

Submission
No 224

INQUIRY INTO DEVELOPMENT OF THE TRANSPORT ORIENTED DEVELOPMENT PROGRAM

Organisation: Naremburn Progress Association

Date Received: 5 April 2024



NAREMBURN PROGRESS ASSOCIATION

Founded 1901; Incorporated 2004

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Dear Portfolio Committee 7,

We write in response to your Inquiry into the Transport Oriented Development Program (TOD). Given the scarcity of information regarding this program and the lack of any open consultation it is difficult as a community group to answer your terms of reference in any full measure however we have provided the submission we made to DPIE regarding the cumulative impacts and considerations which will provide you with greater background.

A majority of the tiny historic suburb of Naremburn is, as the Crow flies well within 1.2km of Crows Nest Metro Station. Should the Crow walk however the accessibility and topology of the area would quickly wear that Crow out, or run it over.

Naremburn is an historic suburb with unique attributes which has suffered repeated attempts at it's demise (three freeway projects and continuous densification) - we represent the oldest residents association in Willoughby. Throughout that history Naremburn has rallied doing their bit to supply the housing needs of hospital and school workers and city commuters. In conjunction with local council Naremburn has achieved something increasingly rare - a dense suburb that does not appear at first look to be dense and has retained much of it's significant heritage. There is however a limit at which our services and beauty will become compromised by unrestrained and unplanned growth - it is generally felt we are at that tipping point.

Further to the background below at attachment 1 we submit:

Attachment 2: newly published research into the unique Aboriginal cultural history of the suburb confirming it's unique place in history as one of the last places of refuge for Gameraigal people on the Lower North Shore.

We would also be happy to provide additional background to the unique educational, ecumenical and artistic history of Naremburn associated with early members of Parliament, Henry Lawson and Australia's only recognised Saint Mary Mackillop

Yours faithfully,

Larissa Penn
President Naremburn Progress Association.

Terms of Reference -

1. That Portfolio Committee No. 7 – Planning and Environment inquire into and report on the development of the Transport Oriented Development Program (TOD), and in particular:

- (a) the analysis, identification or selection undertaken by the Government, the Premier's Department, The Cabinet Office or the Department of Planning, Housing and Infrastructure (Department) into:
- (i) the eight Transport Oriented Development Program accelerated precincts. [The analysis, identification and selection of Naremburn as an Accelerated Precinct has not been made known to](#)

us. Council officers have suggested that DPIE was not at first aware that Naremburn would be so affected and only engaged Willoughby Council in consultation recently.

(b) the probity measures put in place by the Government, the Premier's Department, The Cabinet Office and the Department. NPA are not aware of any probity measures and questions the government's right to enforce blanket reforms which may impinge the property rights of residents (affecting their use and enjoyment of land) where justification and consultation has not occurred. Whilst there is certainly justification for the provision of affordable housing overall where little analysis has been completed into the needs of the particular area in terms of the type of housing needed, vacancy rates already existing, densification already achieved and where costs to the many clearly outweigh benefits to a few in a small and already burdened suburb it is hard to see that probity has been enacted.

(d) consultations undertaken with councils, joint regional organisations and communities during the preparation of the Transport Oriented Development Program State Environmental Planning Policy.

Naremburn has had no consultation with State Government to date regarding the TOD program. At a recent Shadow Ministry breakfast hosted by the local member we were able to speak at length about the unique heritage of Naremburn, the density already achieved and supported and the unique and substantive wildlife corridor that is Flat Rock Gully. No such opportunity has been afforded to us by the Planning Minister or current government. Council has not yet made formal representations to government regarding the TOD program unlike other local councils affected who have represented the cumulative impacts of the Mid and Low Rise changes and TOD program. Willoughby Council have informed us that they are taking a different approach and have met with the Planning Minister and DPIE. We are not however privy to those representations and have not been asked to consult.

(e) ongoing opportunities for review and input by councils, joint regional organisations and communities, including consultations with renters, key workers and young people needing affordable housing in relation to the Transport Oriented Development Program State Environmental Planning Policy.

We have not been informed of any ongoing reviews or opportunities to consult.

(i) the heritage concerns with the Transport Oriented Development Program including but not limited to the concerns of the Heritage Council. Naremburn has two small heritage conservation areas and many items that are not listed but should be afforded protection. Henry Lawson's Cave and circa early 1900's shops are two examples. The statements made to date regarding heritage on the DPIE's website are disturbing and if enacted to their fullest extent could mean the eradication of our natural, built and cultural heritage.

(j) the enabling infrastructure capacity for every station selected or considered as part of the Transport Oriented Development Program. Transport cannot be the only factor that is considered when considering the capacity for growth. As discussed attached our services ranging from our sewers, to bus services to schools and parks are already at capacity or breaking point. Naremburn suffered one of the largest sewage overflows through streets and parks in NSW history in 2020. There appears to have been little consideration of ageing infrastructure across historic suburbs in claiming that established neighbourhoods are less expensive to densify than greenfield sites.

(k) the impact on localised environment and amenity values caused by the Transport Oriented Development Program. There are considerable local impacts in Naremburn see attached

(l) the existing or potential measures and programs analysed, considered or implemented by all NSW Government agencies to support additional housing density, including the housing series reports published by the NSW Productivity Commissioner. Naremburn has already been consulted on and agreed to a Local Centre Strategy and has achieved dense forms of housing that are medium to high. We also support the high growth areas of St Leonards, Artarmon and Crows Nest ie we are the

“neighbourhood” for these high rise areas. There is little evidence to demonstrate that this has been considered.

(m) the ten measures outlined in the National Cabinet's National Planning Reform Blueprint

(n) the development of Transport Oriented Development Program planning policies in other Australian state and territory and international jurisdictions

(o) the impacts of the proposed Diverse and Well-Located Homes process and program. [See attached](#)

23rd February 2024
Department of Planning and Environment

Attachment 1: Re: Proposed Changes to R2 and R3 zones and 1.2km zoning around Crows Nest Metro Station

Growing Well

Dear Department of Planning and Environment,

We are writing to you regarding the announced intention to increase density in R2 and R3 zones and within 1.2km's around Crows Nest Metro Station.

We are the council recognised residents representative association for the Naremburn area. We distribute information to 3000 households and have over 100 active members. We have endeavoured since 1901 to work with the government of the time to achieve positive outcomes whilst maintaining our important heritage, green space and advocating for the services needed to support a growing population.

We recognise the need to address rising housing costs.

We are particularly concerned that key workers are able to be accommodated close to schools and hospitals, that affordable housing ratios are complied with and young people in the area can afford to buy into the housing market. For many years we have been working to accommodate growth whilst maintaining our unique history, character and environment.. We have successfully densified providing a wide diversity of housing types however services and infrastructure in the area are not keeping pace.

The historic village suburb of Naremburn sits squarely within the overlapping range of the proposed reforms. These changes combined stand to impact the whole residential area of the suburb of Naremburn and we believe, in their current form, produce unsustainable and unhealthy outcomes. We would like the opportunity to further discuss our ideas and suggestions as to how housing affordability can be better achieved.

It should be noted that these reforms were discussed with the community in depth at our General Meeting on the 15th February following a briefing with Willoughby Council - all members were invited to contribute and we received many contributions which form the basis of this submission.

