

22 May 2012

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**MAJOR PROJECT 10\_0165**

**PROPOSED RESIDENTIAL DEVELOPMENT WITH BASEMENT PARKING -  
5 WHITESIDE STREET AND 14-16 DAVID AVENUE, NORTH RYDE**

Whilst I do support appropriate redevelopment of the above site, I **object** to this proposal. The reasons for my objection are detailed below.

**1. High-density development at this location is inconsistent with both local and State planning instruments.**

**1.1 Inconsistency with local planning instruments**

The project exceeds the height and density provisions of the R2 Low Density Residential zone under Ryde Local Environmental Plan 2010.

Page 2 (Executive Summary) of the project's Preferred Project Report cites the Draft Ryde Housing Study 2010, noting that the project site is within the area in which it is recommended to:

"Explore the introduction of transition areas fronting Epping Road to allow for a mix of housing styles including **medium density residential housing** to cater for the increasing student and worker population from the University and within Macquarie Park Corridor. Epping Road acts as a barrier, separating Macquarie Park from the residential areas to the south. However the southern side of Epping Road still has relatively good access to the employment, retail, entertainment and public transport opportunities within Macquarie Park, as well as good access to the nearby Lane Cove National Park. The area south of Epping Road also has good access to the regional road network" (my emphasis).

Contrary to the proponent's view that the Draft Ryde Housing Study helps to justify the project, this recommendation from the Study clearly refers to exploration of **medium density** residential housing rather than the high density residential development proposed by the proponent.

I am not averse to over-riding local zoning in cases where a proposed development is strongly supported by State strategies such as the Metropolitan Plan for Sydney 2036. However, *high density* development at this location is **not** consistent with State planning instruments, as detailed below. Therefore over-riding of the current low-density residential zoning is not justified in this case.

## **1.2 Inconsistency with State planning instruments**

The proponent cites consistency with state planning policies as the justification for the permissibility of this development.

However, **intensification of the site to anything above medium-density is not directly consistent with many of the planning policies used to justify the project.** These inconsistencies are detailed below.

### **1.2.1 Metropolitan Plan for Sydney 2036**

This Plan defines Macquarie Park as a 'Specialised Centre' and the Preferred Project Report (p21) uses the following as part of the justification for the project:

'A key action of this plan is the aim to locate 80 per cent of all new housing within walking distance of centres of all sizes with good public transport' .

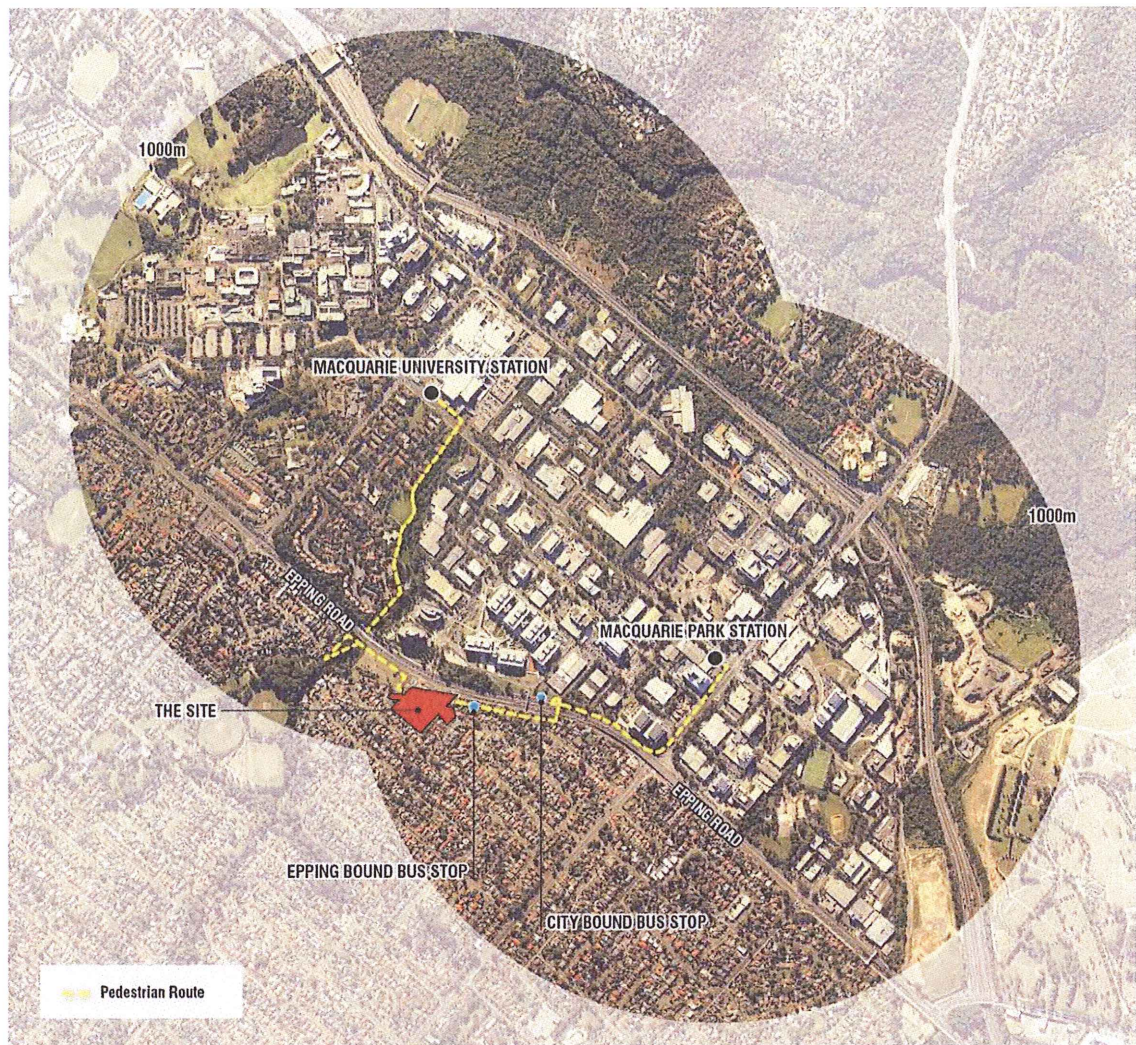
The Metro Strategy (p60) describes the walking catchment of a centre as:

'the area from which people can be expected to walk to the centre's shops, services and public transport. It is generally measured as a radius from a central point in the centre – often a public transport hub such as a train station.'

Page 258 (Appendix D) of the Metro Strategy defines the walking catchment of Specialised Centres (eg Macquarie Park) as having a radius of approximately 1 kilometre.

This walking catchment is illustrated on Page 19 of the Preferred Project Report as follows:





The site is within the walking catchment of Macquarie Park train station and Macquarie University train station, as the site falls within, but close to the boundary of, a 1km radius measured from the train stations.

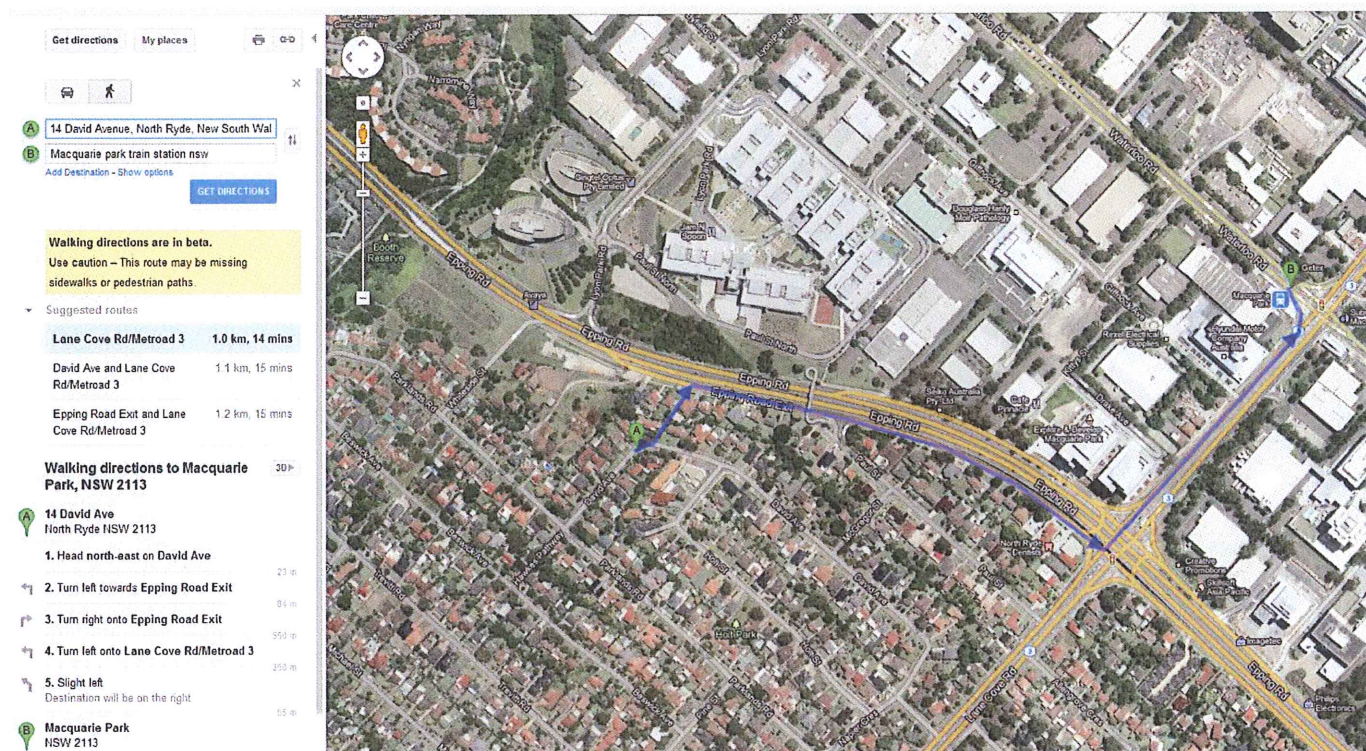
However, the Preferred Project Report grossly understates the actual walking distance (ie the pedestrian route) to these two stations. Page 34 of the Preferred Project Report states that:

‘The pedestrian route to Macquarie University station is calculated to be approximately 820m, while the distance to Macquarie Park station is approximately 760m. As such, the development is **well within 1km walking distance** to the train stations’ (my emphasis).

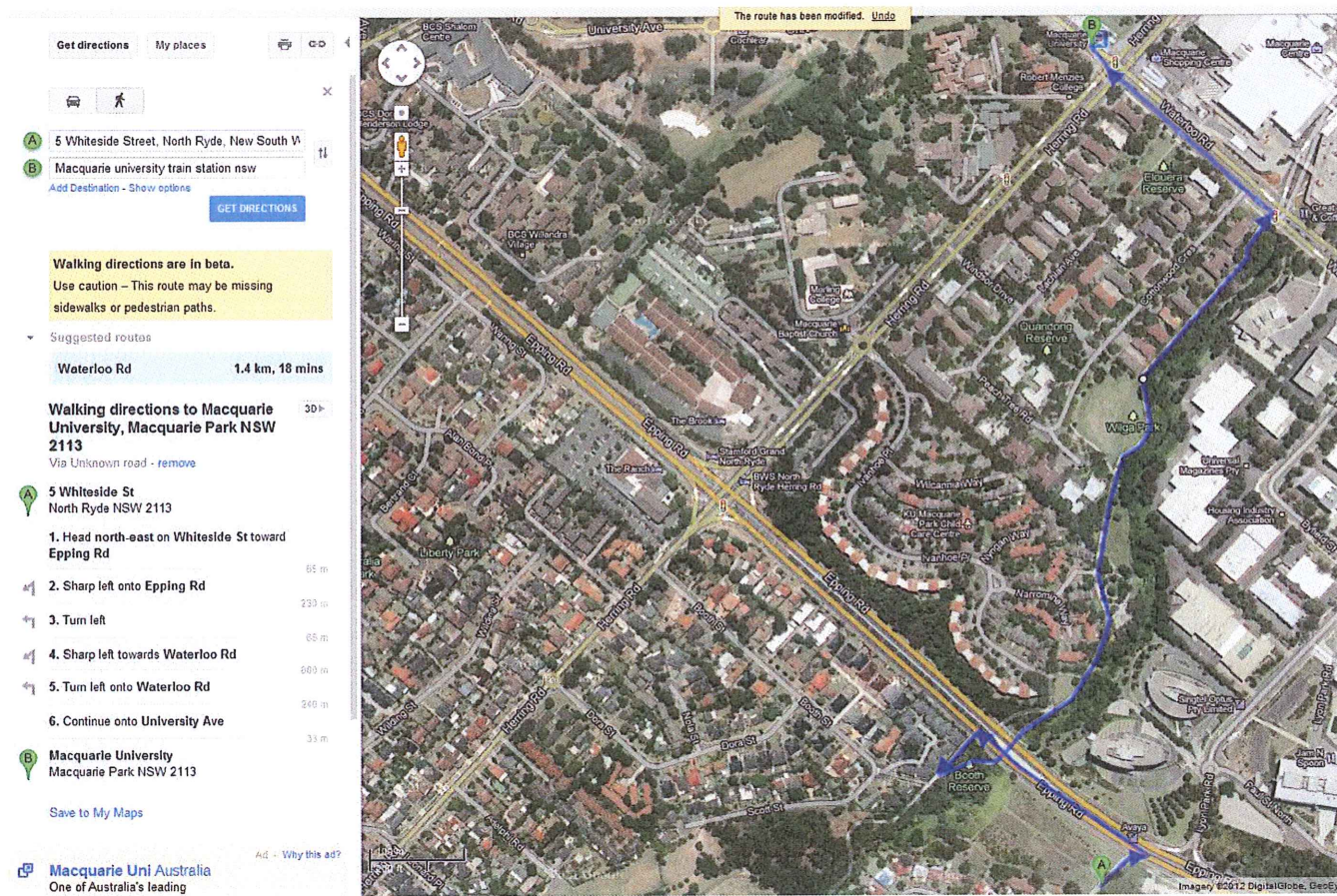
This is both inaccurate and misleading.

