

416 Group Submission – Transport Orientated Development scenarios – Dec 2024

Council has invited submissions on better planning between Roseville and Gordon stations and specifically the five options in response to the Transport Orientated Development proposal.

The 416 Group was formed 22 years ago as a community action group - [Home - 416 Group](#). It represents residents in Killara and Lindfield who live west of Lady Game Drive and near the Lane Cove National Park. That's 750 households who shop in Lindfield, and commute from Lindfield station. Our homes average 3km distance from the station.

Over the whole of its life the group has argued for investment in infrastructure. The current housing proposals are not supported because the infrastructure to support greater density is not in place or planned. In particular, additional housing including that near stations will add to traffic and congestion in part by reducing station parking. More details are included in our February 2024 submission to the State Government attached as appendix 1. The 416 Group has also been appalled by the shortsighted decision by Transport for NSW in November 2023 to withdraw the long-standing funding for 135 commuter parking bays on the Lindfield Village Hub site.

416 Group members live on the west side of Ku-ring-gai and are also affected by developments in the City of Ryde. In considering the TOD applying to Roseville, Lindfield, Killara and Gordon we have also taken into account the proposed additional 9600 homes in Macquarie Park. That includes their impact on the existing road infrastructure.

We have previously in 2014 supplied to Council an analysis of the unrestricted street parking on the west side of Lindfield station that is used by commuters. We have in November 2024 proposed that Council complete an audit of all such parking on the east and west sides of the four stations. Any threat to this parking as a result of the TOD by for example the imposition of time limits needs must be factored into the analysis of housing development options. The point being that when station parking is lost then commuters must make other arrangements. One option for them being to take their car to their destination adding to congestion.

We support the seven planning principles put forward by Council. These relate to avoiding environmentally sensitive areas, minimising heritage and tree canopy impacts, ensuring appropriate building heights, revitalising town centres and managing transition impacts. We agree that the TOD proposal of 400 metres from stations is simplistic and a more nuanced approach to zoning and development is required.

We propose additional principles to apply to the proposed Transport Orientated Development:

- 1. Infrastructure to match new development. Additional schools, road capacity and community services.**
- 2. New development to be subject to traffic modelling and the Transport and Infrastructure SEPP which deals with traffic congestion.**
- 3. Amenity for Ku-ring-gai residents to at least match 2024 levels.**
- 4. Safe pedestrian access to railway stations.**
- 5. Prioritise development to revitalise town centres and other land adjacent to the Pacific Highway.**
- 6. Green space to meet needs of additional population**
- 7. Where the TOD reduces unrestricted street parking used by commuters then that to be replaced by dedicated commuter parking**
- 8. Development away from town centres and the highway to be contained within the Ku-ring-gai tree canopy.**
- 9. All development designed to minimise overshadowing**

With respect to the last point a local example is the impact the Aqualand development in Lindfield Avenue had by overshadowing Lindfield station especially noticeable for commuters on cold winter mornings.

Whilst the State Government Department responsible has 'Infrastructure' in its title no allowance had been made in the Transport Orientated Development for the following:

- The additional vehicles that will come with 23,200 new dwellings and the estimated 50,000 new residents
- Combined with other housing initiatives an overall doubling of the Ku-ring-gai population
- Local schools already at capacity.
- Chatswood gridlock



Besides Chatswood there are other obvious locations that are already congested such as the junction of Lindfield Ave and Havilah Rd in Lindfield and the intersection of Boundary St and Archbold Rd in Roseville. With the additional population and traffic these problem locations cannot be resolved by changing traffic light sequencing or the like. Council's report on the options must acknowledge this. Otherwise, we will be collectively guilty of telling the community that rearranging the deckchairs will save the Titanic.

To address the proposed increased population and maintain amenity we see the need for the following infrastructure. Council should engage and consult with the community and the State and Federal Government to achieve a consensus on these requirements. Residents have a right not to be grid-locked and to get into and out of the roads servicing their homes. Until this infrastructure is designed and funded, development must match existing capacity.

