Council when the St Leonards South Master Plan was adopted by Council with an unexpected boundary change Berry Road to Park Road East.

Copies of these petitions are attached (Attachments B and C)

It is disappointing to note that the concerns expressed in the petition preceding the 13 July 2015 meeting, namely inadequate consultation, traffic congestion, infrastructure issues and liveability, remain some of the primary issues of concern now.

In over two and a half years, Council has not seen it appropriate to acknowledge the legitimacy of community concerns and seek to address them or to provide appropriate assurances.

2. Complexity of issues around the St Leonards South Master Plan Failure of Council to facilitate access to all information required to fully understand issues and make informed comment

The history of the St Leonards South Master Plan process is complex and involves a range of agencies. Council's electronic resources are poorly formatted. It is extremely difficult to negotiate

around the site to develop an understanding of the issues around the Plan and the Gateway process. Department of Planning officers have made this observation to the GCA.

The Councillors who will be charged with making a final decision in terms of the future of the St Leonards South development must be mindful of the enormous significance of the step they are taking. This is no DA about a house renovation. This is a massive re-zoning that will change East Ward and the St Leonards Crows Nest Station Precinct fundamentally and irreversibly.

It is expected that every Councillor will ensure that they are fully informed of all aspects of the Plan, including the complexities around infrastructure capacity and impacts on long term planning for the St Leonards/ Crows Nest area.

The GCA has asked Council for this information without success, notwithstanding the explicit statements of Council's Community Engagement Policy and the Gateway requirements in terms of "*clear and evidence based information available to assist the community to make informed comment*".

It is also hoped that Councillors will ensure that they have made their **own** enquiries in relation to relevant technical, planning and other considerations before they place themselves in a position where they will decide the future of the precinct.

Objection 1

Exclusion of the GCA from the St Leonards Community Liaison Committee (Liaison Committee) 2012 – 2015 led to a development plan for St Leonards South that will place unacceptable stress on the infrastructure of Greenwich and will severely erode the amenity of Greenwich

No evidence has been provided to the community that Council has taken steps to address the unacceptable stress on the infrastructure of Greenwich and the erosion of the amenity of Greenwich

No evidence has been provided to the community that Council has:

- ***conducted accurate and verifiable studies of infrastructure impacts, within and outside the precinct, resulting from this proposed development***
- ***planned in detail the infrastructure and delivery thereof***
- ***confirmed that NSW government and other authorities with responsibility for the delivery or oversight of the infrastructure support the findings and proposals of the Council***
- ***secured funding guarantees in respect of this infrastructure***

On the above grounds, Council must reject this Plan.

Background detail

The process whereby the GCA was excluded from participation in the Liaison Committee is addressed in other recent submissions and does not need to be repeated other than to note that this exclusion represents a complete disregard of Council's own Community Engagement Policy.

Had the GCA been engaged from the outset, it would have raised, very early, concerns that the scale of proposed development adjacent to Greenwich would impact the already strained infrastructure capacity of Greenwich and erode the amenity of Greenwich as a consequence.

When the plans became available for public comment in early 2015, prior to approval of the Park Road East boundary at the EGM of July 2015, the GCA wrote to Council seeking assurances around the guarantee of funding for the full infrastructure needs of the proposed high density precinct to ensure that Greenwich did not suffer further erosion of its infrastructure and amenity.

This plea clearly fell on the deaf ears of those who were determined to push the Master Plan through on 13 July 2015. They did so with minimal input from relevant NSW authorities as to infrastructure impacts/ requirements of the precinct other than scant responses provided in December 2014 **before the Eastern boundary of the precinct was extended** (refer AT-7 to the report to Council for the meeting) and no evidence of infrastructure funding commitments.

Following Council's decision to proceed with the Gateway approval for the St Leonards South Master Plan, the GCA wrote to Council on 24 September 2015 as follows:-

In addition, the community acknowledges the intent of Council to obtain firm commitments from government agencies that the necessary improvements to infrastructure will be fully funded and carried out, particularly in regard to schools, roads and traffic improvements. The GCA requests that Council clearly states how such 'firm commitments' will be obtained to a level that provides assurance to the community that government funding will be irrevocably allocated for school facilities, roads, and other infrastructure, in advance of the exhibition of any Draft LEP.

