

Tuesday, 23 September, 2025

Ms Bronwen Sandland

Assessment of St Leonards South Precinct Contributions Plan (2025)

Independent Pricing and Regulatory Tribunal

PO Box K35 Haymarket Post Shop

SYDNEY NSW 1240

Sent to: Bronwen.Sandland@ipart.nsw.gov.au

Dear Ms Sandland

Assessment of St Leonards South Precinct Contributions Plan (2025)

I write in relation to IPART's review of the St Leonards South Contributions Plan (SLS CP).

Urban Taskforce Australia recognises that IPART's role is to review the proposed increase in funding sought by Lane Cove Council and to determine whether it is reasonable.

However, we believe that some of the assumptions underlying the SLS CP are questionable and that the consequent cost to homebuyers is higher than it needs to be.

This specifically relates to two areas of discussion: transport and open space.

Transport calculations

The report titled *St Leonards South Precinct Section 7.11 Development Contributions Plan* predicts that the daily traffic will increase from 1,100 to 8,400 vehicle trips per day.

This assumes that residents will be heavily reliant on vehicles, however this precinct is directly connected to St Leonards Rail Station and Bus Interchange, and a short walk away from the Crows Nest Metro Station and Wollstonecraft Rail Station.

The assumption that traffic movements will increase eight-fold ignores the location of the precinct and the high likelihood that residents will use other means of travel.

Recommendation 1: For precincts located in close proximity to transport, the number of vehicle trips should be discounted in infrastructure funding calculations.

Open space calculations

The Council projected that local open space would mean that it had an allocation of 0.79 ha per 1,000 new residents, based on five areas of open space:

- 0.5-ha rail plaza;
- 1-ha Newlands Park
- 3.3-ha Gore Hill Oval
- 2.1-ha Smoothey Park
- 0.09-ha Propsting reserve

although it downplayed the accessibility of Gore Hill Oval:

"However, access to this open space is frustrated by potential users having to cross the busy Pacific Highway."

This highway that is crossed every day by thousands of Lane Cove Council residents without issue and we object to the suggestion that this is an impediment to the use of this public open space.

A desktop analysis undertaken by Urban Taskforce has identified 14 parks, plazas, or facilities within a 15-minute walk.

Further, within 15-30 minutes of the precinct there are an additional 26 parks, plazas, or facilities, and at least nine more within 30-40 minutes. These are located not just in Lane Cove Council, but in Willoughby and North Sydney, and provide a variety of options. Most of these were not considered when determining access to open space and this represents a methodological shortcoming of this analysis that needs to be reconsidered.

The amount of public open space within near proximity to St Leonards South is a luxury not enjoyed by other areas of Sydney and the over-indulgence of Council on this matter is hindering critical housing supply.

A full list of these parks and facilities we identified can be found in the Appendix.

Recommendation 2: Open space calculations for precincts should not be limited to the lands within or immediately adjacent to the site but should include open space within a reasonable walking distance.

Recommendation 3: Open space calculations should consider both local and regional open space.

Apportionment

The IPART report states:

"The open space provisions are designed to benefit the incoming residents within the precinct. We consider it is appropriate to apportion all costs to residential development, and within the precinct only."

While the development is the justification for the new space, the report appears to have not taken into consideration the following factors:

- New parkland is likely to be used by residents outside of the precinct, much as Gore Hill Oval and other such facilities are.
- Employees of businesses located along the Pacific Highway will almost certainly make use of a new park during lunchtimes or other breaks.
- Similarly, community facilities will be used by various members of the community, not just the residents of the precinct.

Accordingly, some thought should be given to determining the appropriate level of apportionment, given that there will undoubtedly be benefits to those outside the precinct arising from the delivery of new open space and community facilities.

Recommendation 4: Apportionment should take into account the various people not resident of the precinct who may take advantage of new parks and facilities.

Should you wish to discuss any aspect of this submission further, please call [REDACTED]

[REDACTED]
[REDACTED]

Yours sincerely



Appendix: A list of local parks and facilities within walkable distance of the precinct.

Appendix: A list of local parks and facilities within walkable distance of the precinct

Distances from current 7 Holdsworth Avenue (at a leisurely 4.5km/hr walking pace):

Gore Hill Oval and Cemetery	300m	05 minutes
Unnamed pocket part at 44 River Road	300m	05 minutes
Wadanggarri Park	350m	05 minutes
Newlands Park	400m	06 minutes
The Wollstonecraft Club (outdoor bowling)	450m	06 minutes
Propsting Reserve	500m	07 minutes
St Leonards Rail Plaza	500m	08 minutes
Friedlander Place	550m	08 minutes
Lithgow Street Road Reserve	600m	09 minutes
Greendale Park (connected to Smoothey Park)	650m	09 minutes
Mitchell Street Plaza	600m	10 minutes
Balfour Street Park	700m	11 minutes
Smoothey Park	750m	11 minutes
Wollstonecraft Station Park	750m	11 minutes
Gore Cove Reserve (connected to Smoothey Park)	1.1km	16 minutes
Northern Suburbs Tennis Association	1.2km	17 minutes
Holloway Reserve (connected to Smoothey Park)	1.3km	18 minutes
Ernest Place	1.2km	19 minutes
Naremburn Park	1.3km	19 minutes
Harry Howard Reserve	1.3km	20 minutes
Ronald Park	1.4km	21 minutes
Bob Campbell Oval	1.4km	21 minutes
Berry Island Reserve	1.5km	21 minutes
Jago Street Reserve	1.6km	22 minutes
St Thomas Rest Park	1.6km	23 minutes
Badangi Reserve	1.7km	23 minutes
Gore Creek Reserve Bush Trail	1.7km	23 minutes
Gore Creek Walking Track	1.7km	23 minutes
Bayview Park	1.7km	24 minutes
Oyster Cover Reserve	1.8km	24 minutes
Brennan Park	1.7km	25 minutes
Gillanders Reserve	1.7km	25 minutes
Hallstrom Park	1.8km	25 minutes
Artarmon Park	1.8km	26 minutes
Shell Park	2.0km	26 minutes
Peace Park	1.7km	27 minutes
Fred Hutley Reserve	1.9km	27 minutes
Lane Cove Bushland Park	1.9km	27 minutes
King Street Reserve	2.0km	29 minutes
Lane Cove Golf Club (including the new sports centre)	2.0km	29 minutes
Leemon Reserve	2.3km	31 minutes
Willoughby Leisure Centre	2.2km	32 minutes
Greenwich Baths	2.4km	33 minutes
Waverton Park	2.4km	33 minutes
The Diddy – Longueville Sporting Club	2.3km	34 minutes
Mary Carlson Park	2.6km	35 minutes
Greenwich Sailing Club	2.6km	36 minutes
The Coal Loader	2.6km	36 minutes
Manns Point	2.7km	37 minutes

St Leonards Station	400m	7 minutes
St Leonards bus interchange	400m	7 minutes
Wollstonecraft Station	800m	12 minutes
Crows Nest Metro Station	850m	13 minutes