

Naremburn Progress Association
Notes regarding the Proposed Changes to Density

The Government has released proposed planning reforms which drastically change permitted density within residential zones. Whilst consultation is currently open regarding Low and Mid-Rise Housing reforms, the Transport Oriented Reforms appear to be progressing with little consultation. BOTH Reforms Impact Naremburn and we highly recommend making a submission

- 1) Changes to Create Low and Mid-Rise Housing: Naremburn stands to be heavily impacted by proposed changes to R2 and R3 zones around “town centres”. Being geographically small, we are impacted to such a degree that the whole of our residential area in Naremburn stands to change. Much of Naremburn sits within 800m of Northbridge, Cammeray, Crows Nest and St Leonards shops, which are within range of the targeted densification changes (if considered walkable). Add the Transport Oriented Development Program (below at 2) and the history and character of Naremburn could be forever lost under blanket planning reforms. The government is proposing¹ to change R2 and R3 zones to increase density as follows:

The proposed reforms seek to:

- Allow dual occupancies (two dwellings on the same lot) in all R2 low density residential zones across NSW.
- Allow terraces, townhouses and 2 storey apartment blocks near transport hubs and town centres in R2 low density residential zones across the [Six Cities Region](#).
- Allow mid-rise apartment blocks near transport hubs and town centres in R3 medium density zones across the six cities region.

AND

- within 800m walking distance of a heavy rail, metro or light rail station; or
- 800m walking distance of Commercial Centre (Zone E2) or Metropolitan Centre (Zone SP5); or
- 800m walking distance of the Local Centre (Zone E1) or Mixed use (Zone MU1), but only if the zone contains a wide range of frequently needed goods and services such as full-line supermarkets, shops and restaurants.

The ACCC defines a full line supermarket as “.. ‘full line’, meaning it is a large format supermarket which retails a full range of goods, including packaged groceries, fresh meat, bakery and deli products, fresh fruit and vegetables, and frozen foods.”² Supermarkets at St Leonards and Naremburn do not fit this definition and are therefore are not full line. Access to other supermarkets is constrained do to geographical and man-made barriers to walkability.

AND

- 2) A Majority of Naremburn also sits within the Transport Oriented Development (TOD) Program Phase 1 (TOD) of 1.2km from Crows Nest Station – it is not clear what density changes that would

¹ <https://www.planningportal.nsw.gov.au/draftplans/exhibition/explanation-intended-effect-changes-create-low-and-mid-rise-housing>

² <https://www.accc.gov.au/system/files/public-registers/documents/MER13%2B9090.pdf>

mean, however the government has published the following statement regarding implications. According to published documents³, the changes stand to be significant:

Part 1 of the program will focus on 8 accelerated precincts to create infrastructure and capacity for 47,800 new homes over 15 years.

Land within 1,200 metres of 8 rail and metro stations will be rezoned by the NSW Government to allow for more new and affordable homes. These 8 stations are:

Bankstown, Bays West, Bella Vista, Crows Nest, Homebush Hornsby, Kellyville and Macquarie Park.

Will the TOD program apply in heritage conservation areas? If so, how will it impact character?

The changes proposed will result in significant change in these locations as additional housing is delivered. But it is important to work together to embrace the transition that will occur as the character of these locations evolves.

The new planning controls will apply in heritage conservation areas. However, a merit-based assessment will continue to apply to developments in these locations and relevant heritage controls will apply to the extent they are not inconsistent with the new standards.

Community Action

1. Read the further background below and make a submission direct to the planning portal by Friday 23rd February scroll down to “Have Your Say”. <https://www.planning.nsw.gov.au/policy-and-legislation/housing/diverse-and-well-located-homes>
2. Send us a comment via the website or your submission to include in our submission: secretary@naremburnprogress.org.au
3. Forward your submission to Willoughby and North Sydney Council’s and the Planning and Public Spaces Minister Paul Scully , Transport Minister Jo Haylen and Minister for Housing, Rose Jackson. <https://www.nsw.gov.au/nsw-government/ministers>

Note: In making a submission you will be asked whether you support, object or are just making comments. We suggest taking a SIMBY (Services in our Backyard) rather than a NIMBY (Not in Our Backyard) approach

Naremburn has grown and adapted to change for over 150 years – we want growth done well and change that is well supported.