Background

We would like to bring to your attention the following:

1. The work we have already done as a suburb bordering three council areas to **accommodate density**: The Willoughby City Council community profile on the community website reports that the estimated 2022 **population of Naremburn is 5,960 people**. With a land area of only 1.24 square km, this represents a **population density of 4,798 persons per square km**. This is significantly greater than the density of the wider Willoughby LGA at 3620 per sq km, Mosman at 3359 and Lane Cove at 3868. Of the adjoining LGAs, only North Sydney at 7162 per sq km has a denser population than Naremburn. (Source: NSW State of Environment Map Viewer). According to Willoughby Councils January 2024 papers Naremburn is within a subset of Willoughby suburbs which provide 94% of Willoughby's social housing. In Willoughby City, 56.7% of the dwellings were medium or high density, compared to 46% in Greater Sydney. In Naremburn Ward, 77.0% of the dwellings were medium or high density, compared to 57% in Willoughby City. **In Naremburn, 63.6% of the dwellings were medium or high density, compared to 57% in Willoughby City.**¹ Naremburn has done much of the heavy lifting already when it comes to density. We are not against sustainable, well planned development. We are however a small, geographically constrained and densely populated area which lacks the services and infrastructure to cope with more growth.
2. The significant and unique built, indigenous, and natural **history of Naremburn** on the North Shore which accommodates two heritage conservation areas. Naremburn is recognised as the second settlement on the North Shore and it's history is entwined with the Gamaraygal 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 helped build 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. The community, council, developer and government efforts to conserve this important heritage suburb whilst accommodating growth to date has been substantive. Home owners in conservation areas have also made sacrifices and invested to maintain often hard to maintain homes in the belief that a conservation area holds a collective value, both social and financial. The proposed changes, in their current form, stand to undermine the time, effort and investment generations have made to successfully achieve balanced growth.
3. **2023 has seen the finalisation of the 2036 St Leonards/Crows Nest Masterplan which sits on our Southern boundary.** This plan has been completed after collaboration between the Department of Planning, Willoughby, North Sydney and Lane Cove Councils and the community.

At all stages Naremburn Progress Association asked for 3 things in the Masterplan

1. **Good open green space.**
2. **Stepping down in height from the towers to the Conservation Area.**
3. **Necessary infrastructure before or in line with development.** e.g. traffic, parking, sewerage, water, electricity, gas and open green spaces, pleasant streetscapes with mature trees with spreading canopies that provide shelter from summer sun.

The Masterplan recognises the importance of maintaining the Naremburn Conservation Area as both Willoughby Council and the community feel that it is important to preserve the heritage and character of the Conservation areas for present and future generations. **St Leonards has been used by all 3 Councils to achieve population targets with ever greater heights and density.** At the outset St Leonards was to be a strategic centre for creation of jobs, but as the old commercial buildings were razed the new buildings have been rebuilt for residential or mixed use with the 3 Councils placing the jobs in their own CBDs.

This has resulted in St Leonards having perhaps the highest population density per sq. km (via development along the Pacific Highway, South St. Leonards and St. Leonards Central) of any other suburb on the Lower North Shore. The residents do not enjoy the same amenity as those

¹ <https://profile.id.com.au/willoughby/about?WebID=150>

living close to Chatswood, Lane Cove and North Sydney CBDs and need to travel to these areas for shopping and community amenities.

4. **On the Northern boundary of Naremburn** we have density without Master Planning with the **Channel 9 and Walter St developments** representing another 600+ dwellings and hundreds of additional cars on the road that will be highly impacted by the Warringah Freeway changes. At the **Western Edge there is the proposed Royal North Shore Development (Herbert St Master Plan²) and the density of Artarmon on our border**. Naremburn often acts as the community space for all of these dense areas whilst serving it's own density with two thirds of Naremburn being made up of homes other than single dwellings. Naremburn has managed to pull it's weight regarding density whilst also being the custodian suburb for the parks, bushland escapes, walking routes, sport facilities, community services and village atmosphere that is rapidly disappearing or under contest within these highly dense zones.
5. **Our community accepts development, however, rejects poorly planned overdevelopment that is unsupported by increased investment**. We are facing significant challenges with regard to the **disintegration and inadequacy of the sewage systems** in the area - resulting in recent substantive fines to Sydney Water (\$365k for the 2020 spill of over 16ML of raw sewage plus another \$500k for other environmental projects). This was the largest overflow in recent history across Sydney. Concerningly, several government reports highlight that the North Head catchment will not cope with the planned density in the large growth areas served ie Parramatta, Chatswood, St Leonards etc We are also seeing stormwater issues which are not being addressed due to gaps between State and Local Government jurisdictions. **Bus service failures** with commuters left stranded at bus stops due to full buses is common and there has been **no strategic planning to address the stress on our parks and sporting facilities** which are at capacity. Developer contributions at our margins are often used in other areas despite the impact to Naremburn. We are losing hundreds of trees (and verge space) to the Warringah Freeway Upgrade yet there is insufficient space being provided by the State Government for replacement. The controls proposed make this situation worse with a significant **loss of green space and canopy** in private backyards. Being at the junction of two freeways it is critically important that we retain adequate tree cover and investment is needed to properly **Master Plan the area and provide space**.
6. The **traffic implications of growing density** combined with the concerning impacts of the **Warringah Freeway/ Western Harbour Tunnel reconfiguration** and **poor active transport** connections represents a significant congestion risk. Naremburn is the suburb that connects a **majority of commuters travelling from the North West, North Shore and Northern Beaches** (including Frenchs Forest growth area) **to the Warringah Freeway**. The proposed Warringah Freeway "upgrade" will remove some key local connections to the freeway, resulting in major local traffic congestion at our major intersections and arterial roads (Amherst/ Brook St, Brook/ Chandos St and along Willoughby Rd). The detrimental impact of prioritising the toll road connections over local connections has been predicted in project documents and meetings with TfNSW. This stands to have a similar impact on Naremburn to that being experienced around the Rozelle Interchange. We have advocated that, with the cancellation of the Beaches Link, the connections should be re-planned to relieve the obvious choke points however the project is proceeding as originally planned. With or without the Beaches Link the changed connections at Brook St and Willoughby Rd (as well as Falcon, Earnest and Military Rd) stand to have a profound effect on traffic flows across Willoughby and is a significant barrier to growth.
7. The **sensitivity and importance of the natural environment** in the vicinity which borders **Flat Rock Gully** - a waterway already under incredible strain having recently suffered a mass fish kill event, ongoing development impacts, tree dieback, a major (and frequent) sewage overflows and now being under a contamination management plan - cannot be underestimated. This wildlife corridor is home to endangered species, unique geographical features, aboriginal heritage and is a major biodiversity reserve for the North Shore. Australia has some of the highest rates of urban extinction in the world - if we are to densify further these areas need proper protection. Currently there are some C4 zones along the corridor between Lane Cove and Middle Harbour however there are gaps in the protections around

² https://www.dpie.nsw.gov.au/_data/assets/pdf_file/0013/325111/200828_RNSH-Redevelopment_FAQs.pdf

Willoughby. This should be rectified as a matter of priority and the R3 changes proposed should not apply to areas directly adjacent to this important waterway and wildlife corridor and other parks in the area.

8. **Naremburn is significantly constrained in terms of active transport** due to geography (deep gullies/inclines at the border with Northbridge and Cammeray forming Flat Rock Gully), man made structures (two major freeway systems and their ramps/ arterial roads and a railway line with only two very poorly maintained, unsafe and graffitied crossings) and broken transport links. The bike path that connects Willoughby and North Sydney currently terminates within the freeway system! and there are several points at which commuting cyclists and pedestrians converge which recently saw two active transport users taken to hospital seriously injured. Both the under and overpasses of the freeway at the end of the Gore Hill Cycle Path need urgent re-engineering to separate commuting cyclists and walkers. Slowing down cyclists at these points would be counterproductive to commuting - a grade separated and safe link between the Gore Hill cycleway and Cammeray (as a minimum) is needed. In the meantime **most of the Local Centres within 800mtrs as the crow flies should not be considered walkable** as they are impossible to safely traverse particularly with shopping and/ or children.

