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15 December 2023

Inner West Council
PO Box 14
Petersham NSW 2049
E: strategicplanning@innerwest.nsw.gov.au

Attn: Strategic Planning: Parramatta Road Proposal

RE: Parramatta Road Corridor Stage 1 Implementation
Planning proposal number: PPAC/2020/0003

Dear Councillors,

Please accept our submission on the Parramatta Road Corridor Planning Proposal Phase 1 which is currently being advertised for public comment.

Lungs of Leichhardt is a community group based in West Leichhardt (also known as Taverners Hill North), part of the Taverners Hill precinct targeted by the Planning Proposal. We have closely studied the Proposal, and the issues raised by it, in preparing this submission.

Our conclusion is that the portions of the Proposal that involve Taverners Hill North should be excluded from any version of the Proposal adopted by the Inner West Council. Instead the focus should be on the revitalisation of Parramatta Road.

We are grieved that the community was not involved in the preparation of this Planning Proposal as it would have spared us the anger and anxiety we felt in learning that our future living environment was being shaped without our participation. We strongly believe that future planning – in our neighborhood and elsewhere – should be transparent and involve the community right from the beginning. In our view it will lead to better outcomes.

One of the main benefits from involving residents from the outset would have been to alert the Council planners of the green canopy provided by the backyard gardens of the affected streets and the rich biodiversity that this urban forest environment sustains. These backyards also provide the sustaining trellis streets reinforcing the Greenway. Sadly, it is certain that the replacement of the homes that this Proposal targets will lead to the loss of these precious habitats for a wide variety of birdlife and fauna – some of it rare and even endangered.

We are particularly concerned in Appendix 10 about the red flag raised by ARUP, who reviewed the PRCUTS Traffic Study Traffic Model base year, advising that many aspects of the model should be updated. The Inner West had the 3rd highest total casualty crashes and the fourth highest total killed per head of LGA population for the Sydney Metropolitan Region for 2021 -

therefore there are serious safety considerations and the council has a duty of care to ensure this is addressed.

Public participation would have also brought home to the planners that they were not dealing with a random assortment of streets but a diverse, valued and viable community. This human dimension can only lead to better planning. Community members would have alerted the planners to more realistic prospects for redevelopment – and the rejuvenation of Parramatta Road – such as the Best & Less site at 657-673 Parramatta Road, or vacant lands such as 694 Parramatta Road Leichhardt (which has been vacant from at least 2018).

The Lungs of Leichhardt submission covers the following topics:

- The significance of the urban forest and the profound harm to biodiversity
- The elimination of the overall tree canopy target and the failure of site coverage and 'deep soil' guidelines to compensate
- The complete absence of any 'affordable' housing – this plan will not help solve the housing affordability crisis
- Viable alternatives to avoid a proposal prolonged and unpredictable delivery of new dwellings
- The value of the existing community
- The hardships that will face residents forced to move
- The fundamental flaws in the Traffic Study
- Intensified traffic problems and dangers to students at the adjoining Kegworth Infants and Primary School
- The threat of worse air pollution
- The scarcity of public open space and the absence of any plan to increase it despite the aim to multiply the local population fourfold
- The lack of any infrastructure improvements to protect the current living amenity
- The absence of public transport improvements on Parramatta Road which the planners previously asserted are necessary for acceptable redevelopment outcomes.

We are aware that the Inner West Council feels it has no alternative but to pursue rezonings because the Parramatta Road Corridor Urban Transformation Strategy is backed by a Ministerial directive and because housing targets have been imposed by the state government. On the other hand, as you are well aware, Councils have the responsibility to represent their residents and protect the urban environment. In our view this second imperative is what should drive the Inner West Council in its consideration of this Planning Proposal. Yes, the state government is currently on a very pro-developer drive but it remains a minority government and needs to be responsive to public opinion and decent urban planning.

Given the strength of the response from the Taverners Hill North community, and the precious environmental issues involved, we believe the Inner West Council is well justified in eliminating from the Planning Proposal the rezonings proposed for Hathern, Beeson, Tebbutt and Kegworth Streets.

In doing so, it would honour the explicit promise in the Parramatta Road Corridor Urban Transformation Strategy to maintain the 'established residential', 'historic', 'leafy' and 'low scale'

character of our neighbourhood. On page 202 of the [PRCUTS Planning and Design Guidelines](#) under the heading 10.4 Future Character and Identity, it states:

The leafy, residential and low scale characters south of Parramatta Road in the 'North Lewisham' area and north of Parramatta Road between Hathern Street and Lords Roads will be preserved including the pattern of grain, building typology and historic housing character. The established residential character of low scale workers cottages, detached houses and existing property setbacks of the area will be protected and preserved.

The Lungs of Leichhardt community group is available to answer any queries you may have about our submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mary Lafferty', with a stylized, cursive script.

Mary Lafferty
On behalf of the Lungs of Leichhardt group

Lungs of Leichhardt Submission

CONTENTS:

1. The proposal will facilitate the destruction of crucial biodiversity and goes directly against the commitments of IWC to maintain healthy urban forestry	4
2. The proposal is vulnerable to a prolonged and unpredictable delivery which disrupts both the community and the Council	6
3. There is no possibility of guaranteeing affordability (or livability for families) for homes in Taverner's Hill/West Leichhardt	7
4. Loss of character would be unavoidable	8
5. Traffic disruption and congestion increases (and the safety of the community) have not been seriously considered	9
6. Parramatta Road 'revitalisation' is not fulfilled by developing Taverners Hill and no supporting infrastructure has been proposed	11
7. The rezoning disrupts the fabric of the existing, tight-knit communities and constituents, favouring an imagined one in its place	11
Our key demand	13
Recommendations	13

1. The proposal will facilitate the destruction of crucial biodiversity and goes directly against the commitments of IWC to maintain healthy urban forestry

To quote the IWC, “the best time to plant a tree was 50 years ago... the second-best time is now!” Our residential blocks host privately-maintained mature trees and existing gardens — which cannot be replicated by the planting of new, young plants — that provide a well-established habitat for a wide range of birdlife and native fauna and directly support and expand the Greenway habitat (at no cost to the council). The proposed developments would destroy this valuable area of rich biodiversity for future generations

1. Local wildlife experts and environmental groups, including the Inner West Environment Group (IWEG) and the GreenWay Birdos, Australian Conservation Foundation (ACF) Inner West, and BirdLife Australia have all recognised the crucial role that this specific area plays to support biodiversity in the GreenWay and the significant ecological harm that would occur as a result of rezoning and subsequent medium density development.
2. Our neighbourhood — which hosts gums of over 100 years old — critically supports the Greenway wildlife corridor, providing habitat connectivity for birds and micro-bats

migrating to Hunters Hill and Wolli Creek, and along the eastern seaboard. The potential consequences of this rezoning extend beyond the immediate site, impacting the broader ecological health of the Inner West for future generations.

3. Threatened species that have been recorded in the Greenway include:
 - a. Powerful Owl (*Ninox strenua*)
 - b. Superb Fruit-Dove (*Ptilinopus superbus*)
 - c. Pied Oystercatcher (*Haematopus longirostris*)
 - d. Grey-headed Flying Fox (*Pteropus poliocephalus*)
 - e. Eastern Bent-wing bat (*Miniopterus schreibersii oceanensis*), and
 - f. Long-nosed Bandicoot (*Perameles nasuta*)
4. Council has conducted NO assessment of biodiversity impact on native wildlife affected. We note the exclusion of a biodiversity study which seems to be a major oversight by the Inner West Council.
5. NSW Department of Planning has ruled that IWC should remove overall tree canopy targets. The Proposal attempts to circumvent this ban by advancing a tree canopy target for each development site but this is only 20% which is considerably inferior to the general Sydney target of 40% or even the R1 target of 25%.
6. Leichhardt has one of the lowest levels of tree canopy in the Inner West LGA, at 11-15%, which means our area cannot afford to lose any more. We also have the 3rd lowest open space ratio of all 130 NSW councils.
7. There are no amenity improvements in this planning proposal for our area to increase parklands. In any case, public spaces are now built in a way that are predominantly open lawn which are not conducive to rich biodiversity and small birds - instead they are dominated by introduced species and aggressive natives like the Noisy Miner so will do little for supporting biodiversity.
8. Council engaged ArborCarbon to undertake an aerial measurement of vegetation cover in 2022. The analysis was used to determine current canopy cover and assist in guiding strategic direction for the increase in canopy cover for the Inner West. The analysis indicates the tree canopy of the Inner West has reduced, from 17.7% in 2020 to 16.4% in 2022 equating to a total reduction of tree canopy of 29 hectares. According to the Inner West Council Agenda Item (C08231) Item 4 dated 8 August 2023, half of this loss is associated with State Government infrastructure projects.
9. ArborCarbon found that over half (55.4%) of the canopy is on privately owned land and 44.6% is on publicly owned land. In terms of contribution to overall canopy cover of the LGA, Low Density Residential contributed the most towards canopy (39.4%), followed by General Residential and Public Recreation 22.4% and 14.3% respectively.
10. A “deep-soil” requirement and an [eventual] tree canopy target for each development site are mentioned in the Planning Proposal. However, deep soil plantings will take many years to grow, during which time most of the wildlife in this area will be lost. 15Even once the trees have matured, there will be a permanent loss of the multi-storey dense vegetation and the types of backyards with grass, sheds, eaves and under home areas which have created the specialised habitat needed for small birds, bats, marsupials and lizards, and insects to flourish. These blocks would almost invariably have basement parking so this will require the clearing of the site during excavation.

11. This is the last remaining habitat in Leichhardt for many small birds like the Superb Fairy Wren, White-browed Scrubwrens, Spotted Pardalotes and includes 100-year-old gum trees. Our area is fast becoming the only residential area which can be called 'the lungs of Leichhardt'.
12. Birds (especially small birds) need to have a continuous tree canopy to link trees together from one area to another. Small birds use this backyard tree canopy. Birds also need a buffer zone and these backyards provide that buffer zone for canopy already established for the canal for the native birds. This applies also to Ring Tail Possums.

Our full biodiversity submission is attached at Appendix 1.

2. The proposal is vulnerable to a prolonged and unpredictable delivery which disrupts both the community and the Council

1. A weakness of the planning proposal is that it relies on the willingness of the community to sell their properties to prospective developers. As such, it does not guarantee that new dwellings will be delivered and is especially vulnerable to a prolonged and unpredictable delivery exposed by the strength of objection in the community.
2. We can expect further delays because of worsening construction delivery times in NSW. This is currently an average of 7.8 months between approval to commencement¹ and 33.2 months between commencement and completion².
3. These delays are compounded by the proposed approach which relies on multiple smaller scale developments all subject to their own delays and approval issues as opposed to a selected few larger-scale developments.
4. This unpredictable and extended approach also has the effect of maximising disruption to residents through prolonged and constant construction and uncertainty.
5. In contrast, the council may exert a higher level of control and benefit from robust impact to its targets if it chooses to enable larger scale construction by repurposing commercial land around Parramatta Road.
6. Our modelling (see Appendix 2) of new dwellings delivered over time suggests that the alternative approach of repurposing commercial land around Paramatta Road could achieve the full targets more than two decades before an optimistic delivery of the current proposal and up to 37 years before a constrained delivery.
7. The Kolotex development, approved by the Council in 2014, provides a good case study in the development of new dwellings from rezoning commercial land within the precinct. With a four year construction time from approval to completion and with more than half of the land allocated to gardens and community space, the development provides a template as to what development along Parramatta Road might look like.

¹ [ABS Data Downloads average commencement times for new apartments in NSW](#)

² [ABS Data Downloads average completion times for new apartments in NSW](#)

8. There is a 6200m block of commercial land available for sale now (Best and Less lots) that could enable a large-scale development of 137 apartments if we assume the same scale provided by the Kolotex apartment block which managed to develop 224 apartments from 10,130 sqm of land while still enabling large community spaces.
9. There is ample further commercial land along Parramatta Road to close the gap between the impact of that development and the target. Similar developments have been undertaken along Parramatta Road, both within the IWC area and the City of Sydney. Council is taking an inconsistent stance regarding rezoning commercial and employment lands.
10. Noting that commercial businesses along Parramatta road in the precinct are struggling with a lack of foot-traffic, it is likely that any loss of employment from the rezoning of commercial land would be offset by the jobs created by a large-scale construction approach. Furthermore, mixed used developments could be considered to maintain equivalent employment space. We challenge the council to conduct a study to explore this further.
11. By opting not to challenge or explore commercial rezoning options with the state government initially, the council reveals a lack of willingness to advocate to the government on behalf of its residents. We insist that the Council be more than just “the messenger” in this strategy.

The two assumptions of our model (below in recommendations) is attached at Appendix 2.

3. There is no possibility of guaranteeing affordability (or livability for families) for homes in Taverner’s Hill/West Leichhardt

We believe the justification for sacrificing people’s homes, tight-knit communities and placing significant strain on the local environment cannot be justified by arguments about affordable homes, especially when there is no commitment to creating them.

1. Where the IWC Planning Proposal has specified Affordable Housing (on page 27) it only refers to the “Leichhardt precinct” – and only amounts to 2% of the residential strata area containing a target of 707 apartment in that precinct and applies to no other area (Section 2.10 page 27 Planning Proposal). The other specific reference to affordable housing – principal 2: Page 61 – also only talks about 2% for Leichhardt precinct. This does not even meet the 5% affordable housing target in line with current State Government policy. Nor is it in line with Council’s policy of 15% affordable housing for new developments. Taking the whole Planning Proposal into account, the ‘affordable housing’ target amounts to 14-15 dwellings out of 1516.
2. A survey of the homes in Taverners Hill North showed that 77% of the homes slated for possible lot amalgamation and demolition are family dwellings which have 3 or more bedrooms. Leichhardt has an average of bedrooms per dwelling ratio of 2.5-compared to

NSW and Australia's ratio of 3.1. If these houses are demolished, it will further reduce the ability for families to live in Leichhardt and significantly reduce Leichhardt's overall community as families grow they won't be able to find suitable dwellings for their family size .

3. Three-bedroom apartments are not only expensive but extremely hard to find. Accordingly, a *Sydney Morning Herald* article dated June 25, 2023 "Can Big Apartments Solve Sydney's Housing Crisis?" states, "But experts say there are major impediments to building apartments suitable for families in Sydney as developers were not incentivised to build three-bedroom units. Nicole Cook – University of Wollongong urban geographer – commented in this article: "developers are building the wrong types of apartments to house families as they made more money from smaller apartments".
4. According to the 2021 Census, Leichhardt has a disproportionately high number of young families with children, especially in the preschool to primary age group. Our families need housing that will accommodate our families. We have a number of young families within Taverners Hill North who will be seriously disadvantaged, not only financially, but by having our appropriate residence potentially taken away from us.
5. The new developments will be geared to be studio, one- and two- bedroom units. **"PRCUTS assumed a household size of approximately 2 people per dwelling"**, reinforcing that these new apartments are unlikely to be suitable for families" - Parramatta Road Stage 1 Planning Proposal Exhibition November 2023, 2.12, note, page 11.

Our full affordability submission is attached at Appendix 3.

4. Loss of character would be unavoidable

Character and heritage properties are a crucial component of the Inner West's history and amenity. The development proposal is not only in opposition to the established character of the area, it is directly implicated with the destruction of what makes this area such a unique and inimitable part of Sydney.

1. According to IWC's Leichhardt Development Control Plan (DCP) 2013, destruction of our houses — which were originally constructed before or in the immediate decades after 1900 — would go against the aims to retain local character and heritage. For example, the DCP states a commitment to: "*C3: preserve and enhance the predominant scale and character of dwellings in this precinct, consisting of mostly single storey Victorian and Federation-style dwellings, with more dense development in **appropriate areas**; C5) conserve and enhance the weatherboard cottages and the brick cottages found throughout the West Leichhardt Distinctive Neighbourhood.*" The destruction of existing homes of fine grain character for dense development in its place goes against the aims of the DCP.
2. Additionally, Attachment 3: Development Control Plans - Part G Section 13.3.2, under the heading 'Desired future character' states, "Development has respected the historic

fabric and character of the area". However, the demolition of our homes and replacement with the proposed multi-storeyed flat developments will demonstrate anything but this 'respect'.