³ <https://www.planning.nsw.gov.au/sites/default/files/2023-12/transport-oriented-development-program.pdf>

Key Points to Make to the State Government

Do:

1. **Consult** with local communities and allow local councils to retain control over detailed zoning decisions.
2. **Consider** that **Naremburn is already a density success story** and is doing density, mixed development, and conservation well. 2/3rds of Naremburn is already made up of dense housing types and we have accommodated some of the highest per km density in Sydney whilst successfully maintaining our character, community and green spaces.
3. **Invest** in desperately needed **services and infrastructure**— more buses that stop at Naremburn, proper sewerage systems that do not leak sewerage through our streets, a school, sporting facilities, active transport connectivity, more green space and invest in traffic, noise and pollution mitigating measures i.e attractive sound walls for our shops and community spaces.
4. **Define “Walkable” as safely accessible** to all in the community including those who are most vulnerable i.e. children, elderly, parents with prams etc
5. **Conserve** the immensely important urban bushland, wildlife Corridor and waterways of Flat Rock Gully by limiting development along it's edges and through formal State Government protection
6. **Consider** the available and sustainable **alternatives** (including fast tracking/enabling commercial conversions, accelerating and extending investor vacancy reforms and retaining but relaxing a few conservation controls to allow for more small dwellings to the rear, maintaining height and privacy.

Don't:

1. **Don't implement blanket changes** that would impact all residential zones in the small, historic and dense suburb of Naremburn
2. **Don't allow the scale of proposed R3 changes** on the edge of conservation areas, waterways and parks (in particular along the edge of Flat Rock Gully, Naremburn Park and Flat Rock Creek)
3. **Create a peak hour melt down** at Naremburn by adding more cars at the point where the North Shore, Northern Beaches and Northwest meet the Warringah Freeway (with more failure points to come due to the planned toll road access limitation similar to the priority changes causing problems at Rozelle)
4. **Don't undervalue Sydney's history, character and community** by arbitrarily overriding our modest but enormously important conservation areas, character and heritage items. Naremburn was the second settlement on the North Shore and it's history is entwined with the Gammeraygal i.e. Barangaroo, Alexander Dodds MLC, Henry Lawson, the Waterhouse Family, St Mary MacKillop, Sir Walter Burley Griffin, Eric Wilksch, Mayor Pat Reilly and...the first bridge/planned shopping area, early schools, the planning of the Sydney Harbour Bridge, early faith communities and buildings, early trams, the Quarry that built Sydney, industrial innovation (ie brickworks, refrigeration, television and waste), the RNSH community and successful conservation work related to the Warringah Freeway, Gore Hill Expressway and Flat Rock Gully.
5. **Include Naremburn or St Leonards shops** as walkable “Local Centres” due to there being no full supermarket/ limited range of shops. Don't include Cammeray & Northbridge shops due to the severe inclines/ geology that form a barrier to walkability. Consider that Crows Nest and the Metro station are also not safely walkable for most in our community due to freeway on and off ramps and unsafe walking paths which conflict with commuting cyclists and traffic travelling at high speed.
6. **Don't push our sewerage systems past breaking point** – the largest sewerage overflow in Sydney in recent years has been at Naremburn (600 M Litres of Sewerage) and most enforceable undertakings by Sydney Water have been associated with the North Head catchment. Considerable investment is needed in systems that connect to and flow through Naremburn according to the current “Greater Sydney Water Strategy”⁴ and the “Securing a Water Resilient Future for GPOP”⁵ Report.

