21st April 2026

To whom it may concern,

RE: 300 BURNS BAY ROAD DEVELOPMENT APPLICATION

I am an owner at 2 Waterview Dr and have been a resident for 7 years as well as being a professional transport economist. I am strongly opposed to development in this particular location because:

- **Significant topographical and transport access constraints mean the development will have a catastrophic impact on congestion, safety and amenity** – Additional construction vehicles and traffic generation from residents (+1,260 car trips per day) combined with insufficient parking (1 park per dwelling, likely to be an additional 71-119 vehicles parking on-street) and poor bus services (infrequent, slow and unreliable) will have a catastrophic impact on congestion, safety and quality of life for local residents and through-traffic from nearby Victoria and Epping Roads:
    - Burns Bay Rd is located on a ridge line with narrow lanes and paths which are not separated from local traffic, meaning further widening or intersection upgrades are not feasible.
    - There are substantial deficiencies in the transport assessment which mean it is misleading and cannot be relied upon:
        - Only 2 local intersections have been modelled with the most congested locations omitted.
        - But even then, this modelling shows the intersection will be over capacity by 2035 without the development.
        - No intersection upgrades or other capacity improvements have been included in the proposal.
- **Inappropriate scale of development which is double the existing middle-density developments in the area (5-8 storeys)** – Lane Cove has already done a lot of "heavy lifting" in terms of medium density development around the Lane Cove Town Centre and Waterview Drive/Burns Bay Rd (5-8 storeys). However, development of up to 15 storeys is totally out of character with the local area, being double the current height limit. Lane Cove has been rated as one of the most liveable local governments in Australia but this sort of high density development is now putting this under threat from the construction and resident traffic that will be generated with no mitigation.

Unique features of the local area need to be given due consideration

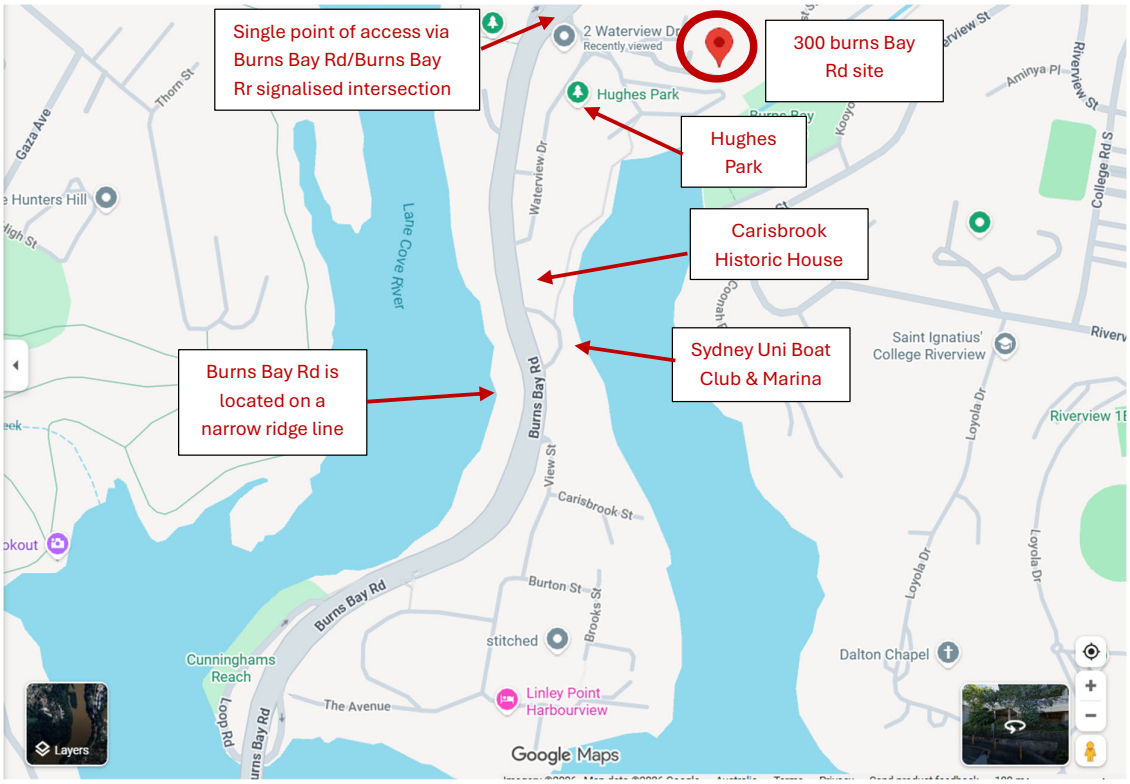
Lane Cove is not homogenous, and this side of Lane Cove (Lane Cove West) is completely different to Lane Cove Rd/Epping Rd with different topography and land

uses and significant transport network constraints making it totally inappropriate for this scale of development.