3. The rezoning of these streets will have a significant detrimental impact on the two heritage items in Beeson Street. Their character and identity will be lost.
4. The rezoning requires the amalgamation of three or four existing small single blocks into ones large enough – minimums of 20-metre frontage and 720m² in area – for the multi-storeyed flats. The Development Control Plan aims for an orderly lot amalgamation pattern but such DCPs have only guidance status and decisions on future developments will be taken by planning panels and the Land & Environment Court. The danger persists that we shall see a hotchpotch of multi-storeyed developments alongside and interspersed among single-storey cottages.

Our full character and history submission is attached at Appendix 4.

5. Traffic disruption and congestion increases (and the safety of the community) have not been seriously considered

The proposed redevelopment would add hundreds of cars to the already heavy traffic on a narrow arterial road, worsening both air pollution and the potentiality for accidents. The capacity of public transport is overestimated by the Proposal.

1. Increasing the density of this area will significantly increase the number of cars coming in and out of this area as well as the parking load. Doing so raises the prospect of issues and dangers that are heightened due to the specific location of the proposed zones changes.
2. From the 2016–2020 crash statistics, 7.87% of all pedestrian-related crashes occurred within a school zone. Of all crashes that occurred within a school zone, 14.1% occurred while the school zone was active. For crashes occurring within 400 metres of a school, this significantly increases to a total of 75% (Source: IWC 10 October 2023 Item 17).
3. IWC spent \$35,000 on the construction of a blister lip kerb along Tebbutt Street for Kegworth School in 2022 after the school raised concerns about the signalised intersection of Lords Rd & Tebbutt St – Council is aware this is a very dangerous location which requires safety measures. Construction on busy roads in the vicinity of a school is only going to make the situation more dangerous.
4. Additionally, the most relevant Traffic Study is seriously flawed and needs to be recommissioned. ARUP was commissioned to undertake a review of [Appendix 10 – Parramatta Road Corridor Precinct-wide Traffic and Transport Study](#) Cardno Traffic Study dated 2022. ARUP is a firm with a collective of 18,000 designers, advisors and experts working across 140 countries. The ARUP review findings have been tabulated and there were a significant number (46% of 70 items) of inconsistencies noted within the Cardno report. ARUP's conclusion (page 18 of 22). Two items specifically relate to the Tebbutt Street intersection.

5. It would be extremely irresponsible for the Inner West Council and State Government to rezone in light of this, given that Tebbutt and Hatherth Streets are highly trafficked arterial roads until a new traffic study is undertaken and independently verified/reviewed by suitably qualified persons (CPEng NER). Arup's conclusion is as follows:
6. Additionally, there is evidence that public transport isn't, in its current state, able to be relied upon. As Jo Hayden, NSW Minister for Transport, stated in a 22 May 2023 report on Channel 7: "our train network is neither reliable nor resilient, and we need to act fast to fix it now." PRCUTS Appendix 10 - Parramatta Road Corridor Precinct-Wide Traffic and Transport Study and its Implementation was based on Train services demand which were calculated on a one week period in (21-25) November 2017 which is very out of date. This is now significantly out of date and train services have changed — the study was also performed after the HSC so less students would have been travelling to school.

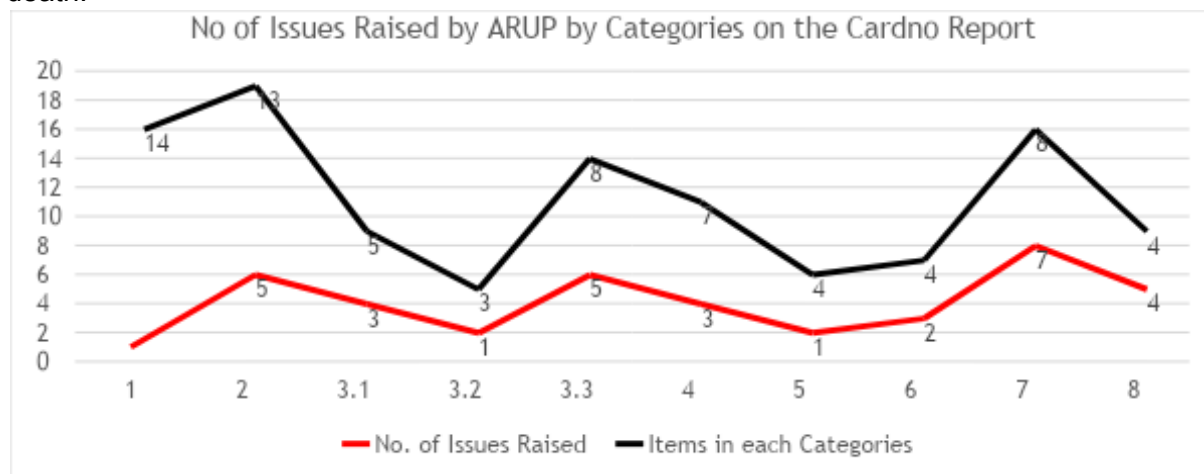
10 Conclusion and recommendations

The review of the Parramatta Road Corridor Urban Transformation Transport Study base year model has shown that many aspects of the model should be updated to ensure it provides a robust basis from which to forecast future year performance and identify appropriate road infrastructure requirements to support planned urban growth.

We recommend the base model be revised primarily to address issues identified in the assignment process. The calibration results should also be revised and further information on validation checks are needed to ensure the model provides a suitable baseline representation of traffic movements on the network during both the AM and PM peak periods.

The main findings of the review are summarised in Table 14.

We note Table 14 Finding Summary in Arup's findings the following issues listed below, of which some of which have significant safety impacts which lead to potential injury accidents and even death.



Our full traffic submission is attached at Appendix 5.

6. Parramatta Road ‘revitalisation’ is not fulfilled by developing Taverners Hill and no supporting infrastructure has been proposed

The planning proposal focused on Parramatta Road, effectively ignoring State Government criteria

1. This current Planning Proposal Stage 1 has been developed under the guise of delivering the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) but is targeting our residential neighbourhood instead.
2. The Parramatta Road infrastructure that is crucial to sustain redevelopment in areas fringing it is not being delivered. The original iteration of this Planning Proposal **made development conditional** on a commitment from the state government to provide a rapid public transport system for Parramatta Road. This requirement has now been deleted, alongside the original urging that we needed to: “retain the existing low-density character across the remainder of the Precinct”.
3. Furthermore, in the Parramatta Road Corridor – Implementation Plan 2016-2023, page 37, Figure 7 clearly shows that Beeson St, Kegworth St and Lords Rd are not to be included in the first stage of the Taverners Hill Action Plan. (See parramatta-road-implementation-plan-2016-2023.pdf (landcom.com.au))
4. This proposed upzoning for residential flat buildings is being justified on the grounds that our area is close to the light rail station. Yet the light rail is at, or near, the limit of its running capacity with it being unable to introduce more peak hours services (currently run every 8 minutes).
 - a. This limit is because of constraints associated with the single track near Dulwich Hill and power supply limits
 - b. The light rail capacity will be put under strain by the 4,700 new dwellings either recently completed or under construction along the line including 1500 apartments in 12 towers, 265 apartments at Harbourside - Darling harbour.
5. Council planners have justified omitting Parramatta Road from the current Planning Proposal on the grounds that the agreement to Council’s employment protection measures was not confirmed until late in the preparation of the Planning Proposal. It would, however, be consistent with the rest of the current Proposal if an amendment was now made to delete the proposed rezonings in West Leichhardt and instead publicly advertise a substitute rezoning of the Parramatta Road Taverners Hill blocks similar to what is proposed for Kings Valley in the current Proposal.
6. Crucially, no supporting infrastructure has been suggested to support the proposed increase of residents in the area. There are no infrastructure improvements beyond some possible footpath improvements envisaged for Taverners Hill, north or south, in the Planning Proposal.
7. In order to maintain living amenity, population and dwelling increases need to be accompanied by increased public open space, education and health facilities and

services, expanded and improved transport options, and adequate energy and water services.

Our full submission on the lack of Parramatta Road revitalisation, lack of proposed infrastructure improvements and lack of consideration for flooding issues attached at Appendix 6.

7. The rezoning disrupts the fabric of the existing, tight-knit communities and constituents, favouring an imagined one in its place

The proposed rezoning will significantly disadvantage residents and families on modest incomes if they are forced to move.

1. **Key essential workers could lose their homes.** Our community within the Hathern, Beeson, Tebbutt and Kegworth Streets is largely made up of single, semi-detached and dual occupancy residential properties as well as 24 public townhouses/units. This area is the cheaper end of Leichhardt and occupied by average-income families and individuals (including health care, child care, aged services, teachers along with blue collar and retail workers) who are under cost of living pressure. Council policies are committed to protecting such residents:
2. Section 2.3 of the Inner West Council Affordability Housing Policy states: *“Council is committed to protecting and increasing the supply of housing stock that can be affordably rented or purchased by very low, low, and moderate income households, including target groups identified as having particular housing needs in the Inner West Council area. These include:*
 - a. *Very low and low income key workers;*
 - b. *Asset poor older people, including long-term residents of the LGA;*
 - c. *Young people, including those with a social or economic association with the LGA;*
 - d. *Lower income families including sole parent families and those totally priced out of the housing market;*
 - e. *People with special housing or access needs, including people with a disability, frail aged people, those at risk of homelessness, Aboriginal and Torres Strait Islanders and people from culturally and linguistically diverse communities.”*
3. Increased land value flowing from the upzoning to R3 will result in increased Council rates which will increase pressures to sell. Residents can obtain deferral of the difference between the current R1 and the proposed R3 rates, but on selling the property the deferred amount for the past five years (including interest) would have to be paid.
4. Sale of property to a developer is based on a square metre rate calculated on how big the size of your land. The calculation does not take into account a home's market value and what you have done to improve your home.
5. This area is a traditionally lower income area so many residents are still paying off mortgages – older residents may not be able to transfer or get a new mortgage.

6. Moving would also involve stamp duty and other moving costs.
7. This area is still considerably cheaper than the rest of the suburb and neighbouring areas, which would mean many residents forced out may have to leave the area, and leave their community, family and healthcare providers.
8. The area proposed for rezoning is a community, not just a bundle of streets. West Leichhardt is often misjudged as an undesirable place to live as it is located in the heart of a heavy-traffic area. However, our streets have a different story to tell. A mix of houses, units, and townhouses, these properties are either owner-occupied, public housing or used for private rental — our street is therefore a microcosm of housing across urban Australia.
9. Some residents have lived in our community for 50 years or more, while others have just moved in. Irrespective of how long they have lived in our village, all would state without hesitation their sense of belonging. The cul de sac of Beeson Street has provided a safe environment for kids to play outside and these same children extend their relationships to people and places through their attendance at our local School (Kegworth). It is also a safe environment for our older neighbours and those with disabilities to walk freely up and down the street, which is vital for their physical well-being and to reduce their social isolation.
10. We have a mixed range of occupations and incomes within the affected area. Most of the residents of the streets to be rezoned will not be able to buy back into this area if the overdevelopment of our very small streets is allowed. Many of the long-term residents have expressed an intention and desire to age in their homes and within their community. Homeowners have stated their intention not to sell hence thwarting the government's grab to rapidly develop already occupied homes.
11. One of our greatest achievements has been maintaining our sense of place while undergoing three major redevelopments since the mid-1990s until the recent redevelopment of the old Toy Factory into residential units. Beeson St is a great example of a community not being adversely affected if development is done properly. Not one existing house was destroyed in this process. No one was dislocated from their home and community.
12. The increase of population density resulting from the residential developments were not of such a scale as to drastically overpopulate this very small physical space which is crucial to maintaining a cohesive community. The community is of a size that enables us to recognise each other as residents of the same street(s). We have welcomed diversity in the street. The public housing tenants, for example, are integrated into this community. The same can be said for tenants in the private units. We live in harmony when the capacity of the developments are at a level that is suitable for the size of the area.

Our key demand

Remove this area of West Leichhardt from the PRCUTS rezoning plan for the reasons detailed above. Public opinion is very much opposed to this socially and environmentally destructive Planning Proposal.

The online petition we launched almost simultaneously with the exhibition of the Planning Proposal now has more than 1800 signatures.

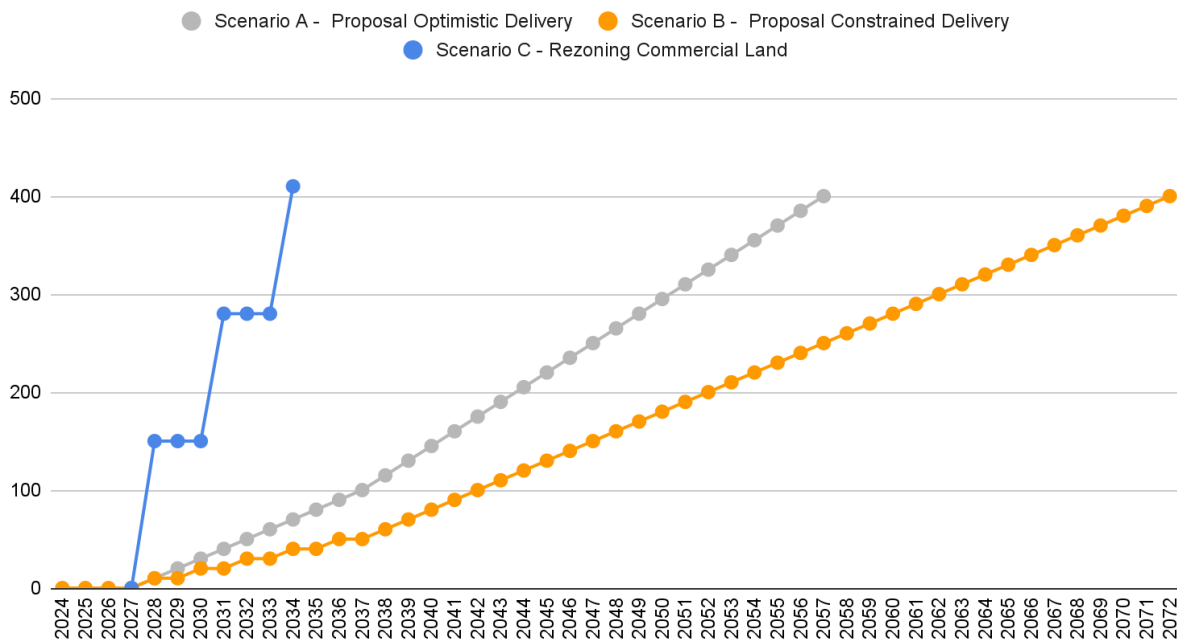
Recommendations

1. To re-orientate the Planning Proposal to focus on Parramatta Road Taverners Hill.

This would be both consistent and practical. A large site in this area – the Best & Less properties (657-673 Parramatta Road Leichhardt) – is currently on the market. It lends itself to the rezoning treatment proposed for Parramatta Road Kings Valley.

Our modelling (see below — based on assumptions in Appendix 2) of new dwellings delivered over time suggests that the alternative approach of repurposing commercial land around Parramatta Road could achieve the full targets more than two decades before an optimistic delivery of the current proposal and up to 37 years before a constrained delivery.

A comparison of additional dwellings delivered by scenario over time



2. The recommissioning of the Traffic Study.

ARUP, a leading traffic, civil and infrastructure design house has noted significant areas to be addressed within the modelling, calibration of results and validation checks required. (Discussed in detail in Appendix 5).

3. Recognition of this site's crucial importance in supporting the GreenWay's biodiversity and Council's commitment to protect this area for future generations

The site proposed for rezoning is the critical habitat of small birds and other native wildlife that are not commonly found elsewhere in Leichhardt and are in general decline in Greater Sydney, including the Inner West. It is an ecological ark for our suburb as well as an important habitat for migratory birds and bats. If the backyards habitat and tree canopy were removed and replaced by apartments, there would be profound ecological loss for the Inner West. In addition to removing this area from rezoning plans, more needs to be done to proactively guard against ecological harm so that we can maintain biodiversity and mature tree canopy for future generations.