9. **Naremburn no longer has it's own Primary school and the area has a shortage of (healthy) parks and sporting facilities.** Children are forced across freeways, main roads and poor connections to access schools. These connections will become busier with the freeway configuration changes. Pocket parks and green space amongst high rise developments will not service the needs of the density already planned. We need **investment in a fully scoped Gore Hill Sporting Facility, additional green space identified (that does not degrade bushland) and innovative spaces** provided over car parks and within developments for indoor sports. Wherever possible **carparks should be undergrounded to create more community space and these spaces should be protected from traffic and pollution** - our current Streetscape upgrade sits at the end of the Warringah Freeway upgrade which will cause a significant increase of traffic to Willoughby Rd. We have asked for green walls and attractive sound barriers to be provided as part of the Freeway project with no response. **Children need healthy spaces to grow up in** - they should not be crammed into high rise schools zoned to serve high rise apartments or forced to play in polluted parks. **We would be pleased to discuss further ideas such as considering a junior campus at Naremburn and creating more green space as discussed in this submission.**

10. Whilst many new developments have evolved to become residential rather than commercial in function there are reports of **older commercial buildings having high vacancy rates**. CI Australia³ reports that the commercial vacancy rate in St Leonards and Crows Nest reached 24.3% by June 2023, the highest vacancy rate since 1990. Reports since as well as anecdotal evidence suggest this trend is continuing. Architects and builders report that the **cost and legalities of conversion from commercial to residential is prohibitive**. A pattern book approach and review of these legalities may create an opportunity for conversion reducing the need for new builds and ever increasing heights. Additionally we are hearing of increasing **vacancy in residential stock** across Willoughby (approx 240 dwellings in the Naremburn/ Crows Nest/ St Leonards postcode⁴) and significant **competition from overseas buyers** in St Leonards and Crows Nest. Many new developments are high end luxury apartments (a penthouse recently sold for \$18M) that the average 20 something demographic cannot compete for. The ABS predicts that our highest rate of growth from immigration will be in the 20 something demographic - smaller more affordable entry level options such as granny flats are required rather than large luxury developments. Whilst we support the right type of growth it needs to be carefully balanced with traffic/ parking issues, heritage and livability. **We do not support the removal of minimum lot sizes and shoebox style apartments**. The government should set a minimum standard of living and address the other factors mentioned above to address affordability. We also **reject the notion that developers should be given height and FSR bonuses** to include affordable

³<https://www.ciaustralia.com.au/media/4174/ci-australia-north-shore-office-market-report-h1-2023.pdf>

⁴https://sqmresearch.com.au/graph_vacancy.php?postcode=2065&t=1

living space on the North Shore. Land and property values are high - a percentage of all dense builds should include a mandatory affordable/ key worker quota without jeopardising privacy, green space and other livability factors.

We would like to suggest the following approach:

Please Do:

1. **Consult** with local communities and give council decision making powers over zoning and where density is best suited
2. **Consider** that **Naremburn is already a density success story** with a depth of housing supply. We are doing density, mixed development and conservation well and have experience as to the best approach to achieve that mix.
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.

Please 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) and the increased heights in R2 and R3 zones that would fundamentally change the character of the suburb and impact heritage and privacy. Where density is zoned to increase privacy and light requirements should be tightened to offset these issues. Increasing FSR should be offset by the government offering greater protections over public spaces and converting public land to more green space.
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 and priority changes)
4. **Don’t undervalue Sydney’s history, character and community** by arbitrarily overriding our modest but enormously important conservation areas, character and heritage items.
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 sewage overflow in Sydney in recent years has been at Naremburn (600M Litres of Sewerage) and most enforceable undertakings by Sydney Water have been associated with the North Head catchment which has received an audit request from the EPA. Considerable investment is needed in systems which all connect to and flow through Naremburn according to the current “Greater Sydney Water Strategy”⁵and the “Securing a Water Resilient Future for GPOP”⁶ [2] Report. Naremburn is the junction point between the NSOOS, the Northside Storage Tunnel and Middle Harbour - systems need to be heavily invested in at this junction and capacity increased to support development from

⁵ <https://water.dpie.nsw.gov.au/plans-and-programs/greater-sydney-water-strategy>

⁶ <https://www.sydneywater.com.au/content/dam/sydneywater/documents/Securing-a-Water-Resilient-Future-for-GPOP-Brochure.pdf>

occurring not only in Naremburn but from Bankstown, Parramatta, Chatswood, St Leonards and Crows Nest.

Final Consideration

We have contacted the Hamburg Freeway Capping Project Team in Germany⁷ to understand more about their project and would be happy to pass on more information. This is a project born out of community advocacy aimed at repairing a community divided by an expressway and in so doing provide green space and opportunity for sustainable and healthy growth. There are many examples of this type of urban renewal project occurring worldwide. It is clear the North Shore is out of space with North Sydney and Willoughby having some of the lowest green space to population ratios in Sydney. The areas between Naremburn and Cammeray would be ideal to provide this kind of solution.

Capping/ Lidding the Freeway would provide opportunity to resolve local traffic issues, active transport connectivity, provide for a park/school and in so doing provide capacity for more affordable housing in the area. Given the land values on the North Shore the cost/ benefits of this option should be seriously considered in order to accommodate more people whilst maintaining liveability. The NPA for some time has also been advocating for the continuation of the rail system between Chatswood and the Northern Beaches. Extending the Metro stopping at North Chatswood, Frenchs Forest and Brookvale would serve key growth centres whilst removing traffic from the road. Removing a substantial percentage of the flow through traffic would also provide capacity for growth which isn't currently possible without peak hour gridlock and major intersection failures.

Below we have attached some pictorial references to help demonstrate the issues

We would appreciate the opportunity to discuss these issues and work with you at your earliest convenience.

Yours faithfully

Larissa Penn

President Naremburn Progress Association

On Behalf of the Naremburn Progress Association Executive Committee and Members

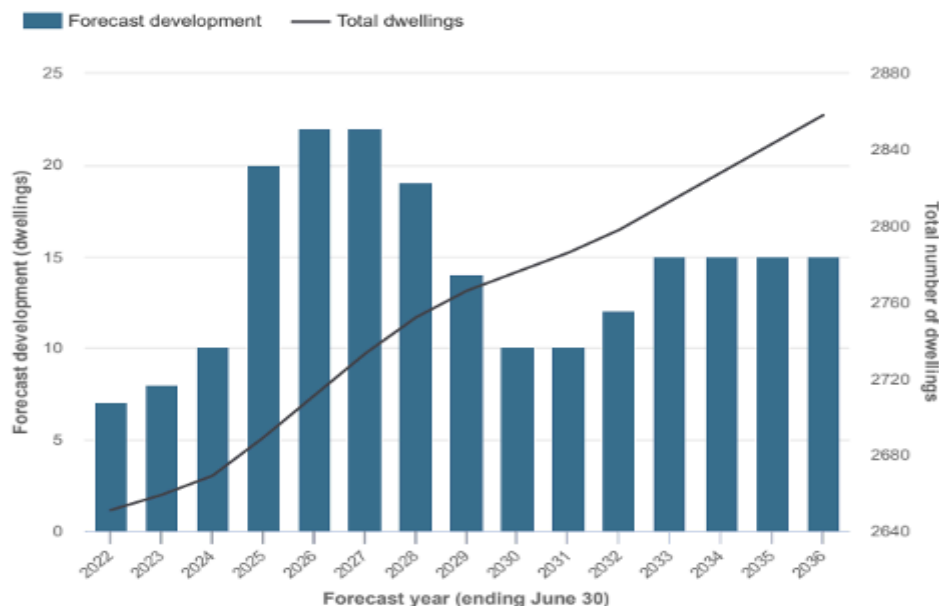
⁷ <https://naremburnprogress.org.au/wp-content/uploads/2023/09/NM-August-2023-PRT-v2.pdf>

Appendix

1. The Growth and Housing Diversity already planned for Naremburn and achieved across Willoughby - Forecast id⁸

Forecast residential development

Naremburn

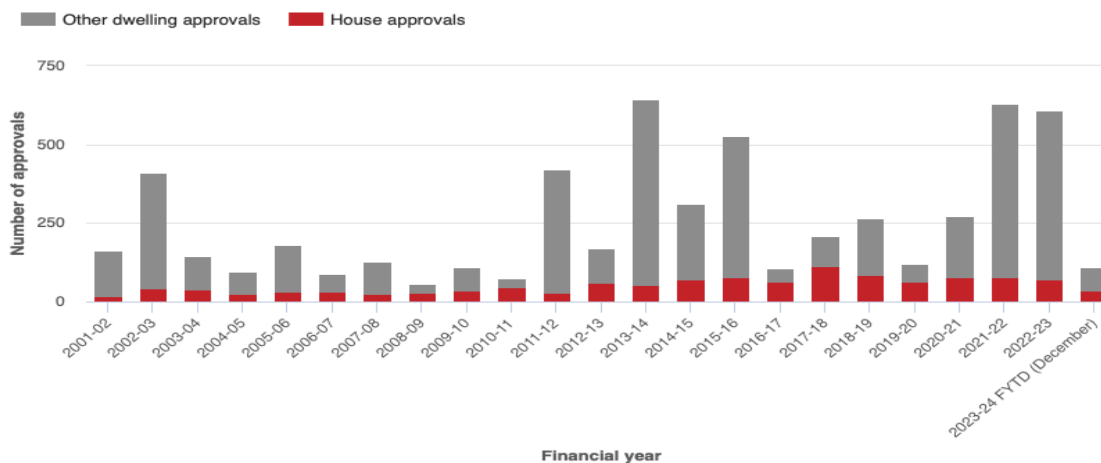


Source: Population and household forecasts, 2021 to 2036, prepared by id (informed decisions), January 2023.