Topographical constraints from location on a ridge line

Burns Bay Rd provides the only access in and out of 300 Burns Bay Rd. This is a located on a ridge line with Lane Cove River on each side (see Figure 1). Located to the north is Epping Rd (via Centennial Ave) and to the south is Victoria Rd which generate significant traffic. Burns Bay Rd also provides access to the nearby Sydney University Boat Club and Marina, Carisbrook Historic House and Hughes Park which generate additional traffic.

Figure 1: Topographic constraints from location of Burns Bay Rd *on a ridge line*



Burns Bay Road is a main road but only had two narrow road lanes in each direction and narrow pedestrian paths with no barriers to traffic (Figure 2). There is already significant congestion with queuing in both directions during peak periods and frequent crashes (many of which nearby residents including myself have attended prior to emergency services arriving).

It is not feasible to further widen Burns Bay Rd given the topographical constraints, meaning that congestion and safety risks to both motorists and pedestrians will increase

substantially over time with general growth in population. But the 300 Burns Bay Rd development could generate more than 1,260 car trips per day[1].

Figure 2: Narrow lanes and pedestrian paths with no barriers to main road traffic

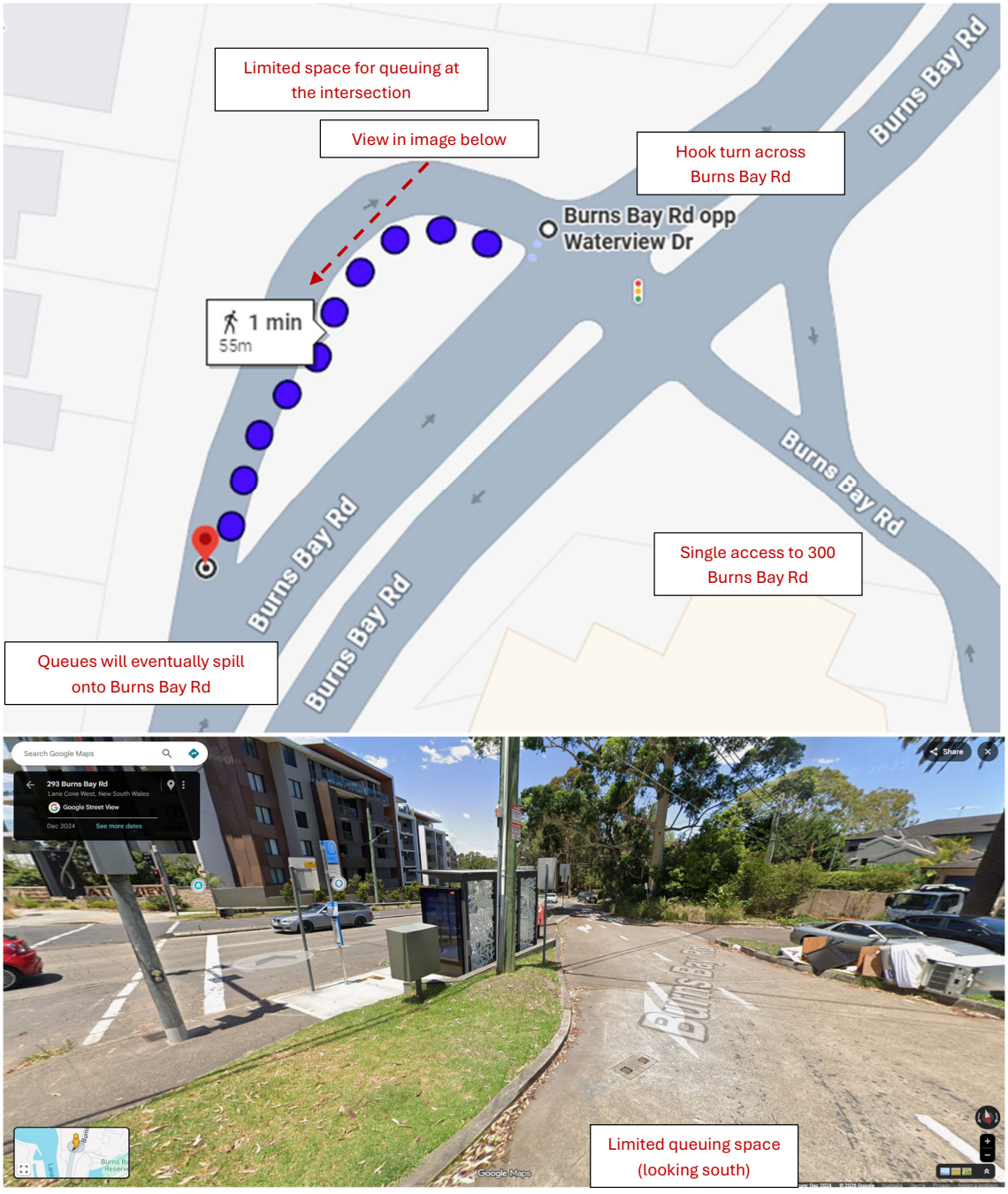
Site access is significantly constrained