4. The requisite community consultation that includes constituents in the assessment of areas set for redevelopment.

The preparation of this Planning Proposal began in October 2020, adopted by Inner West Council in March 2022, forwarded to the NSW Department of Planning in May 2022.

During this process affected residents were never notified let alone consulted. Formal public consultation was not commenced until November 2023 – residents only found out about the proposal informally in April 2023.

One result of this process, culminating in submission of the draft Planning Proposal in May 2022, was that the NSW Department of Planning was able to dilute or eliminate significant provisions (such as the overall tree canopy target and a commitment to a rapid transit system on Parramatta Road) and to make itself rather than Council the ultimate plan-making authority.

Residents were robbed of the opportunity to make alternative proposals and improvements. It is crucial that any further discussions or considerations regarding the redevelopment of our community be in transparent and supportive consultation with those who will be most impacted.

Appendix 1: Biodiversity Loss and Environmental Harm

Table of Contents

<i>Rezoning will lead to biodiversity loss and environmental Harm</i>	17
1.1. Rezoning conflicts with the Blue-Green Grid Strategy and associated community preferences	17
1.2. No assessment or consultation on biodiversity impact and harm	18
1.3. Climate change, air quality and the urban heat effect	18
1.4. Loss of tree canopy cover and connectivity	18
1.5. Loss of backyard habitat and ecosystems	19
1.6. Impact on bird diversity – especially small birds	19
1.7. Impact on threatened and vulnerable species	20
1.8. Impact on established ecological communities	20
1.9. Impact on migratory birds and bats.....	22
1.10. Impact on nocturnal birds.....	22
1.11. No protection for tree canopy or native animal habitat	22
1.12. Deep soil plantings inadequate	23
1.13. No feasibility study	23
1.14. Environmental loss for future generations	23
1.15. There are alternative sites that don't require destroying the urban forest	23
Appendix 1-1: Location of Proposed Rezoning for Redevelopment	25
Appendix 1-2: Google Satellite Map	26
Appendix 1-3: List of Threatened Species and Recorded Birds Impacted	27
Appendix 1-4: Tree Canopy by Suburb in the Inner West LGA	29
Appendix 1-5: NSW State Government Gateway Determination	30
Appendix 1-6: Inner West Council Biodiversity Response	33
Appendix 1-7: Parramatta Road Alternative Sites	35

Appendix 1: Biodiversity loss and environmental harm

Rezoning will lead to biodiversity loss and environmental Harm

The area proposed for rezoning: namely Hathern St, Beeson Street, Kegworth Street, bounded by Tebbutt Street¹ contains the densest amount of backyard urban forest in Leichhardt², made up of large mature trees including 100 year-old gums and multi-level foliage and backyard habitat. Importantly, they are critical trellis streets that connect directly to and provide crucial support and extended habitat for the most biodiverse part of the GreenWay wildlife corridor in Leichhardt.

Local wildlife experts and environmental groups, including the Inner West Environment Group (IWEG) and the GreenWay Birdos, Australian Conservation Foundation (ACF) Inner West, and BirdLife Australia have all recognised the crucial role that this specific area plays to support biodiversity in the GreenWay and the significant ecological harm that would occur as a result of rezoning and subsequent development.

Removing tree canopy and backyard habitat to replace them with apartment developments will increase pollution and urban heat for West Leichhardt. It would fragment the GreenWay's vital wildlife corridor, not only endangering the habitat for small native birds, marsupials but also risking altering the delicate balance that sustains the GreenWay as a crucial stopover for seasonal migrants and a habitat for the state-listed Powerful Owl. The potential consequences of this rezoning extend beyond the immediate site, impacting the broader ecological health of the Inner West for future generations.

The rezoning should be rejected for the following reasons, covered in more detail in this submission:

1. Loss of Tree Canopy Cover and Connectivity
2. Loss of Backyard Habitat and Ecosystems
3. Impact on Bird Diversity – Especially Small Birds
4. Impact on Threatened and Vulnerable Species
5. Impact on Established Ecological Communities
6. Impact on Migratory Birds and Bats
7. Impact on Nocturnal Birds
8. Climate Change, Air Quality and the Urban Heat Effect
9. Rezoning Conflicts with the Blue-Green Grid Strategy and Community Preferences
10. No Assessment or Consultation on Biodiversity Impact + Harm
11. No Protection for Tree Canopy or Native Animal Habitat
12. Deep Soil Plantings Not Adequate
13. No Feasibility Study
14. Environmental Loss for Future Generations
15. There are Alternative Sites that Don't Require Destroying the Urban Forest

1.1. Rezoning conflicts with the Blue-Green Grid Strategy and associated community preferences

The Inner West Council's Blue-Green Grid Strategy and supporting Community Engagement has made it a priority to protect, enhance and increase the Ecological Grid in the Inner West, especially around the GreenWay. The GreenWay being the main artery of the IWC Blue-Green Grid.

The Draft Blue-Green Grid Strategy based on community consultation states that key aims include:

1. "Protect, enhance and increase wildlife corridors and areas of habitat for native flora and fauna" (p49)

¹ See Appendix 1: Location of Proposed Rezoning for Redevelopment

² See Appendix 2: Google Satellite Map

2. “Expanding the urban tree canopy and vegetation and integrating water into the landscape to reduce urban heat, improve air quality and provide natural habitat for native fauna” (p47)
3. “Mitigate urban heat and sequester carbon through water retention and increased tree canopy cover” (p49)
4. “Protect and enhance natural environment for future generations” (p77)
5. “Provide habitats for different native species” (p77)

Yet the proposed rezoning will allow the removal of the biggest and most concentrated grouping of large mature backyard trees in Leichhardt to be removed, significantly reducing habitat for the Inner West’s wildlife corridor, threatening biodiversity and native species, increase urban heat, and decrease air quality.

1.2. No assessment or consultation on biodiversity impact and harm

There was no environmental impact study undertaken on the impact of rezoning. This is despite local environmental experts and groups such as IWEG, ACF Inner West and BirdLife Australia recognising the importance of the habitat and that biodiversity that will be threatened with rezoning this site.

The Inner West Council (IWC) concluded that, “The proposed changes are unlikely to result in any adverse effects on critical habitat for threatened species and ecological communities.”³

This conclusion was reached without consultation with experts or residents with local knowledge of native flora and fauna in these areas, nor did they conduct a biodiversity study of the area or ecological impact study of the proposed rezoning.

No approvals should be made on rezoning without a comprehensive and genuinely independent ecological impact study conducted that consults with local experts to ensure that there is full understanding and awareness of the effects of rezoning on biodiversity, threatened and vulnerable species, migratory animals and ecological communities. The IWC must be accountable for the changes it proposes, and adequate research and consultation is a crucial aspect of liability, especially when acting on behalf of concerned constituents.

1.3. Climate change, air quality and the urban heat effect

The backyards in the proposed rezoning area contain some of the largest, most mature trees in Leichhardt. These trees clean our air of carbon dioxide and other pollutants from traffic on Parramatta Road, Tebbutt St and Hathern St. If we lose any of these trees, it will mean more pollution for the surrounding areas, including Kegworth Infants and Primary School.

To make matters worse, this rezoning proposal will add large numbers of extra cars to the key arterial route made up of Tebbutt St, Brown St, Cook St, and Old Canterbury Rd – increasing the frequency and duration of already common traffic jams. This will significantly increase pollution produced, while significantly reducing the amount of trees that help to clean up this pollution.

Furthermore, because of the current dense canopy cover, the location is currently not identified as a hot spot in the Inner West Council’s ‘Where should all the trees go?’⁴ document. Removing them however will result in this zone increasing in temperature compared to the surrounding landscape.

Rezoning this area and the resultant removal of these trees will reduce our ability to clean the air, further contribute to climate change and worsen the urban heat effect.

1.4. Loss of tree canopy cover and connectivity

The proposed rezoning poses a significant threat to the existing tree canopy cover and disrupts the vital connectivity provided by these trellis streets. The Inner West Council has committed to increasing its tree canopy in line with the NSW Department of Planning and Environment goal of a 40%

³ See Appendix 6: Inner West Council Biodiversity Response

⁴ <https://www.innerwest.nsw.gov.au/ArticleDocuments/1036/202020%20vision%20report.pdf.aspx>

increase by 2030. However the Inner West LGA tree canopy coverage is at 19.3%⁵, and **Leichhardt has one of the lowest levels of tree canopy in the LGA at 11-15%⁶, which means it cannot afford to lose any more.**

Trees are not just greenery; they are essential components of our urban ecosystem, providing shade, habitat, and improving air quality. They provide oxygen and moisture back into the atmosphere. The removal of trees will disrupt this corridor, hindering the ability of species to use the site and leads to habitat fragmentation, creating isolated patches of greenery. **Fragmented habitats make it difficult for wildlife to traverse the urban landscape, contributing to population decline and limiting genetic diversity.**

1.5. Loss of backyard habitat and ecosystems

It's not just the tree canopy itself that provides precious habitat for native wildlife, but it also the particular nature of the backyards in this area with multi-level foliage, soil, sheds, underneath of older houses, roofs and eaves that has created the specialised habitat needed for small birds, marsupials and lizards (as well as the insects they feed on) to flourish.

1.6. Impact on bird diversity – especially small birds

If these houses and their backyards were replaced with apartments, then there will be far less bird song in the GreenWay.

BirdLife Australia reports that GreenWay and its surrounding streets currently support approximately 110 different bird species (from regular IWEK surveys)⁷. While some of these birds are found elsewhere in urban areas, this part of the GreenWay supports a number of small birds such as Superb Fairy-wrens, White-browed Scrubwrens, known to be in decline in urban areas. Interrupting this continuous corridor will have impacts for the types of bird species that can use it. Making it less suitable for these small native birds and less common species, and instead opening the site to introduced birds and abundant aggressive natives like Noisy Miners and Rainbow Lorikeets.

Since 2014, small bird populations have declined by over 50% in the Inner West. In addition to the destruction of backyard tree canopy, public green spaces are now mostly lawn rather than dense bushes for understandable safety reasons. This makes remaining backyards with abundant tree cover, especially those connected to the GreenWay, even more important to protect if we want to support our small bird populations.

The area proposed for rezoning and the adjacent part of the GreenWay is likely the last area in Leichhardt where Superb Fairy-wrens are commonly seen as they have largely disappeared from the rest of Leichhardt and much of the Inner West. Unlike much of the rest of Leichhardt, these backyards contain dense, large trees, including 100 year-old gum trees), mid and lower storey vegetation which provide continuous shelter and opportunities for feeding – especially for small birds.

⁵ <https://www.greenerspacesbetterplaces.com.au/wwattb/inner-west-council/>

⁶ See Appendix 4: Tree Canopy by Suburb in the Inner West LGA

⁷ See Appendix 3 for a detailed list of examples of native birds that have been identified by IWEK surveys in our part of the GreenWay wildlife corridor.



1.7. Impact on threatened and vulnerable species

The rezoning proposed will allow the destruction of habitat for threatened and vulnerable species.

The Inner West Environment Group notes that the following threatened and vulnerable species have been recorded in this part of the GreenWay⁸:

- Powerful Owl (*Ninox strenua*)
- Superb Fruit-Dove (*Ptilinopus superbus*)
- Pied Oystercatcher (*Haematopus longirostris*)
- Grey-headed Flying Fox (*Pteropus poliocephalus*)
- Eastern Bent-wing bat (*Miniopterus schreibersii oceanensis*), and
- Long-nosed Bandicoot (*Perameles nasuta*)

The Grey-headed Flying Fox was voted the Inner West's wildlife mascot and can be frequently heard chattering in the trees at night in these backyards.

The elusive Long-nosed Bandicoot was sighted this year in a Kegworth Street backyard.

BirdLife Australia believe this area is likely a stopping location for young, unpaired Powerful Owls and that locations like these are critical for young birds to disperse safely across the landscape. Removing this habitat will put further pressure on an already vulnerable species.

1.8. Impact on established ecological communities

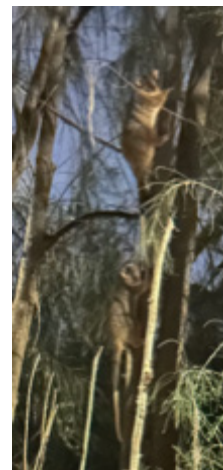
Rezoning and higher density development of this area will also have detrimental impact on established ecological communities beyond just threatened and vulnerable species.

⁸ See Appendix 3: List of Threatened Species and Recorded Birds Impacted

For example, this area has colonies of Kookaburras who have been here for many years and are frequently heard laughing in the gum trees. Kookaburras are known to pair for life⁹ and remain in their territories all year, living in close social groups. They reuse their nests for multiple years in a row (in fact, there's been a documented case of Kookaburras using a nest cavity on and off over 60 years¹⁰).

Unfortunately, they are unlikely to be able to just move somewhere else as their habitat is disappearing across Greater Sydney. A study in 2022 by Griffith University using citizen science data found that Kookaburras, once common, were now in decline in urban areas in Greater Sydney.¹¹

This area provides extended habitat to the GreenWay to a rich biodiversity of native wildlife and as such, supports a complex ecology, which will be irreparably harmed if the backyards are replaced by apartments.



Here is a Green Tree Frog from a Kegworth St backyard taken just this week. Green Tree Frogs, once common, have disturbingly disappeared from much of Sydney.¹²

⁹ <https://birdlife.org.au/bird-profiles/laughing-kookaburra/>

¹⁰ <https://birdfact.com/articles/kookaburra-nesting>

¹¹ <https://www.abc.net.au/news/2022-08-18/kookaburra-decline-in-eastern-cities-due-to-noisy-miners/101340504>

¹² <https://australian.museum/blog/amri-news/aussie-green-tree-frog-disappearing-act/>



Figure 5 Green Tree Frog

1.9. Impact on migratory birds and bats

Data collected by IWEГ and surveys in Birdata also show the value of the GreenWay and surrounding trellis streets as a stopping point for seasonal migrants. This is the only location in the Inner West council footprint where species like Rose Robins and Golden Whistlers have been recorded in the past 10 years and one of only three locations with Grey Fantail sightings. Other species like Spotted Pardalotes and Silvereyes show clear preferences for the habitat along the GreenWay corridor running from right through the Inner West LGA and connecting to the Tempe habitat in the bottom right of the LGA.

The Inner West Environment Group notes that the GreenWay and its trellis streets provide a critical connectivity for birds on their way to Hunters Hill and Wolli Creek and for those also migrating along the eastern seaboard. Also supported are migratory microbats.

Because these trellis streets provide much needed resting points for migratory birds and microbats, removing this habitat will affect the long term future of these species as well.

1.10. Impact on nocturnal birds

This area proposed for rezoning is immediately next to the GreenWay and IWEГ and BirdLife Australia have warned that apartments tend to have much more light spill than single homes. Nocturnal birds, including the Powerful Owl and Southern Boobook (both known to frequent this part of the GreenWay), rely on darkness for their hunting. Excessive artificial lighting can impact both the birds themselves and their prey, and may result in them leaving the area.

1.11. No protection for tree canopy or native animal habitat

Despite the claims from the Inner West Council planners that there will be some protections for some trees in the rezoning site, there is no provision for the enforcement of this. In fact, the choice has been to remove this area from tree canopy targets altogether:

The NSW Department of Planning (DPE) has ruled that there can be **NO protection of tree canopy**. The Gateway determination letter from DPE to Council¹³ instructs the planners to:

'... (n) remove the proposed overall precinct/zone based tree canopy targets (including streets)'

In any case, the habitat that supports the richest biodiversity in Leichhardt is not just a few large trees, it is a connected and complex ecosystem that crucially includes the backyards of older homes along with dense and multi-level foliage, sheds, the roofs and underneath of homes with access to soil.

¹³ See Appendix 5: NSW State Government Gateway Determination

None of this complex habitat can be protected if the aim is to replace homes with backyards for apartments. What little green space will be afforded by developers will be sparse, fragmented and will have none of the features that have made this specific location so conducive to supporting a rich biodiversity of native wildlife.

