



ENVIRONMENTAL SERVICES
Director

13 January 2014

The Director General
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2000

Attention: Tim Archer
Acting Director,
Metropolitan Delivery, Growth Planning & Delivery

Sandy Shewell

Department of Planning
Received
22 JAN 2014
Scanning Room

Dear Sir/Madam,

RE: PLANNING PROPOSAL 45 VICTOR STREET CHATSWOOD (CHATSWOOD POST OFFICE SITE) PRE-GATEWAY REVIEW – PGR_2013_WILLO_003_00
Council reference: PP 2013/03

I refer to your letter of 19 December 2013 advising Willoughby Council of a pre-gateway review request for the planning proposal for the Chatswood Post Office site received by the Department of Planning and Infrastructure.

It is emphasised that this submission has been prepared by the officers of Council without the benefit of input by the Council of the City of Willoughby because of the unrealistic time frame imposed on Council by the Department over the Christmas New Year holiday period. It is noted that the decision to refuse to support the planning proposal was a unanimous decision made at a full Council meeting. It is further noted that the letter of advice from the Department was received after Council Meetings ceased for 2013 and the deadline for a response is prior to Meetings recommencing in 2014. The Council of the City of Willoughby is as yet unaware of this application.

Error in Summary of Pre-gateway Application

Firstly this submission must clarify the application noting that the Department's letter of 19 December 2013 incorrectly advises the proposed variation to the height control to be an increase from 12 metres to 42 metres. This is incorrect and confirmed by the documentation lodged with the application. The application is requesting:

1. **Increase** in the maximum height limit from **12 metres** (about RL 106) to about **141 metres** (RL 235). This represents an increase from 3 storeys to 42 storeys or more depending on the floor to floor heights between levels.
2. **Remove** the floor space ratio control for the site (currently 2.5:1) to allow the building to be defined by a building envelope.

ENGLISH

If you do not understand this document, please visit Council's Administration Building to discuss it with Council staff who will arrange an interpreter service. The Administration Building is located at 31 Victor Street, Chatswood and open from 8.30am to 5pm, Monday to Friday. Alternatively, you may ring the Translating & Interpreting Service on 131 450 to ask for an interpreter to contact Council for you. Council's phone number is (02) 9777 1000.

ARABIC

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ARMENIAN

Եթե չէք հասկնալ այս փաստաթուղթը, խնդրեմ այցելելք բաղարային խորհուրդի Վարչության Շենքը այդ մասին խօսելու: Բաղարային խորհուրդի աշխատակիցները հետ որոնք ձեզի համար բարգման մը կը կարգադրեն: Վարչության Շենքը կը գտնուի՝ 31 Victor Street, Chatswood եւ բաց է կ.ա. 8.30 – կ.է. 5.00, Երկուշաբթիէն մինչեւ Ուրբաթ: Կարելի է նաեւ հեռաձայնել Թարգմանութեան Սպասարկութեան՝ 131 450 եւ խնդրել որ թարգման մը կապ հաստատուի: Բաղարային խորհուրդին հետ ձեզի համար: Բաղարային խորհուրդի հեռախօսի համարն է՝ (02) 9777 1000:

CHINESE SIMPLIFIED

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CHINESE TRADITIONAL

如果您不明白本文件，請前往市政府行政大樓，與市政府職員討論，市政府職員會安排傳譯員提供服務。行政大樓位於31 Victor Street, Chatswood，辦公時間是週一至週五上午8:30至下午5:00。此外，您也可以致電翻譯傳譯服務處，電話131 450，請傳譯員為您聯絡市政府，市政府的電話是(02) 9777 1000。

CROATIAN

Ako ne razumijete ovaj dokument, molimo vas otidite u administrativnu zgradu općine i razgovarajte s osobljem općine koje će vam organizirati usluge tumača. Zgrada općine se nalazi na adresi 31 Victor Street, Chatswood i otvorena je od 8.30 izjutra do 5 poslije podne, od ponedjeljka do petka. Druga mogućnost je da nazovete Službu prevoditelja i tumača (Translating and Interpreting Service) na 131 450 i da ih zamolite da vam nazovu općinu. Broj telefona općine je (02) 9777 1000.

GREEK

Αν δεν καταλαβαίνετε αυτό το έγγραφο, παρακαλούμε επισκεφθείτε το Κτίριο Διοίκησης της Δημαρχίας για να το συζητήσετε με το προσωπικό της Δημαρχίας που θα οργανώσει διερμηνεία για την εξυπηρέτησή σας. Το Κτίριο Διοίκησης βρίσκεται στη διεύθυνση 31 Victor Street, Chatswood και είναι ανοιχτό από τις 08:30 π.μ. έως 5 μ.μ., Δευτέρα έως Παρασκευή. Διαφορετικά, μπορείτε να τηλεφωνήσετε στην Υπηρεσία Μεταφράσεων και Διερμηνείας στο 131 450 και να ζητήσετε από ένα διερμηνέα να επικοινωνήσει με τη Δημαρχία για λογαριασμό σας. Ο αριθμός τηλεφώνου της Δημαρχίας είναι (02) 9777 1000.

