

18 August 2011

Major Projects Assessment
NSW Department of Planning & Infrastructure
GPO Box 39
Sydney 2001
Attention: Jane Flanagan
Via email: plan_comment@planning.nsw.gov.au

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 Environmental Assessment 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

Page 5 (Executive Summary) of the project's Environmental Assessment states that:

"While the project exceeds the height and density provisions of the R2 Low Density Residential zone under Ryde Local Environmental Plan 2010, the proposed intensification of the site is directly consistent with the principles of a range of broader strategic planning considerations, such as the NSW State Plan 2010, Metropolitan Plan for Sydney 2036, the Draft Inner North Subregional Strategy, the Metropolitan Transport Plan 2010 and Integrating Land Use and Transport – A Planning Policy Package 2001."

This statement is incorrect, as intensification of the site to anything above medium-density is **not** consistent with many of the planning policies mentioned above. These inconsistencies are detailed below.

1.2.1 Metropolitan Plan for Sydney 2036

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

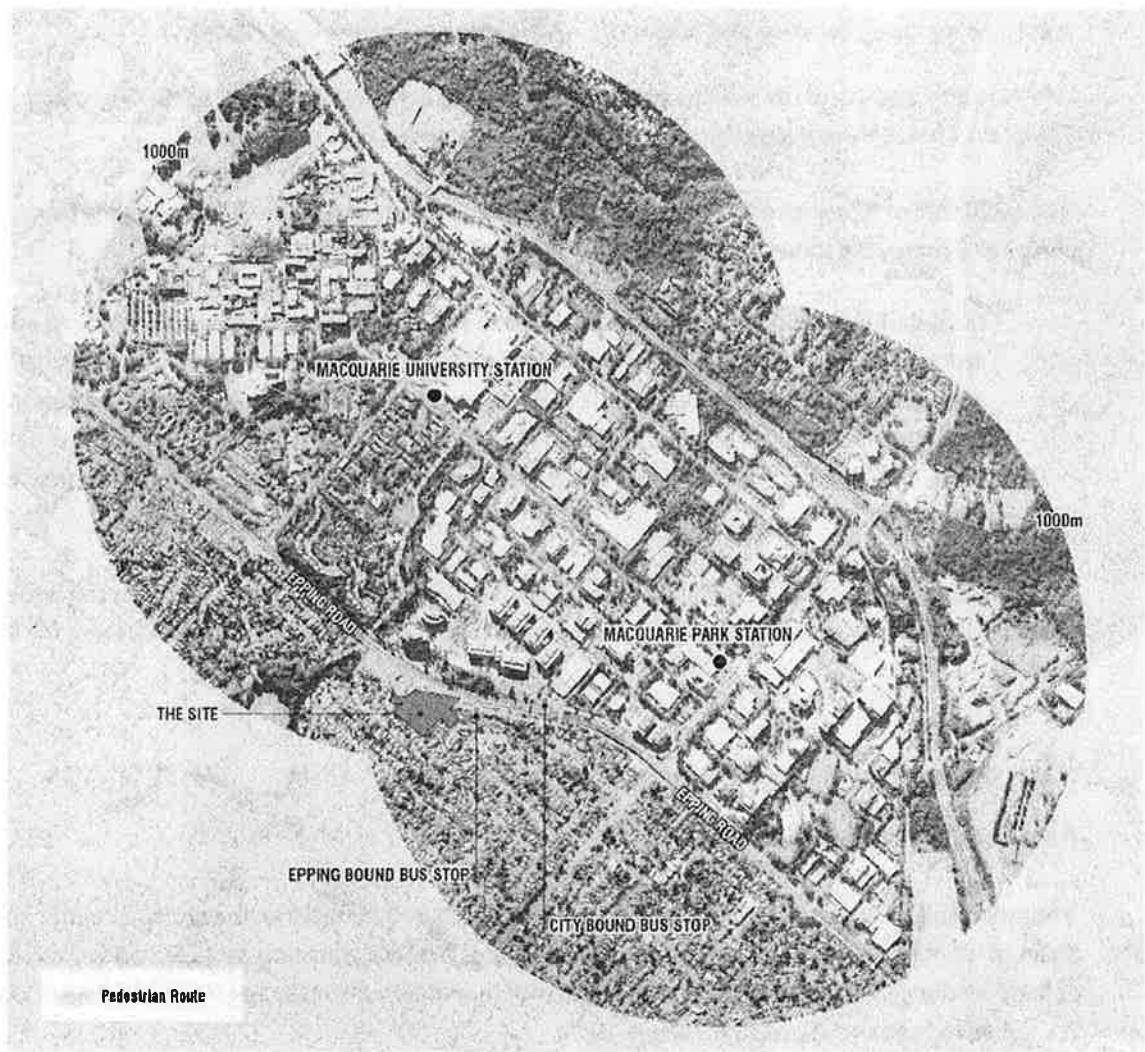
'A key action of this plan is the aim to locate 80 per cent of all new housing within walking distance of centres of all sizes with good public transport' .