There is only a single point of access to the site via a "hook turn" from the signalised intersection on Burns Bay Rd, which stops general north-bound traffic during these right hand movements. There is only 55 metres of space for queuing at the intersection before traffic starts to spill back onto Burns Bay Rd (see Figure 3 below). This is insufficient to support additional construction vehicles and traffic generated by residents.

The traffic impact assessment used to support the development application shows this intersection will be at Level of Service E by 2035, even without the development. This is an indicator that the intersection is at capacity and means that each vehicle is expected to be delayed by more than a minute on average. The only rating that is worse is Level of Service F which is an indicator of being over capacity resulting in total breakdown of traffic flows. With another 1,260 car trips per day having no choice but to use this intersection it is likely that Level of Service F would be reached, providing sufficient evidence that this development should not proceed. It would have a catastrophic impact on residents as well as through-traffic accessing Epping and Victoria Roads.

[1] Based on 225 dwellings and NSW Household Travel Survey benchmarks of 7.5-8.5 trips per household per average weekday, 70% car mode share.

Figure 3: Single point of access via the Burns Bay Rd/Burns Bay Rd Dr signalised intersection including a hook turn

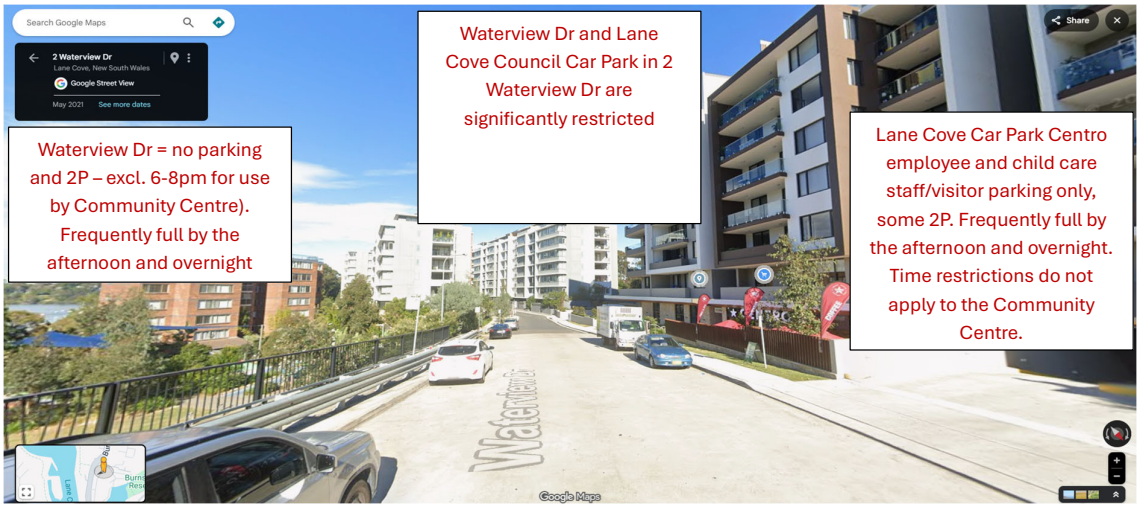


Immediately after the Burns Bay Rd signalised intersection there is a complex four-way roundabout (see Figure 4 below). This provides the only access to 300 Burns Bay Rd as well as numerous medium-high density apartment complexes (5-8 storeys), a Centro supermarket, childcare centre, Lane Cove Community Centre and Lane Cove Community Centre.