We will see what has happened elsewhere in Leichhardt where introduced and aggressive native species like Noisy Miners and Lorrikeets get more areas where they thrive and further push out small birds, marsupials and lizards and a rich biodiverse range of insects.

1.12. Deep soil plantings inadequate

Inner West Council planners have discussed a “deep-soil target” for new development. However, deep soil plantings will take many years to grow and mature, during which time most of the wildlife in this area will have nowhere else to go.

Even if after many years, there are a few larger trees, there will be a permanent loss of the multi-level dense vegetation and the types of backyards with grass, sheds, eaves and under home areas which have created the specialised habitat needed for small birds, marsupials, lizards and insects to flourish.

The proposed rezoning would only amalgamate blocks in lots of 3 so they would be relatively small areas used to build mid-rise apartments, thus it is unlikely that much space could be set aside for large trees anyway as their roots and the overhang of the tree canopy would cause issues with the buildings.

1.13. No feasibility study

There has been no feasibility study conducted for the proposed rezoning to see if the development that it would facilitate would even be feasible for developers.

The Inner West Council's proposed block sizes are small for apartments and therefore, a developer would want to maximise their financial yield by using as much land as possible for building.

It is likely that any attempts by the Inner West Council to set any protections or requirements for tree canopy will be successfully challenged by a developer on the grounds of financial feasibility.

1.14. Environmental loss for future generations

The GreenWay wildlife corridor is a profoundly special area for Inner West biodiversity and ecology and it plays a role in the broader ecology of Sydney and the Eastern Seaboard due to it being a stopover site for migratory birds and bats.

This rezoning proposal facilitates the removal of a significantly large part of the total connected habitat available in the GreenWay corridor for the diverse range of native and migratory wildlife that currently use it.

The environmental loss that would be facilitated by this rezoning will not just be felt by the current generation, but will be felt for future generations to come.

1.15. There are alternative sites that don't require destroying the urban forest

There are other more appropriate sites nearby to redevelop into apartments – including empty, state owned blocks of land and disused industrial land – that won't require destroying precious habitat for Australian native animals. For example, the Best & Less site¹⁴ would facilitate much higher density but have little biodiversity or environmental impact as there are no trees or wildlife havens on that site.

We recognise the need for more housing but it should not have to come at the cost of losing our urban forests and the biodiversity supported by them. We need better planning – and genuine

¹⁴ See Appendix 7: Parramatta Road Alternative Sites

consultation with local environmental experts and residents – to choose sites that don't harm our already fragile and threatened urban wildlife.

We can have both higher density AND thriving urban biodiversity in our suburbs if we work together with local environmental experts and residents to select development sites carefully.

Appendix 1-1: Location of Proposed Rezoning for Redevelopment

The map below shows the location of the streets to be impacted.



Figure 6 SEQ Figure * ARABIC 6: Area proposed to be rezoned(left) and Google Satellite Map of Taverners Hill North (right)

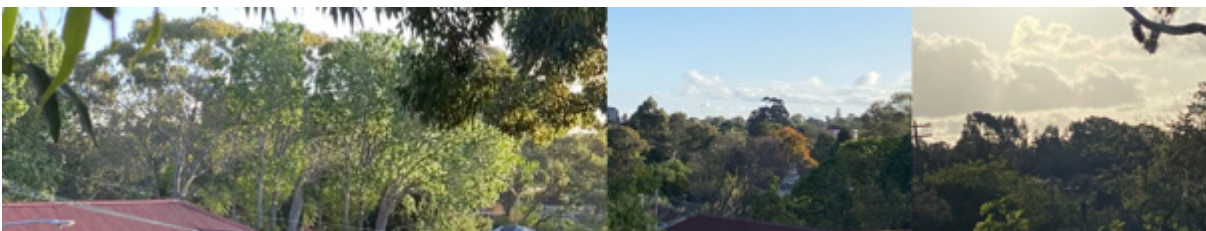
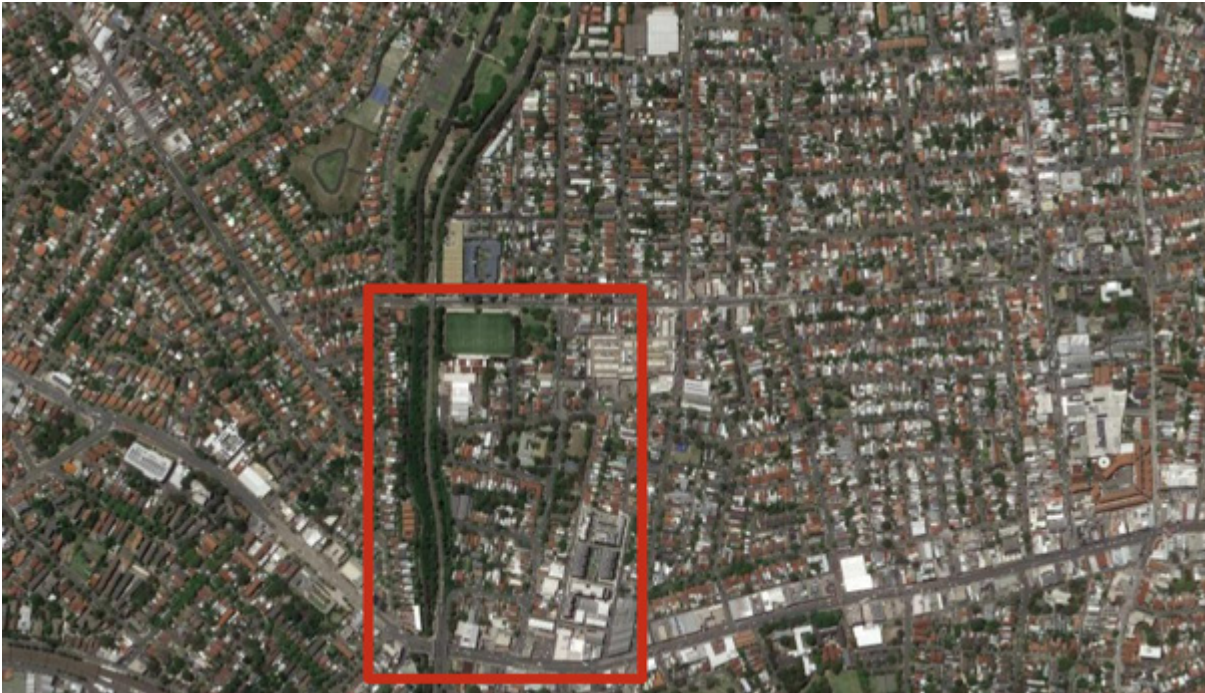


Figure 7 Photos of some of the affected tree canopy

Appendix 1-2: Google Satellite Map

This Google Satellite image below illustrates how much more denser the tree canopy is in this area compared the rest of Leichhardt.



Appendix 1-3: List of Threatened Species and Recorded Birds Impacted

Source: Jo Blackman, Inner West Environment Group

Threatened species that have been recorded in the GreenWay include:

- Powerful Owl (*Ninox strenua*)
- Superb Fruit-Dove (*Ptilinopus superbus*)
- Pied Oystercatcher (*Haematopus longirostris*)
- Grey-headed Flying Fox (*Pteropus poliocephalus*)
- Eastern Bent-wing bat (*Miniopterus schreibersii oceanensis*), and
- Long-nosed Bandicoot (*Perameles nasuta*)

Native Birds in Our Corridor include:

Australasian Darter	Eastern Cattle Egret
Australasian Figbird	Eastern Great Egret
Australian Bush Turkey	Eastern Osprey
Australian Golden Whistler	Eastern Rozella
Australian King Parrot	Eastern Spinebill
Australian Magpie	Fan-Tailed Cuckoo
Australian Pelican	Galah
Australian Pied Cormorant	Golden Whistler
Australian Raven	Great Cormorant
Australian White Ibis	Grey Egret
Bar-shouldered Dove	Greater Crested Tern
Black-face Cockoo-shrike	Grey Butcherbird
Back Bird	Grey Fantail
Brown Gerygone	Grey Goshawk
Brown Goshawk	Horsfield's Bronze Cuckoo
Brown Honeyeater	Intermediate Egret
Buff-banded Rail	Laughing Kookaburra
Channel-billed Cuckoo	Leaden Flycatcher
Chesternut Teal	Little Black Cormorant
Cockatiel	Little Corella
Collared Sparrowhawk	Little Lorrikette
Common Blackbird	Little Pied Cormorant
Common Koel	Little Wattlebird
Common Myna	Long-billed Corella
Common Starling	Leaden Flycatcher
Crested Pigeon	Magpie-lark
Crimson Rosella	Maned Duck

Masked Lapwing	Scaly-breasted Lorikeet
Musk Lorikeet	Shining Bronze Cuckoo
Nankeen Night Heron	Silver Gull
New Holland Honeyeater	Sivereye
Noisy Friarbird	Southern Boobook
Noisy Miner	Spotted Dove
Olive-backed Oriole	Spotted Pardalote
Orient Dollarbird	Striated Heron
Pacific Back Duck	Sulphur-crested Cockatoo
Pacific Koel	Superb Fairy-wren
Pacific Swift	Tawny Frogmouth
Peregrine Falcon	Topknot Pigeon
Pied currawong	Tree Martin
Powerful Owl	Welcome Swallow
Rainbow Lorikeet	White-bellied Sea-eagle
Red Wattlebird	White-browed Scrubwren
Red-browed Finch	White-headed Pigeon
Red-rumped Parrot	White-faced Heron
Red-whiskered Bulbul	White-naped Honeyeater
Rock Dove	White-plumed Honeyeater
Rose crowned Fruit dove	White-throated Needletail
Rose Robin	White-winged Triller
Royal spoonbill	Willie Wagtail
Rufous Whistler	Yellow-faced Honeyeater
Sacred Kingfisher	Yellow-tailed Back-cockatoo
Satin Bower bird	

Appendix 1-4: Tree Canopy by Suburb in the Inner West LGA

Link: <https://www.innerwest.nsw.gov.au/ArticleDocuments/1036/Suburb%20Tree%20Canopy.pdf.aspx>

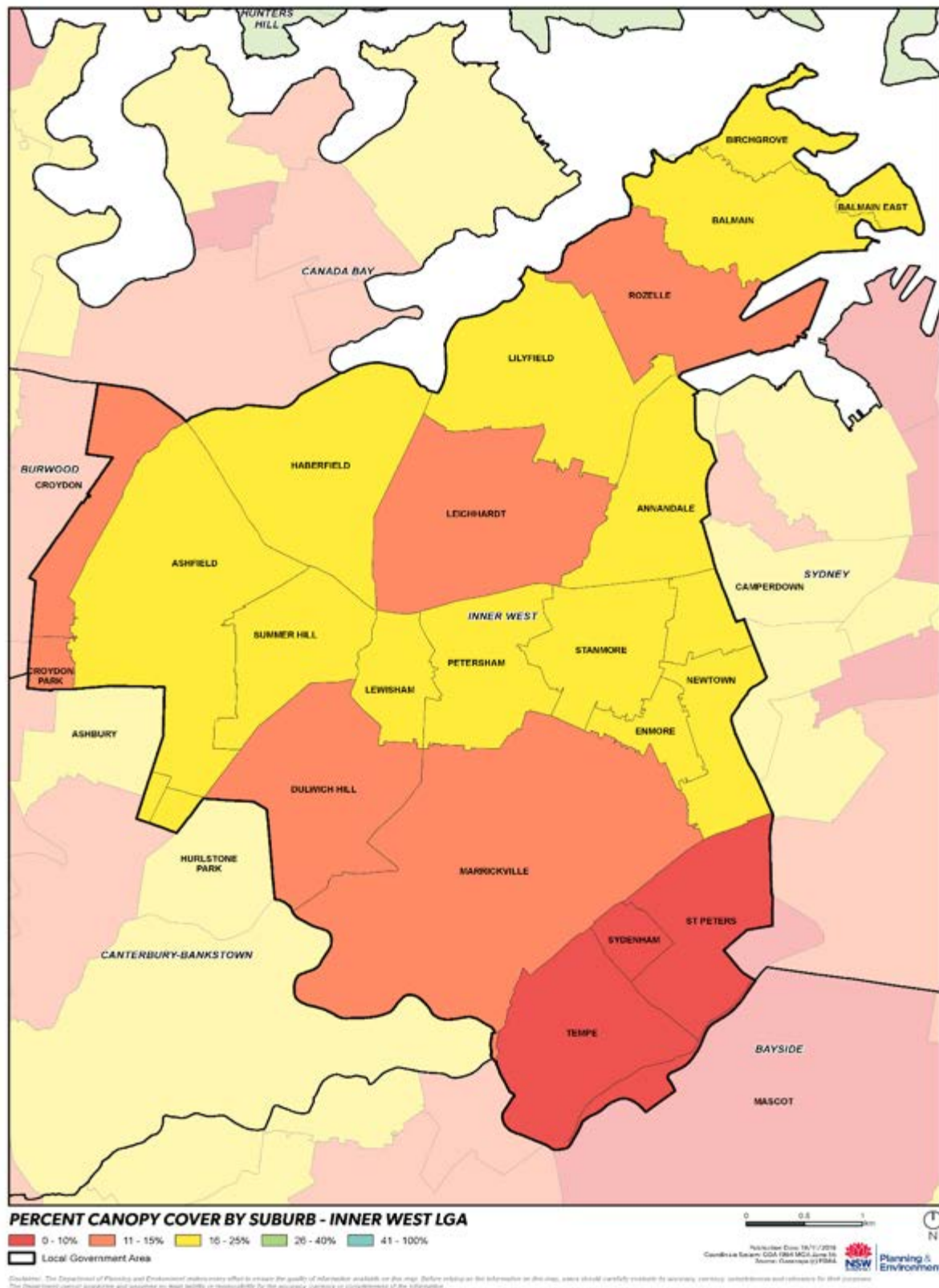


Figure 9: Map showing Leichhardt as one having one the lowest levels of tree canopy at 11-15% - it's even less than Camperdown and Newtown which are far closer to the CBD.

Appendix 1-5: NSW State Government Gateway Determination

Site Link: <https://www.innerwest.nsw.gov.au/develop/plans-policies-and-controls/planning-proposals/planning-proposal-tracker/parramatta-road-corridor-stage-1-implementation>

Link to specific document:

[https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Gateway%20determination%20-%20Inner%20West%20PRCUTS%20Stage%201%20\(PP-2022-1921\).pdf.aspx](https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Gateway%20determination%20-%20Inner%20West%20PRCUTS%20Stage%201%20(PP-2022-1921).pdf.aspx)



Department of Planning and Environment

Gateway Determination

Planning proposal (Department Ref: PP-2022-1921): to amend the Inner West Local Environmental Plan 2022 to implement Stage 1 of the Parramatta Road Corridor Urban Transformation Strategy 2016 (PRCUTS) in parts of the PRCUTS Precincts of Leichhardt, Taverners Hill and Kings Bay.