ITALIAN

Se avete difficoltà nel capire il presente documento, rivolgetevi all'Administration Building del Comune e gli addetti municipali provvederanno a richiedere l'assistenza di un interprete. L'Administration Building è situato al n. 31 di Victor Street, Chatswood ed è aperto dal lunedì al venerdì, dalle 8.30 alle 17. Oppure potete chiamare il Translating and Interpreting Service al 131 450 e chiedere loro di mettersi, per vostro conto, in contatto con il Comune. Il numero telefonico comunale è (02) 9777 1000.

JAPANESE

本文書が理解できない場合には、カウンスルの事務局にお越しいただければ、カウンスル職員が通訳サービスを手配の上で、ご相談に応じます。事務局の住所は、31 Victor Street, Chatswoodで、窓口受付時間は月曜から金曜の午前8時半から午後5時までです。他にも、電話131 450の通訳通訳サービスにおかけの上、通訳士にカウンスルにつなぐように依頼することもできます。カウンスルの電話番号は、(02) 9777 1000です。

KOREAN

이 문서를 이해하지 못하실 경우 시의회 청사를 방문하셔서 시의회 직원과 이에 대해 상의하십시오. 시의회 직원이 통역사 서비스를 추천할 것입니다. 시의회 청사는 31 Victor Street, Chatswood에 위치하고 있으며 월요일에서 금요일, 오전 8시 30분에서 오후 5시까지 오픈합니다. 아니면 여러분이 직접 번역통역서비스에 131 450으로 전화하셔서 통역사에게 시의회에 연락하여 여러분과 연결하도록 요청하십시오. 시의회와 전화번호는 (02) 9777 1000입니다.

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3. Retain the B3 Commercial Core zoning but **permit shop top housing** on the site by adding shop top housing as an additional permitted use in Schedule 1 of WLEP 2012.
4. **Require a minimum of 2,066m²** non-residential floor space. The amount of 2,066m² is a minimal increase in the floor space of the existing Chatswood Post Office building on the site.
5. Accept the provision of potentially 300 units on the site and reduced car parking well below requirements.

Variation of Proposal from that Considered by Council

The pre-gateway application made to the Department of Planning and Infrastructure has deleted from the proposal the intention to locate the Chatswood Post Office onto the site in any redevelopment. The non-residential uses on the site are now requested to be a retail shop use on the ground floor (210m²) and office premises on levels 1 to 3 (1,856m²).

As a result of the change the indicative operational FTE on the site is reduced compared to that previously considered by Council from 86 to 77 jobs.

The pre-gateway application advises that the change arises from the high demand for the limited supply of car parking in Victor Street and constraints of providing adequate loading/collection facilities for the needs of the post office in a redevelopment. The discussion confirms some of the issues Council had with the planning proposal when it was considered. It also arises that Australia Post has advised that it will look to purchase an alternative more appropriate site within Chatswood CBD.

The pre-gateway application provides no clarification of where an alternative more appropriate site for the Chatswood Post Office is possible in Chatswood CBD. The current post office site is appropriate, well known, convenient, and has operated as the site of Chatswood Post Office for in excess of 30 years. If the needs of the post office were properly considered in the Planning Proposal then the use could continue to operate on the site. The requirements for operation of a viable Post Office have been subsumed by the intention to maximise development returns for the proponent for a residential project instead of a commercial building as intended by the B3 Commercial Core zoning of the site.

In addition the size of the maximum potential indicative office floor plate in the pre-gateway application compared with the planning proposal considered by Council indicates a reduction from 930m² to 850m². There is no explanation for the change.

Report to Council on Planning Proposal

A copy of the report considered by Council is attached to this submission for the Department to review in its assessment of the pre-gateway application. It is noted that the report dealt with the key elements of the planning proposal having regard to the strategic planning of Chatswood and its role in the northern subregion. Council urges the Department to give close consideration to the points made in the report.

The report did not seek to comment on the errors in the application or to dwell in any detail on the fundamental impracticalities of the proposal. There were sufficient strategic planning and

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urban design considerations to warrant refusal of the Planning Proposal without enumerating the inconsistencies. Further elaboration is provided later in this submission.

Relevant Background Information

It is relevant that the Department is made aware that this is the second planning proposal lodged by Australia Post for the Chatswood Post Office site. The first proposal was lodged in 2012 and had to await the gazettal and operation of WLEP 2012 before it could be considered by Council. A report was prepared and appeared on the Business Paper of Council for its Meeting of 17 June 2013.