As at 5 January 2018

- we have a plan that shows minimal infrastructure within a proposed precinct of 2,400 high rise dwellings and at least 4,800 people (assumption of minimum 2 persons per unit)
- we have a plan that shows minimal services within a proposed precinct of 2,400 high rise dwellings and at least 4,800 people
- we know that the residents of the precinct will have to leave their precinct to access the services they will not have like supermarkets, doctors, restaurants – all the things that people want and need for physical and emotional wellbeing
- we know that this must impact the infrastructure of Greenwich
- we have a *Cumulative Transport and Accessibility Study* and a *Report on Traffic Impacts of Large -Scale Developments on Pacific Highway* prepared by Council's own consultants and note that some submissions to Council express serious concerns around the reliability of these studies
- we have no revised responses from key authorities that relate to the larger plan adopted 13 July 2015.

If we do not have revised responses from key authorities that relate to the larger plan adopted 13 July 2015, we assume that Council and Councillors do not either.

If Council does have them, the community is entitled to see them in terms of Council's own Community Engagement Strategy and the Gateway's required compliance with Section 5.5.2 *Guide to Preparing LEPs (Department of Planning and Infrastructure 2013)*.

We have sought this information and were amazed to hear, in mid December, that Council officers were only then planning to go back to the relevant regulators to request updates to their infrastructure assessments.

This is 15 months after the Gateway advised Council in Condition 4 of its Determination that it needed to do this.

Given the huge number of developments, completed, under construction or approved in the past three years in the Lane Cove LGA specifically and in the St Leonards Crows Nest Precinct generally and the impacts on infrastructure that are obvious to all as we sit in queues at traffic lights, bus stops and hospital emergency departments, it is extraordinary that Council has not been updating their feedback from regulators on a regular basis and providing this information to Councillors and the community.

And we have been advised by Council's Strategic Planner that this information will not be made available to the community until it is included (and maybe in summary only) in the report to Council before the meeting to approve or reject the Plan. Councillors will be aware that the papers for Council meetings are only released to the community about two to three working days before a Council meeting.

It is impossible to make fully informed comment on the Plan in the absence of current and accurate information about something as basic as infrastructure assessment/impacts/delivery. And it must be similarly impossible for Councillors to make sound assessments about the merits of the Plan without it.

Councillors have no choice but to reject the Plan.

Objection 2

Lane Cove Council is not required by the NSW government to provide the additional high density housing stock proposed under the St Leonards South Master Plan

The scale and impacts of the St Leonards South Master Plan threaten the orderly planning of the St Leonards Crows Nest Station Precinct to develop high quality and diverse residential areas that create sustainable and liveable communities

Council must cancel the St Leonards South Master Plan

Background detail

The NSW government has not required Lane Cove Council to prepare the St Leonards South Master Plan.

The GCA has sought from Council information as to current mandates of the NSW government for development of additional high density residential stock in the Lane Cove LGA .
The GCA has not received this information.

Lane Cove Council has already exceeded housing targets mandated by the NSW government. This is confirmed in a report to Council December **2017** in respect of the recent Revised Draft North District Plan released by the Greater Sydney Commission as follows:

“Over the past 5 years Lane Cove has facilitated significant residential development which has exceeded the dwelling growth targets set by the State Government, previously 3,900 by 2031. The capacity within the current LEP is approximately 4,300 dwellings. Since 2010 Council has approved 3,919 additional dwellings, and a current DA at St Leonards for 458 apartments, would if approved, see this increase to 4,377”.

The plans of the NSW Department of Planning and Environment for the St Leonards Crows Nest Station Precinct are still in the process of development following release of the Department’s Interim Statement in August 2017.

The Department of Planning issued an update on the status of its planning for the St Leonards Crows Nest Station Precinct in December 2017:

What happens next?

☑ *The planning investigation for St Leonards Crows Nest is being undertaken in three stages. The draft vision, objectives and guiding planning principles contained in the Interim Statement, which were developed in collaboration with the councils, comprised the first stage. The findings of Stage 1, and the matters raised in submissions, are informing the second stage, which is currently underway.*

☑ *Stage Two is the preparation of a Land Use and Infrastructure Implementation Plan (LUIIP), which will provide a planning framework for the Precinct and indicate the infrastructure upgrades needed to support the area’s sustainable growth over the next 20 years. The draft LUIIP is scheduled for public exhibition in early 2018 and extensive community consultation will be undertaken when at this stage. .*

It is clear that a finalised plan for the St Leonards Crows Nest Station Precinct is not likely in the short term and that there will be **extensive** community consultation at the draft stage likely early this year.

In the light of the above, it is apparent that the St Leonards South Master Plan is an initiative of Lane Cove Council.

Its progression through the Gateway process is a decision of Lane Cove Council.

Lane Cove Council has the right to cancel the St Leonards South Master Plan and terminate the Gateway process at any time.

This should happen immediately.



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