Residential building approvals

Willoughby City Council

export



Source: Australian Bureau of Statistics, Building Approvals, Australia (8731.0). Compiled and presented by id (informed decisions).

Dwelling structure

Occupied private dwellings (excl. visitor only and other non-classifiable households)

	Naremburn	%	New South Wales	%	Australia	%
Separate house	893	37.8	1,902,734	65.6	6,710,582	72.3
Semi-detached, row or terrace house, townhouse etc	461	19.5	340,582	11.7	1,168,860	12.6
Flat or apartment	1,010	42.7	630,030	21.7	1,319,095	14.2
Other dwelling	0	0.0	19,374	0.7	54,711	0.6

More information on [Dwelling structure \(STRD\)](#)

Table based on place of enumeration

⁸ <https://profile.id.com.au>

2. Historical Significance of Naremburn -

See Willoughby Historical Society⁹

upstream were the Naremburn Falls. These Falls were of unparalleled beauty and no doubt the splash of the falling water must surely have been soothing and inspiring to Henry. His cave really was in a grand setting and we will never know the profound influence it must have had on him.

Posterity, however, is fortunate that the cave still exists today and deserves to be tended and preserved as a shrine to that great Australian. This is the site which must lay claim to his statue to guard the refuge of his Spirit, not in an out-of-the-way city park. The cave overlooks the playing fields that now replace the magnificent waterfalls and wooded ravine which our civic fathers saw fit to destroy forever for the sake of a repository for garbage and rubbish. Only slight compensation is afforded as these fields will now form part of a linear park system and will be named Bicentennial Reserve, Willoughby.

But the spirit of Henry Lawson lives on and Naremburn's present and future generations should be able to recognise with pride that they also owned part of that literary giant. What finer tribute could be rendered, belatedly perhaps, than to dedicate part of what remains of that gully to the memory of such a great literary genius. It would be a fitting posthumous recognition.

Henry Lawson Account in "The Naremburn Story" by Eric Wilksch¹⁰

Walk the Link Connecting Our Heritage Conservation Areas



A streetscape in Naremburn Conservation Area

expected to become the commercial centre of the north side of Sydney Harbour.

The development of the area now known as the NCA was part of the Crows Nest Subdivision of 1903. The uniform grid pattern of the streets bounded by Chandos Street, Willoughby Road, Lawson Lane, and Northcote Street, with small, narrow frontage allotments, was classified by the National Trust as an Urban Conservation Area in 1983.

Taking a walk in and between both areas provides perspective on how development that seeks to maintain the built environmental and social cohesion of Naremburn is the best way forward.

3.



A home in Naremburn's Town Centre Heritage Area

BY JULIE WADDINGTON AND PHILLIP BIGGS

Naremburn Central Township (NCT) and the Naremburn Conservation Area (NCA) provide historical context for Naremburn's significance as the gateway to Willoughby. They're examples of how 19th- and early-20th-century cottages give Naremburn

its distinctive, cohesive character. The areas are geographically distinct and quite different in character, too.

The NCT was the first European settlement in the area, bounded by Central, Market, Adolphus, and Slade streets. In the 1880s, residential development occurred concurrently with commercial development that was

Sources: Willoughby City Library digital collection, including Naremburn Neighbourhood Walk.

CONTINUED ON PG 10

Story in Community Newsletter - History Edition¹¹

⁹ <https://abc17603.wordpress.com/history/suburbs/naremburn/>

¹⁰ [Bicentennial Book - The Naremburn Story by Eric Wilksch Willoughby City Library https://libraries.willoughby.nsw.gov.au › ecm](https://libraries.willoughby.nsw.gov.au › ecm)

¹¹ <https://naremburnprogress.org.au/wp-content/uploads/2023/09/NM-August-2023-PRT-v2.pdf>

St Leonards & Crows Nest 2036 Plan

What we've heard and how we've responded

The final St Leonards and Crows Nest 2036 Plan supports the St Leonards and Crows Nest community with new infrastructure, open spaces, upgraded cycle lanes and plans for future health and education needs.

We received a lot of feedback on the draft St Leonards and Crows Nest 2036 Plan exhibited in 2018 and we've been working closely with the community and other stakeholders to ensure this has been reflected in the final plan.

We've heard and responded to concerns about height and open space and we've given detailed consideration to other issues raised in submissions.



4. Channel 9 and Walter St - Daily Telegraph Article¹³



The proposal has been lodged to Willoughby Council.

“With these 164 apartments (along with) the 460 at the Channel 9 site it would appear that an additional 1200 resident cars will be added to the community and will result in excess of 2000 extra movements through the limited intersection at Willoughby and Artarmon Rds,” they said.

¹² <https://www.planning.nsw.gov.au/sites/default/files/2023-03/st-leonards-crows-nest-planing-package.pdf>

¹³ <https://www.dailytelegraph.com.au/newslocal/north-shore/willoughby-walter-rd-development-plans-for-164-units/news-story/947217a30a534703d5e95c51b73ee79c>

5. Failing Infrastructure and Services

5.1 Sewerage and Stormwater Systems

Some parts of the Lower North Shore wastewater system were originally commissioned as far back as 1888, with the majority in place by 1930. So, the network is generally over 100 years old and is now prone to breakdown and overflow into surrounding waterways such as Flat Rock Gully. Coupled with this, the Northside Storage Tunnel (a major 500 ML storage and treatment facility) is operating at capacity, with no ability to handle the significant wastewater volume increases which will arise as new developments such as Walter St and Nine by Mirvac come on line. Development proposals typically conclude that on an incremental basis additional outflows generated will not adversely affect network operation, but conveniently overlook the fact that current operations are already above capacity, with physical networks subject to failure, and accompanying environmental issues. A major line failure in 2020 resulted in the EPA fining Sydney Water a total of \$865k, but fines are not the correct strategy to utilise to ensure compliant behaviour - we need iron-clad commitment from all levels of government to ensure adequate funding for this major infrastructure project.

Another peculiarity of the Naremburn area is the existence of sewer “party lines”, whereby sewerage is handled via aboveground services, with a lack of clarity as to ownership, extent and liability for maintenance and cleanup. Although on a much smaller scale than the sewage issue noted above, it still represents a significant hazard and must be programmed for bringing up to standard - this standoff by the authorities has been going far too long.

Stormwater management and repair of failed infrastructure is also a major concern. Some installed services have never functioned properly since original commissioning e.g. stormwater drain at northern end of Naremburn shopping village. Willoughby Council has programmed several large-scale repairs/upgrades of failed services, but the overall issue lacks proper timing and capital allocation. There is also a question around capability to complete current programmes.

The foregoing means that any increase in housing density in the Naremburn area must be carefully considered as critical services infrastructure is failing and requires major repairs/ capacity upgrades prior to any housing density increase.