The first Planning Proposal was more detailed in its concept plans and documentation. It similarly proposed to add shop top housing to the list of permissible uses on the site but it requested that the height control increase be less from 12 metres to 70 metres and proposed a floor space ratio increase from 2.5:1 to 12:1. The non-residential floor space proposed was 4,097m² in a total floor space of 11,786m² that included Chatswood Post Office on the ground floor. The planning proposal also included a road widening in Victor Street to provide a turning area at the end of Victor Street. Basement levels of car parking (125 spaces) were proposed and 95 shop top housing units.

The assessment report on the original Proposal considered the strategic planning and role of Chatswood CBD. Notwithstanding that shop top housing in the core of Chatswood is inconsistent with the principle that residential uses should be located on the edge of the CBD rather than within the CBD core, the assessment noted the adverse impact of State Government major project approvals in the vicinity that have undermined the appropriate strategic planning principles of its own strategies for major centres. The report recommended the planning proposal not be supported but that it acknowledged that there may be a compromise solution that could be considered. The following was recommended in response to the first planning proposal lodged by Australia Post in 2012:

1. *THAT Council advise Australia Post that it is prepared to consider an alternative planning proposal and an alternative Concept Development Plan based on:*
 - a) *Lowering the height of the building to a maximum height of RL 140 (being the approximate height where the Sebel residential apartments commence). This can address view loss from the Sebel residential apartments and overshadowing of the Remembrance Gardens.*
 - b) *Reduction in the maximum FSR to a maximum of 8:1 including retaining the proposed 4,079m² of office floor space and the Post Office as a minimum. The floor space will be consequential from the reduction in height and will contribute to reduced traffic generation onto Victor Street. It will also enable greater compliance with the on-site car parking requirements and reduce the need for multiple basement parking levels.*
 - c) *Provision of 4% of GFA in residential for affordable housing units*
2. *THAT the Concept Development Plan be redesigned to :*

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- a) *Locate parcel boxes and private post collection boxes in Basement level 1 with 24/7 public access enabled and only mailing boxes at street level.*
 - b) *Minimise the number of south-facing units by having north-facing apartments with dual aspect and cross-flow ventilation.*
 - c) *Provision of an atrium or similar element through the south-west corner of the commercial suites to provide natural light and ventilation.*
 - d) *Reinforce the podium height established in Victor Street of RL 122 approximately.*
 - e) *Ensure sufficient clearance at the north-east corner above the road widening dedication.*
 - f) *Reduce the number of car parking spaces to reflect the reduced number of dwellings.*
3. *THAT Council is prepared to enter into a voluntary planning agreement providing for the applicant to:*
- i. *Create a shared zone for the entire length of Post Office Lane and including road widening dedication.*
 - ii. *Creation of a turning area at the end of Victor Street with retention of at least 4 short-stay parking spaces including one space for people with disabilities and 4 motor cycle spaces.*
 - iii. *Widening of the footpath in Victor Street to a minimum width of 4 metres.*
 - iv. *Payment of a monetary contribution for any short-fall in on-site parking in accordance with Council's DCP at the time of consideration of a development application for the proposal.*
 - v. *Reduction in the driveway width entering from Victor Street to one-way with provision of an internal passing bay and traffic control to maximise the active frontage of the Post Office in Victor Street.*
 - vi. *Provision of a public right of way over the driveway to allow access to post/parcel boxes and to allow for a future vehicular connection to the basement of the "Sydney Water" building. The construction and structure of the basement shall allow for connection between the two sites to be made in the future.*

At the request of Australia Post the consideration of the report on the first planning proposal was withdrawn from the meeting and no determination was made by the Council.

A second planning proposal that is comparable but not identical to the pre-gateway application currently lodged with the Department was lodged with Council in September 2013. As noted earlier in this submission the second planning proposal is for a substantially larger development of twice the size of the first planning proposal. No footpath or road widening for a turning circle is proposed in Victor Street as part of the proposal nor are there any other tangible community benefits proposed in the Planning Proposal.

Key Issues of Concern with the Pre-gateway Application

The key issues with the pre-gateway application currently before the Department are largely summarised in the attached assessment report to Council. The following only summarises the key issues of concern with the pre-gateway application. More discussion is provided in the attached report.