I, the Executive Director, Metro East and South at the Department of Planning and Environment, as delegate of the Minister for Planning, have determined under section 3.34(2) of the *Environmental Planning and Assessment Act 1979* (the Act) that an amendment to the Inner West Local Environmental Plan 2022 to implement Stage 1 of the Parramatta Road Corridor Urban Transformation Strategy 2016 (PRCUTS) in parts of the PRCUTS Precincts of Leichhardt, Taverners Hill and Kings Bay should proceed subject to the following conditions:

1. Prior to public exhibition, the planning proposal (including relevant appendices) is to be revised to address the matters set out below:
 - (a) include an explanatory note that future development will be subject to state/regional infrastructure contributions in accordance with the implementation actions in the Parramatta Road Corridor Urban Transformation Strategy Implementation Update 2021;
 - (b) include a figure or figures in the planning proposal that clearly identify all land and sites that are subject to the planning proposal;
 - (c) address consistency with section 9.1 Direction 1.5 Parramatta Road Corridor Urban Transformation Strategy, including:
 - i. the proposal seeks a height of 23m rather than 17m and a FSR of 3:1 rather than 1.9:1 for 97 Norton Street, Leichhardt. Appendix 12 to the planning proposal refers to the Urban Design Study, however it is unclear that the site is specifically discussed in the Urban Design Study;
 - ii. the proposal seeks a height of 23m rather than 17m and a FSR of 3:1 rather than 1:1 for 23 Norton Street, Leichhardt. Appendix 12 to the proposal acknowledges the FSR variation but not the height variation. Update Appendix 12 to the planning proposal to acknowledge the inconsistency and provide justification; and
 - iii. part of 35-53 Old Canterbury Road, Lewisham is proposed to remain with a FSR of 1.1:1 and is identified on the proposed FSR incentive map as 1.1:1. The incentive FSR map is to be updated accordingly to remove the area from the map.
 - (d) address consistency with section 9.1 Direction 4.1 Flooding, including:
 - i. update the planning proposal to address relevant recommendations of the NSW Government's 2022 Flood Inquiry Report;
 - ii. clearly address the requirements of Direction 4.1, providing clear assessment and consideration the level of flood hazard(s) that may impact the proposal; and
 - iii. remove references to outdated Direction 4.1 numbering.

- (e) to contemplate the suitability of the use of the R1 General Residential and/or R4 High Density Residential zones under Inner West LEP 2022 to remove the need to rely upon 'residential flat buildings' as an additional permitted use for land zoned R3 Medium Density Residential;
- (f) remove the proposed additional heritage local provision;
- (g) review and correct as required existing and proposed maximum building heights and floor space ratio provisions to ensure the planning proposal and proposed mapping are consistent;
- (h) to include an assessment of the proposed sustainability provisions against *State Environmental Planning Policy (Sustainable Buildings) 2022* (Sustainable Buildings SEPP). This must outline how the proposed incentive targets relate to the targets set out in the Sustainable Buildings SEPP.
- (i) in relation to the proposed performance standards for non-residential development, update the proposal to use the development type term 'office' rather than 'commercial development' or provide justification as to why the term commercial development is preferred;
- (j) include a table in the planning proposal that clearly demonstrates indicative zoning under the Department's employment zones reforms;
- (k) amend the proposed workers facilities provision to reframe it as an overarching clause setting out aims and objectives, the detailed requirements may be contained in a Development Control Plan (DCP);
- (l) remove references to the finalisation of the draft Design and Place State Environmental Planning Policy (SEPP) 2021;
- (m) remove the proposed clause that considers reduced sustainability requirements for heritage items;
- (n) remove the proposed overall precinct/zone based tree canopy targets (including streets);
- (o) remove the proposed incentive requirement for all car parking to be provided as unbundled parking in new developments;
- (p) provide a plain English explanation of intent for the proposed community infrastructure contributions (CIC) clause for the Leichhardt Precinct, noting that the Department is unable to support a CIC levy that does not conform with the existing legislative framework for infrastructure funding under the *Environmental Planning and Assessment Act 1979*;
- (q) remove the two proposed transport infrastructure provisions; and
- (r) update the project timeline to reflect the progress of the planning proposal and Gateway timeframes.

2. Consultation is required with the following public authorities:

- Ausgrid;
- Adjoining Councils;
- Greater Cities Commission;
- Commonwealth Department of Infrastructure, Transport, Regional Development and Communications;
- Department of Education;
- Environment and Heritage Group of the Department of Planning and Environment;
- Environment Protection Agency;
- Heritage NSW;

PP-2022-1921(IIRF22/1918)

- Jemena;
 - NSW Health;
 - State Emergency Service;
 - Sydney Airport Corporation;
 - Sydney Metro;
 - Sydney Trains;
 - Sydney Water Corporation; and
 - Transport for NSW.
3. Prior to finalisation, the planning proposal to be updated to:
- (a) address the Implementation Actions in the *Parramatta Road Urban Corridor Transformation Strategy Implementation Update 2021* to:
 - i. ensure the planning proposal aligns with any transport or infrastructure plan developed by the NSW Government; and
 - ii. address the recommendations and outcomes of the Precinct-wide traffic studies.
 - (b) provide additional analysis demonstrating that the tree canopy targets (% of site area) and the deep soil target can be achieved on a site-by-site basis;
 - (c) provide feasibility analysis considering the zoning, height and floor space ratio and other requirements for development including design excellence, affordable housing contributions, local and community infrastructure requirements and contributions, state or regional contributions and sustainability requirements. This updated analysis should also account for any amendments to the planning proposal that occur as part of the plan making process; and
 - (d) ensure that the thresholds for BASIX standards which trigger the incentive provisions are appropriate having regard to the Sustainable Buildings SEPP.
4. The planning proposal should be made available for community consultation for a minimum of 28 days.
5. The planning proposal must be placed on exhibition no later than **5 months** from the date of the Gateway determination.
6. The planning proposal must be reported to Council for a final recommendation no later than **9 months** from the date of the Gateway determination.
7. The timeframe for completing the LEP is to be **12 months** from the date of the Gateway determination.
8. Given the nature of the proposal, Council is not authorised to be the local plan-making authority.

Dated 20th day of October 2022.



Amanda Harvey
Executive Director, Metro East and South
Planning and Land Use Strategy
Department of Planning and Environment

Delegate of the Minister for Planning

Appendix 1-6: Inner West Council Biodiversity Response

Inner West Council Link: [Parramatta Road Corridor Stage 1 Implementation - Inner West Council \(nsw.gov.au\)](https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Attachment%20%20-%20Planning%20Proposal%20-%20Post%20Gateway.pdf.aspx)

Link to Planning Proposal document featured below

<https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Attachment%20%20-%20Planning%20Proposal%20-%20Post%20Gateway.pdf.aspx>



Planning Proposal

**Parramatta Road Corridor Implementation Stage 1
September 2023**



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PO Box 14, Petersham NSW 2049

Section C – Environmental, social and economic impact

Q7. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

The proposed changes are unlikely to result in any adverse effects on critical habitat for threatened species and ecological communities.

Land to the south of Parramatta Road between the Hawthorne Canal and Palace St, Petersham is identified as "Biodiversity" on the Natural Resource—Biodiversity Map under IWLEP 2022 (see Figure 10 below). Clause 6.4 Terrestrial biodiversity of the IWLEP 2022 requires the consent authority to consider the potential impacts to fauna and flora, and their habitats, in the assessment of a development application.

The Planning Proposal will not alter the extent of the biodiversity mapping, nor the requirements to be considered in the assessment of a development application on land identified as Biodiversity. Therefore, the Planning Proposal will not adversely impact threatened species, populations or ecological communities, or their habitats.



Figure 10 – Extract from IWLEP 2022 indicating the extent of Terrestrial Biodiversity (in green) in the Planning Proposal area (in black boundary).

Q8. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

It is unlikely that the proposal will result in any environmental effects that cannot be managed through the proposed LEP provisions in conjunction with the existing LEP provisions.

The Planning Proposal in fact includes provisions which will positively contribute to the environmental considerations in the Parramatta Road Corridor. In particular, the proposed amendments through FSR and HOB incentives mechanism will ensure that urban design, built form, amenity, stormwater management and environmental sustainability are given thorough consideration prior to granting consent to any additional development capacity above the existing LEP controls.

Planning Proposal: Parramatta Road Corridor Stage 1 – September 2023

Appendix 1-7: Parramatta Road Alternative Sites

A photo of a nearby alternative site on Parramatta Road that could deliver more housing quicker and with more certainty *without* removing urban forest and critical habitat.



Appendix 2: Unpredictable delivery

Table of Contents

- 1. Model.....37
 - 1.1. Assumptions.....37

Appendix 2: Unpredictable delivery

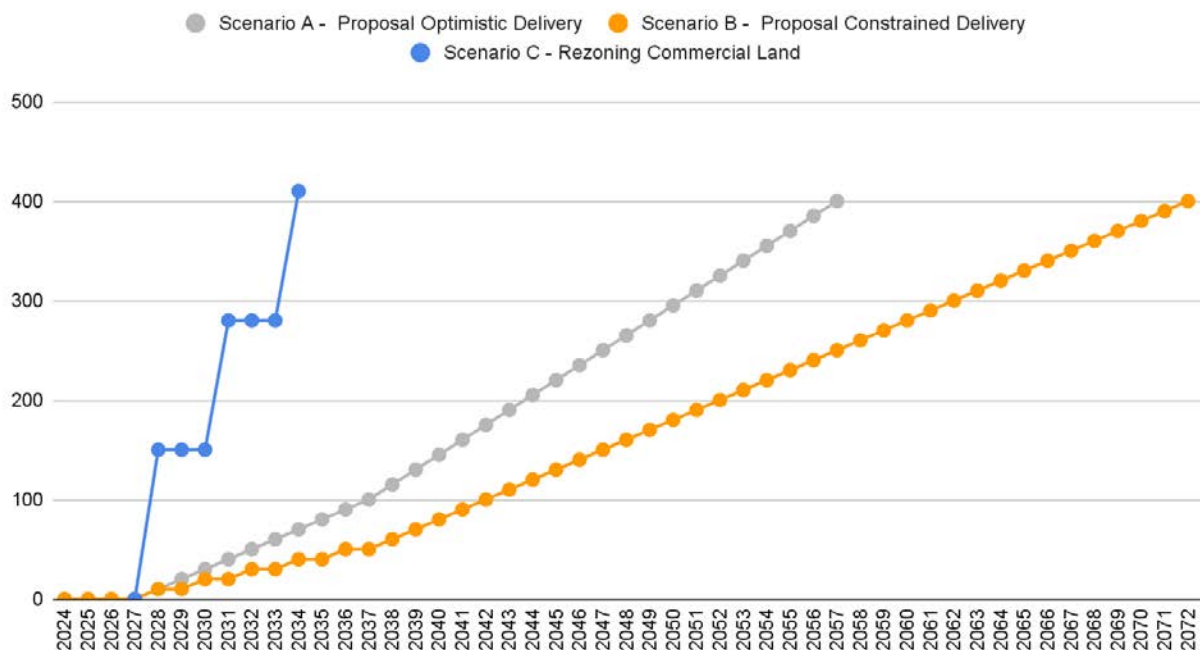
1. Model

This is a model of two scenarios, one where the existing proposal is implemented and another where the approach is to rezone commercial land around Parramatta.

1.1. Assumptions

- Scenario A - existing proposal with an optimistic delivery:
 - Assumes that developers are able to acquire 600 sqm of land a year in the first 10 years from acquiring 2 existing residences enabling the development of 12 apartments based on the NSW average apartment size of 118.7 sqm against a FSR of 2.4 (the outcome being 10 new dwellings)
 - From year 10 onwards the model assumes the rate of acquisition will increase to 900 sqm of land per year resulting in 15 new dwellings per year.
 - The model assumes that apartment construction will take three years with this being below the average approval to completion time seen for apartments seen in the state.
- Scenario B - existing proposal with an constrained delivery:
 - Assumes that developers are able to acquire 600 sqm of land every two years in the first 10 years with the same assumptions as Scenario A resulting in 10 new dwellings at intervals of two years.
 - From year 10 onwards the model assumes that developers are able to acquire 600 sqm of land a year resulting in 10 new dwellings.
 - The model assumes the same length of construction as Scenario B
- Scenario C repurposing commercial land:
 - Assumes that the delivery of developments on repurposed commercial land of similar size to the Best and Less lot yielding up to 137 apartments that are approved at years 1,4 and 7
 - Assumes that construction will take four years to complete in line with the precedent set by the Kolotex development

A comparison of additional dwellings delivered by scenario over time



Appendix 3: Affordable Housing

Table of Content

- 1.1. Summary.....40
 - 1.1.1. *This proposal will not deliver moderately priced dwellings*41
 - 1.1.2. *Taverners Hill North - wealth perception incorrect:*.....42
- 1.2. Taverners Hill North – current family dwelling size42
- 1.3. Social and public housing decline.....43
 - 1.3.1. *State Government dwelling targets*44
- 1.4. No feasibility study44
- 1.5. Impact of rezoning on residents' quality of life44

Appendix 3: Affordable Housing

1.1. Summary

The local population is made up of 74% families. Council's proposal will result overwhelmingly in studios and 1-2 bedroom apartments that will not be able to house all of the diverse demographic needs (including essential workers) which often requires at least 3 bedroom housing which is exactly what will be permanently lost if the proposal is accepted. This is a major oversight of the design documents, the underlying assumption is that 15% will be 3 bedrooms, however, each development application is "stand-alone" and this low target in all likelihood will not be delivered.

Existing social and affordable housing will be replaced with new, unaffordable housing. This proposal will move us further from the goal of increasing affordable housing, not closer. The rezoning will displace residents who will not be able to afford to live nearby and who will lose their community. Even those who refuse to be displaced will eventually be penalised by the Inner West Council (IWC) rate policy of having to pay the difference between R1 and R3 rates plus interest when they sell their property, hence making these existing homes less attractive when sold as the new owner will also be subject to this rate policy if not a developer. In other words, the homeowner will be penalised when selling. The argument that existing residents will tap into a gold-mine and be paid huge prices by developers does not match reality and ignores the huge difficulties facing anyone that is forced to sell by creeping development and rate rises: locating a similar home, moving costs, stamp duty, loss of community and connections to local services, and so on. Of course some residents, by reasons of age and employment status, would have difficulties obtaining another mortgage.

A far more efficient way to increase affordable housing is to replace non-residential property with residential property. Parramatta Road itself, which is the claimed focus of PRCUTS, has many large unused or under-utilized commercial properties whose owners want to sell. Rezoning them would be far more effective at achieving the State Government's aims. Many more apartments could be built and so many more could be assigned to government (or NGO) ownership for social housing. We request that the Council review its hard-line stance against rezoning commercial properties along Parramatta Road which would be required to deliver the actual renewal along the Parramatta Road corridor.

The current proposal will result in a loss of affordable housing which is an important form of community infrastructure that supports community well-being, social/economic sustainability, diverse labour market, and economy, and produces a strong and inclusive community.

This LGA is already providing more than its fair share of new housing – there are 561 new apartments just one block away from the targeted area in West Leichhardt (Taverners Hill North) – whereas more affluent suburbs are contributing very little.

The proposal will not benefit those in need of housing. It will only help developers and investors. The main cause of the housing crisis is the 50% discount on Capital Gains Tax and Negative Gearing which artificially makes property the most attractive investment class and drives prices higher. The State Government can't do much about federal tax law, but it is necessary to identify that the causes of housing affordability are not just a supply and demand issue, it is much more complicated. One of the contributing factors that the State Government can do something about is to reverse the massive selloff of social housing properties perpetrated by the previous State Government. Rather than just helping developers and investors, the State Government could reinvest heavily in social/public housing to dramatically increase truly affordable housing. The 2% that is proposed for this rezoning for the Leichhardt sector only – is totally inadequate and is significantly less than the IWC target of 15% which is itself not enough to be effective.

It is important to note that there was no economic feasibility study performed for Taverners Hill North, therefore the above issues were not identified. The major imponderable that such a study would have identified is whether this Proposal will deliver the result in the short-term that is claimed for it – more than 300 new dwellings in the next 5 or 6 years.

1.1.1. This proposal will not deliver moderately priced dwellings

Developers will always maximise their profits. Furthermore, there have been articles clearly stating this fact as shown below:

To quote Michael Koziol, writing in the *Sydney Morning Herald* SMH, 18 Feb 2023, headlined **Why solving Sydney's housing crisis is more complex than developers will admit:** *"The truth is much more complex and comes back to a harsh but unavoidable reality: profit-making developers aren't going to collapse the value of their product."* Tim Williams, a former chief executive of the Committee for Sydney and planning adviser to the British government, now working in the private sector was reported saying in the same article *"We haven't got a housing supply problem, we have a housing ownership problem. You can make planning as free as you like and the private sector will still build more or less the same number of homes as the market will allow it to build. They're not going to build more homes to collapse the price. So, it's a myth."*

Rob Stokes, the former Minister for Planning, is also reported saying, *"In the same way that our diet needs to be balanced, our housing appetite also needs to be balanced. If the market is only providing \$2 million apartments, we will increase the supply of \$2 million apartments. But that won't speak to the housing needs of the collective more broadly."* In other words, the developer will not produce so many units that their profit margins drop. We need only look to the 'Jewel' development in Queensland to see how developers drip feed apartments onto the market to maintain excessive profits. See Table 1 to gauge how affordable and suitable for families these proposed units will be.

