

11<sup>th</sup> September 2023

J. Wallace  
201/53 Gerard Street,  
Cremorne NSW 2090

Director State Significant Acceleration  
NSW Planning  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

### **Pathways Cremorne Seniors Housing**

**Application No: SSD-49472213**

**Location: 50-88 Parraween Street, 59-67 Gerard Street, Cremorne 2090**

I strongly oppose the proposal put to the State Government Department of Planning and Environment (DPE) for the above development on the following grounds –

- It blatantly exceeds the planning limits and zoning for the site as well as, I understand, the regulations for height of such seniors accommodation.
- The height, bulk and scale of the proposed development – especially the 8-storey building proposed for Gerard Street – is a maximum exploitation of the site and is a massive over development of a key site adjacent to the Cremorne Town Centre.
- The loss of heritage resulting from the dismantling and partial reconstruction of some (not all) of the heritage cottages that North Sydney Council, in conjunction with the community, are seeking to permanently protect.
- The absence of a cumulative traffic impact assessment which, I believe, would demonstrate the inability of Parraween Street (in conjunction with MacPherson and Winnie Streets) to cope with the increased traffic flow this development would bring.
- The deleterious impact of a single drive access for 134 cars (both ingress and egress) to Parraween Street.
- The negative impact of staff parking and visitors parking for both the ILUs and RTCs.
- The inaccurate claim that the development would increase kerb parking in Parraween Street.
- The destruction/obscuring of so many mature trees that are so visible to pedestrians and adjacent residents, and which are so important to the character of the streetscape.
- The highly dubious demolition, excavation and construction timelines set out in the proposal suggesting a 16-month build time.
- The history of poor communications, insincere consultation and avoidance of due engagement with stakeholders by the developer and its agents, and the probability that these aspects will NOT be improved during the development.

This submission will now expand on each ground.

### **Zoning & Compliance**

The proposal to DPE appears to be intended to avoid existing zoning restrictions and Council Planning Strategies. I do not know the technicalities of this and hope North Sydney Council will address this issue as part of its submission.

## **Height Bulk and Size**

The site proposed for the development is one of the largest single developments (by area) ever in Cremorne. Its proximity to the Cremorne Town Centre magnifies the need for any development of the site to be empathetic to community needs. North Sydney Council is more than aware of this fact and has been actively promoting Parraween Street as the “heart” of the community. In support of this vision, the Council is actively planning upgrades in the near future to Cremorne Plaza and Langley Place, and a redevelopment of the Parraween Street carpark to provide affordable housing, an early childcare centre, green space parkland with underground public parking for 161 cars.

With this as a background, I believe that the four buildings proposed by this development are incompatible with this vision.

All options explored in the proposal are predicated on a maximum bulk for the site. The justification for the option chosen is that it secures that maximum bulk while providing some community benefits in a staggered rise and a “public” park. Such exploitation of the potential of a site may be commercially understandable, but not at the loss of the future feel and amenities of the site for the community.

In particular, the proposed 8-storey building, at 28.66 metres, is an anathema. It is overtly outside the present zoning of the site which only allows construction for up to 12 metres. While the Proposal seeks to justify this height variation by pointing to similar tall buildings in the locality, these were developed during an unfortunate era of lax planning controls. The 2020s are different and the community’s expectations far more demanding and sophisticated. One only needs to look at how development proposals for Neutral Bay Town Centre (Woolworths, Coles site etc) has allowed such precedents to explode with development of ever taller and taller towers.

I am not against the development of this site *per se* but rather encourage empathetic development premised on the preservation of the heritage cottages, along with residential housing that conforms with the existing controls of the Local Environmental Plan with variations as permitted by law under SEPP (Housing) 2021.

## **Heritage**

The 12 Parraween Street cottages are subject to IHOs which, when formalised, will secure the permanent protection of these cottages for the streetscape. The community has also sought state heritage listing for the adjacent Hayden Orpheum Picture Palace. Both the community and the Council have acted concertedly to achieve these goals with the vision of Parraween Street becoming the “heart” of the community as discussed above.

The IHOs have been based on sound expert heritage advice which was accepted by the Land and Environment Court. After much deliberation, the LEC dismissed the developer’s appeal to overturn the IHOs. The 12 cottages have now received Gateway approval from the Department of Planning for processing of their listing, and are currently on public exhibition in advance of their imminent heritage listing on North Sydney Council’s LEP 2013.

<https://yoursay.northsydney.nsw.gov.au/pp-3-23-parraween-st>

While the proposal provides for the dismantling and reconstruction of just (3) of the heritage-identified cottages for adaptive reuse, I believe this to be a stratagem to appease the community. The heritage significance of these three properties will have been fundamentally changed. In the case of the other 9 cottages currently protected by the IHOs, heritage will be permanently lost. Demolition cannot occur if they are heritage listed.