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General:-

1. The pre-gateway application is inconsistent with the relevant Section 117 Directions.
2. Residential development is not permitted in the B3 zone and is not reflected as appropriate in the objectives for the zone. The site is not in an edge location but rather the commercial core of the Centre.
3. The objectives of the development standards for height and floor space ratio reflect the B3 zone development objectives for Chatswood CBD and add understanding to the intended development outcomes for the commercial/retail core of Chatswood CBD in which the site is located.
4. The pre-gateway application is inconsistent with the metropolitan priorities for Chatswood CBD in the Draft Metropolitan Strategy 2031. These priorities have persisted through the various Sydney Region strategic planning documents since the Metro Strategy of 2005. Adding significant shop top housing to the B3 zone in the location is not appropriate.
5. The pre-gateway application is not consistent with the principles of the local planning strategies for Willoughby and Chatswood CBD.
6. The provision of dwellings in the Willoughby local government area (LGA) has met or exceeded all targets set for the LGA since the early 1990's. New targets have been addressed and will be met elsewhere in Willoughby under the provisions of the recently gazetted WLEP 2012 without the need to compromise the business role of the core of Chatswood CBD.
7. The achievement of jobs targets set by State strategic plans for Chatswood have already been compromised by inconsistent decisions on several major project applications such that key sites have been lost to mixed use (predominantly residential projects) with minimal contribution to increase jobs in the CBD.
8. The current Planning Proposal would result in a reduction of the non-residential floor space proposed in the original planning proposal. It merely seeks to maintain the existing job capacity (see later discussion on this point) and fails to achieve the B3 zone intent for employment growth that at 2.5:1 FSR would represent in the order of 125 jobs.
9. Financial institution funding of development currently favours the quick turnover of residential development at the expense of commercial development. This is no justification for deviating from the long term planning principle for balanced growth and distribution of jobs and business floor space in Sydney. The pre-gateway application only provides non-residential commercial floor space comparable to the existing post office building on the site in a development that is 93% residential. Minimal additional jobs potential is contemplated or possible with the proposal. As a minimum the Planning Proposal should achieve an amount of non-residential floor area to allow for the number of jobs that could be realised under the LEP permitted FSR of 2.5:1.

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Concept Plans:-

1. The concept plans are vague and poorly developed. Inconsistencies exist between plans and elevations. The indicative floor plate layouts suggest residential units are potentially only 4 metres wide. Basement car parking even though proposed to be less than required will require at least 10 – 15 basement levels given the small site area. In this regard it is noted that the expectation and requirement for Council's in considering and preparing statutory development controls is to "reality check" the workability of the standards being developed. The same is required and expected in a planning proposal. Council's view is that the Planning Proposal is fundamentally flawed in the ability of the site to accommodate an appropriate number of car parking spaces for 300 units as well as commercial floor area (195 proposed compared to 355 being adequate and already allowing for a discount for proximity to public transport). The size of the site and constraints for an adequate internal ramp system means that only 10 – 22 car spaces can be achieved per level (refer Planning Proposal Drawing Level 1 (Ground Floor) Plan SK05, June 2013). Delivery and waste handling is inadequate, storage and recreational space for residents is not known and so on.
2. All car parking and delivery access is off Post Office Lane that is required in the future to operate as a share-way providing pedestrian access to Chatswood Station and Interchange. Although paving treatment is proposed for use as a share-way this is inconsistent and conflicts with the scale and traffic volume that will arise from the proposal. Just for the residential this is estimated to be 369 daily trips per unit based on RMS Guide to Traffic Generating Development updated for Chatswood CBD in August 2013.
3. Urban design has little regard to the site context. The concept elevation fails to acknowledge the existing street wall consistency in Victor Street with setback of building mass above RL 113. The concept also disregards the visual impact of the building scale in the context of Chatswood Mall.
4. The context justification of the variation in height is selective in the choice of buildings to justify the twelve times increase in the permissible height proposed. The selection includes buildings that are not part of the immediate site context in the retail core of Chatswood on the eastern side of the North Shore Rail Line. The height study in part uses the backdrop of the western commercial office core to justify the building scale.
5. The concept plans indicate potential encroachment of the building outside the site area. The site is 978.4m² at ground level and 1,014m² above RL 98.45. Above RL 98.45 the shape is irregular with the frontage along Post Office Lane being indented by 1.22 metres for about 7.3 metres of its length.

Impacts:-

1. The extent of additional shadowing impacts on the surrounding area (including the Remembrance Gardens) and buildings is not justified and is unacceptable.

