

26 May 2019

Dear Panel

There are several issues with the St Leonards South Planning Proposal which I will refer to as the "Rezoning Plan" or the "Plan". Accordingly, I would like to express my opposition to the Plan. The Plan will have negative results for the area and for the community, due to a number of reasons including traffic and transport which this paper will discuss.

Recently several excessive high density residential developments were approved and constructed in the St Leonards and adjoining areas with more on the way. In St Leonards alone, excluding this proposal, there are over 4,000 new units already approved which equates to around 8,500 or 9,000 new residents, an increase of around 300% over current levels. This excludes the RNS hospital development!

This is a massive amount of development for one small area. Any further increases in high density residential development are not justified due to a severe lack of infrastructure, services, transport and excessive traffic. The community is feeling the effects and the impact of reduced amenity and increased traffic.

My main concerns with this rezoning in relation to Traffic and Transport are as follows:

A. Cumulative traffic impacts

Assessing the traffic impact of the proposed rezoning of St Leonards South needs to consider that the area is located at a key juncture of a vital set of link roads (eg the Pacific Highway, River Road, Herbert Street and Falcon Street) accordingly it is essential to accurately assess the impact of this rezoning plan on immediate streets as well as across the network now and when the other proposed developments are completed in 2 or 3 years' time. Consideration and due weight should also be given to the need for quick and easy access to the RNS Hospital via these roads.

The traffic assessment reports on the Rezoning Plan had a number of shortcomings including:

- not taking a cumulative assessment of the Rezoning Plan on the whole area, they simply concentrated on the immediate near streets. Even the "St Leonards Cumulative Transport and Accessibility Study" report by PTC (provided by Council's assessment report) only took 4 developments into account as being cumulative, whilst ignoring the many other developments in the area.
- the reports were not comprehensive in considering significant important aspects, for example the PTC Report concentrated on pedestrian traffic only and ignores traffic levels that directly impact the rezoning of the area and its viability. The new report did not update any data.
- no consideration was given to the effects of the likely acceptance or adoption of the proposed changes by the RMS. For example, proposing changes to traffic management on

Falcon Street or Pacific Highway are not likely to be accepted by RMS since they will impact other flows in the network. As such, RMS is unlikely to accept the proposed changes.

- most of the traffic studies in assessing the cumulative impact of other developments relied on analysis from reports submitted by the developers which have limited scope, pre-agreed objectives and have been criticised for their own short comings.
- no consideration was given to the fact that the area has a wide catchment. River Road is a major feeder road for the Lower and wider Northern side of Sydney. At the same time, the Pacific Highway has a wide catchment and covers a major hospital (RNS) and a growing industrial park. This additional congestion will adversely impact emergency vehicles approaching RNS Hospital.
- cumulative impact of the following high density developments (listed below) were not included in the Rezoning reports, for example the impact of the additional residents and additional traffic on the already heavily congested River Road, Berry Road, Greenwich Road and Herbert Street:
 - Residential towers at Greenwich Hospital,
 - Two large developments on Greenwich Road,
 - RNS Hospital site developments,
 - The 6 large high density developments on the Pacific highway (some of which are at completion stage),
 - High density developments on River Road,
 - Other high density developments from the adjoining councils.

The majority of the developments listed above are already approved or in the pipeline and cannot be stopped, while the St Leonards South rezoning is not final and can be stopped or reduced, to leave capacity to cater for the traffic from organic and other known growth.

Currently there is already significant traffic congestion around St Leonards, it is chaotic and very dangerous to exit out of streets on to River Road or the Pacific Highway. If this rezoning proceeds it will exacerbate a dangerous problem. There will be a huge increase in both pedestrian and motor vehicle car traffic.

Council's own report notes that traffic modelling indicates "... that further increases in density may not be supportable in the precinct under currently-known traffic planning policies". The report also notes that "Substantial traffic measures, such as new traffic lights for Park Rd (or Portview Rd) on Pacific Hwy, would be necessary and there is no basis for confidence that RMS would agree to such changes to the regional traffic flow".

Even though current thinking is that developments near travel hubs require less vehicle amenities, however the St Leonards area is an exception given that it is more oriented towards families who require cars for sports/activity drop offs and big shopping for families.

B. Plan for improved active transport connections

The St Leonards train station is already well above capacity, the figures from Sydney Trains show St Leonards at 141% capacity. Hence, the rail network will not cope with additional commuters. The Crows Nest Metro station is at least 5 to 6 years away while this rezoning will be finished in around 2 years.

At St Leonards train station, at peak time, currently there is standing room only on trains. In catching the train to the city for work, I am very often forced to stand on the stairs as passengers force their way on the congested train. Also, at times I am forced to stand in the vestibule area on the train and then am forcibly pushed/squashed on to the other door of the carriage, again due to overcrowding on trains. Currently the frequency for trains to the city is every two minutes (peak time) and any delays on the train system causes the issue to be much worse. If this proposed Rezoning Plan is approved along with the increase in population from the other already approved high rise developments, St Leonards train station and the traffic situation around the area will be catastrophic, all the way to the City.

The problem will be exacerbated at the end of May 2019 when the Chatswood Metro will open. More than 4,500 commuters from the Northwest will be added to the train network via St Leonards, these figures are based on internal modelling forecasts. If the train network is already at 141% then the trains won't cope. This doesn't even include the additional demand from developments in North Sydney and Willoughby Council side etc. Hence a lot more commuters to come.

The new Metro and train stations are located on the other side of the Pacific Highway which has restricted pedestrian access from the precinct and any additional pedestrian access across the Pacific Highway will impact traffic flow on already congested roads.

Therefore, this rezoning is not appropriate per the 2036 Plan and does not have the elements of a TOD with the already over stretched rail network and other services and infrastructure thus impacting amenity.

In short, the proposed rezoning is not good planning and will have detrimental impact on the area and residential amenities in St Leonards and should therefore not be supported.

Thank you for considering my submission.

Your faithfully

Arlette Jubian