Figure 4: Complex four-way round-about to access 300 Burns Bay Road

As a result of these alternative uses, on-street parking is already over capacity. There are time limits of 2 or 3 hours but Waterview Dr, Lane Cove Council Car Park (2 Waterview Dr), Hughes Park and Burns Bay Rd parking is frequently fully utilised with many vehicles regularly flaunting the time limits despite being subject to fines.

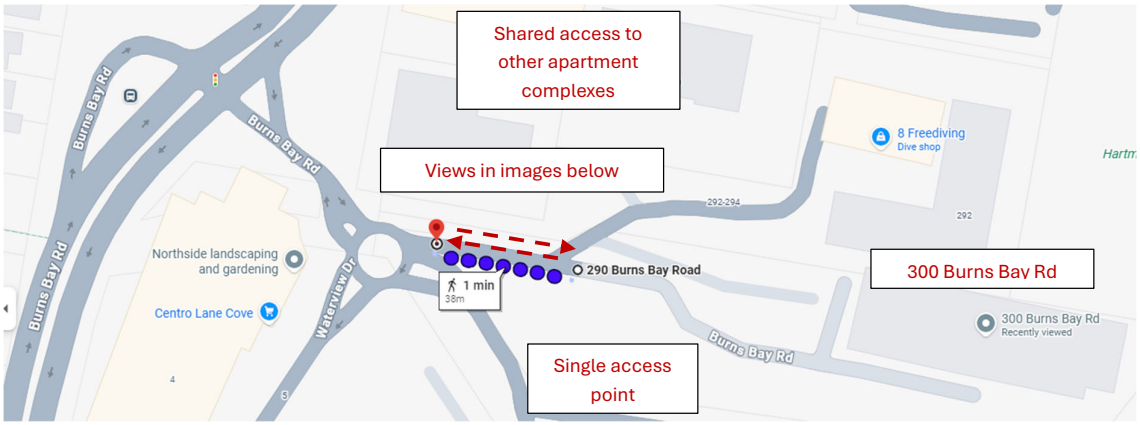
Figure 5: Limited on-road parking with time limits



After navigating the roundabout, vehicles accessing 300 Burns Bay Rd must travel via a single access road to a gated entry 55m away, providing limited capacity for queuing vehicles. This access road is also shared with several other large apartment complexes (Figure 6 below).

Construction vehicles using this road would be catastrophic for local congestion and pedestrian safety including for local residents and children and pets at the nearby Hughes Park and apartment building. Traffic impacts are also likely to spill back to the roundabout and beyond, having larger flow-on effects for local residents seeking to travel to or from their homes and potentially flowing back to Burns Bay Rd.

Figure 6: Narrow road lane access to 300 Burns Bay Rd shared with several apartment complexes



Traffic impacts extend beyond the immediate site but have not been assessed

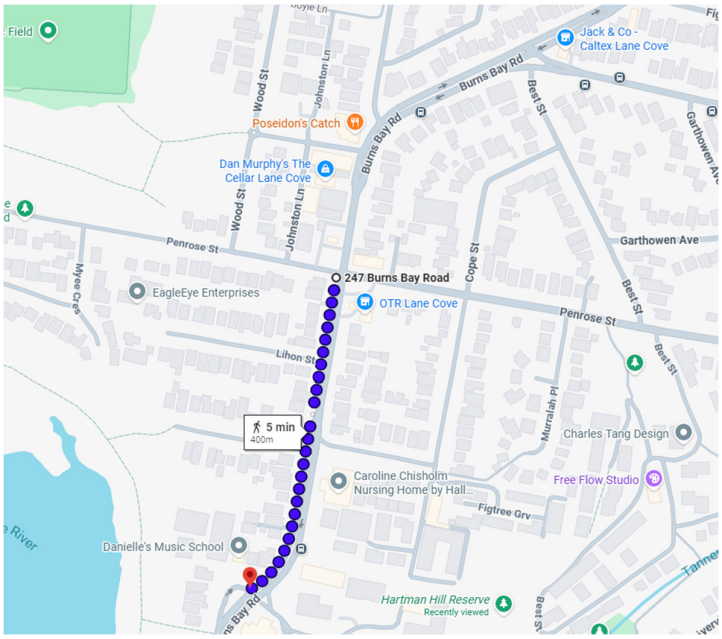
In addition to the local access constraints, the Burns Bay Rd/Penrose St signalised intersection is a significant constraint.

