

27 May 2019

Independent Planning Commission
Submission on Planning Proposal for St Leonards South Residential Precinct

Dear Madam Chair and fellow Commissioners

Thank you very much for the opportunity to speak at last Monday's Public Meeting.

The following are the notes from which I spoke on the day. Acknowledging that in view of my allotted slot as speaker being number 41 of 43, as well as speaking at the traditional 'graveyard' time of early afternoon, I did not labour all the points raised in the interests of both yourselves and others in the room. This choice was made easier by the fact that more considered and eloquent speakers had already covered many of the points I had intended to raise on the day with much greater capability than I could ever hope to offer.

By way of background my family are long-term local Greenwich residents who are very concerned about the increased traffic resultant from the St Leonards South Plan (SLS), and the constraints on egress we are dealing with in respect of this site.

Existing Traffic Problems

I, together with the many other local residents and commuters from further afield, already experience bottlenecks when travelling to and from my home each day.

Anyone challenging this view has simply to go and sit in the traffic jams evident each morning peak period when trying to turn out of Greenwich Road to River Road, or Greenwich Road to the Highway or River Road through Shirley Road to the Highway amongst others such as the corresponding access points to Riverview, Northwood and Longueville.

Turning in and out of Longueville Road to Epping Road (another impacted 'hot spot') is also horrendous, and the traffic during school travelling times can similarly be problematic due to the necessary reduced speed limits in place.

This view was shared by earlier speakers without challenge.

Please note also that the current issues do not yet reflect any impact from the major residential construction projects already in progress in the area. The most obvious of these are the big 3 being Mirvac, Landmark and JQZ which add 1,900 new dwellings. There are also other impacts to be considered such as further development of the Royal North Shore Hospital site, and the old ABC studios at Gore Hill, amongst others such as the proposed development of the nearby Greenwich Hospital which is just along River Road.

All of these would be expected to further compound the current issues with traffic, and before the proposed SLS site incrementally impacts.

Background on the SLS site

The reality of the SLS site is that there are only 2 ways to exit or enter. The choice is either:

- i. The Pacific Highway; or
- ii. River Rd

Both are very much constrained and any increases to their traffic levels will have flow-on impacts.

The Highway is a primary road artery for the entire North Shore and at any presumed entry point for the SLS site there will be the complications of existing congestion and poor traffic flow. Additionally there is the particular challenge presented by the neighbouring Royal North Shore Hospital, noting especially that the proposal for traffic to exit the SLS site via Berry Rd places such traffic in direct line with the facing Reserve Rd opposite....being of course the primary entry and exit for emergency vehicles to the hospital which regularly and necessarily navigate that intersection with lights and sirens on.

Complicating emergency service access points by further development would seem to be somewhat reckless and potentially very dangerous. (There is a similar issue with the fire engines station in the impacted area facing Shirley Road).

Exiting traffic also has to deal with the pedestrians crossing the highway at this point which constrains the time available to limit the impact of delays on the Pacific Highway corridor.

The only alternative, River Rd to the south of the site, is also a major arterial in that it services the Lower North Shore and acts as a conduit for traffic travelling further to and from the west. As with the Highway, River Rd is already heavily congested and other residents have spoken about the nightmare experiences in egressing from the impacted SLS site even now.

There is with this road already existing and recognized choke points such as school zones and the exacerbation caused by lanes on River Rd reducing at several points from 2 to 1.

Hence how will it cope with the expected increase of 4,800 new residents?

Expert Advice

With regard to these 2 options I would invite the Panel to carefully consider the written advice of the Roads & Maritime Service (RMS) who state in their letter to Council dated 26 February 2018 that, and I quote

“Until the Traffic and Transport Impact Assessment for the St Leonards / Crows Nest Precinct is finalized, Roads and Maritime considers the modelling / analysis undertaken for the subject planning proposal as inadequate and limited in scope, identifying the traffic impacts associated with the proposed development and not the cumulative traffic impacts associated with the proposed development and full development uplift in the Planned Precinct.