Previous reports of subsidence in Naremburn and Party Lines:

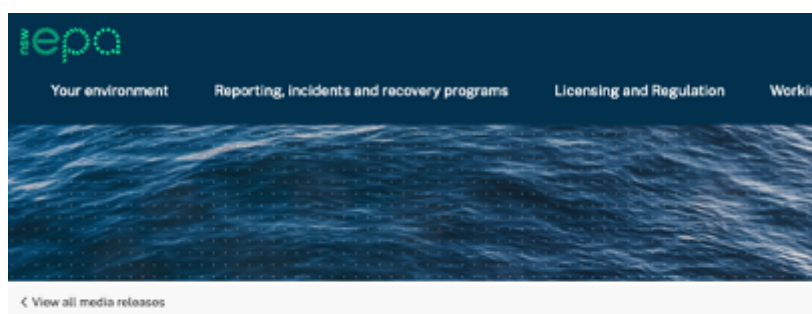
<https://drive.google.com/drive/folders/1y3xmZt69zMS4C7RN9AWD8TxwoOjjmEz?usp=sharing>

Prosecution for Sewage Overflow:

https://www.caselaw.nsw.gov.au/decision/189094965bbb21c38fc8b007#_Toc139011888

EPA media Release:

[https://www.epa.nsw.gov.au/news/media-releases/2023/epamedia230711-sydney-water-to-pay-over-\\$865k-after-huge-sewage-overflow](https://www.epa.nsw.gov.au/news/media-releases/2023/epamedia230711-sydney-water-to-pay-over-$865k-after-huge-sewage-overflow)



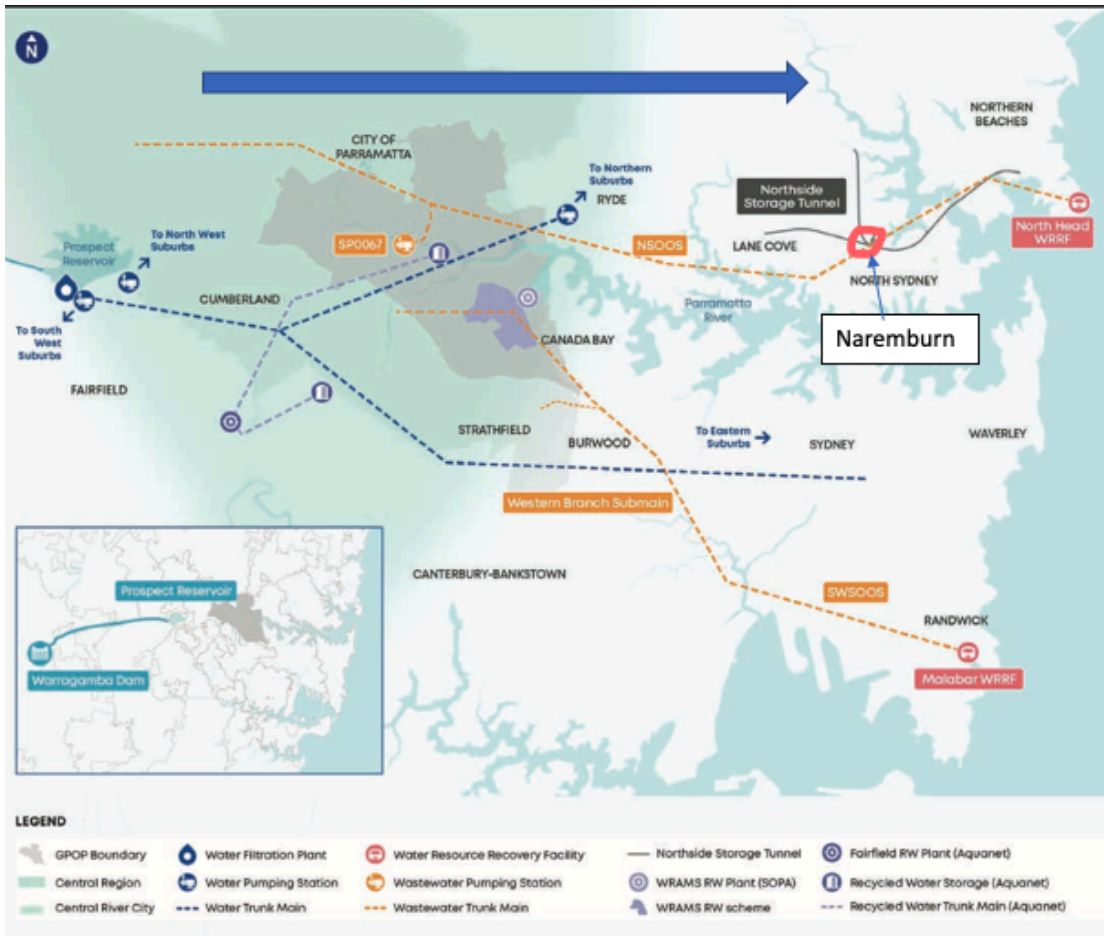
Sydney Water to pay over \$865k after huge sewage overflow

11 July 2023

Sydney Water Corporation has been convicted and fined \$365,625 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.

The North Head Catchment has significant capacity issues: per the Greater Parramatta and Olympic Peninsula (GPOP) Plan

Naremburn sits at the Junction of the 500 Million Litre Northside Storage Tunnel and the NSOOS¹⁴ which services high growth areas from as far away as Bankstown to Parramatta, St Leonards, Crows Nest and Chatswood. The Greater Parramatta and Olympic Peninsula Master Plan; Securing a water resilient future for GPOP" makes it clear that there is insufficient capacity in this systems to support the planned growth in Parramatta let alone the rest of the area served under the North Head catchment. Naremburn sits at a critical junction where some of the oldest pipes on the North Shore of Sydney meet overflow points and the precious environments of Middle Harbour. A lack of investment combined with the pressures of development in this area have already resulted in a disastrous overflow situation and suspected subsidence. The North Head catchment (below right) at Blue Fish Rd, Manly has the highest number of enforceable undertakings issued by the EPA and the Naremburn overflow is the largest listed in the history of Sydney Water prosecutions quoted in the proceedings.



[Export to excel](#)

Number	Name	Premises	
1527672	SYDNEY WATER CORPORATION	FISHERMANS ROAD, MALABAR, NSW 2036	View document
1541831	SYDNEY WATER CORPORATION	BLUE FISH ROAD, MANLY, NSW 2095	View document
1562955	SYDNEY WATER CORPORATION	BLUE FISH ROAD, MANLY, NSW 2095	View document
1617612	SYDNEY WATER CORPORATION	JUNCTION ROAD, SHELLHARBOUR, NSW 2529	View document
1617615	SYDNEY WATER CORPORATION	CORNER OF SHEATHERS AND FERGUSON LANES, GRASMERE, NSW 2570	View document
1623088	SYDNEY WATER CORPORATION	PORT KEMBLA ROAD, WOLLONGONG, NSW 2500	View document
1627006	SYDNEY WATER CORPORATION	BLUE FISH ROAD, MANLY, NSW 2095	View document
1628070	SYDNEY WATER CORPORATION	FISHERMANS ROAD, MALABAR, NSW 2036	View document
1629365	SYDNEY WATER CORPORATION	BLUE FISH ROAD, MANLY, NSW 2095	View document

22 February 2024

Rethinking the linear approach

GPOP is currently serviced by rainfall dependent water supply from Warragamba Dam, and wastewater is transferred by the Northern Suburbs Ocean Outfall Sewer (NSOOS) to the North Head Wastewater Resource Recovery Facility (WRRF) for treatment and release to the ocean. The NSOOS and North Head WRRF do not have sufficient capacity to service the projected growth for the area.

¹⁴<https://www.sydneywater.com.au/content/dam/sydneywater/documents/Securing-a-Water-Resilient-Future-for-GPOP-Brochure.pdf>

Sydney Water’s latest Annual Report¹⁵ highlights significant issues with “leakage” and “material harm incidents” exceeding criteria. The North Head Catchment appears to be the dominant offender with the most enforceable undertakings issues by the EPA to Sydney Water¹⁶ and an audit notice issued.

Thriving, liveable and sustainable cities	Deliver safe, affordable, reliable and high-quality water and wastewater services and manage our assets effectively and efficiently	Water Quality – Compliance with Australian guidelines for drinking water and recycled water products standards	All Systems compliant	All Systems compliant	✓	Stable
		Water Conservation – System Water Leakage	108 (+/-16) ML/d	129 ML/d	⊖	Improving
		Water Service – Number of properties affected by unplanned service interruptions (>5hrs)	<42,567 (Upper limit for Operating Licence)	39,935	✓	Stable
		Wastewater Collection – Number of properties experiencing an uncontrolled sewage overflow in dry weather	<14,924 (Upper limit for Operating Licence)	2,915	✓	Stable
		Wastewater Transport – Material Harm Pollution Incidents in wastewater system (overflows or incidents)	<460 in year	617	⊖	Improving

The current Greater Sydney Water Strategy; Water for a thriving, sustainable and resilient Sydney Published in August 2022¹⁷ highlights the following worrying issues. The Productivity Commission's analysis of the cost to build in established areas does not appear to account for the cost to upgrade these systems.