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2. Views from surrounding buildings especially north facing apartments in the Sebel building and east facing apartments in the Interchange towers will be adversely impacted.
3. The potential to integrate with the adjacent site to the west (the old Sydney Water building) as a minimum at the lower levels has not been adequately explored given the constraint of the small size of the subject site and problems of access and noting the ensuing isolation of the Sydney Water building if the redevelopment occurs. The principle of the EP&A Act 1979 to promote and co-ordinate the orderly and economic development of land is dismissed by the proposal.
4. There are numerous adverse traffic impacts arising from the planning proposal including but not limited to the use of Post Office Lane, conflicts with turning vehicles at the end of Victor Street, loss of on-street short-term parking, traffic generation analysis that does not have regard to extra traffic arising from already approved but not completed development in the vicinity as well as the conflicts with the high numbers of pedestrians in Victor Street accessing Westfield and the Mall.
5. Grossly inadequate delivery and loading areas are proposed and are all that is possible on the small site. The loading also has to rely on use of a turntable for manoeuvring. The maximum size of truck that is proposed to access the site (8.8 metres) is less than the size of the Council garbage truck (over 9.8 metres) that would be required to service the residential units if this planning proposal proceeds.
6. Constrained and poor access to the site will mean any construction work of the scale proposed will be complex, extremely difficult and problematic and have extreme adverse impact in the operation of the area and surrounding businesses for a significant period of time.
7. The car parking provision is well under WDCP requirements. The pre-gateway application advises that 339 spaces would be required by the development and 195 are proposed. In fact there is an error that has carried through from the Planning Proposal previously considered by Council in the calculation as incorrect rates were used for the non-residential floor space requirements. Office/business car parking rate is 1 space per 110m² and retail shops is 1 space per 25m². A correction of the applicable rates requires the provision of 255 residential spaces, 75 visitor spaces and 25 spaces (rounded down) for the ground floor retail and office levels. This totals 355 spaces. A reduction in the provision of residential car parking has sought justification by reference to the RMS (RTA) 2002 guidelines for Metro Regional CBD Centres which would require 180 resident spaces notwithstanding that Chatswood is a subregional centre where the RMS guidelines requires 232 resident spaces. Visitor spaces required, pursuant to the guidelines, is 60 spaces for a subregional centre. Nevertheless the Planning Proposal proposes to provide 185 resident spaces and no visitor spaces with only 10 non-residential spaces. Even though there is inconsistent logic in the justification for undersupply of car parking there is also no justification for providing 0 visitor spaces. The suggestion that nearby "public" car parks can be used is unacceptable as the nearby car parks have no spare capacity and are provided ancillary to the needs of the shopping centres to which they support and are attached to. A shortfall of 160 spaces is not acceptable and Council does not have any plan to provide for such a shortfall elsewhere in the CBD. The Planning Proposal should be

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significantly reduced in density so that the reasonable car parking needs of the development can be satisfied on the site.

8. The economic impact analysis does not adequately understand and address the circumstances of Chatswood. By relying on percentages for vacancy rates it does not acknowledge the relatively small quantum of office floor space in Chatswood where tenancy movements of even small spaces have an impact on the vacancy rate when measured as a percentage of the total floor area in the centre. Even though the actual vacant amount (m²) is relatively small by comparison to other centres. It also means that there is continuous and large fluctuations in the % rates as tenants move in and out as a result. It does not acknowledge that any refurbished building in Chatswood such as 465 Victoria Avenue is fully taken up.
9. In addition the reliance of the analysis on vacancy rates also relies on industry benchmarks of 5% which have been exceeded by most centres in recent years. It is unknown how a benchmark is established when so many suburban centres of Sydney exceed the benchmark. Chatswood fluctuates between 5% and 10% as noted in the report which is reasonable for a centre such as Chatswood.
10. It is accepted that the small floor plate arising from the restricted site area will compromise flexible use potential of the office floor space but this provides more reason to look at options of integrating with the old Sydney Water building adjacent. This would be an appropriate planning approach for the two sites.
11. The economic report notes that rents of units in Chatswood are 20% higher and sale prices of units are 35% higher than the Sydney averages. The Planning Proposal is silent on the LEP requirement to provide 4% affordable housing units to be dedicated to Council for inclusion in its affordable housing scheme.
12. The economic report identifies an operation FTE of 77 but does not acknowledge that there is a net reduction in jobs potential as a result of the proposed redevelopment. The existing post office building is partly vacant following changes in the operation of Australia Post and the relocation of mail handling to bulk handling centres such as Artarmon. With additions, renovation and refurbishment the existing building could be made available to other uses and would again provide comparable employment potential to that which previously existed on the site which was in the order of 20 in the Post Office and about 65 to 70 in the office levels.

Inconsistencies in Documentation

Some inconsistencies have been noted in the above discussion such as the rates used for calculating required car parking in accordance with WDCP which results in an under-estimation of required car parking (339 instead of 355 spaces). In no particular order other inconsistencies noted include but are not limited to:

- The "Sydney Water Building" is no longer owned or operated by Sydney Water and has been vacant for more than 7 years.
- The Sebel building contains Council offices, tourist accommodation in the form of serviced apartments and about 14 residential levels.