This approach potentially limits consideration of traffic impacts and attributes potential traffic infrastructure improvements to the subject area only and does not address the cumulative traffic impacts and the regional scale infrastructure response required for full development uplift in the St Leonards / Crows Nest Precinct.”

The Council’s St Leonard’s South (SLS) proposal would seem to be flawed since it is limited to the distinct development sites within the Lane Cove Council area. The proposal should be addressing the substantial number of developments within the greater region that will feed onto the key arterial roads that pass directly through the St Leonards / Crows Nest area. The Council proposal should be considering the cumulative effects of the additional new developments and the thousands of additional new dwellings intended in the area.

The subsequent communications between Council and Roads & Maritime (and see the relevant agency submissions 9 May 2019 to the IPC) should rightly and more properly be assessed in light of the earlier RMS advice regarding cumulative impact.

Thus while Council can canvas the (and I quote) the”potential for improving capacity of the Berry Rd / Pacific Highway intersection and potential for additional lane capacity on River Road” it is unreasonable to see them as a viable or effective solution in isolation and in the absence"... of placing the SLS proposal in the proper context of assessment against other developments impacting the wider precinct.

Council attests in its submission that “All authorities / utilities support the scheme”. I have not however seen, or been privy, to where the RMS concerns of 2018 have been addressed or dispelled. Hence I would appreciate the Panel undertaking the necessary due diligence to close this issue out.

It is also worrying that Lane Cove Council in its submission to this Panel refers to much earlier 2014 RMS modelling rather than the RMS letter from 2018. This is exacerbated by Council’s seemingly limiting the threshold for traffic to be safely accommodated to “2,400 new dwellings subject to traffic measures being undertaken”. (See last page of submission and reference to Paramex and SIDRA models). There’s obviously more dwellings than this under construction or being further envisaged for the surrounding area.

Even more surprisingly Council acknowledges in the same modelling that an increase of just 17% in the number of dwellings to 2,800 “**would require significant traffic and infrastructure upgrades**”.

Are we really that confident on the veracity of the modelling done, and the chosen scope to which it has been applied, to ignore this exposure?

Developer Input on Traffic

The developer input on traffic seems to be largely silent from what I have seen to-date or heard at the Public Meeting. (Where is the rigorous testing with the community that they are continually quoting?)

I would challenge the developers’ thinking on public transport usage as it seems somewhat optimistic. For example Mr T. GOODE, the town planner speaking on behalf of SJD, who are

the landowner of properties at 8 to 22 Berry Road and 13 to 21 Holdsworth Avenue, St Leonards, says that this is a site that is 400 metres from St Leonards station, 500 metres from Wollstonecraft station and 800 metres from the future Crows Nest Metropolitan – Metro Station.

The distances mentioned seem to be the closest points as the ‘crow flies’ rather than the furthest SLS points. (One of the more astute local residents has as quoted on page 61 of the transcript to this meeting said – “As a local resident, I can say this is clearly inaccurate and a false representation of the facts. I also did three separate searches for three separate addresses in St Leonards South on whereis.com, to find how far it is to walk to the Crows Nest metro from St Leonards South. For each case, the walking distance is around one kilometre). They also seem to ignore the steepness of the local topography. Hence the reality would seem that a large number of the proposed residents for SLS would need to rely on their cars to commute.

I was also very interested to hear Mr P. Mitchell (one of the earlier speakers) who is a director of City Plan Services representing Country Gardens St Leonards who are major land owners in the planning proposal area saying that they have modelled “**traffic growth from our development ... It will be negligible. There will be increases of 0.4% to 0.9%.**”

I’ve tried to check subsequently that I heard correctly but the specifics were either not recorded in the transcript to the Public Meeting or deliberately redacted. I am also unable to substantiate the accuracy of the modelling done in the absence of further details being made available.

An increase of the order quoted does not seem to be negligible. Far from it! Especially if it were to be replicated across all of the other sites being proposed.