Challenges for wastewater management

The main challenges to improving our wastewater management in Greater Sydney are:

- Population growth is generating more wastewater, driving up nutrient loads and increasing the need for more stringent, more advanced and more costly treatment to meet discharge standards.
- Increasing demands on the Hawkesbury–Nepean River to supply water and wastewater services to Sydney are leading to elevated nutrient levels and reduced river flows, contributing to ongoing risks of algal blooms and excessive aquatic weed growth.
- Development is pushing into ephemeral sub-catchments, such as Upper Wianamatta South Creek and parts of the Greater Macarthur Growth Area, requiring more recycling and pipeline infrastructure to move wastewater to suitable receiving waterways.
- Sydney’s three major deep ocean outfall treatment plants at Bondi, Malabar and North Head are having increasing difficulty complying with discharge limits for oil and grease, and there are significant challenges in managing infrastructure.
- Discharging sub-primary treated effluent to the ocean is out of step with accepted national and global practice, and although current testing has not identified risks, we need to guard against future long-term risks associated with emerging concerns about microplastics and other contaminants.
- Wet weather overflows from the sewerage system continue to be a problem for waterway health, recreational uses and amenity.
- The trunk wastewater network is exposed to single points of failure.
- Fixing these problems and upgrading infrastructure, especially the large coastal systems, will be complex and costly.

¹⁵ <https://www.sydneywater.com.au/content/dam/sydneywater/documents/sydney-water-annual-report-2022-23.pdf>

¹⁶ <https://app.epa.nsw.gov.au/prpocoapp/searchenforceableundertaking.aspx>

¹⁷ <https://water.dpie.nsw.gov.au/plans-and-programs/greater-sydney-water-strategy>

5.2 Stormwater Failures and Inadequate Waterway Protections

Naremburn regularly experiences flooding and overflows due to stormwater runoff that has been left without being addressed predominantly due to jurisdiction disputes between the Council and State Government. Naremburn has a very high proportion of State Government Roads and Infrastructure for such a small suburb and addressing this means taking a cross jurisdictional approach. These issues were noted in the Greater Water Strategy as having a significant impact on the ability of established suburbs to manage increasing development pressures and the impact to the environment is considerable. Even our waste facilities are under pressure due to taking on more rubbish leading to the disastrous Fish Kill event.

Below Naremburn Shops - dangerous entry point from Willoughby Rd (a State Road opposite Freeway offramp) to Village Shops and stormwater run off into Flat Rock Gully from building sites located on the edge



Home > Working together > Community engagement > Community news: updates on current and ongoing issues > Flat Rock Creek fish kill

Community engagement

Community news: updates on current and ongoing issues



Noise investigations



Flat Rock Creek fish kill

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

5.3 Bus Service Failures

Given Naremburn is that the end of the line when it comes to the bus network to the city we regularly see buses skip our stops as they head to the city leaving residents stranded¹⁸ Many of our residents will not be able to walk the 1-2 kms to the new Metro due to age, capacity, geography, and safety issues associated with crossing on and off ramps around multiple expressways. Willoughby Council's submission to the Bus Privatisation Inquiry¹⁹ summarised the bus problem as follows:

Impacts of privatisation

2.78 On the question of the extent to which recent privatisation has led to poorer bus services, the position of Willoughby City Council was that these service changes 'were generally unrelated to the tender process for Regions 7 and 8 which occurred throughout 2020 and 2021'.¹⁶⁴ However, the Council contended that the current service levels for the area are insufficient to meet the needs of residents. Moreover, the Council expressed concern that there has been no effective planning to make changes to services in light of new infrastructure and planned growth for the area, such as the growth hub of Frenchs Forest, the Sydney Metro City and Southwest and the

6. Traffic Implications: Growth and Toll Road Projects

At a meeting in February 2023 Transport for NSW confirmed the following traffic impacts from the toll road projects. Project documents model a series of intersection failures and degraded levels of service however did not map out traffic on arterial roads. Several of the intersection failures impact Naremburn. These projections already represent a significant increase in traffic to today- further growth targets would need to consider the implications and what mitigations are required. To date Willoughby has not been included in the Road Network Review.

Traffic changes

Question	Answer	
What is the estimated increase in traffic on:	2037 forecast average weekday traffic, all	
	No project	WHT+WFU
Willoughby Rd (north of Gore Hill Fwy)*	44,000	46,500
Eastern Valley Way (north of Sailors Bay Rd)	30,000	31,000
Sailors Bay Rd (west of Strathallen Ave)	30,000	31,000
Strathallen Ave (south of Barooka Rd)	33,500	34,500
Brook St (north of Merrenburn Ave)	37,500	34,500
Chandos St (east of Alexander St)	18,000	18,000
Smith St (east of High St)	12,000	12,500
High St (north of Edinburgh Rd)	16,500	20,500

*For context existing volume on Willoughby Road is ~30-35,000 vehicles per day

Submitted questions

Traffic changes

Question	Answer	
What is the estimated increase in traffic on:	2037 forecast average weekday traffic, all	
	No project	WHT+WFU
Alpha Road (south of Mowbray Rd)	33,500	34,000
Edinburgh Road (west of Eastern Valley Way)	19,500	17,500
Mowbray Road (west of Alpha Road)	17,000	19,500
Miller Street (south of Amherst St)	31,500	32,500
West Street (south of Amherst St)	7,500	7,500
Reserve Road (south of Barton Rd)	15,000	15,000
Military Road (west of Ben Boyd Rd)	85,000	85,500
Cahill Expressway (Circular Quay)	44,500	48,500

7. The Need to Protect Our Green Spaces through planning controls i.e. Flat Rock Gully

The need to better protect Flat Rock Gully is of ongoing concern to the community whether that is due to threats from major tunnelling projects such as the Beaches Link, Building atop of the old contaminated landfill site within it's bounds or development along it's edges it is clear to most that this unique and majestic Gully needs to be afforded stronger protections.

¹⁸<https://www.theguardian.com/australia-news/2023/feb/02/mutiny-on-the-sydney-commute-pirate-bus-hits-the-road-after-privatisation-leads-to-axed-routes>

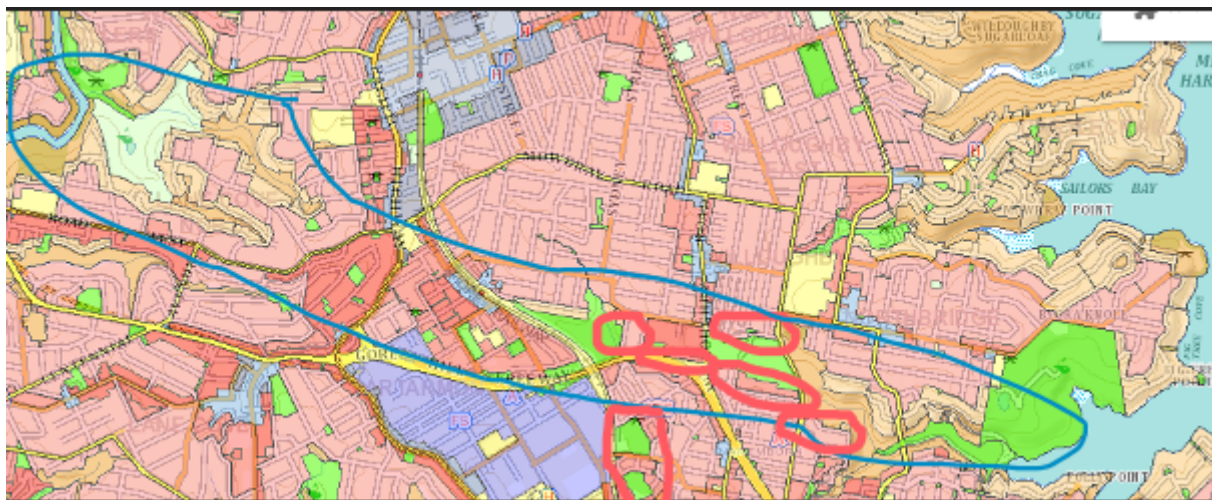
¹⁹<https://www.parliament.nsw.gov.au/lcdocs/inquiries/2858/Report%20No.%2018%20-%20PC%206%20-%20Privatisation%20of%20bus%20services.pdf?fbclid=IwAR20ckZp3UYtkrN9Lu66POIzB0h22rMJsudo4Mgp7VnBBZJheGtDGG3ohhU>