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- The Thomas Street mixed use major project development modification is used as part of the justification for the proposed height in the planning proposal even though it is some distance from the subject site and is a development on a site of over 4,000m² in area. The increase in height of that development was not approved by the PAC. A reduced height was eventually approved after conciliation in the Land and Environment Court that reduced the height by 9 storeys. One of the reasons for this reduction included the need to lessen the overshadowing impact. The same issue arises with the Planning Proposal.
- The meeting held with Council on 28 June 2013 prior to lodgement of the 2013 Planning Proposal advised Australia Post, its consultants and representatives of Mirvac Projects who attended to meeting that the additional scale and density of the development proposed was out of context, had unacceptable impacts, was inconsistent with the strategic planning for that part of Chatswood and would not be supported by Council.
- In the justification for the Planning Proposal the documentation notes the opportunity to develop new employment opportunities. The proposal results in a likely reduction in operational employment potential on the site as previously noted in this submission. In addition the calculation of the operational FTE level of 77 jobs relies on an excessively high rate for the retail shop at 1 job per 20m² which is the accepted rate for office floor space. Surveys of jobs in retail floor space average around 1 job per 30m² to 1 job per 35m². This means that likely FTE levels post development will more likely to be in the order of 72 to 73 jobs.
- The subject proposal is not consistent with special area shop top housing allowance along Victoria Avenue in the retail core of Chatswood in WLEP 2012 as claimed. WLEP 2012 permits shop top housing of a within the overall 14 metre height control and FSR of 2.5:1 subject to the ground and first level being used for retail or business premises. This was conceived in the preparation of WLEP 2012 as being potentially small units (with no car parking) above two levels of commercial premises.
- In the traffic report congestion at the intersection of Albert Avenue with Victor Street is largely attributed to queuing from the Pacific Highway. The discussion does not acknowledge the queuing that also occurs during peak shopping times of cars seeking to access the multi-deck car park and Mandarin Centre that also affects the operation of the Albert Avenue/Victor Street intersection. These impacts are integral components of the operation of the surrounding street network that are not reflected in the SIDRA analysis in addition to the analysis not considering the impact of approved development in the area. Further, in the absence of advising the alternative location intended for Chatswood Post Office it is unknown how it can be claimed that the relocation of the post office will likely result in a reduction of traffic volumes and parking demand in Victor Street. That is contingent upon where the post office is relocated to.
- The economic report makes reference to a development application for a shop top housing proposal in the building north of the site fronting Victoria Avenue. Council has not received any development application for such a proposal even though the provision of WLEP 2012 facilitates use of the upper level as residential. Any such

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proposal would be subject to the design and merit considerations in assessment of a development application.

- The Mandarin Centre car park and the Chatswood Chase car park are not general public car parks. They are ancillary to the shopping centres to which they are attached. The multi-deck car park in Albert Avenue is owned by Council and is managed by Westfield and hence is known as the Westfield car park. The multi-deck car park was enabled by contributions of land or works in kind or monetary contributions in association with various retail developments on the eastern side of the North Shore Rail Line. It was constructed in stages and is fully utilised to provide car parking for Westfield and other retail shops on the eastern side of Chatswood CBD. It is unacceptable to use these car parks as an excuse for not providing car parking infrastructure on the site.
- The discussion in the traffic report on the percentage of dwellings in Chatswood (postcode 2067) with zero car parking is confusing. The table appears to indicate the provision of car parking spaces rather than car ownership in the Chatswood area generally. A review of the 2011 census information for the Chatswood area indicates that 14.4% of dwellings in the area are studio or one-bedroom dwellings and 36.9% are two-bedroom dwellings. The survey of car ownership indicates that in the Chatswood area 20.7% of households do not own car. This amounts to 1,723 households. It is accepted that smaller dwellings may not own a vehicle but they also may not have a car space. There are also some older people in the area that have ceased to drive but may continue to live in larger dwellings. Thus it is not known how this discussion then leads to an advice that reducing infrastructure delivery cost by reduced car parking provision in the development leads to a more affordable housing subset when it is also acknowledged in the economic analysis that the cost of dwellings is 35% higher than Sydney averages and rents are 20% higher. Further the debate for reduced car parking on the site relies on use of car parks that are fully committed to support the retail activities for Chatswood as noted above such that reliance on use of those car parks undermines the infrastructure provided for the business of Chatswood CBD. The end result of deficient car parking on the subject site is an unacceptable outcome for Chatswood as a major centre.

Is there a net Community Benefit for the Pre-gateway Application Planning Proposal?

There is no net community benefit for the pre-gateway application on 45 Victor Street for the Chatswood centre or the Willoughby community.

The justification for the application is that it will “unlock” land for development but this does not consider the isolation of adjacent land for future redevelopment. The justification also states that it will unlock funds for Australia Post to purchase a new and more appropriate site elsewhere in Chatswood for an Australia Post flagship store but this ignores the fact that the current site is suitable and appropriate for continued use as Chatswood Post Office if the site was redeveloped to properly accommodate the needs of Chatswood Post Office. The post office is a destination location in the centre that is already part of the vibrancy of the area.