Tactical Responses to the increased Traffic

One example of the tactical responses proposed for dealing with the increased traffic from the SLS site is the proposed removal of on street parking on Berry Rd and the provision of dual lane capacity for the intersection with the Pacific Highway the proposed traffic from the site.

The reality is that this only directs the traffic straight into an existing and recognized bottleneck.

I highlight here the CARDNO report of 3/10/2018 which was prepared for the Department of Planning and Environment as a Strategic Transport Study for the St Leonards and Crows Next Station precinct. This major report states...

“The finding of the modelling indicates the road network (with some upgrade) has an ability to absorb the increased traffic expected although increase in demands along the Pacific Highway between Herbert Street and Christie Street place this part of the network under significant pressure under all scenarios. **The demand is expected to exceed the capacity in this section of road for all tested future scenarios.**”

It appears also that the Cardno report may be limited by not considering the many intra-precinct car trips within the impacted area made by residents (the Cardno study only considers journeys to work by residents and journeys in and out of the precinct by non-residents).

For the benefit of the Panel I note the proposed Berry Rd exit to the Highway would direct incremental city bound traffic immediately into the Herbert and Christie Street section, with only some hundreds of metres separating the two.

Similarly, for River Rd. While Council can agree (and I quote)...” to remove all on street parking from Greenwich Road to the Railway line if necessary.”and suggest that a “setback will provide the opportunity for a Land Reservation should the RMS require additional land to increase capacity or adjust the configuration of River Road.”it does not address or resolve the issue of the known and existing bottleneck to which traffic from the proposed St Leonards South (SLS) site would be directed. That issue is the narrowing of River Rd from x2 lanes to x1.

While Council may offer land at the southern boundary of St Leonards South (SLS) it would presumably be of concern both to Council and the community if RMS sought to widen River Road by reserving any portion of say Newlands Park. (Note all the community angst about preserving this asset from encroachment and overshadowing. The various developments also rely on this remaining to meet their open space requirements).

Even if the bottleneck issue is overcome (on this I have my doubts given the challenges of both the windy road and steepness at this point) once you ascend the hill past the Park there is the further bottleneck presented by the existing narrow rail bridge with the restriction of single lanes in each direction.

Required Infrastructure Funding

Given the traffic concerns currently constraining the site, and the St Leonards South (SLS) proposal for an additional 2400 units compounding these concerns, then it might reasonably be presumed that the would-be developers will contribute towards ameliorating the problems they are causing.

However we have heard today that developers are unable or unwilling to pay such a contribution.^{1 and 2}

So who is going to pay the obvious shortfall in required infrastructure funding? (For example building a widened bridge over the rail line up from Newlands Park will not be cheap).

This presumably leaves the wider community with both the obvious traffic problems caused from development of the SLS site and no financial contribution to help reducing. This is hardly a satisfactory outcome.

In quick summary we therefore have:

1. Traffic modelling indicating the site is bounded by an overcapacity network;
2. Recognition that the SLS proposal should, but doesn't, incorporate likely impacts from new developments in the broader precinct;
3. A proposal suggesting traffic be fed directly into clearly identified bottlenecks for which no sustainable solution has yet been provided; and
4. A proposal that parties obtaining direct commercial benefit be exempt from contributing to a solution, band-aid as any solution may be.

¹ For example - Greateon doesn't support the inclusion of the – of St Leonards South in the SIC levy and would ask that the panel recommend to the Minister that the proposed SIC levy be waived in relation to the St Leonards South area, consistent with council's view; and

² Ms K. Bartlett - the planning consultant for Top Spring – "I think probably the second issue really relates to the SIC levy and that, in terms of the infrastructure that St Leonards South is required to deliver The – we have no issue with either the contribution of community infrastructure of the 7.11. The issue is that the SIC does on top of that – and that would be for specific state-level infrastructure, it's not associated with Lane Cove infrastructure – does affect the feasibility.

I do hope that you will take the issues into consideration as you assess the proposed SLS high-density development and the long term consequences of it proceeding as currently outlined.

Thank you very much for your time and efforts.

Yours sincerely

John Dowey