Table 1: Sample of sale prices for apartments at Upward Street and George Leichhardt

Location	Rooms	Total Square Metre	Sold amount / Date	Body Strata Per Quarter
203/45 Upward Street, Leichhardt Studio (2018)	1 Studio 1 Bath	42M ²	\$540,000 April 2018	
103/45 Upward Street, Leichhardt Studio (2021)	1 Studio 1 Bath	44M ²	\$577,500 Nov 2021	
202/45 Upward Street Leichhardt	1 Bed 1 Bath	66m ²	\$680,000 April 2023	
28/ 30-40 George Street, Leichhardt	1 bedroom 1 bathroom 1 Car Park	106m ²	\$863,000 June 3023	
41/ 30-40 George Street, Leichhardt	2 bedroom 1 bathroom 1 Car park	78m2/ 112m2	\$1,132,500 June 2023	\$1,265pq
G07/35B Upward Street, Leichhardt	1 Bedroom 1Bath	67M ²	\$665,000 July 2023	\$903 per quarter
207/ 22B George Street Leichhardt	1 bedroom 1 bathroom 1 Car Park	78M ²	\$750,000 August 2023	\$923 per quarter
140 / 69 Allen Street Leichhardt - Townhouse	3 bedroom 2 bathroom 2 Car park	123m ²	\$1,920,000 Aug 2023	

1.1.2. Taverners Hill North - wealth perception incorrect:

Our affordable housing precincts are home to many members of our community on low to moderate incomes: young workers and students; teachers; care workers; hospital and aged care paramedical staff; retail and hospitality workers; blue collar workers; people in relatively low-paid university and technical jobs; older people on pensions with limited super; and some older single women. We believe a significant demographic of our North Taverners Hill community falls within **the “Target Groups the IWC is committed to Protect”** (Section 2.3 of the Inner West Council Affordability Housing Policy cites)

Given that rent for new apartments is likely to be higher than for older stock, the use of ‘median’ values means that the affordability assessment is conservative. Given the fact that there have been significant increases in real (adjusted for inflation) rents in recent years, it is likely that housing will become even more unaffordable in the LGA in the future. Again, the analysis of projected affordable housing needs is likely to be conservative.

The evidence indicates that the vast majority of those needing affordable rental housing in the LGA are unlikely to have their needs met through the market without strong planning intervention to create affordable rental housing. The current rezoning proposal will dispose of the very people it alleges it is trying to help.

1.2. Taverners Hill North – current family dwelling size

A survey of the homes in Taverners Hill North showed that 77% of the homes slated for possible lot amalgamation and demolition are family dwellings that have 3 or more bedrooms. It is further noted that Taverners Hill North is primarily housing for families. There is no specification in the rezoning proposal for families who need 3 or more bedrooms. As mentioned above, Leichhardt has an average of bedrooms per dwelling ratio of 2.5% against NSW and Australia's ratio of 3.1%. If these houses are demolished it will further reduce the ability for families to live in Leichhardt and significantly reduce Leichhardt's overall community as families grow they won't be able to find suitable dwellings for their family size.

Three-bedroom apartments are not only expensive but extremely hard to find. Accordingly, a *Sydney Morning Herald* article, dated June 25, 2023, **“Can Big Apartments Solve Sydney's Housing Crisis? *But experts say there are major impediments to building apartments suitable for families in Sydney as developers were not incentivised to build three-bedroom units.* Nicole Cook, an urban geographer at University of Wollongong, commented on this article **“developers are building the wrong types of apartments to house families as they made more money from smaller apartments”**.**

As mentioned above, according to the 2021 Census, (table 2) Leichhardt has a disproportionately high number of young families with children, especially in the preschool to primary age group. Our families need housing that will accommodate their family's needs.

Table 2: Census Data on Leichhardt Families

	Leichhardt	NSW	Australia
Median Age (as at 2021)	38 years old	38 years old	41 years old
Family & group households (excluding Single households)	74.0%	75%	74.4%
Children (0 to 15 years old)	25%	18%	18%
Preschool	8.6%	6.8%	6.3%
Primary – Government	22.2%	18.1%	18.5%
Primary – Total	29.6%	26.4%	27.0%

We anticipate that should our area be rezoned to R3 – Medium Density, and as there is no compulsion by the developer to provide a greater proportion of 3 and 4-bedroom units as 1 and 2

bedrooms are easier to sell than based on (Saville Economics and planning: Parramatta Road feasibility study) which reiterates that developers will most likely build studios and one-bedroom units, then we believe that houses suitable for families in Leichhardt will be reduced overall to the detriment of the suburbs character.

1.3. Social and public housing decline

On 15 May 2023, Channel 7 News reported: that Rose Jackson, Minister for Housing said, “*The previous government sold off \$3.6Bn of public housing.*” Now the Labor government says there needs to be 320,000 dwellings built over the next 5 years. NSW Premier Chris Minns said the NSW Govt needs 30% social and affordable housing for essential workers. ([More than \\$3bn of social housing sold by NSW government since Coalition took power | Housing | The Guardian](#)). Based on the statistics below, the Inner West has already had a reduction of 261 public housing dwellings and an addition of 12 dwellings bringing the net total reduction to 249 dwellings overall.

Table 3: Inner West public housing levels 2011 vs 2021

Suburb	Ward	2011	2021	Difference	%State housing
Lilyfield	Baludarri-Balmain	303	265	-38	9.1%
Balmain East	Baludarri-Balmain	59	54	-5	6.8%
Balmain	Baludarri-Balmain	270	233	-37	5.2%
Marrickville	Midjuburi-Marickville	445	367	-78	3.4%
Petersham	Damun-Stanmore	91	76	-15	2.2%
Leichhardt	Gulgadya-Leichhardt	155	125	-30	2.1%
Haberfield	Gulgadya-Leichhardt	35	36	1	1.6%
Dulwich Hill	Djarrawunang-Ashfield	97	90	-7	1.5%
Annandale	Balmain-Leichhardt	59	58	-1	1.5%
Enmore	Damun-Stanmore	16	22	6	1.4%
Rozelle	Baludarri-Balmain	63	49	-14	1.4%
Stanmore	Damun-Stanmore	49	41	-8	1.3%
Ashfield	Djarrawunang-Ashfield	99	104	5	1.1%
Summer Hill	Djarrawunang-Ashfield	34	19	-15	0.6%
Lewisham	Damun-Stanmore	13	10	-3	0.6%
Tempe	Midjuburi-Marickville	9	3	-6	0.2%
Birchgrove	Baludarri-Balmain	0	0	0	0.0%
St Peters	Midjuburi-Marickville	4	0	-4	0.0%
Sydenham	Midjuburi-Marickville	0	0	0	0.0%

It is clear that the supply and demand argument is a gross oversimplification of the conditions that have led to the affordability crisis. A significant proportion of the problem can be traced back to government policy.

1.3.1. State Government dwelling targets

The less affluent suburbs in metropolitan Sydney are bearing the burden of the target uplift in dwellings (Table 4). It is clear from these figures that the State Government targets show little equity in the application of government policy. In short, the people of the Taverners Hill precinct are being asked to share a disproportionate portion of the burden.

1.4. No feasibility study

There was no economic and financial feasibility study for Taverners Hill although the other two areas considered under this Planning Proposal have been subject to such **Because of the need to purchase and amalgamate three existing allotments before redevelopment can be contemplated – and because the Development Control Plan discourages the creation of isolated lots between redevelopments – the pace of any redevelopment is highly likely to be very slow. The likelihood that the proposed rezoning will not work is increased substantially by the fact that existing residents are not inclined to sell.**

We do note that the feasibility testing was undertaken on commercial properties on Parramatta Road. In this connection we highlight the comment in *Section 4.2 Property Market Demand – Warehouse and distribution* (Savilles, appointed by IWC) that demand research finds very limited demand for warehouse and distribution spaces along Parramatta Road within the Inner West LGA. Large-scale warehouse and distribution occupiers will be able to find cheaper space more fit for purpose with less travel time to the M4 and M7 in Homebush / Silverwater or further west. Additionally, occupiers will be able to find space with better access to the port and airport in South Sydney and Marrickville. The relocation of commercial spaces is a far easier undertaking than the relocation of residents embedded in the community.

LGA	Dwelling Target (2016-2021)
Bayside	10,150
Blacktown	13,951
Blue Mountains	650
Burwood	2,600
Camden	11,801
Campbelltown	6,801
Canada Bay	2150
Canterbury-Bankstown	13,250
Central Coast*	Not Applicable
Cumberland	9,351
Fairfield	3,051
Georges River	4,800
Hawkesbury	1,151
Hornsby	4,350
Hunter's Hill	150
Inner West	5900
Ku-ring-gai	4,000
Lane Cove	1,900
Liverpool	8,251
Mosman	300
North Sydney	3,000
Northern Beaches	3,400
Parramatta	21,651
Penrith	6,601
Randwick	2250
Ryde	7,600
Strathfield	3650
Sutherland	5,200
Sydney	18300
The Hills	8,551
Waverley	1250
Willoughby	1,250
Wollondilly	1,551
Woolahra	300

*Central Coast Council (CCC) was not part of the Greater Sydney Region when the 2018 District Plans were prepared.

CCC is targeting to supply 32,550 dwellings to 2036 equating to approximately 1,630 dwellings per annum. Source: Central Coast Draft Housing Strategy.

Table 4 : the five-year housing targets for each Council area as taken from the relevant district plans for the 2016-2021 period

1.5. Impact of rezoning on residents' quality of life

If forced into a must-sell position by the impact of the creeping development and its associated negative effects – overshadowing, overlooking, increase in traffic and difficulties of leaving and returning to home, the destruction of the local ecology, to name a few – moving will produce for the homeowners a financial burden that would be punitive or such that they would be forced to stay in a neighbourhood of reduced amenity. Because of age, it would be very difficult for older residents to secure a top-up/new mortgage.

Costs associated with proposed zoning changes: stamp duty, depression of sale prices, increases to rates, Capital Gains Tax. etc. As a consequence, the owner would **not** be in an advantageous position to sell, or if forced to sell, would be unable to acquire a similar property with the same amenity.

Currently there are developments, renovations and maintenance being performed in our neighbourhood. Many have been undertaken in ignorance of the current Planning Proposal given that residents were neither notified or consulted in the development and adoption of this proposal. In addition, lift the rezoning to R3 proceeds, there will be a high level of uncertainty in the community to proceed with these improvement projects inhibiting existing residents from making changes that improve their quality of life.

Appendix 4: Our Area's History

Table of Contents

1.	History of Taverners Hill North.....	46
1.1.	1700 and 1800's.....	46
1.2.	The 1900's	49

Appendix 4: Our Area's History

1. History of Taverners Hill North

1.1. 1700 and 1800's

Historically large landholdings of the early land grants along Parramatta Road were divided into smaller, semi-rural allotments. The Kegworth Estate, 100 acres granted to William Thomas in 1794, was one such estate.

The suburb of Leichhardt developed over the course of the 19th and early 20th as a consequence. From 1875, these estates were further subdivided and sold.

The two maps (Figures 1 and 2) from the 1883 State Library (Author: New South Wales Department of Lands) shows our present day houses which have had subsequent extensions on Tebbutt and Hathern Streets.

The original estate had been reduced to 48 acres of the original 100 acres which included the Tebbutt Street original workman's cottages **and some of these blocks of land were further subdivided and sold in 1925 on which homes were built and which are still standing today. These exact same homes are also included in the lot amalgamation plans (Refer Appendix 4-1).**