- 1. New road tunnel under the Pacific Highway. Stage one under Chatwood. Stage two to Wahroonga with on/off ramps to connect with Ryde Road.**
- 2. New commuter parking to replace lost street parking. Stage one 1000 spaces above railway line at Lindfield. Stage two 1000 additional spaces at Gordon**
- 3. Duplication of Fullers Bridge over the Lane Cove River and duplication of Fullers Rd, Millwood Ave and Delhi rd.**
- 4. Duplication of Lady Game Drive**
- 5. New flyover or underpass at Boundary Road intersection with Archbold Rd and Penshurst Street.**
- 6. New Metro from Northern Beaches to Macquarie Park and construction of the planned for but never built link from Epping to Parramatta.**

All of these proposals have environmental consequences and some including those taking precious national park land for road widening are severe The problem arises because the North Shore is a captive of its geography which places constraints on population.

New homes near stations are designed to make taking public transport by the new residents more likely. The needs of existing residents are equally valid. Some ways these can be addressed as a part of the TOD:

1. **Undercover, safe and well-lit kiss and ride near stations.**
2. **Secure parking for bikes, e-bikes and motor-bikes.**
3. **Pedestrian bridges over the Pacific Highway.**
4. **Remaining unrestricted street parking to be free to Ku-ring-gai residents.**

For the reasons set out in this submission the 416 Group cannot support any of the five scenarios put forward by Council in this consultation. Applying the 416 Group principles the least bad of the options are 2a and 3b

Appendix 1 - 416 Group submission to the NSW Government on the proposed changes to housing policy – February 2024

Introduction

The 416 Group was formed 21 years ago as a community action group - [Home - 416 Group](#).

It represents residents in Killara and Lindfield who live west of Lady Game Drive and near the Lane Cove National Park. That's 750 households who shop in Lindfield, and commute from Lindfield station. Our homes average 3km distance from the station.

Over the whole of its life the group has argued for investment in infrastructure. The current housing proposals are not supported because the infrastructure to support greater density is not in place or planned. In particular, additional housing including that near stations adds to traffic and congestion. It is very poor and divisive public policy to attempt to apply, rushed, one size fits all wholesale planning changes without a proper consultation process with communities affected.

Housing yes – Infrastructure first

On Saturday 17 February 2024 John Schumann and Australian band Redgum performed at Chatswood Concourse. At the beginning he said to the audience *"We come from Adelaide and here we are in big, smart, cosmopolitan Sydney. But on the way here caught in solid traffic for an hour dying for a pixx"*.

That is the Sydney experience and greater housing density will make it even worse.

Not well understood by people who do not live there is that the Northshore is a captive of its geography:

- There are only two road crossings over the Lane Cove River in the 15km by road between the Epping Road bridge over the river and the head of the valley at Thornleigh. These two crossings at Fullers Bridge (Delhi Road – single lane each way) and De Burghs Bridge (Lane Cove Road – three lanes) are heavily congested and the congestion is getting worse each year.

- On the east side of the Pacific Highway over Middle Harbour there is only one crossing in the 21km by road between the Spit bridge and the head of the valley at St Ives. That is Roseville bridge – three lanes each way and also heavily congested.
- The road network must navigate around numerous steep bush gullies.

Unlike many other parts of Sydney where drivers may be able to find another way to avoid congestion that choice usually does not exist for residents of the North Shore.

More specifically the 416 Group precinct is served by Lady Game Drive running from Delhi Road to Lane Cove Road. During peak hours it is severely backed up at both ends and it is getting worse each year. The reliability of the bus service between Macquarie Park and Chatswood via Lindfield Station is compromised by the congestion. For residents, leaving their homes and reaching work on time has become more difficult.

Our area mostly does not have footpaths and people generally have to walk on the roads because the verges are very often unnavigable due to steepness. The Ku-ring-gai Council is under resourced and has a program stretching out many decades to put at least one footpath on each road. Storm water infrastructure is failing and is in a decrepit condition.

Bushfire risk

The area is vulnerable to bushfire escaping from Lane Cove National Park. In conditions designated *Catastrophic* by NSW Fire and Rescue (eg strong north-westerly winds combined with 40+ degree heat) homes are not defensible and evacuation is the only course. This is what occurred in January 1994 when there was no pressure remaining in the reticulated water main and 13 homes were lost and others damaged. The only three evacuation routes are either along or across Lady Game Drive. Whilst Bradfield Rd, Lindfield together with Guyong St and Booraba Ave has only one path of exit. Since 1994 there has been a new sub-division at Brevet Ave and Squadron Ct and three new child-care centres opened adding approximately 150 more evacuees in an emergency.