The map below shows the pedestrian route from the easternmost (ie closest) part of the site (David Avenue) to Macquarie Park station. The walking distance is 1km, not 760m as stated by the proponent.





The map below shows the pedestrian route from the westernmost (ie closest) part of the site to Macquarie University station. The walking distance is 1.4km, not 820m as stated by the proponent.





Therefore while the site falls within the 1km radius ('as the crow flies' ) to these stations, the actual pedestrian routes show that the site, while within the walking catchment, is clearly in the **outer parts of the walking catchment**.

The Metro Strategy section 'Appropriate Location for Housing' (page 107) states that:

'larger local and Strategic Centres...are suited to medium-high rise medium-high density, **with some low rise medium density in the outer parts of the walking catchment**' (my emphasis).

It is clear from the Metro Strategy that this site, being in the outer part of the walking catchment of a Specialised Centre, is not an appropriate location for high-density housing such as that proposed by this project.

Unlike the proposed Allengrove development on the corner of Epping and Lane Cove Roads (MP10-0037), which is an easy walk of less than 400m to Macquarie Park train station (and has been refused planning consent) **consistency with the Metro Strategy cannot be used as a justification for high-density development at the Whiteside Street location**.

#### 1.2.2 Planning Guidelines for Walking and Cycling (2004)

This State planning guideline states that:

'Potential walkability is defined by a circle of radius 400m or 5 minutes walk around a centre, and 800m or 10 minutes walk around a centre that includes a public transport stop. Actual walkability is defined by drawing a line along all streets up to 400m or 800m distance and by identifying all sites accessible to that line' (Section 4.3, page 19).

This again supports the conclusion that the Whiteside Street development **cannot be considered to be within easy walking distance of major transport hubs**, as the walking distance to the major train stations from the project site is **greater than 800m**. This further supports the conclusion that the Whiteside Street project location is in the outer part of the walking catchment and therefore is not suitable for high-density development.

#### 1.2.3 Draft Centres Design Guidelines (2011)

The proponent cites the following principle from these Guidelines to help justify the project (Environmental Assessment, Executive Summary, page 6):

'Concentrate the highest **appropriate** densities of housing with jobs, services and public facilities in integrated, mixed-use centres within an acceptable walking distance of major public transport nodes, such as rail stations and high-frequency bus routes' (my emphasis).

The Metro Strategy states that **the highest appropriate density for sites in the outer walking catchment is low-rise, medium density**. Therefore the Draft Centres Design Guidelines cannot be used to justify high-rise, high-density development at the project site.

The above inconsistencies with State planning policies undermine the basis on which the proponent aims to justify this project. **The site is clearly unsuitable for high-rise high-density residential development and the project should therefore not be approved.**

## **2.0 Summary of objections**

In summary, development of high density housing at this location will result in an isolated development that is inconsistent with surrounding low-density land use, with residents of the new development relying heavily on use of the local road network.

**Basically, the Whiteside site is just a bit too far from the train and the shops to justify high density redevelopment.**

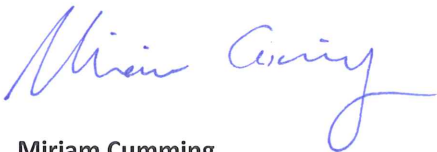
The fact that the quiet residential streets surrounding the site may need to undergo major parking restrictions in order to accommodate the development should also signal to the assessors of this project that high density development is not appropriate for this site.

**Appropriate medium-density redevelopment of this site would be consistent with State planning policies and targets, would help meet housing targets and provide some consolidation of the Macquarie Park corridor in line with government strategies, and would provide an acceptable outcome in protecting the amenity of local residents in the surrounding low-density residential area.**

If you have any questions regarding this submission please contact me on 0418 474 264 or [miriam.cumming@hotmail.com](mailto:miriam.cumming@hotmail.com).

No reportable political donations have been made in the previous two years.

Yours sincerely,



**Miriam Cumming**

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