Northbound through-traffic from Victoria Rd only has a single lane

Queuing in both right turn lanes from Burns Bay Rd to Penrose St which provides access to the River Rd (Figure 7) leaves only a single lane for north-bound through traffic. This results in queues back to Cope St (200 m) or Waterview Dr (400m km) during peak periods (Figure 8). Turning movements can also be dangerous given narrow lanes on Burns Bay Rd with vehicles regularly veering out of their lanes.

Figure 7: Burns Bay Rd / Penrose St intersection (northbound) – queuing at 2 right turn lanes regularly results in a single lane for through traffic

Figure 8: Burns Bay Rd / Penrose St intersection (northbound) - Queue lengths for northbound through traffic during peak periods

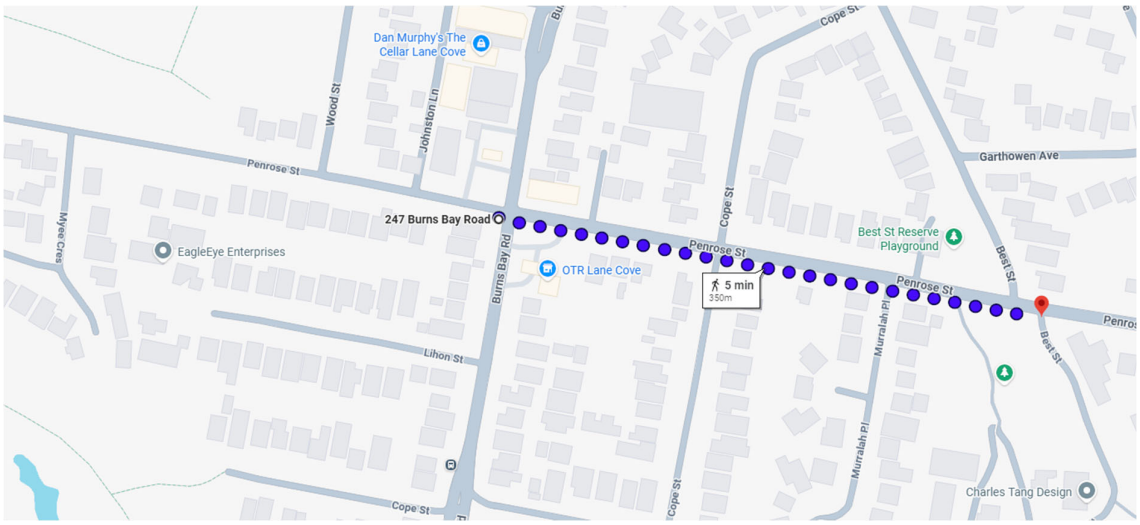


Only two lanes on Penrose St and dominant left turn movement

There are only two lanes on Penrose St and the dominant movement is a left turn onto Burns Bay Rd south bound. The right lane is also used for straight and right movements. In peak periods this results in significant queuing in the left lane back to Murralah Pl (270m) or Best St (350m). There is also a significant safety risk from vehicles using the right turn lane to cut the queue and then try to weave back into moving traffic in the left lane close to the intersection.

Figure 9: Burns Bay Rd/Penrose St signalised intersection (westbound) – Two lanes with dominant left turn movement

Figure 10 Burns Bay Rd/Penrose St signalised intersection (westbound) - Queue lengths westbound left turning traffic during peak periods