Access to public transport

The North Shore train line provides a good service and will be supplemented in 2024 with the opening of the Metro line from Chatswood to the Sydney CBD. To access the nearest station 416 Group residents may:

- Walk – not viable Lindfield station is 3km steeply uphill.
- Bus – infrequent, slow and not reliable in peak hours due to traffic congestion.
- Kiss and ride – requires an adult at home to drive. Involves twice as many trips so is energy inefficient.
- Use commuter parking (very early risers only)
- eBike – in future if storage is provided.

The Lindfield Village Hub

On 14.11.23 the commuter parking within the Lindfield Village Hub project was defunded of \$9.8M by decision of Transport for NSW being the same day the Ku-ring-gai Council was to have awarded the contract for construction to the preferred developer. The amount had already been provided to the Council two years previously. As at February 2024 without this essential funding the developer has withdrawn and the project has collapsed. The project was

to have created substantial new housing within the life of the current NSW Government. The reasons given by Transport for NSW for reallocating the funding have been judged utterly inadequate. The NSW Government has lost credibility and has not responded to correspondence from this group and others.

One of the lessons from the Northwest Metro was that the 4000 commuter parking bays that were created helped ensure its success. In Lindfield it was to be 135 bays. More information about the project is at the end of this submission

Additional housing

Contrary to what is sometimes alleged steady progress in recent years has been made in Ku-ring-gai to add housing and in particular more apartments. More can be done to add homes and offer greater choice of housing but in a democracy this must be in consultation with Council and the community.

The proposals for multi-dwelling and mid-rise housing near stations and the Transport Orientated Development program should be restricted to non-heritage areas, height limits should respect the character of neighbourhoods (eg within tree canopy) and development should be done such that existing limited commuter parking is not compromised. That means providing new housing with parking which is what the market demands (viz current redevelopment of Lindfield Coles with > than one parking bay per apartment). If adequate parking in new developments is not provided, then local streets get parked out by new residents and their visitors to the disadvantage of residents living distant from the stations and represented by groups like the 416 Group. Case study – North Epping.

New housing with retail below may replace old developments immediately along the Pacific Highway and in the village centres. Its' design should avoid placing station platforms in shadow (viz the over height Aqualand development on Lindfield Ave, Lindfield).

An increase in FSR of a sub centre like the Lindfield, Moore Avenue shops to allow housing above retail is acceptable subject to adequate on-site parking being provided for new residents and their visitors. That will ensure continuing access to parking for customers of the shops and other businesses.

Dual occupancy creating more smaller homes is acceptable subject to tree canopy being maintained at a percentage consistent with the targets of Ku-ring-gai Council.

Getting commuters out of their cars

Congestion can mainly be beaten via change in behaviour and getting people out of their cars in peak hours and onto public transport (this requires commuter parking as part of the mix).

More roads help but have a tendency to shift the congestion and not solve it. To be attractive to commuters the whole of the journey involving public transport needs to be efficient and quick.

Investment in Infrastructure

Short term

1. Reinstate the \$9.8M State funding for commuter parking on the west side of Lindfield Station and so allow the Lindfield Village Hub project to proceed. The project provides new housing which has already been designed both on the site and on the site of the existing library which is to be sold once the new library is built.
2. Build a pedestrian bridge over the Pacific Highway opposite Lindfield Station. Current road crossing on a crest on a curve with extended wait times is very dangerous.
3. New pedestrian and cycle bridge over the Lane Cove River linking south west end of Fiddens Wharf Road and Riverside Drive. Links with existing cycleway to Macquarie Centre and Macquarie University.

Medium term

1. Two levels of new commuter vehicle and ebike parking above the railway corridor at suitable locations near stations on the North Shore rail line. Suggest 1200 bays.
2. Build the Epping to Parramatta rail link as was originally planned linking Parramatta to the employment hub in Macquarie Park.

Longer term

1. Plan for a road tunnel under Chatswood along the Pacific Highway alignment from Roseville to Gore Hill (Epping Road and Pennant Hills Road have tunnels, why not Pacific Highway?) Plan for future stage from Chatswood through to F3 at Waitara and without the through traffic revitalise the village centres including additional housing.
2. Road tunnel under Macquarie Park following Lane Cove Road alignment to address population growth, commercial activity, combating gridlock, catering for through traffic.