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 3 of the Environmental Assessment as follows:



What the proponent fails to mention is that whilst the site is within the 1km radius of the major train stations of the Specialised Centre, the actual walking distance to these stations is over 1km and walking to the closest station takes about 20 minutes at a brisk walk. Therefore the project site is clearly in the **outer 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 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, **consistency with the Metro Strategy cannot be used as a justification for high-density development at the Whiteside Street location**.

1.2.2 Integrating Landuse and Transport – A Planning Policy Package (2001)

The 'Housing' section of the policy document *Integrating Land Use and Transport – Improving Transport Choice – Guidelines for planning and development* (p34), states that:

'The proximity of housing to transport services is an important determinant in improving transport choice and managing travel demand in urban areas. In general:

- **households should be within an 800–1000 metres walk of an existing or programmed metropolitan railway station** or equivalent mass transit node, served at least every 15 minutes, or within a 400 metre walk of a bus route, accessing a metropolitan railway station, or equivalent mass transit node, served at least every 20–30 minutes — in denser urban areas with higher frequency services, the walking catchment may be 600–800 metres' (my emphasis).

The project location is well outside the 800-1000 metres actual walking distance from the two major railway stations. **Consistency with this planning package cannot be used as a justification for this project.**

1.2.3 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 **significantly greater than 800m**. This further supports the conclusion that the Whiteside Street project location is in the outer walking catchment and therefore is not suitable for high-density development.

1.2.4 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.**

Development of high density housing at this location will result in an isolated development that is completely inconsistent with surrounding low-density land use.

Appropriate medium-density redevelopment of this site would be consistent with State planning policies and targets, and would provide an acceptable outcome in protecting the amenity of local residents in the surrounding low-density residential area.

2. The Environmental Assessment contains insufficient detail on how the local road network will be protected from unacceptable traffic impacts.

The proponent has revised the proposed traffic access to the site in order to protect the local road network from unacceptable traffic impacts.

Residents of the proposed development will only be able to turn left into the development and right out of the development, ie the site will only be able to be accessed from Epping Road, not from Parklands Road.

While this solution is workable in theory, **there is limited detail on how the left-in, right-out access will be enforced.**

Lack of enforcement of the left-in/right-out access will lead to non-compliance, with residents turning left out of the site onto Parklands Road and utilising local roads to ensure a shorter trip to their destination.

The left-in/right-out access is fundamental in protecting the amenity of residents in the surrounding low-density residential areas.

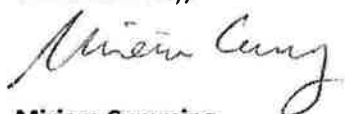
The access into and out of the site must be designed so that residents are **physically constrained** from turning left out of the site or turning right into the site, by way of physical barriers. A simple 'no left turn sign', for example, will not be sufficient to enforce the access restrictions.

In addition, the proponent's suggestion of not granting visitor parking passes to residents of the new development must be written into any conditions of consent, as more parking on local streets will further congest these narrow streets.

If you have any questions regarding this submission please contact me on 0418 474 264 or miriam.cumming@hotmail.com.

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

Yours sincerely,



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