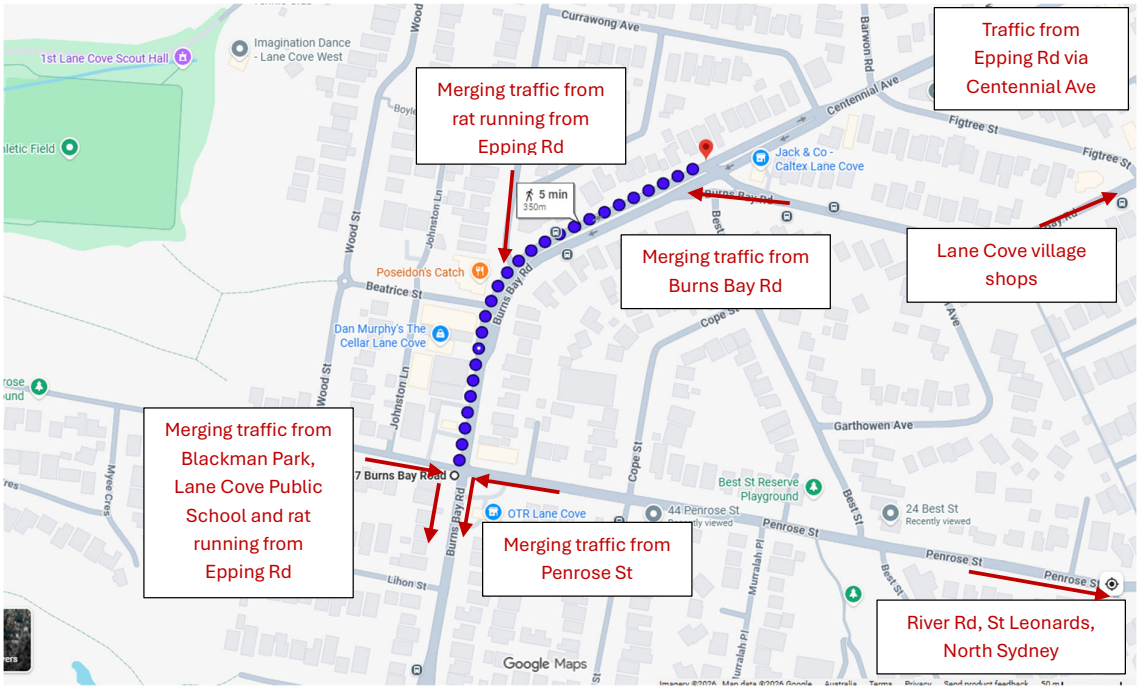
Southbound traffic delayed by merging and congestion from Victoria Rd

There is significant traffic generated from Epping Rd via Centennial Ave. There are then conflicts from merging traffic from:

- Burns Bay Rd (Lane Cove Town Centre).
- Cullen St (rat running from Epping Rd)
- Penrose St eastbound (Blackman Park, Lane Cove Public School and rat running from Epping Rd).
- Penrose St westbound (River Rd, St Leonards, North Sydney).

This results in significant queuing on Centennial Ave southbound back to Best St/Burns Bay Rd (350m) and Figtree St (500m).

Figure 11: Burns Bay Rd/Penrose St signalised intersection (southbound) – Merging traffic and queuing



The Centennial Ave/Epping Rd intersection is also significantly constrained. Centennial Ave has two lanes, one for right turn onto Epping Rd (to the Sydney CBD) and another for through traffic to Mowbray Rd (to Chatswood) and left turn onto Epping Rd. These conflicting movements result in significant queuing during peak periods. The left turn to Epping Rd also immediately reduces from 2 to 1 lane resulting in queuing and delays.

Figure 12: Centennial Ave/Epping Rd Intersection (north-bound)

Figure 13: Centennial Ave/Epping Rd Intersection (left turn to Epping Rd reduces from 2 to 1 lane)

Parking provision is grossly inadequate and will spill onto the street

There are 225 dwellings but inly 237 car spaces including visitors. This is equivalent to round 1 car space per dwelling, but compares to an average 1.5 cars per household in the Lane Cove Local Government Area (Australian Bureau of Statistics 2021 Census). This level of car ownership is typical of inner-city, high-density areas with very strong

public transport such as the Melbourne LGA (1.0). However, it is significantly lower than LGAs in the Inner West of Sydney (1.2-1.4) showing how manifestly unrealistic this provision would be; particularly when considering the level of bus service provision (discussed in more detail below).

As a result, the overflow would spill onto the streets where parking is already regularly full on Burns Bay Rd, Hughes Park, and Penrose St with significant illegal parking despite fines. Applying car ownership rates from the Inner West and Lane Cove LGAs, this could add between 71 to 119 cars parking on-street every day. This will have a significant impact on surrounding residents.