The submission to the Beaches Link EIS regarding the importance of Falt Rock Gully and why it needs to be protected is here: [Save Flat Rock Gully and Middle Harbour Submission](#)

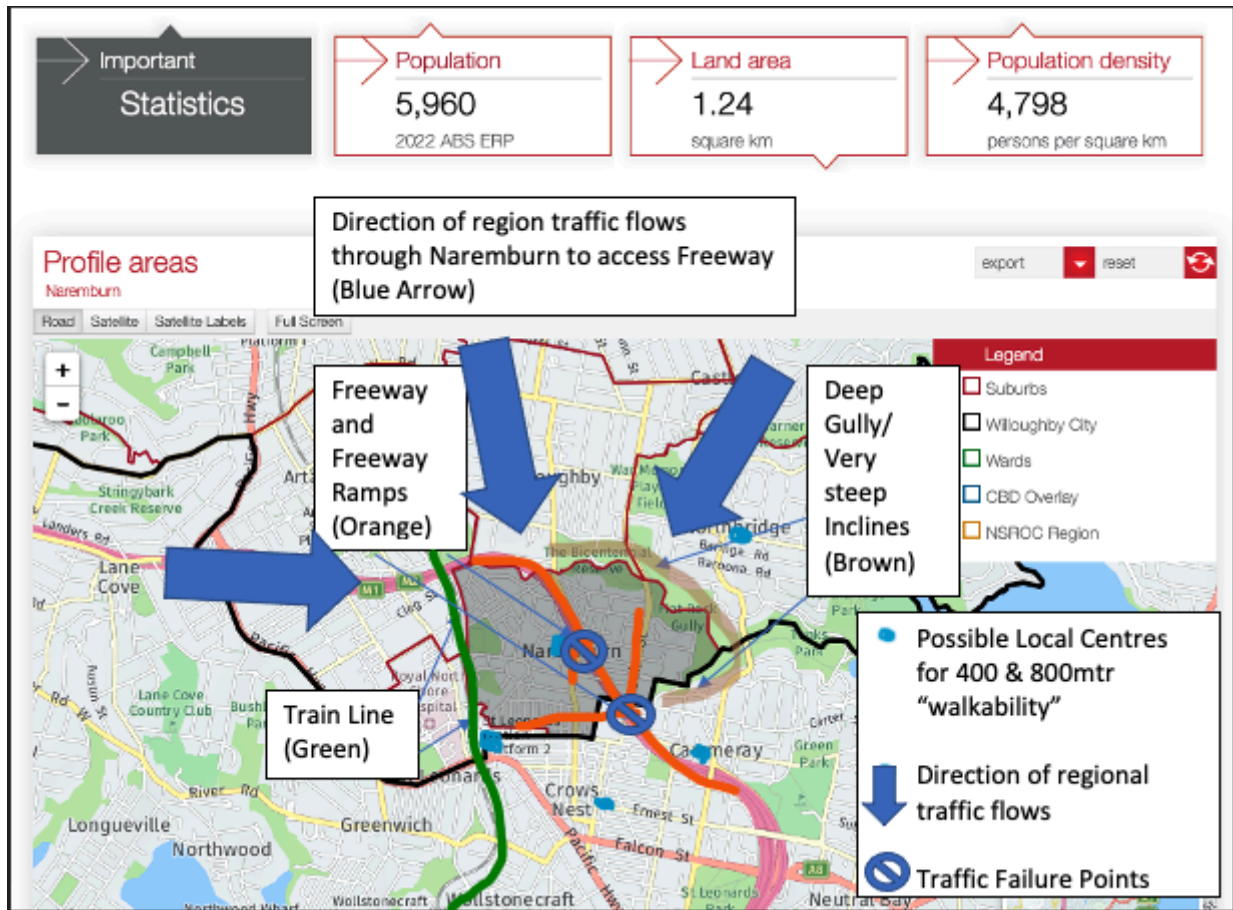
It would appear that in the past some protections were put in place in the form of C4 zones which limit development along the edge however in Willoughby there are many gaps and in some places such as Naremburn R3 zones remain. This would potentially mean 16-21 metre tall buildings being built to the very edge of this catchment and right above Henry Lawsons Cave and Flat Rock Creek. This cannot be allowed to happen and the wildlife corridor must be protected. Should the density changes come into force we ask that the areas directly adjacent to the Gully be converted to Environmental Living zones (areas in red) and that the same be done around Naremburn Park and the Upper Reaches of Flat Rock Creek.

Whilst some Environmental Living C4 zones exist (cream color) there are major gaps. Filling these gaps particularly around Naremburn would better protect the bushland and waterway into the future. In the past R3 zones have been located on the edge of parks and bushland – the opposite is required to protect these precious resources for use by the whole community. This outdated approach needs to change and the planned R3 changes should not be applied in these areas but rather density should be focussed away from catchment edges and the areas circled in red classified as C4.

Blue= Wildlife Corridor between Lane Cove River and Middle Harbour joined by Bushland (Tan), Parks (Green) and Nature Strips. Based on NSW Spacial Viewer Tool.



8. Active Transport/Walkability Constraints



Ella St Railway Bridge - is one of only two crossings across the railway line to the St Leonards/RNSH district and has been the subject of many requests for maintenance, graffiti removal, wider footpaths, a bike path and better lighting/ access. NPA ran a local competition to suggest murals and a beautification project. Active transport connections such as these need to be better maintained across Naremburn if we want to encourage people to walk and ride.

Can you help us to beautify our area? 🌻

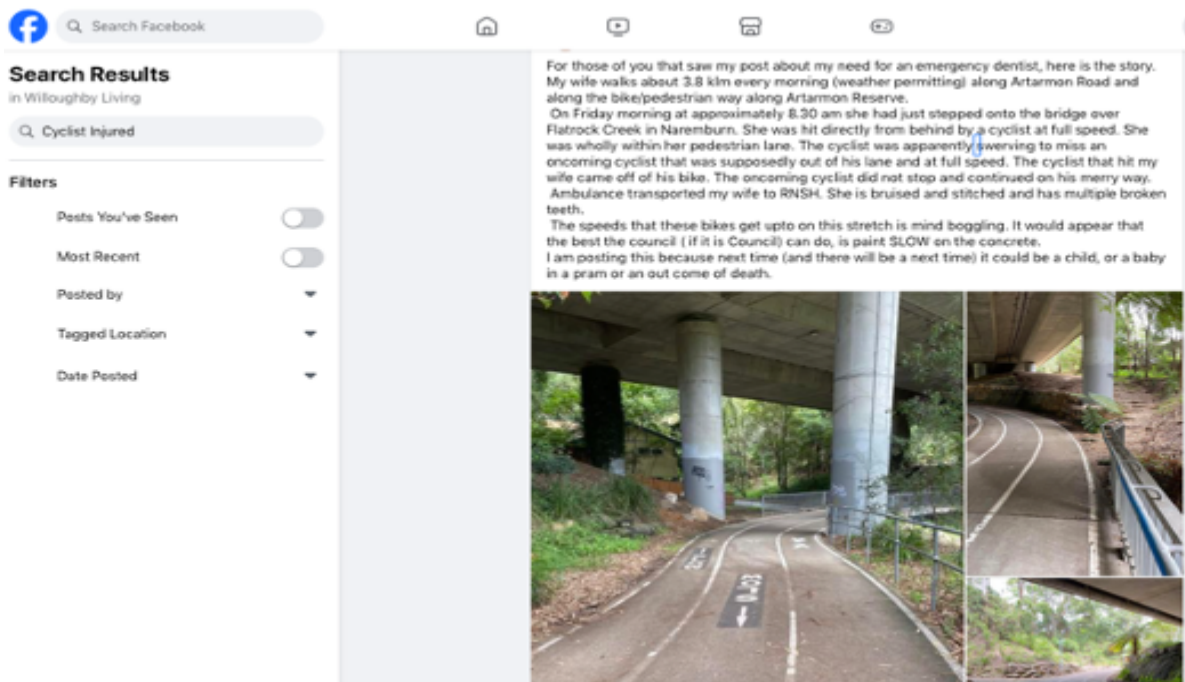
This is Ella St Bridge and it is one of the entry points to Naremburn. We think you will agree it might just be the ugliest bridge in all of Australia!! 🤢

Create your own design for a mural to fix our ugly bridge in the space provided and win the chance to have your design published in the next Naremburn Matters Magazine!! Have a look at page 7 of Naremburn Matters for some inspiration!! You never know your mural might just be painted onto the bridge one day!

