



Greenwich Community Association Inc

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6 September 2017

The North District Commissioner
Greater Sydney Commission
Chair, Project Control Group
St Leonards and Crows Nest Station Precinct
PO Box 257
PARRAMATTA NSW 2124

Dear Commissioner

St Leonards and Crows Nest Station Precinct – Interim Statement (August 2017)

Thank you for the opportunity to comment on the Interim Statement on the St Leonards and Crows Nest Station Precinct released by the New South Wales Department of Planning and Environment.

This letter follows up on our submission to the Greater Sydney Commission on the Draft North District Plan dated 31 March 2017 (copy attached).

In general we **support** the draft vision, objectives and guiding principles in the Interim Statement.

Greenwich Community Association

The Greenwich Community Association (**GCA**) is a forum for residents living in the Precinct and also for residents in areas adjoining the Precinct.

Greenwich includes the part of the Precinct known as St Leonards South and so the GCA is directly interested in developments in the Precinct from the perspective of the St Leonards South residents.

Greenwich also includes areas to the south of River Road and west of Pacific Highway that are integrally connected to the Precinct. These adjoining areas are closely affected by, and contribute opportunities for, each of the key themes being investigated by the Department for the Precinct – employment, transport, social infrastructure and open space.

There are some aspects of the Interim Statement and the Department's methodology that we would like to draw to your attention for consideration when developing the Land Use & Infrastructure Implementation Plan.

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Co-ordination with LGAs

We are pleased to see that staff from all three of the local government councils that intersect at the Precinct – Lane Cove, Willoughby and North Sydney – are represented in the Project Working Group and Control Groups in order to coordinate future development and infrastructure over the next 20 years.

This is a welcome development. In recent years St Leonards South has borne the brunt of massive increases in residential development in the St Leonards and Crows Nest Station Precinct with, up to now as far as we can see, little corresponding integrative development of facilities that constitute a liveable environment – features such as green spaces, new schools, bike paths, community halls, etc.

This has been and continues to be a major concern for the GCA, both for the Greenwich residents who live in St Leonards South and for the rest of our community which suffers from the knock-on effects on roads, infrastructure, facilities and environment resulting from the lack of integrated and co-ordinated planning.

We **encourage** the Department to seek, through the Council staff on the Project Working Group and Control Groups, detailed input from residents into its investigations and plans. Whilst input from residents in the St Leonards South precinct is important, it is more relevant to consult with residents who are likely to remain in areas that adjoin the proposed rezoned St Leonards South precinct long after the residents of St Leonards South have secured their windfall gains and moved out of the area.

Integrated approach to extend to adjoining and supporting areas

The Interim Statement includes a well-considered package of guiding principles that are directly relevant to Greenwich.

A number of principles that are expressed in intra-Precinct terms will be of greater value and impact if they recognise the need to integrate with adjoining and supporting areas. For example, it is noted on page 9 that the “Precinct lacks a comprehensive cycle network. There is an opportunity to build on the established cycleways, improve connections between transport nodes to create a more connected and safer cycle network” and that “[C]onsideration will be given to improving pedestrian movement...across the Precinct”.

We agree with and support both statements. We would add that the improvement in cycle and pedestrian paths should be designed to create a more connected and safer network both within the Precinct and for movements into and out of the Precinct.

By way of practical example. The Department’s *St Leonards and Crows Nest Station Social Infrastructure and Open Space Study – Background Review (February 2017)* correctly notes in its discussion of pedestrian accessibility (para 2.4.1) that limited pedestrian crossings across the Pacific Highway and Warringah Freeway create accessibility barriers.

However, as River Road is a boundary of the Precinct, it does not highlight that River Road itself is a significant accessibility barrier for pedestrians within a 10 minute walking catchment of both St Leonards station and the new Crows Nest Metro station.

As noted in our submission to the GSC, 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.

This affects the amenity of people living south of River Road and working in the Precinct or travelling via St Leonards station or the Crows Nest Metro. It affects the access of people living and working in the Precinct to open spaces in adjoining areas such as Gore Creek oval.

This practical example and other similar issues are directly relevant to many of the draft Guiding Principles in the Interim Statement, including, for example:

- in the principles headed “Integrated” (page 12), the principles relating to (1) supporting diverse uses, (2) improving walking, cycling and public transport choices, (3) improving east-west links, (4) supporting cycling for all ages and abilities, and (5) setting maximum parking rates;
- in the principles headed “Equitable” (page 13), the principles relating to (1) providing affordable housing, and (2) ensuring adequate social infrastructure; and
- in the principles headed “Liveable” (page 13), the principles relating to (1) ensuring the Precinct is connected to the broader Green Grid and has active connections to Sydney Harbour and its foreshore, and (2) planning a walkable Precinct.

We ask the Department to address the River Road barrier as a specific issue and also to adopt an approach to its guiding principles that recognises their relevance to integration with adjoining and supporting areas as well as intra-Precinct.

The importance of implementation

We recognise that the Interim Statement is intended only as a high level statement of vision and guiding principles, and that the way in which the vision and principles will become real is intended to be explained in the Land Use & Infrastructure Implementation Plan. The development of this Implementation Plan is a critical stage in embedding the success of the vision and principles.

We wish to emphasise the importance of putting in place through the Implementation Plan the systems and resources required to make sure that the plans are implemented as intended.

As noted in our submission to the GSC, we support the GSC’s approach of preparing an implementation plan for all relevant actions, including target outcome, timeframe, KPIs, responsibility, accountability and reporting. We ask the Department to adopt that approach in the Land Use & Infrastructure Implementation Plan.

We are particularly concerned to ensure that the Implementation Plan includes rigorous requirements for transparency in local planning decisions. Our earlier submission outlined the recent experience of St Leonards South where a rezoning could be advocated by council, seeking massive changes to height, density and use, quite outside the LEP, and without any planning or funding for the most significant infrastructure challenge in 50 years, where the rezoning is driven by windfall gains not reinvested in the community, and measured against developer proposals, not community strategy.

Special Infrastructure Contribution

In this context we note the Department intends to develop and exhibit a draft Special Infrastructure Contribution (SIC) plan for the Precinct (Interim Statement, page 6).

We support this in principle. If it is well designed it could be a valuable support for sustainable and enhancing growth in the Precinct and adjoining areas.

We ask the Department to focus in particular on:

- how it is raised, ie to ensure that this is equitable and well directed in terms of allocation of incentives and costs towards the guiding principles, and
- how it is applied, ie to ensure that the decision making process is transparent and fair, and properly considers all impacts, both within the Precinct and in adjoining areas.

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Thank you for the opportunity to comment on the Interim Statement. We would be happy to comment further on any of the points raised in this letter.

Yours faithfully



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