Buses are slow, infrequent and unreliable and will not mitigate additional traffic congestion generated

Higher frequency buses at the Lane Cove Interchange are not close

300 Burns Bay Rd is not close the Lane Cove interchange on Epping Rd. It is a 2.7 km (41 minute) walk to the Lane Cove Interchange (Figure 14) or an or 18 to 24 minute bus trip (Figure 15 below). There would also be additional transfer and in-vehicle time for these journeys, which make their travel times and complexity significant.

Figure 14: Located far from higher frequency buses at the Lane Cove interchange on Epping Rd (walk)

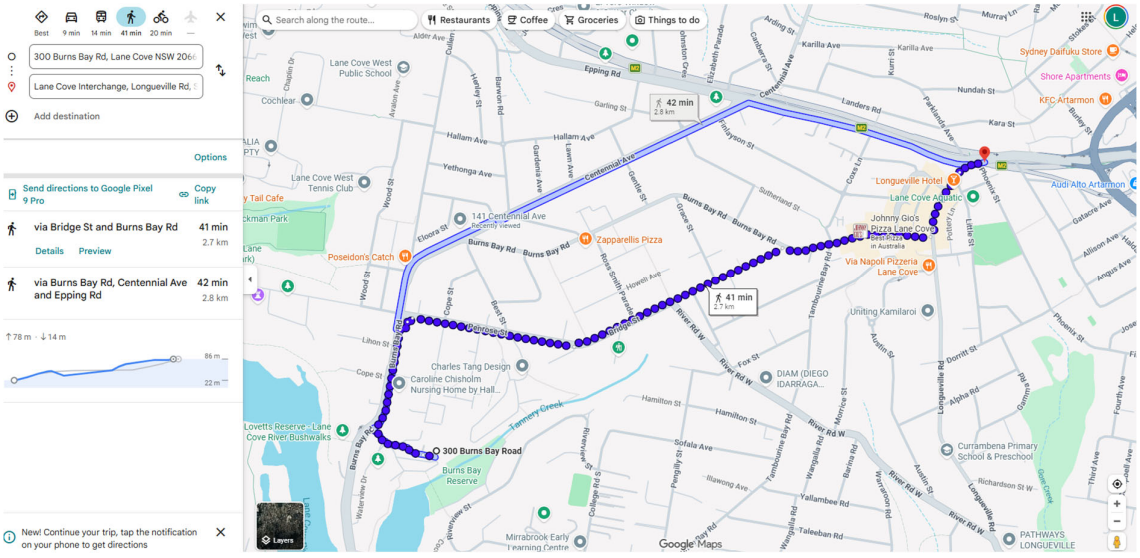
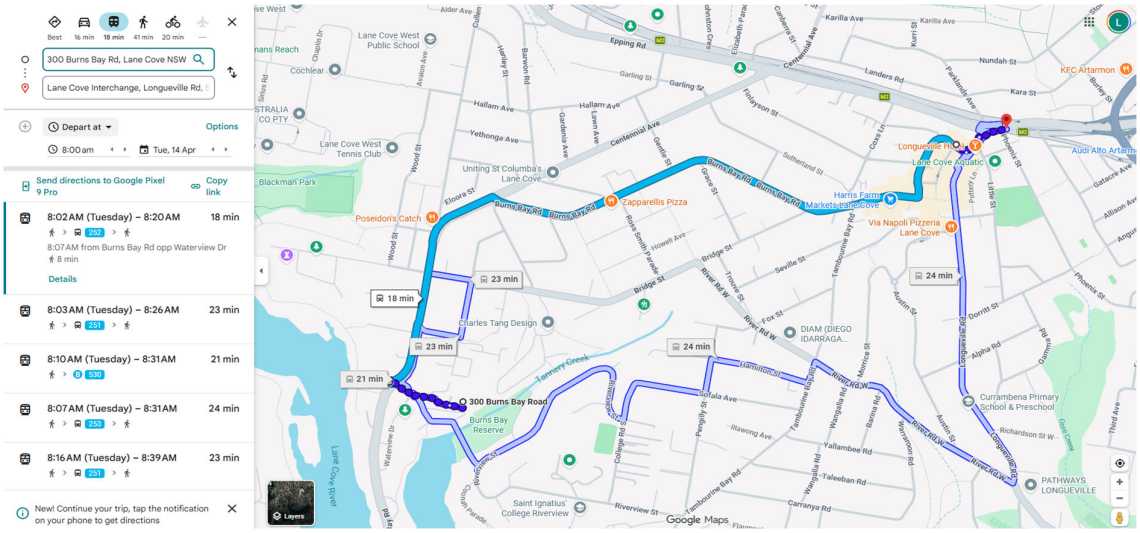


