

NAREMBURN PROGRESS ASSOCIATION

Founded 1901; Incorporated 2004

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The Chief Executive Officer (CEO)
Willoughby City Council, Chatswood NSW
Attention: Ms Debra Just

13 January 2022

RE: DA-2021/340 – 43 Donnelly Road Naremburn NSW 2065

Dear Ms Just,

Thank you for the opportunity to provide feedback on this very significant development application.

Naremburn Progress Association must regrettably object to the proposal on the basis of:

- i) Heritage
- ii) Traffic and Congestion
- iii) Amenity including schooling, parks, community facilities
- iv) Services including sewage
- v) Overdevelopment both of the site and across the area
- vi) Sustainability and Health

Detail

i) Heritage

As identified in the planning documents the site's heritage is significant. The heritage listing for the Church Building states that: "Even in this (at building) early stage, the church was considered one of the most artistically merited churches on the North Shore"¹ The Church building with its steeple is so significant to Naremburn (and Willoughby) that the logo of the Naremburn Progress Association has the church spire predominantly displayed as the area's key landmark. The spire is visible from Cammeray, Crows Nest and many surrounding suburbs and sits at the boundary between North Sydney and Willoughby marking the change from one LGA to another. Whilst the Church building is to stay intact the scale, style and bulk of the surrounding buildings will detract from this important sites Heritage value.

The land as a whole cannot be detached from the heritage value of the Church – the land was originally part of the Alexander Dodds Estate – a person of key significance in the Naremburn Area and a member of [Member New South Wales Legislative Assembly 15 Dec](#)

¹ <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2660264>

1864 - 03 Feb 1872 and [New South Wales Legislative Council](#) 08 Sep 1885 - 06 Feb 1892. The importance of the original estate and land associated should not be dismissed.

The site in total was also instrumental in Naremburn's historical role as an education precinct with the original school being conducted in one of the first streets established in the City of Willoughby (Market St) and later transferred to this site. "With the new church and facilities becoming well established at the site in Willoughby Road, and the school still being conducted at the original site in Market Street, consideration was being given to complete the **consolidation of the entire plant adjacent to the church**. A new school, hall and annex were built during those years, enabling the Market Street school to be closed in 1931; classes resumed in the new school the following year."² The heritage value of the site and the land associated with the Church and school is overlooked in the heritage assessment.

Note: It is noted that the site as a whole site is marked as Area 3 under WCC's Special Provisions Map however it is not clear what this pertains to?³

The alienation of the Church from the historic St Cuthbert's Church opposite on Merrenburn and the heritage of the village centre also represents a significant loss of heritage given the history. The street view from Merrenburn Ave demonstrates that the Church will almost be completely obscured from view. This disconnection from the village centre needs further consideration as part of the design. Maintaining the 4 points of heritage in connection ie) Naremburn Public School, St Leonard's Church, St Cuthbert's Church and the Village Centre is an important aspect of Naremburn's heritage value.

ii) **Traffic and Congestion and Safety**

Access to the underground parking will be accessed via Merrenburn Ave which is already a very busy road and a major school route for children who need to travel out of the suburb to access schools since the Naremburn schools were closed. A new wombat crossing has reduced the lanes unexpectedly (the original plans show that the two lanes heading West would be retained) from two to one which is causing traffic to bank up on along the whole length of the road during peak times. The proposed entry and exit point to the development is very close to the Wombat Crossing and traffic and safety will be further compromised during service, youth group and school holiday activity times at St Cuthbert's Church. A right hand turn exiting the development will be particularly dangerous for children travelling to and from school or attending Church activities. The location of the entry and exit point is considered to be extremely problematic and whilst the number of extra trips is not highly significant the location of the access point is expected to exacerbate what is already a dangerous intersection. Given the proximity to public transport consideration should be given to reduced parking spaces and to relocating the driveway.

iii) **Amenity**

Facilities for Children and Sport

NPA understood that the original proposal was for an over 55's development however it appears no longer to be designated as such. Given the size of the townhouses additional

² Wilsche, Eric. The Naremburn Story, 1988. p

³ https://eplanningdprod.blob.core.windows.net/pdfmaps/8250_COM_SPA_005_010_20121112.pdf

families are likely to be attracted to the development. Currently there is a shortage of green space and schooling in the area. The additional pressure born by the many St Leonards developments, the St Leonards and Crows Nest 2036 Plan (which includes 6683 new homes) along with densification in Naremburn itself (Garland Rd, Walter St, Channel 9 site, Naremburn Centre Strategy etc) means that facilities are coming under greater strain than ever before. We do not believe that the area has capacity to support further densification outside what is already planned until such time as more green space and schooling is made available.

Deficit in Community Facilities

Whilst the site is owned privately the nature of the site has meant that the community has had access to facilities such as hall hire, children's activities, and welfare. The community is in significant need of such facilities and as such the private development of the site into further housing for the area adding to further population increase creates an even greater deficit. We fully respect the landowners right to make decisions regarding it's own site however we would urge further discussion with government authorities with regard to the possible use of space which is in the public's interest whilst at the same time compensating the owners appropriately.

It is not clear whether the site has been considered for a school of medium rise rather than the unpopular high-rise proposal currently being scoped for St Leonards. It is essential that children have access to space, quiet environments, and safety. NPA would welcome such a discussion between the property owner, community, council and State Government provided the other constraints such as Merrenburn Ave and amenity concerns were resolved.

Sewage System at Capacity

NPA recently had a series of meetings with Sydney Water following recent a recent sewage event, subsidence (reported to council) and planned duplication of the Sewage Line in Flat Rock Gully. Sydney Water have advised that he sewage system is at capacity and bound for further failures. This puts health, the environment and amenity at risk. All sewage from the St Leonards, Crows Nest and Naremburn/ Artarmon developments flow through this area. A full scoping study is now to be undertaken by Sydney Water to assess the wider problem and the line duplication has been put on hold pending what is foreshadowed to be a larger project to address the issue. We would like to urge Willoughby Council to not approve any further densification in the area until this situation has been resolved. Whilst this development in and of itself may not contribute a large amount it may be the tipping point which creates a further system failure. We would also urge the council to notify other councils in the immediate area of this issue and urgently work with DPIE and Sydney Water to express urgency in addressing the significant sewage issue.

iv) Overdevelopment

The proposal itself exceeds the LEP height regulations and represents a significant loss of open and green space. The bulk, style and function is not in keeping with the site or it's surrounds and will result in a lack of privacy for existing residents due to the orientation of some buildings.

v) Sustainability and Health

Due to what appears to be fill used on site the contamination investigation has identified serious contaminants above human and environmental health criteria. This is concerning particularly given the likelihood of further contaminates in the area being distributed by trucks and developments such as the tunnel dive site. The cumulative impact of contaminants may have significantly negative impacts on health, particularly that of children. Further testing and a remediation plan should be considered prior to approval to establish the safety and viability of addressing contamination onsite noting there is a children's bus stop and another Church and residents in very close proximity.

Willoughby Council has made a commitment to the environment via it's Green City Plan 2028. The removal of 33 mature trees and green space is unacceptable.

The plans indicate that there will be 3-4 swimming pools onsite and whilst there are water tanks installed this number of pools would indicate that water usage and treatment with chemicals is not a sustainable undertaking.

The dark colours and metal elements will add to the heat island affect alongside the removal of mature trees. Light colours and mature tree retention/ replacement should be included in conditions.

For and on behalf of Naremburn Progress Association (including Naremburn Action Group)

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