Willoughby does not need additional dwellings in Chatswood CBD compromising the development of increased business floor space in the core of the centre. Willoughby Council has been an exponent of transit orientated development in its policies and strategic planning in

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both Chatswood and St Leonards for many years and the results are already demonstrated. The issue now is to save the business viability of its centres in its strategic planning and not succumb to short term opportunistic development because of the current quick financial return for mixed use projects.

The impacts of the scale of the pre-gateway application are unacceptable in building mass and bulk, traffic, car parking demand, overshadowing and loss of views. The unplanned increase in resident population in the location will add to the adverse impact of increased use of open space, recreation, community facilities and community infrastructure. This is in addition to other unplanned major residential project approvals by State Government that have been imposed on and impacted Chatswood CBD.

On balance no economic or social benefits can be found for the proposal and only tokenistic urban design improvements are proposed to the public domain.

Finally the pre-gateway application is inconsistent with State and metropolitan planning strategies particularly in relation to the role of Chatswood and provision for additional employment. The Planning Proposal is not in the public interest.

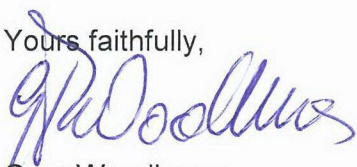
Conclusion

This submission on the pre-gateway application and Willoughby Council's consideration and determination of the planning proposal application does not support the redevelopment of 45 Victor Street Chatswood as proposed. In conclusion Willoughby Council strongly objects to the granting of any gateway approval for this application.

Council officers have previously indicated possible support for a compromise development outcome that may form the basis of a new Planning Proposal for a gateway application.

This submission recommends that the Proposal be rejected in its current form and the proponent be invited to confer with Council about a revised Proposal.

Yours faithfully,



Greg Woodhams

ENVIRONMENTAL SERVICES DIRECTOR

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**WILLOUGHBY CITY
COUNCIL**

MEMO

Memo. To Noni de Carvalho
Memo. From James Brocklebank, Group Leader, Traffic & Transport
Date 28 October 2013
Ref./File No.
Subject 45 Victor Street - Post Office planning proposal

The following comments are made regarding the planning proposal for the site at 45 Victor Street, which is currently occupied by the Chatswood Post Office.

1. Under the proposal, the driveway access would be via Post Office Lane, which is only 6m in width with parking on its northern side. The proposal would see a significant increase in the number of vehicle movements into and out of Post Office Lane including heavy vehicles making deliveries to the site, removalist vans etc. This would create difficulties in terms of vehicle movement in and out of the lane particularly at the junction with Victor Street, a cul-de-sac, without a turning circle.

The cul-de-sac end of Victor Street is a site of much congestion and illegal parking activity and many vehicles currently use Post Office Lane to complete a 3 point turn in order to proceed south and exit Victor Street. Post Office Lane currently carries low volumes of traffic and the above, while, not desirable, doesn't cause too many issues. The proposal will exacerbate the problems and lead to significant conflict between exiting traffic from the lane, turning traffic in Victor Street and pedestrians using Victor Street to access the Victoria Ave Mall, Westfield or Chatswood Station.

2. Post Office Lane currently has parking permitted on its northern side with parking banned on its southern side. Given the increase in two way traffic flow resulting from the development proposal it would be necessary to ban parking in the lane to provide sufficient carriageway width for safe two way traffic flow. There is a very high demand for the limited parking supply in Victor Street by customers of the Post Office, by people dropping off or picking up from the station, by vehicles making deliveries, by people dropping off/picking up from Westfield etc and the loss of parking in Post Office Lane would further exacerbate parking problems in Victor Street. Increased double parking and illegal parking in No Stopping zones is anticipated with a resultant restriction on through traffic flow. High levels of illegal parking activity within Loading Zones and No Stopping zones in Victor Street already occurs and further traffic and parking activity within the precinct can only exacerbate these issues.
3. It is noted that the Planning Proposal provides for only one Loading Bay serviced by a turntable and designed to cater for vehicles up to an 8.8m service. This is considered to be completely inadequate. Table 5.1 of the Guide to Traffic Generating Developments gives general guidance on the amount of loading bays that would be required for new developments. If the rates for loading bays from

the table were to be translated to the proposed development at 45 Victor Street, then there would need to be 1 loading bay for Post Office, Commercial uses plus another 5 for the residential component. At least 50% of these 6 bays would need to be accessible by trucks. Of those accessible by trucks it is considered that at least one should be accessible by a heavy rigid vehicle i.e a 12.5m truck.