The bigger picture

Short Term Holiday Letting

The previous NSW State Government failed to introduce effective measures to control short term holiday letting especially in strata buildings in Sydney. NSW Planning failed to reconcile the rights of people to do what they like with their property with the rights of other residents in buildings and the consequences of short-term holiday letting. These include impact on residents, increased wear and tear on buildings, loss of long-term residential accommodation and the undermining of the feasibility of developing new dedicated and properly designed visitor accommodation. In order to reclaim housing back for residential, short-term letting now requires controlling through licensing, strict limits on numbers of days and a new 7.5% levy to match that being introduced in Victoria in 2025. The proceeds to be applied to fund new social and affordable housing with potential to raise over \$100 Million annually.

Migration

Immigration supports economic and social development but must be matched to the availability of housing and so limited until investment in infrastructure and housing supply has caught up. Migrants to be offered greater incentives to settle outside cities with housing shortages. Similarly international student numbers to be limited and private courses which have little to do with education and a lot to do with a pathway to permanent residency to be properly audited and controlled.

Existing housing resources

Many homes have one, two or three bedrooms empty. The NSW Government has the means to extend greater incentives to home-owners to offer accommodation especially to

international students who are open to exploitation otherwise and who greatly benefit from a homestay experience.

On the night of the 2021 census 8% of homes in Sydney were unoccupied. In Ku-ring-gai it was 7% representing 3165 homes. Some homes are vacant for a sound reason (eg probate underway for a deceased estate) but for others it is that escalating values have made land banking an attractive investment. There is case study from overseas that a vacant homes tax raises substantial funds for investment in social housing whilst also significantly reducing the number of vacant homes so providing additional housing within existing assets.

Regional infrastructure

Incentivise housing in regional towns through investment in fast rail, other infrastructure and value capture. A long-term view to be taken in assessing the viability of very fast rail. Where appropriate relocate government enterprises to locations outside Sydney.

Funding of commuter parking at the Lindfield Village Hub

Below is the December 2023 letter from the 416 Group to the NSW Premier and Ministers for Transport, Housing, and Planning.

I'm writing on behalf of the 416 Group representing residents in Killara and Lindfield who live west of Lady Game Drive. That's 750 households who shop in Lindfield, and commute from Lindfield station. Our homes average 3km distance from the station.

We have long advocated for commuter parking. It meets resident's needs, supports public transport, gets people out of their cars, reduces congestion and reduces carbon emissions. The 4000 parking bays on the North-West Metro line have underpinned its success. We were very pleased when Transport for NSW committed \$34M for 240 commuter parking bays on the west side at Lindfield. Subsequently the community developed a vision whereby the parking funding stimulated Ku-ring-gai plans for urban renewal projects known as the Lindfield Village Green which has been successfully completed including 105 commuter parking bays on the east side and the Lindfield Village Hub to be built on the west side. I personally have committed hundreds of voluntary hours to the project.

On Tuesday 14 November after years of work Council was due to vote to appoint the contractor to build the Lindfield Village Hub incorporating the balance of 135 commuter parking bays. We understood that \$9.8M funding for those bays had been provided for by Transport for NSW in 2021 and the funding and operational agreement was governed by a deed.

We were astonished to learn on the day of the Council meeting that the funding was to be withdrawn. We ask that you review the circumstances and reinstate this funding. The whole project is now in jeopardy and that means not only no parking but delay in the new library, community centre, childcare, shops, new small park/plaza and new residential apartments both as part of the Village Hub development and on the existing Lindfield library site to be freed up and recycled for housing. If commuter parking is not built losers will be west side Killara and Lindfield residents who live beyond walking distance from the station.

The Government has every right to act on and fund its priorities however it seems to us that where a project is as far advanced as the Lindfield Village Hub that consideration

should include the waste which will result from withdrawal of funds. In the planning and acquisition process for the project Council has now already invested more than the \$9.8M state contribution. It does not have the means itself to develop commuter park and ride. The 193 bays on westside residential streets within reasonable walking distance of the station are already parked out.

The north shore train line has capacity for more passengers and in 2024 is to be supplemented by the new Metro line from Chatswood to the city and beyond. The state investment of \$9.8M represents good value for money and is well below the original funding commitment. For our members, public transport to the city is the future. Finally, in the context of the government's housing objectives now is the time to support investment in infrastructure and not take it away.