## **Traffic**

The proposal claims –

*“The proposed development does not warrant a cumulative traffic impact assessment (CTIA) as the proposal reduces the traffic generation of the site”*

I strongly dispute this claim for the following reasons –

- The proposed 134 cars to be garaged on the site will increase the residential vehicular use of Parraween Street by 119 cars as well as up to 56 bicycles and 9 motor bikes. This will add up to 20% more residential cars using an already very busy, short, unclassified suburban street.
- The services the developer proposes to provide to its residents will require further daily heavy vehicle truck and delivery services adding to the traffic.
- Parraween Street has become a “rat run” for Mosman, Cremorne, and Neutral Bay residents to cross Military Road from North to South and visa versa. This is exacerbated during peak hours as both Winnie and MacPherson Streets (which bookend Parraween Street) become clogged constricting ingress and egress from Parraween Street for lengthy periods. This development is likely to add to this problem. TfNSW and Council have unsuccessfully been trying to remedy this situation for years.
- The cancellation of the Northern Beaches Tunnel project announced by NSW Government on 8 September 2023 will only further complicate the issue of traffic congestion on Gerard Street and Military Road and their impacts on Parraween Street.
- The claims in the proposal that the development will lead to a reduction in vehicle trips from the site in both the morning (9 less trips) and evening (5 less trips) is laughable. A recent poll of one unit block directly opposite the site, with half the number of Units and with a large seniors residential component, found that those residents exceeded the stated vehicular trips in the proposal (ie 16 and 19 trips in AM and PM peak period as set out in 7.6.2 of the EIS) by multiples of those numbers.
- The proposal fails to raise or address the issue of extra traffic from visitors, service providers (eg menulogue deliveries, health services).
- The proposal to have only one drive to ingress and exit the site for 134 cars plus delivery trucks and service vehicles will create a bottleneck, continuing noise and safety issues for Parraween Street and its residents. Its proximity to the popular Cremorne Plaza will also impact that plaza’s amenity.

Before any final decision on this proposal, I strongly commend a full CTIA be undertaken.

## **Parking**

The proposal significantly understates/misrepresents the parking issues that such a development will cause.

- It suggests it will allow additional kerbside parking with the filling in of existing driveways to many cottages. This contention fails to take into account that –
  - Parraween is designed as a two lane thoroughfare.
  - Council/TfNSW has instituted 90 degree parking opposite the site to allow for maximum parking for commercial and public vehicles.
  - As a result, it is not feasible for full kerbside parking on the site side due to safety concerns – as evidenced by the fact that the existing kerbside parking on Parraween Street in front of the site is limited to motor bikes.
- The public parking on Parraween Street is hugely influenced by patronage of the Hayden Orpheum Picture Palace. During peak show times it is extremely difficult to find a parking spot, not only on Parraween Street but in the wider vicinity. This development will only add to the lack of public parking.
- The proposal does not address the additional parking requirements of family and friends visiting the RCF, and the visitors and services delivered to the ILUs.

Possibly this aspect could also be reviewed before any decision on the proposal.

## **Treescape & Through-site Park**

Development in the North Sydney LGA has already reduced the greenspace from the mid 30% to the mid 20% for the LGA. This has a huge impact on residents and their quality of life. The present low-rise development of the site opens up visibility of a large number of mature trees on the site and adjacent sites. This view will be eliminated by the development.

While the through-site “public park” (sic) attempts to address this concern, it will only have limited appeal to local residents.

Much is made of the community amenity of the proposed through-site park. I believe this is a distraction for the following reasons –

- There is unlikely to be much use of the through-site walkway as locals primarily use the Paling Street and the Council walkway adjacent to the Parraween Street carpark, both of which have pedestrian crossings on Parraween Street, to connect to the town centre and public transport.
- The proposal acknowledges that a pedestrian crossing from Ada Street is not justified, so the use of the “public park” by locals north of Gerard Street will be minimal.
- The area of the “park” is very limited and will not be family friendly. It is more likely intended as an outdoor facility for site residents.

## **Demolition & Construction Program**

I submit that the timelines for demolition, excavation, remediation and construction are highly dubious for the following reasons –

- History in Parraween Street for development of single and dual building developments much smaller than the proposal indicate this is more of a 3 – 4 year construction period. Three years is a long time to create major dysfunction within such a sensitive commercial and residential locality.
- Labour shortages and stretched supply chains are likely to continue to frustrate and extend such timelines.
- The pretention that regimented lorry schedules will alleviate the disturbance of the traffic and use of the locality are unrealistic.
- The reliance on use of large lorries for access to Parraween Street via Gerard Street is likely to further hinder traffic flows on that very busy street.

## **Communications, Consultation & Engagement**

The developer’s history of acquisition, and the initiation of this proposal, does not cast it or Pathways in a good light.

Several former owners of properties on the site expressed concerns to members of the community about the manner in which their “negotiations” were handled.

Once the developer had its future ownership of the site secured, it sought to raze the cottages when the Council’s independent expert’s heritage report was published, by quickly issuing a Complying Development Certificate for demolition, thus seeking to avoid any true consultation and engagement. Its agent gave notice that the cottages would be demolished on 14-days notice – tenants and existing resident-owners were quite distressed. The communications were “stark” and “brutal”.

When this strategy did not work, the developer held a 3-hour workshop some three months later to display the concept of their proposal – one not dissimilar to the proposal now lodged. Their agents had visual documentation but were unable to answer many of the questions/issues interested stakeholders asked. An online “engagement” session was also held but “technical difficulties” forbid any questions being asked of the panel. Again, this was

consultation in name only. There was no demonstrable interest to engage with the community. It appeared from the community's view to be a *fait d'accompli*.

With this background, I am very concerned whether the developer and Pathways have any real interest or concern to consult or engage with stakeholders and their "promises" to do so in the future should be interpreted accordingly. Actions speak louder than words.

### **Conclusion**

I submit that this Pathways proposal is both flawed and not in the best interests of the community, lacking both site specific and strategic merit.

I declare that I have not made a reportable political donation in the last two years.

I acknowledge and accept the DPE disclaimer and declaration.

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