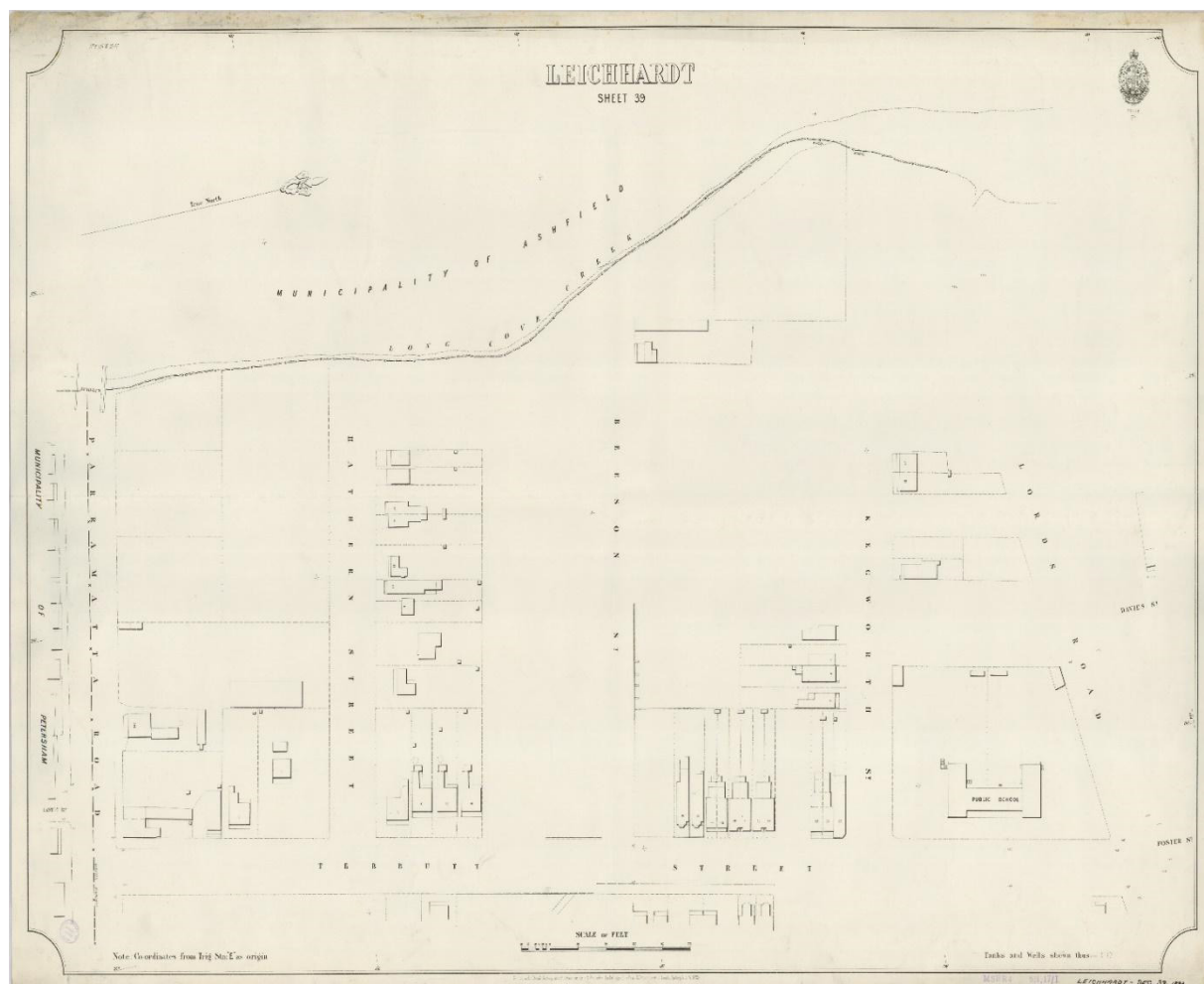


Figure 1: Department of Lands Maps dated 1883 show west of Tebbutt Street

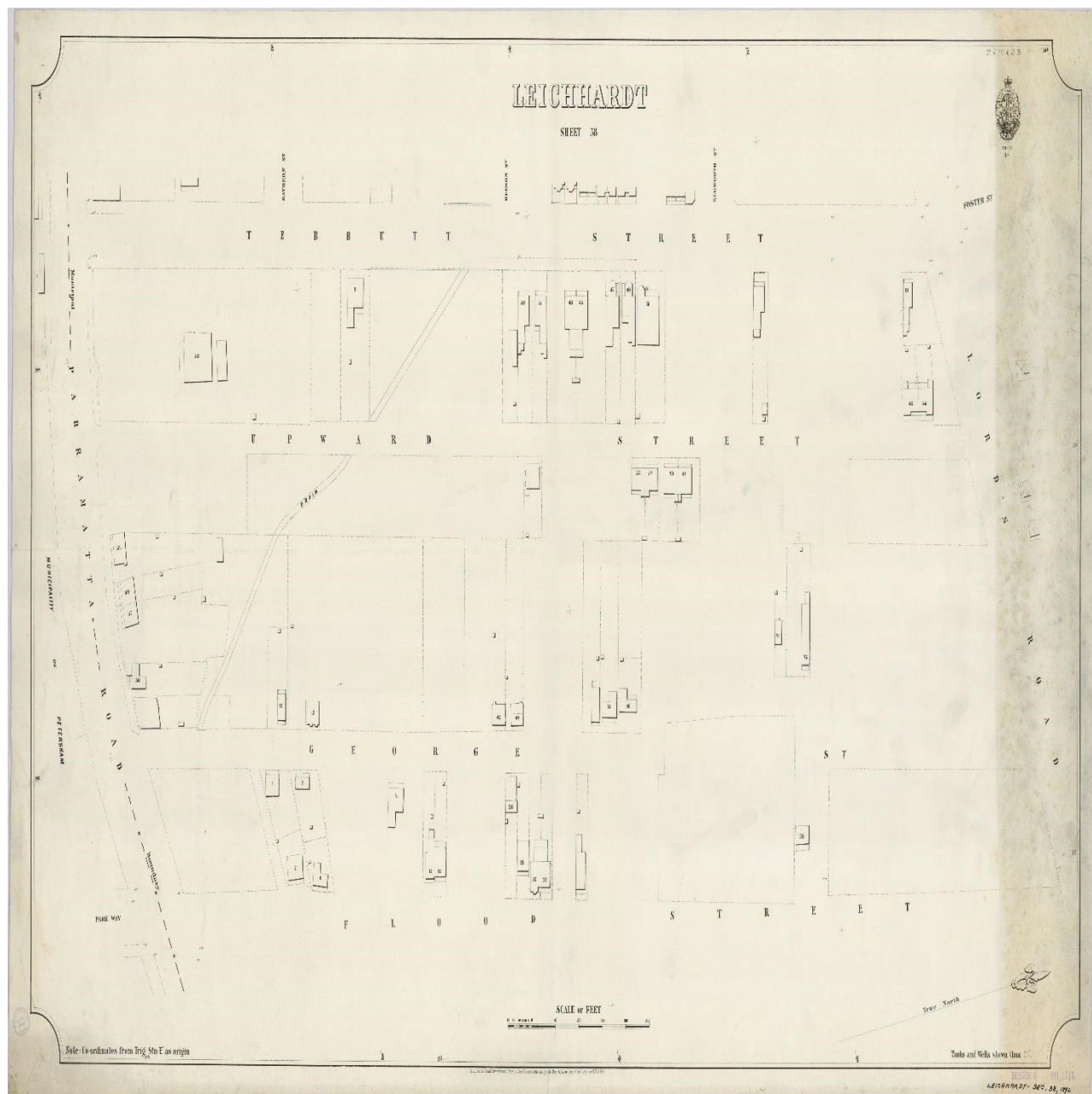


Figure 2: 1883 Department of Lands map showing East of Tebbutt Street

Land sales within the estate commenced by 1879, and continued into the 1920s.

In 1889 other land blocks on Kegworth and Beeson Streets and Tebbutt as shown on Figure 3 were placed on sale.



Figure 3: Kegworth Street property Sale Notification 1889

Much of Section 1 of the Kegworth Estate remained consolidated in Francis James Shaw's ownership following the initial 1870s subdivision of the estate. His house, known as Rutherford, fronted Parramatta Road. The house is indicated on the 1887 Kegworth Estate subdivision plan, and the 1892 Detail Survey.

Many of the current homes have elements of the original houses. Further land releases occurred:

"The Kegworth Estate: midway between Petersham & Summer Hill, off the Parramatta Road, comprising highly eligible sites for private residences and excellent business lots, in first class positions, for sale by auction on the ground Saturday, Nov. 5th, 1892, at 3 p.m. / by Watkin & Watkin".

1.2. The 1900's

Although some of the homes were the late 1880/1890's, subsequent land sub-division occurred in Hathern, Beeson, Tebbutt and Kegworth streets with early 1930's homes and industrial sites being built and still exist today.

The small outbuilding / WC near the eastern / Upward Street boundary of the site in the 1892 plan is in the approximate location of the subject building. In 1917, title to three allotments of the Shaw land passed to Charlotte Maud Palliser Shaw. (Other allotments remained in Shaw family ownership.) She sold one allotment to John Joseph Kain, a contractor of Petersham, in 1924. The Electric Light and Power Supply Company purchased the site from Kain in 1938. At this time there were no improvements on the land.

Substation No. 1520, at 9 Tebbutt Street / 4a Upward Street, was constructed in 1938 for the Electric Light and Power Supply Company Ltd (ELSPC) by master builder John Friel Laxton.

On 11th July 1938, JF Laxton submitted a building application to Leichhardt Municipal Council for a brick substation on land owned by the Electric Light and Power Supply Company, to a value of £1250.

John Friel Laxton, builder, was responsible for the construction of dozens of substations between 1928 and 1938.

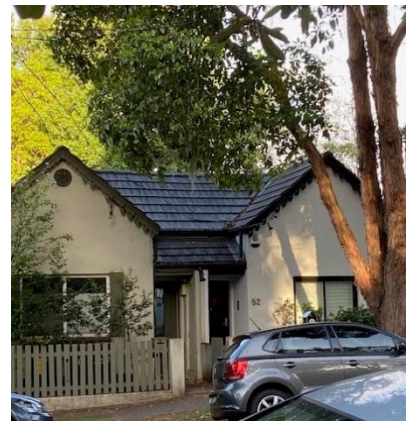
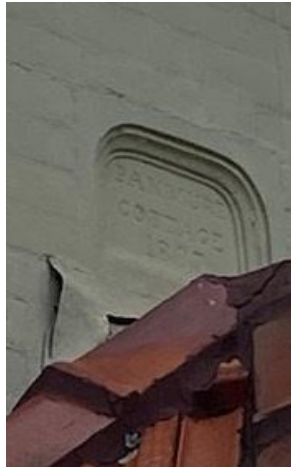
Appendix 4-1 – Current Homes which were built once this area were sub-divided in the 1870's to 1930's

The following photos are a very small sample of some of our homes, steeped in history which may be lost forever within the proposed rezoned area at North Taverners Hill.

Kegworth Street



Tebbutt Street



Beeson Street



Appendix 5: Traffic Impacts – Taverners Hill North

Table of Contents

1. Traffic issues: Key concerns	54
1.1. Taverners Hill North	54
1.2. Traffic Study is seriously flawed and needs to be recommissioned	57
1.3. Increased traffic – and the absence of mode-shift infrastructure	59
1.4. Increased safety issues for an already dangerous area	60
1.5. Safety and health risks to Kegworth Infants & Primary School students	61
1.6. Significantly more pollution created	62
1.7. Proposed rezoning in Lewisham or southern side of Taverners Hill	62
2. Parking	63
2.1. Change of approach to provide a minimum level of off-street parking in an apartment block development	63
2.2. Impact on existing on-street parking	63
3. Recommendations for the Parramatta Road Corridor Urban Transformation Strategy Planning Proposal Phase 1	65
Appendix 5-1: Table 14 ARUP Finding Summary Issues	66
Appendix 5-2 Our Streets	68
Appendix 5-3: Blister lip at Tebbutt & Kegworth Streets	76
Appendix 5-4 – Maximum car spaces for development	77

Appendix 5: Traffic Impacts –Taverners Hill North

1. Traffic issues: Key concerns

Significantly increasing the density of this area (Kegworth Street, Beeson Street, Hathern St and Tebbutt Street) will subsequently also significantly aggravate the traffic congestion, safety issues and the parking load. This doesn't only affect local residents but will significantly impact anyone using Tebbutt and Hathern Streets to travel across Parramatta Road, as well as school children at Kegworth Infants & Primary School, and residents in surrounding streets.

Even if the mode-shift target in the Planning Proposal was achieved – car journeys to be reduced from 79% to 71% of journeys – it would still represent an exponential increase in car movements as 325 new dwellings would generate more journeys than those of the 60 existing dwellings. Crucially, the public transport improvements that would support this target being reached, are no longer part of the Planning Proposal.

The Traffic Study that underpins the Planning Proposal also has many defects as identified in the Arup review of the study. For instance, the traffic study omitted the PM peak and weekend traffic and did not consider recent and other proposed developments that would impact usage of the Taverners Hill precinct roads. The Arup review recommended a complete overhaul of the modelling and a redoing of the study – see section 1.2 below.

1.1. Taverners Hill North

Taverners Hill is a local centre within the suburb of Leichhardt. The Taverners Hill Core Precinct is a mixed-use area comprising residential and commercial properties, with private dwellings in varying densities nearer to Parramatta Road.

The precinct supports a range of businesses including car dealerships, offices, automotive repair stores, events specialists, artistic education centres, print shop, a gym and a meat wholesaler, concentrated along Parramatta Road. Residential land uses include apartments, terrace housing and workers cottages.

The precinct is essential for connections to wider Sydney in the following ways:

- Taverners Hill road network supports regional east-west and north-south trips, as well as access to local destinations and residential areas. Parramatta Road provides the only regional east-west connection through the precinct
- The Dulwich Hill Light Rail Line and GreenWay corridor run north-south along the precinct's western boundary, limiting opportunities for additional vehicle east-west links to the north until Marion Street
- Parramatta Road limits some vehicle movements to and from the precinct as vehicles travelling from the south cannot turn right onto Parramatta Road. Additionally, vehicles travelling west along Parramatta Road cannot turn right to enter the northern parts of the precinct
- Brown Street includes a constrained single lane in each direction, with a bridge providing connection over Parramatta Road. The route utilising Foster Street/ Tebbutt Street, Hathern Street, Brown Street, Cook Street/ Barker Street and Old Canterbury Road provides an important north-south connection between City-West Link Road and suburbs south of Parramatta Road such as Lewisham, Dulwich Hill and Marrickville as well linking back to Parramatta Road
- The active main streets of Old Canterbury Road and **Tebbutt Street provide north-south connection linking Lewisham Station to Marion Street.** *This rat run is considered a toll-free route to the airport.* The Industrial pockets are located on Hathern, Tebbutt and Lords Road which is also accessed via Kegworth.

Where there is more traffic, drivers take more risks to try and circumvent the traffic (e.g. residents frequently see drivers steering into the oncoming traffic lane to get around traffic jams).

Key destinations in and in vicinity of Taverners Hill Core Precinct are:

- Kegworth Public School;
- TeamKids – Kegworth Public School - providing before and after school and vacation care
- Leichhardt Community Church;
- Apia Football (Soccer) Club - Lambert Park Sportsfield
- MarketPlace Leichhardt Shopping Centre
- Industrial Estates and business at Hathern, Tebbutt and Lords Road (south side of Kegworth) as well as on Parramatta Road
- The Kolatex Factory and Labelcraft George Street Apartments

Other key destinations in and around this vicinity of Taverners Hill Frame Precinct are:

- NSW Ambulance Haberfield Superstation;
- Uniting Church in Australia;
- Bunnings Ashfield
- The Willows Private Nursing Home
- Uniting Nursing Home
- Anglicare Nursing Home
- Bay Run and Leichhardt sporting fields
- Norton Street shopping area
- Habberfield village
- The Mills Apartments complex and Summer Hill village

See the map below for the location of traffic concerns.

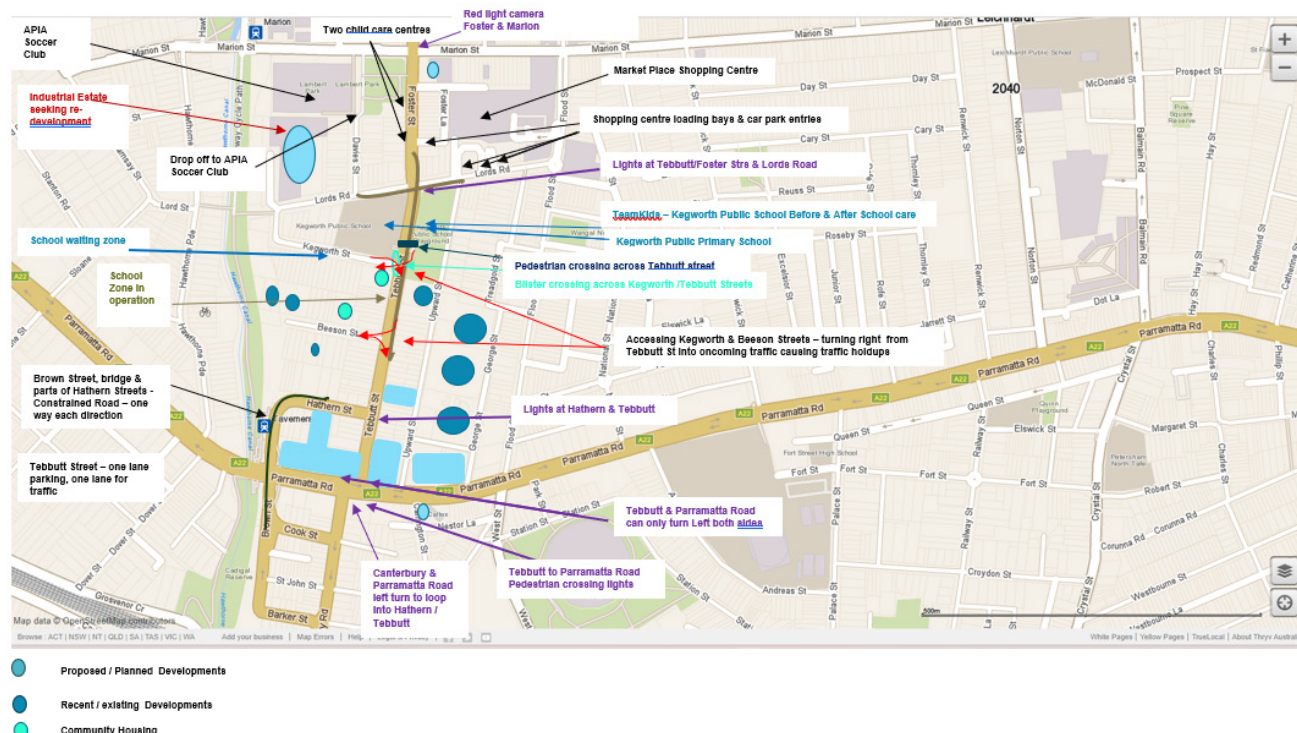
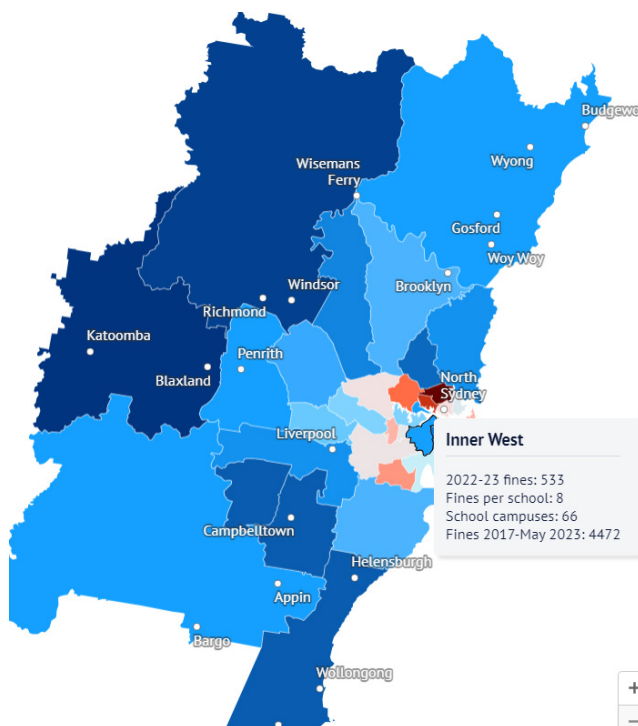


Figure 1: Map of West Leichhardt

This rezoning will have significant impact on:

Kegworth Primary School

- School is on Kegworth, Tebbutt & Lords Road,
 - Frequent drop offs and children crossing roads that coincide with peak general traffic times. See [Location and transport - Kegworth Public School \(nsw.gov.au\)](https://www.nsw.gov.au/location-and-transport-kegworth-public-school)
 - The vehicle drop-off and pick-up queue on the north side of Kegworth Street have to exit onto Tebbutt Street as it is unsafe to do a u-turn
 - Increasing traffic in this area will increase more drivers getting frustrated and taking risks, which will increase the chances that a child will get injured or killed.
- Team Kids Day care (Tebbutt) with two other child cares (Foster) and Leichhardt Marketplace entries (Foster & Lords Rd). Note that:
 - 14% of pedestrian related accidents occurred near an active school zone, this significantly increases to 75% within 400m of a school zone
 - Channel 7 (24 May 2023) reported School Zones Pedestrian fatalities are up 58% for the same period last year.
- In 2022, concerns from the school resulted in blister lip by constructing \$35,000 kerb extensions at the corner of Tebbutt and Kegworth Streets
- Tebbutt, Kegworth, Foster Streets and Lords Road have a 50km speed limit, which changes to a 40km when school zone time is in operation between 8.00am -9.30am and 2.30 – 4pm. However, there are no cameras to monitor traffic. Further down the road at the corner of Marion and Foster Street, speed cameras have recently been re-activated, however it does not provide visibility of traffic around the school or along Tebbutt / Forster and Kegworth Streets and Lords Road. Tebbutt and Hathern act as a rat run between Parramatta and Victoria Roads as well as the wider area (including to the airport).