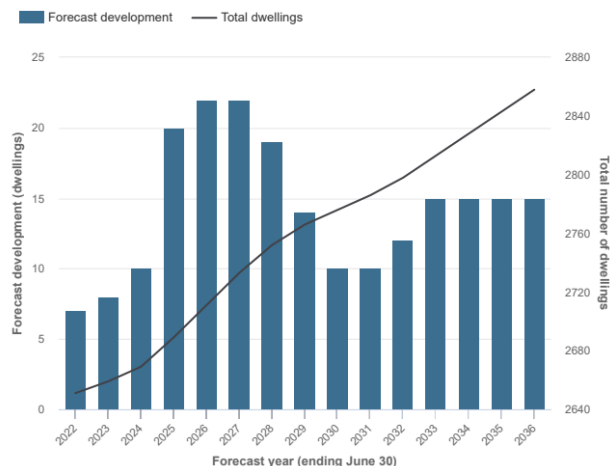
⁴ <https://water.dpie.nsw.gov.au/plans-and-programs/greater-sydney-water-strategy>

⁵ <https://www.sydneywater.com.au/content/dam/sydneywater/documents/Securing-a-Water-Resilient-Future-for-GPOP-Brochure.pdf>

Naremburn has already densified & is impacted by surrounding high density- current controls provide for positive and sustainable growth given it's small size and constraints

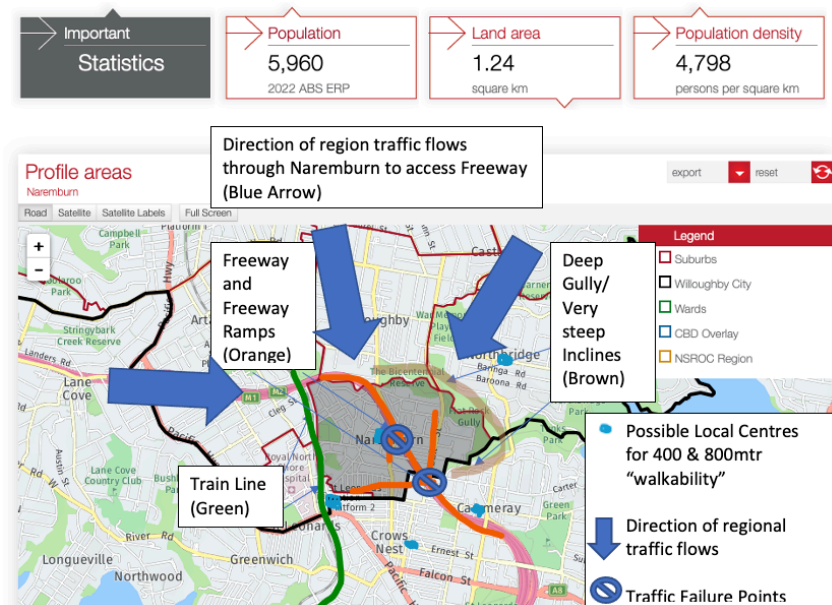
Forecast residential development

Naremburn



Source: Population and household forecasts, 2021 to 2036, prepared by id (informed decisions), January 2023.

Naremburn has considerable constraints to safe walkability and is the end point suburb connecting North Shore, North West and Northern Beaches Traffic to the Warringah Freeway



Naremburn's Sewerage and Stormwater Infrastructure is under pressure and failing⁶



Sydney Water to pay over \$865k after huge sewage overflow

11 July 2023

Sydney Water Corporation has been convicted and fined \$865,625 and have separately agreed to pay \$500,000 to environmental projects, after around 16 million litres of raw sewage resulted in the relocation of 39 residents in Naremburn in 2020.



Flat Rock Creek fish kill

The NSW EPA, with the help of Department of Climate Change, Energy, the Environment and Water (DCCEEW) scientists, has been sampling and monitoring Flat Rock Creek since the pollution incident in December 2022.

Results of investigation

On 8 December 2022, the EPA received reports of a fish kill and pollution incident in Flat Rock Creek in Naremburn and Cammeray. The following is a summary of the EPA's investigation into the incident.

⁶ https://www.caselaw.nsw.gov.au/decision/189094965bbb21c38fc8b007#_Toc139011882, <https://www.epa.nsw.gov.au/working-together/community-engagement/updates-on-issues/clean-up-notice-issued-for-flat-rock-creek-fish-kill#:~:text=On%206%20December%202022%2C%20the,storage%20facility%20on%205%20December>, Photo: Naremburn Shopping Village Floods Regularly, the area is suffering subsidence including streets and homes