Director, Sydney Central Urban Renewal Department of Planning and Environment GPO Box 39 Sydney, NSW 2001

Over Station Concept Proposal and Environmental Impact Statement [EIS] for the Crows Nest Metro

13 December 2018

I strongly object to the proposed Over Station Development for the Crows Nest Metro station.

My objection is based on the following documents:

- EIS application materials provided in regard to the Crows Nest Over Station Development
- Crows Nest Sydney Metro Site Rezoning Proposal including Appendix A
- St Leonards & Crows Nest Draft Local Character Statement
- St Leonards & Crows Nest 2036 Draft Plan
- Crows Nest Sydney Metro Sites Detailed Urban Design Study (SJB Urban)
- St Leonards & Crows Nest Economic Feasibility Review (SGS Economics & Planning)
- ARUP St Leonards and Crows Nest Station Precinct, Social Infrastructure and Open Space Study

The reasons for objecting are set out below:

Scale and form of Over Metro Development: The height and scale of proposed buildings in this proposal is not in character with the Crows Nest area. The proposed new buildings will tower over the adjoining development and considerably overshadow the Hume Street Park, the only very small, local and treasured open space used extensively by the locals. It is not considered as good planning and it is irresponsible to add large numbers of residents to the area without considering their future recreation and social needs.

The buildings over metro station should be scaled down to maintain good winter sun access to the surrounding streets, parks and to Willoughby Road.

Mix of Uses: The proposed buildings should have more creative mix of uses and incorporate employment opportunities and bring more jobs and essential services into the area and activities **that maintain and improve the social wealth of the community**, such as: medical services; alternative health care; recreational spaces; a performance space; a childcare; a start-up hub and serviced offices.

The buildings over the Metro Station should become a go-to destination that bring people and jobs to the area not another high-rise residential tower development.

The proposed multi-level carpark over the Metro Station will create a bad design precedent for the area. This type of design has been a blight on the character of cities since the 70's and it is definitely not an appropriate design solution for the Crows Nest centre.

Contribution to Public Domain: The over metro station development should create an inviting public square at the entry to the metro station with some of the abovementioned community facilities. This square should have good winter sun access and be sheltered from the winter wind. The new square should open up onto the Hume Park and form a seamless, high quality community friendly, continuous public domain that Crows Nest desperately needs.

The proposal does not fit with the Draft Local Character Statement: The document sets out the background for all planning associated with the St Leonards & Crows Nest 2036 Draft Plan. It projects residential targets for the area of about 10,000 additional dwellings and approximately 20,000 additional residents and doubling existing employment in the area to 70,000 jobs beyond 2036.

In respect to this growth projections the OSD proposal is based on poor planning decisions and it contains two important errors or assumptions that would considerably affect the community in Crows Nest and the future occupants of the proposed development. These are:

Limited Public Open Space: The rezoning application for the site states that there is "Enough high quality open space to support growth in the area", however the North Sydney Council's 2014 report "Recreational Needs Study" found the Crows Nest / St Leonards area had the least open space of any area in North Sydney Municipality. It recommended that the Council as a matter of urgency has to put money to purchase land for open space to fix this problem. The ARUP report also mentions that report.

The existing parks, playgrounds, playing fields etc. provide bare minimum recreation areas for the current residents in Crows Nest and St Leonards and it is unacceptable simply to add additional 20,000 residents to the area and rely on the existing provision of, limited, open space and only making very small adjustments to the existing pocket parks and narrow railway landscape buffers.

The proposed 20,000 new residents which this proposal will contribute to would be entitled to have about 56ha of additional open space provided for them within a reasonable walking distance from their places of residence. This is based on the Department of Planning and Local Government open space rate of **2.83ha for 1000 people**. This open space provision does not include the open space required for the additional future 70,000 workers.

In that regard, the over station development does nothing to alleviate the critical shortage of open space. It could do so however in a small way by abandoning the commercial building on site C and instead devoting this area to open space as a buffer between a station entry on Site A and the Hume Street park.

With the planned major increase in population and employment in Crows Nest /St Leonards area there are no additional parks and outdoor recreation spaces planned as part of the State Government 2036 strategy.

The ARUP St Leonards and Crows Nest Station Precinct Social Infrastructure and Open Space Study states that the recreation facilities are currently at capacity and there are few opportunities for creating new public parks and squares for this planned high growth area.

Planning is about balancing economic, environmental and social needs of the community. This proposal is completely off balance into the economic sphere and it should be rejected and scaled down to achieve better balance of the environmental and social community needs.

The scale and the mix of uses proposed for the OSD should be reconsidered based on the existing availability of the recreation and social infrastructure in the area and to enhance and contribute rather than diminish the quality of the public domain.

The NSW Government should seriously listen to the community concerns and reject this inappropriate proposal.