Kids and Adults welcome to enter!

The Broken and Disastrous Gore Hill Cycleway to North Sydney Connection

When pedestrians and cyclists converge - the underpass and overpass across the freeway system in Naremburn are unsafe, inefficient, poorly maintained and poorly graded particularly for those with a disability. The NPA would like the opportunity to discuss solutions with the NSW Government.



The overpass and surrounding connections are also completely inadequate and unsafe with (1) cracked and slippery surfaces, (2) unsafe merge points, (3) cycleway leading onto the expressway and poles on the cycle path and (4) a shared user bridge with unsafe gradients and inefficient flow and (5) poorly maintained street signage and line markings



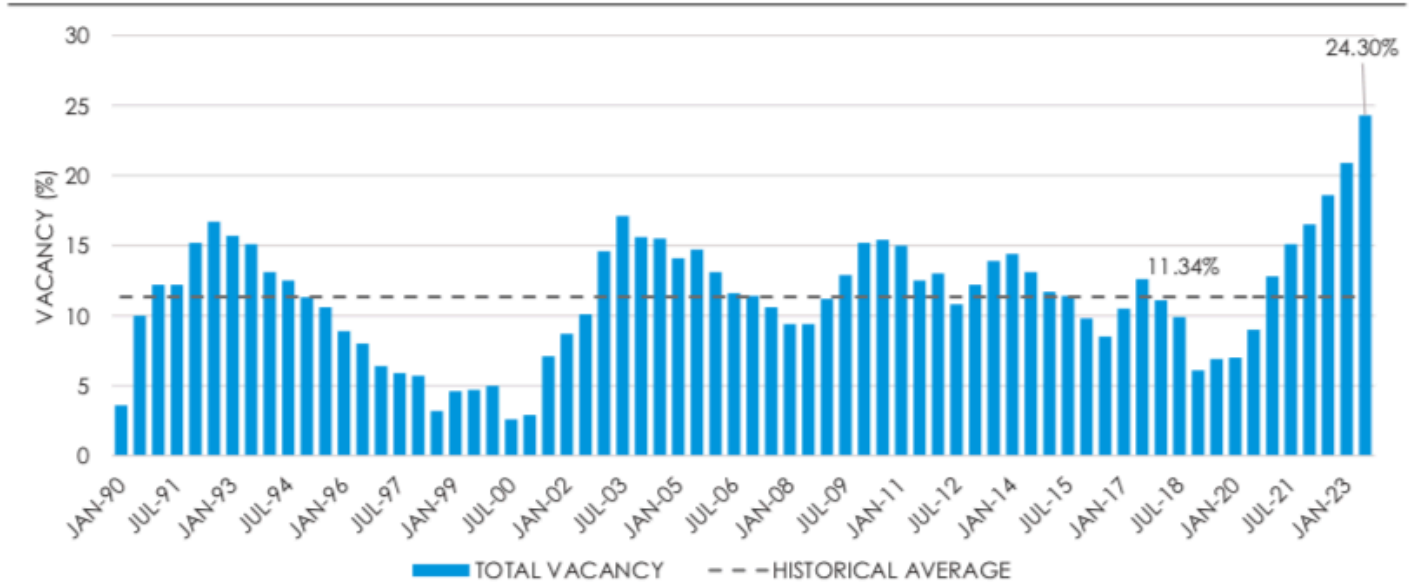
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10. Commercial Vacancy Rates are at an all time high

North Shore Office Market Report to June 2023²⁰

TOTAL VACANCY VS HISTORICAL AVERAGE - ST LEONARDS & CROWS NEST

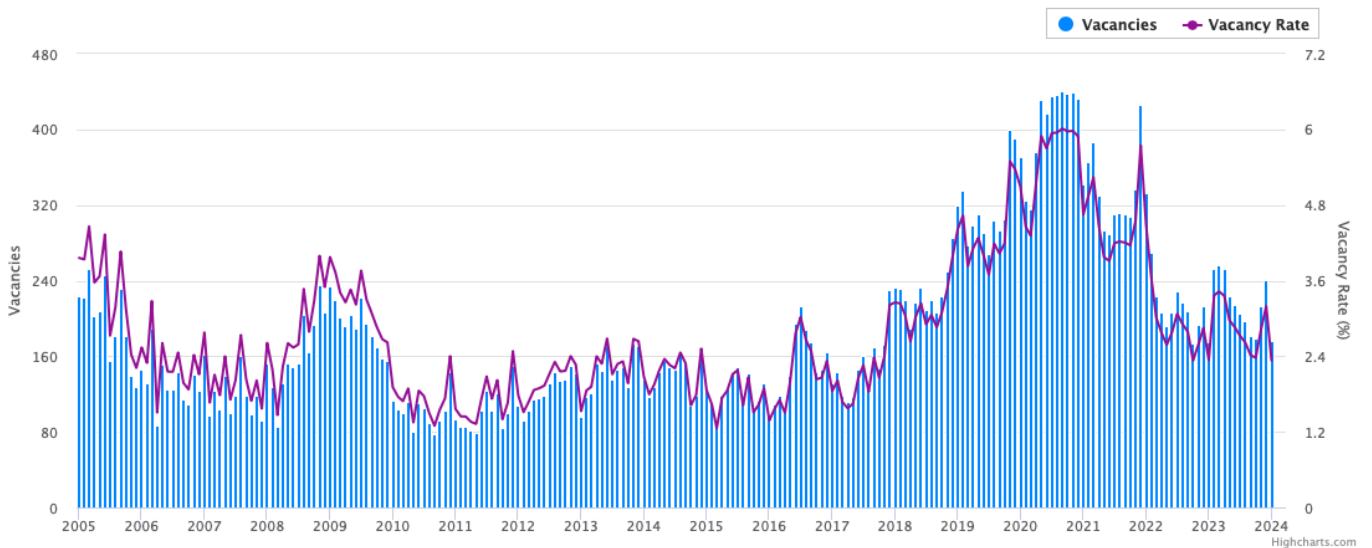


RESIDENTIAL VACANCY RATES

POSTCODE 2065

Residential Vacancy Rates

Source: SQM Research



Buy the data behind this chart

Postcode or suburb:

Residential Vacancy Rates in Naremburn and surrounds averages around 240 dwellings according to SQM Research

²⁰ <https://www.ciaustralia.com.au/media/4174/ci-australia-north-shore-office-market-report-h1-2023.pdf>

Final Considerations

RESCUING NAREMBURN FROM FREEWAY MADNESS



Image courtesy of POLA Landschaftsarchitekten GmbH

Naremburn has been hit with three major freeway projects in its history! In addition to sound walls and proper congestion planning, the NPA is advocating for space. Freeway “lidding” – building green space over the freeway – is becoming common overseas to help cities recover space from a bygone era of city and transport planning.

Imagine the space that would be created if this was done up and down the Warringah Freeway! With at least five more years of work to go and 6,000 trees to plant, now is the time for the government to (re)consider this option. A huge thanks to the designer of this lid for allowing us to show you what’s happening right now in Hamburg.

Attachment 2:

<https://www.aboriginalheritage.org/history/flat-rock-gully-an-aboriginal-history/#:~:text=Over%20the%20generations%2C%20local%20Aboriginal,through%20the%20use%20of%20fire.>