Figure 15: Located far from higher frequency buses at the Lane Cove interchange on Epping Rd (bus + transfer)



<u>Buses are infrequent, slow and regularly delayed or cancelled. Travel times to train stations are prohibitively long</u>

There is only one higher frequency service (251 to Wynyard) but this only operates during peak periods only. Despite being only 12km from the Sydney CBD, a bus from 300 Burns Bay Rd takes at least 41 minutes assuming it runs to timetable (which is comparable to a 42 minute bus journey from Baulkham Hills despite a significantly longer distance of 28km[2]).

However, services are frequently late and cancelled. Route 253 also operates to Wynyard but is lower frequency and takes 45 minutes. There are no buses to other locations in the CBD such as Town Hall or Central.

Other services operate to Chatswood (536), North Sydney (252) and Burwood (530) however, these are infrequent and slow (30 mins to 44 minutes). Transferring to a train would involve additional walk, wait and in-vehicle time making these journeys complex and travel times unattractive.

Table 1: Bus service frequencies and travel times

Route	Peak frequency	Off peak frequency	Travel times*
251 – Lane Cove West to City (Wynard) via Freeway	10-15 mins (AM) 20 mins (PM)	N/A (peak only)	41 mins
252 – Gladesville to North Sydney	20 mins	30	45 mins

[2] Google Maps, 2026 for an average weekday trip departing 8am.

Route	Peak frequency	Off peak frequency	Travel times*
253 – Riverview to City (Wynard)	30	60	45 mins (Wynyard)
536 – Gladesville to Chatswood	20-30	30-60	30 mins (Chatswood)
530 – Burwood to Gladesville	20	30	44 mins (Burwood)

*Note: *Google Maps, 2026. Average weekday trip departing 8am from 300 Burns Bay Rd*

Serious deficiencies in the transport assessment mean it is misleading and cannot be relied on

The transport assessment has some serious deficiencies and omissions. These include:

- Only 2 local intersections have been modelled and the areas with the most significant congestion have been included (i.e. Burns Bay Road, Burns Bay Rd/Penrose St signalised intersection, Centennial Ave/Epping Rd intersection).
    - Even then, their own modelling shows Level of Service E without the development.
    - The assessment states no intersection upgrades are required, which is not supported by their own modelling.
- The chosen traffic model only covers intersections however, traffic impacts will occur outside intersections e.g. along Burns Bay Rd, Penrose St, Centennial Ave and other local roads (i.e. from rat running). As such, a model covering a larger study area (such as Aimsun) would be more appropriate.
- Future growth and the development have not been modelled together. Neither have construction vehicle impacts.
- Descriptions of high frequency public transport are misleading and not supported by analysis of service frequencies or travel times.
- Assumption that the public transport mode share will increase from current 4.6% to 15% is unrealistic as is the assumption that construction workers would use public transport.

Building heights are completely inconsistent with the surrounding areas and the scale of development is manifestly inappropriate

Lane Cove has already done a lot of “heavy lifting” compared to other LGAs through numerous recent development with apartments of 5 to 8 storeys. Many of these are nearby on Waterview Drive (including the 8 storey development at 2 Waterview Dr in 2019). The other location is around the Lane Cove Town Centre near Epping Rd, which is more appropriate given higher frequency bus services on Epping Rd.

However, 15 storey towers at a height of 54.5 metres would be more than double the existing 21m limit and totally out of character with Lane Cove West. This is not the Lane Cove Town Centre where these higher densities are more appropriate.

Existing transport constraints, inadequate parking and construction traffic would also have catastrophic impacts on the local network which is already constrained by topography and accommodates traffic from both Victoria Rd and Epping Rd. Even the transport assessment indicates that the Burns Bay Rd/Burns Bay Rd signalised intersection would be over capacity without the development. Yet no upgrades are stated to be required or proposed as part of the development.