

28th November 2018

Re Channel 9 development Mod 2

Lodgement of concerns

ipcn@ipcn.nsw.gov.au

Dear Commissioner,

I am owner at [REDACTED] and attended the meeting on Tuesday 27th November. I am writing to lodge my concern over the Mod 2 proposal as I could not speak on the day and my continued support for the previously approved design.

My primary concerns are:

- 1) the number of units (density) and height for its location
- 2) impact of the most recent design on traffic specifically on Richmond and Artarmon Avenues.
- 3) Reduced Public Benefit
- 4) Flawed Justification

Channel 9 site is isolated from key amenities and mass transport options - it is not suitable for high density development. The nearest railway station is a 1.5km walk up and down hills, the nearest supermarket is 1.3km and only reached indirectly via Naremburn or via Frenchs road, little medical facilities, retail & other amenities within walking distance of the site. Residents will be dependent upon car transport to travel to services and amenities, and the only transport option which is the bus on Willoughby road is already overcrowded.

I have no doubt this site will house families such as mine that will need to run kids to and from school, after school activities, work and various weekend commitments, often travelling multiple times a day in and out, in and out of the site. The site's isolation will result in higher traffic movements per residence than the level provided by Roads and Maritime Services (RMS) guidance since the RMS' level is based on sites that are not as isolated. These issues were recognised by PAC in reaching their determination. Fact - traffic on local roads and specifically on Artarmon and Richmond will be increased due to the proposed changes as a result of an increase in 60 units and the reduction of non-residential of 200m².

Along with increase in density which will mean increase in traffic, a key concern is the change in design (ie removal of Scott street) in Mod 2 which takes the site from having 3 entry/exit points to have only 2 entry exit points. Along with this the access road on Richmond Avenue has been moved down the street.

What is my concern here?

The change in location of the Richmond Ave access road down towards the end of the cul de sac and the reduction of entry/exit points from the site will result in:

- More of the street being impacted by a large increase in travelling cars versus the approved design that had minimal impact.

- More cars will be using Richmond Ave (which is currently a quiet cul de sac) given the Artarmon entry/exit is now only a left hand turn out and left hand turn in . In fact at least 50% + of residents will want to be turning right onto Artarmon Road and travelling to Willoughby road lights and will use Richmond Ave , rather than the Artarmon Rd exit - as with the roundabout shared at the recent meeting at the intersection of Richmond and Artarmon this would mean this would be the quickest way to travel east down Artarmon road.
- More cars will be entering Richmond Ave to access the site given they will not be able to turn right into the site off Artarmon road when travelling from the west, which will also be a popular direction given it is the direct route to the station.
- I have two daughters that walk to Willoughby Public School and Willoughby Girls high and they access school via Edward Street. There are no provisions in plans in for how all the children from the development site, Richmond Ave, Chelmsford Ave for example will cross Artarmon road safely with 15 % increase in traffic in what already is a busy road. With no school bus available for this 1.5 km walk getting them there safely is of great concern as the school foot traffic will increase. The current refuge island sits in the only reasonably safe spot to allow a good visual for children along the road before hills and corners obstruct their views.

Reduced Public Benefit

The proponent and Department suggest that the proposed increase in unit numbers is justified by the proposed “Voluntary Planning Agreements” of \$1.5M in tied expenditure.

However the proposed “Voluntary Planning Agreements” of \$1.5M is tied to expenditure directly related to the development with little net benefit to the community.

- \$0.5M on Willoughby & Artarmon Roads in an effort to mitigate the traffic impact caused by the development;
- \$1M to upgrade Walter St Reserve that will be largely to the benefit of residents of the new development.

In addition there is a reduction in community benefit since:

- The public loses the benefit of the \$5M from the sale of Scott St property;
- The proposed VPA is less than the \$4M VPA offered to WCC as part of the approved development plan.

Flawed Justification

- The Department of Planning & Environment (**Department**) fails to justify the increase in unit numbers.
- The Department provides 6 reasons to justify the Proposed increase (see section 6.2) each are either incorrect or irrelevant:
 1. Building heights are no greater than the existing approval
 - * incorrect, building heights are increased, there are more storeys and greater mass
 - * the maximum headline RL heights are maintained via subterranean construction
 - * building 8/9 now 3.2m higher than in approved concept plan
 2. Built form on the site edges provides a transition to the neighbouring low scale
 - * incorrect the transition on the edges are worse than in the approved scheme, the heights are higher, there is less set-back and greater density closer to the low scale

residential

3. Over shadowing is improved
 - * minor improvement but irrelevant to the question of the number of units and housing density
4. Open space is improved
 - * total open space is reduced, green open space is marginally improved but at the cost of reduction in internal roads and worsened parking issues;
 - * there is no reduction in built form
5. Traffic generation remains acceptable
 - * this is isolated site where residents are dependent upon cars
 - * the 15% increase in apartment numbers will increase traffic impact by at least 15%
6. Public benefit from the Voluntary Planning Agreement
 - * the proposed Voluntary Planning Agreement is not for the public but targeted to the needs of the development;
 - * the public benefit is significantly inferior to that of the approved development

In conclusion based on the above and the numerous other factual concerns raised at the meeting I request that the Independent Planning Commission:

- 1) reject the increase in unit numbers, and maintain the limit set by PAC and the Land & Environment Court,
- 2) reduce building height and storey levels to that set by PAC & the L&E Court.

Nothing has changed to support the request to add another 60 units to the site, this is not of public benefit, it is a pure commercial decision to improve a return on the investment for the developers whom will be long gone when the current residents have to live with poor design and overcrowding in an isolated site.

Yours sincerely,

Andrew McInnes

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