The developer would need to justify why they believe 1 loading bay would be considered sufficient for this development by carrying out surveys of similar developments and by demonstrating that there is sufficient loading zone capacity in Victor Street. It must be noted that the Loading Zones in Post Office Lane would be lost should the planning proposal proceed (to cater for two way traffic flow).

The traffic study has not demonstrated turning movements by trucks in and out of the site to Post Office Lane or from Post Office Lane to/from Victor Street. This must be demonstrated to Council's satisfaction for the largest vehicles accessing the site. Some adjustment to kerb lines at the Victor Street/post Office Lane intersection is anticipated

4. The traffic study submitted with the planning proposal estimates the traffic generation from the proposed development at 58 vehicle movements per hour and concludes that this traffic generation will have a negligible impact on the performance of the nearest signalised intersection at Albert Ave/Victor Street.

The traffic analysis does not take into account is the extra traffic generated by the current development activity at 14-18 Thomas Street, by the development of the Metro Towers over Chatswood Interchange or from the planning proposal which has recently been submitted for 65 Albert Avenue. Once the traffic generated by these three developments is considered the result may be markedly different. The analysis also does not take into account issues such as a) the extensive weekend queuing that occurs on Albert Ave eastbound waiting to turn right into Victor Street southbound or b) the extensive pm peak queuing westbound on Albert Avenue on approach to the Pacific Highway or c) the extensive delays which can occur in Victor Street during peak shopping periods due to double/illegal parking and/or vehicle manoeuvring issues. The above issues will not be apparent in a single intersection SIDRA analysis which considers only turning volumes at the intersection.

It is considered that the additional traffic resulting from the planning proposal will have a greater impact on the performance of Victor Street than the SIDRA analysis has shown and that the additional traffic generated by existing or proposed development in the vicinity should also be taken into consideration.

5. Victor Street carries significant volumes of pedestrian traffic with significant numbers of pedestrians crossing Victor Street at many points along its length to access Westfield, the Post Office and or the Victoria Avenue Mall. The region around the intersection of Post Office Lane and Victor Street is a particular concern as there is existing conflict between crossing and/or walking along victor Street and vehicles turning in and out of Post Office Lane. Many vehicles perform 3 point turns at the northern end of Victor Street and when doing so are placing these pedestrians at risk. The proposed development will increase the number of vehicle movements at the above intersection placing greater pressure on

pedestrian safety. The planning proposal has not proposed any measures to mitigate these risks.

It should also be noted that Post Office Lane will form a major pedestrian access point to the Metro Towers development once completed. Post Office Lane in its current form can safely cater for this pedestrian traffic however should the planning proposal at 45 Victor Street proceed it is unlikely that pedestrians would be safely catered for within the lane. While it is considered that the proposal is detrimental to pedestrian safety in the vicinity. If the planning proposal proceeds consideration will need to be given to the impacts of the vehicle and truck movements in the lane on pedestrian safety and measures must be proposed and implemented to ameliorate the safety concerns.

6. Only 1 Motorcycle parking space is to be provided under the planning proposal. Chatswood has experienced a significant growth in motorcycle use in recent years and it anticipated that the use of motorcycles may be attractive to potential residents and/or visitors to this site. The number of motorcycle spaces on site should meet DCP requirements
7. It is noted that the parking supply is well under the DCP parking rates with 195 spaces to be provided as opposed to a DCP requirement of 339. Given the proximity of the site to Chatswood Station and Bus Interchange and given concerns about traffic generation from the site a reduction in the number of parking spaces is not overly concerning. It is however considered that the provision of no visitor parking spaces at all is inappropriate. It has been argued that the DCP visitor parking requirements are unnecessary given the proximity of the Westfield carpark and will many visitors may park there a reliance upon the Westfield carpark to provide for visitor parking generated by this development is not valid. The Westfield carpark has been funded by developer contributions as a retail carpark and any spare capacity should not be swallowed up to support shortfalls in residential development's parking capacity. While some reduction in visitor parking capacity may be appropriate on the basis of the proximity to rail and bus travel the provision of no visitor parking is opposed as some should be provided to cater for elderly and/or mobility impaired visitors or for others who may not be able to access the site via public transport.

If Council is to accept a reduction in parking supply at the development this should be justified by reference to parking surveys at similarly located and sized developments elsewhere.

The justification for the reduction in carparking supply notes an increasing trend for residents to not own a car. Many such residents, while choosing not to own a car will still need access to a car for private trips and as such the designation of some car share spaces within a publicly accessible area of the carpark would seem appropriate.

8. The bicycle parking provision outlined in the planning proposal is considered satisfactory and the use of a secure bicycle enclosure in lieu of lockers is supported.
9. The planning proposal has not identified how the development will be constructed and this is a source of major concern. Victor Street and Post Office