According to a *SMH* article: “Australian Children aren’t walking to school – but there’s a plan to change that” dated 4 Feb 2023, schoolchildren are more likely to be driven rather than walk or cycle to school, prompting a Sydney council to develop safe routes to encourage parents to let children navigate busy roads. But the number of children walking and cycling to school has declined from 75 per cent to 25 per cent over the past four decades – despite initiatives such as Walk Safely to School Day.

APIA Soccer Club

- The APIA Leichhardt Football Club’s home ground, Lambert Park. Lambert Park is also located close to Tebbutt, Kegworth, Beeson Streets. Members travel to the APIA club for training via Hathern and Tebbutt Streets and parking can spill up Tebbutt and Kegworth Streets.
- Kegworth Street, Lords Road and Davies Street is a drop off zone to the APIA Soccer Club that runs seven days a week. The APIA Club has over 1700 registered players (800 families and growing).

Marketplace Shopping centre

- At the intersection of Lords Road, Foster and Tebbutt Street are traffic lights at Kegworth Primary School. This intersection is a key turning location to access Leichhardt Marketplace parking entry as well as deliveries for Woolworths loading dock and within the shopping centre as well as a rat run to Norton Street to avoid turning left onto Marion Street from Foster Street. Large delivery trucks travel up and down Tebbutt Street to access Leichhardt Market place shopping centre.

A comprehensive description of traffic impacts on our streets is located at **Appendix 5-2**.

1.2. Traffic Study is seriously flawed and needs to be recommissioned

Arup was commissioned to undertake a review of Appendix 10 – Parramatta Road Corridor Precinct-wide Traffic and Transport Study: Cardno Traffic Study dated 2022. Arup is a firm with 18,000 designers, advisors and experts working across 140 countries. The ARUP review findings have been tabulated and there were a significant number (46% of 70 items) of inconsistencies noted within the Cardno report. ARUP's conclusion (page 18 of 22). Two items specifically relate to the Tebbutt Street intersection. It would be extremely irresponsible for the Inner West Council and State Government to rezone in light of this, given that Tebbutt and Hathern Streets are highly trafficked arterial roads until a new traffic study is undertaken and independently verified/reviewed by suitably qualified persons.

Arup's conclusion is as follows:

10 Conclusion and recommendations

The review of the Parramatta Road Corridor Urban Transformation Transport Study base year model has shown that many aspects of the model should be updated to ensure it provides a robust basis from which to forecast future year performance and identify appropriate road infrastructure requirements to support planned urban growth.

We recommend the base model be revised primarily to address issues identified in the assignment process. The calibration results should also be revised and further information on validation checks are needed to ensure the model provides a suitable baseline representation of traffic movements on the network during both the AM and PM peak periods.

The main findings of the review are summarised in Table 14.

We reproduce the Table 14 Finding Summary in Arup's findings the following issues listed below. In our view some of the identified defects have significant safety impacts which could lead to potential injury accidents and even death.

The Category tables reviewed by Arup in relation to table 14 is as follows:

- 1 Model Development
- 2 Demand Development
3. Modelling parameters and assumptions – General
- 3.2 Modelling parameters and assumptions – Turns
- 3.3 Modelling parameters and assumptions - Sections
4. Intersections and signalisation
5. Public Transport Inputs
6. Active transport and pedestrians
7. Assignment and convergence
8. Model Calibration and Validation

We believe the Traffic Study needs to be recommissioned for the following reasons:

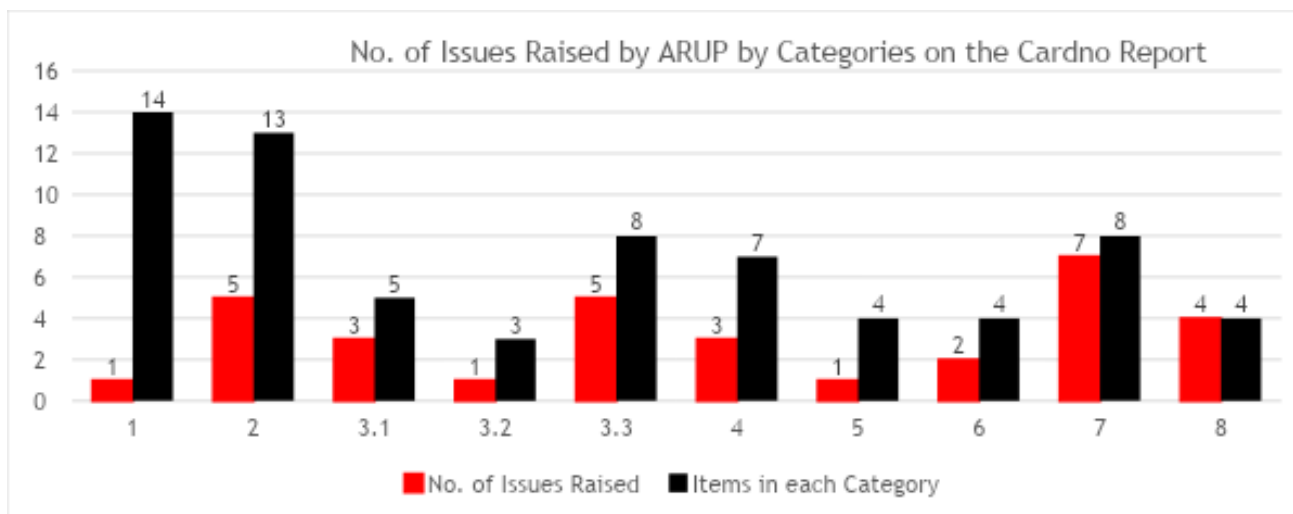


Figure 2: Categories within the Cardno Traffic Report that were reviewed by Arup and the number of issues per category raised

- ARUP, a leading traffic, civil and infrastructure design house has noted significant areas to be addressed within the modelling, calibration of results and validation checks required.

Additionally, below are two issues which specifically identify Tebbutt Street.

#	Item	Finding
4. Intersections and signalisation		
4.4	Phases	Node 82756 does not have any movement allocated to third phase. Phasing of the "N4528 SITE 47 – Parramatta Rd & Old Canterbury Rd & Tebbutt St" intersection appears to be incorrect – only one phase of movement defined (minor movements don't have any phase) Phasing of External ID 17437 appears to be incorrect
6. Active transport and pedestrians		
6.4	Allocating required time (mid blocks)	Mostly coded correctly (with some minor issues, such as N4528 SITE 47 (Parramatta Rd & Old Canterbury Rd & Tebbutt St"), N_17437 and N4528 SITE 86, where phases without any movement were observed)

- The study did not include an adequate study of PM peak period nor did it include the weekend traffic that can be even busier for many hours.
- It did not take into account all development both current and future into their evaluation.
- It was finalised during Covid and both travel and work habits have since changed.
- Appendix C Base model density plots - Traffic Flow (pages 104 to 105) - show in the 2018 Base Model simulated density PM (see figures 6 and 7) that the simulated PM traffic model for 5.30pm to 6.30pm in Figure 7 is at the highest level of 50 to 60 – the highest level of capacity. Adding more housing into this small area (which is already at peak capacity according to the 2018 model) which has restricted exit points will potentially cause more accidents, injury and even death.
- Traffic Modelling Guidelines (Roads and Maritime Services, 2013) standard GEH recommendations of model calibration (85 percent of turn and link flow comparisons to have a GEH less than five and 100 per cent of turn and link flow comparisons to have a GEH less than 10) were not adopted. A "relaxed criteria" was 80 per cent of turns to have a GEH less than five and 95 percent of turns to have a GEH less than 10. This is not acceptable and despite this a GEH exceeding 10 included 41NL Left turn from Tebbutt Street to Railway Terrace.

We have reproduced the tabulated list of these issues and they are located at Appendix 5-1 below.

1.3. Increased traffic – and the absence of mode-shift infrastructure

Increased traffic in and out of Beeson/Kegworth Streets and apartments on Tebbutt and Hathern Streets will create more and longer traffic jams on a main arterial road

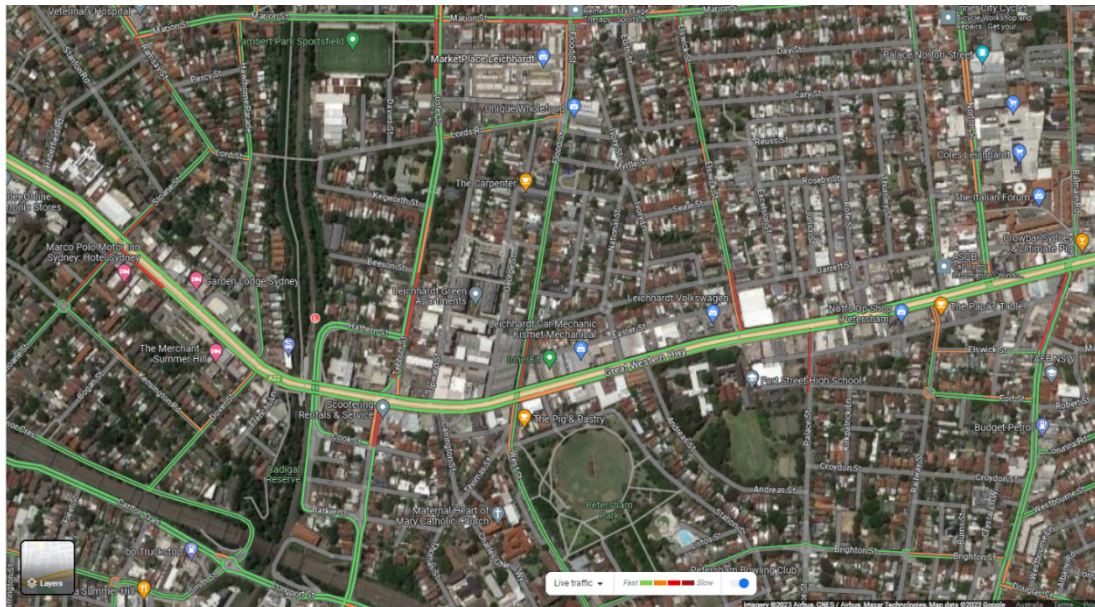


Figure 3: Taverners Hill using Google Maps Traffic Layer (30 August 2023) earlier in the day

The Tebbutt Street, Hathern Street to West Street overpass is a critical road for traffic across the city from Parramatta/North Shore (is it also a connecting road to Parramatta Road onto WestConnex) as well as to the South West and Botany/Airport.

Because this main arterial road is mostly only one lane during this section, there are already frequent traffic jams especially during the peak PM and Saturday periods.

Transport Plan context report: - Camperdown, Leichhardt and Taverners Hill (10 March 2022):Section 12.4.7 Supporting PRCUTS population and employment growth (page 66) states:

*“The road network along the IWC PRC precincts is congested for long periods during the weekday and weekend peaks, especially along Parramatta Road and intersecting arterial roads. **High population and employment growth cannot be supported with existing mode share due to lack of capacity and inconsistency with place-making and sustainability objectives.** Mode shift towards sustainable modes through provision of sustainable transport infrastructure and prioritisation is essential to reduce demand on the road network and improve network performance.*

“The road network along the IWC PRC precincts is congested for long periods during the weekday and weekend peaks, especially along Parramatta Road and intersecting arterial roads”.

“There is currently very low excess capacity on the road network during peak periods.”

The substantial increase in public transport capacity that this PRCUTS document recognises as essential for any sustainable increase in development is not part of this Planning Proposal.

1.4. Increased safety issues for an already dangerous area

There is a known cluster of vehicle crashes on Parramatta Road leading into the Tebbutt St entry. Residents are also well aware of frequent crashes on Tebbutt and Hathern Streets. The traffic lights on the corner of Hathern and Beeson were installed because of a fatality.

Note that within a five-year period (2013 to 2017), Parramatta Road between Brown and Flood Street (Taverners Hill Access points in our neighbourhood) had 23 crashes. This is of concern because of the tight constrained roads and there is no additional capacity to make these sections of roads safer.

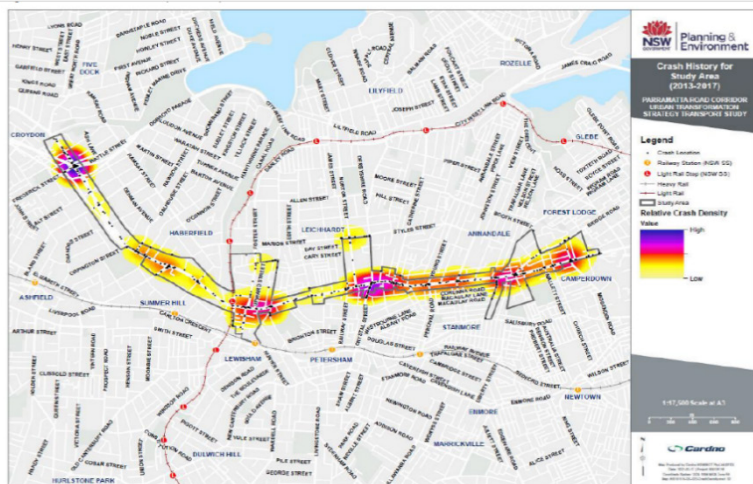


Figure: Crash Cluster History study of Parramatta Road provided by Cardno for 2013 to 2017

We haven't been given updated statistics of our area and traffic information particularly about our street high crash rates which are noted in the Cardno report which states that this is due to **high vehicle volumes** and **high traffic demand during peak periods** resulting in traffic congestion.

For 2021, **the Inner west had the 3rd highest total casualty crashes and the 4th highest total killed and injured per head of LGA population for the Sydney Metropolitan Region**. It should be noted that the figures for 2020 and 2021 have declined most likely due to Covid restrictions with lockdown in 2021 being for a quarter of the year, however the percentage as a total of the Sydney Metropolitan area appears to be increasing. The data shows that there appears to have been significantly more accidents along Tebbutt Street than Norton Street. In addition to the many accidents on Hathern and Tebbutt Streets, one of our Inner West council workers was pinned between a council vehicle and a taxi on Tebbutt Street, he sustained crushed / broken legs amongst other injuries.

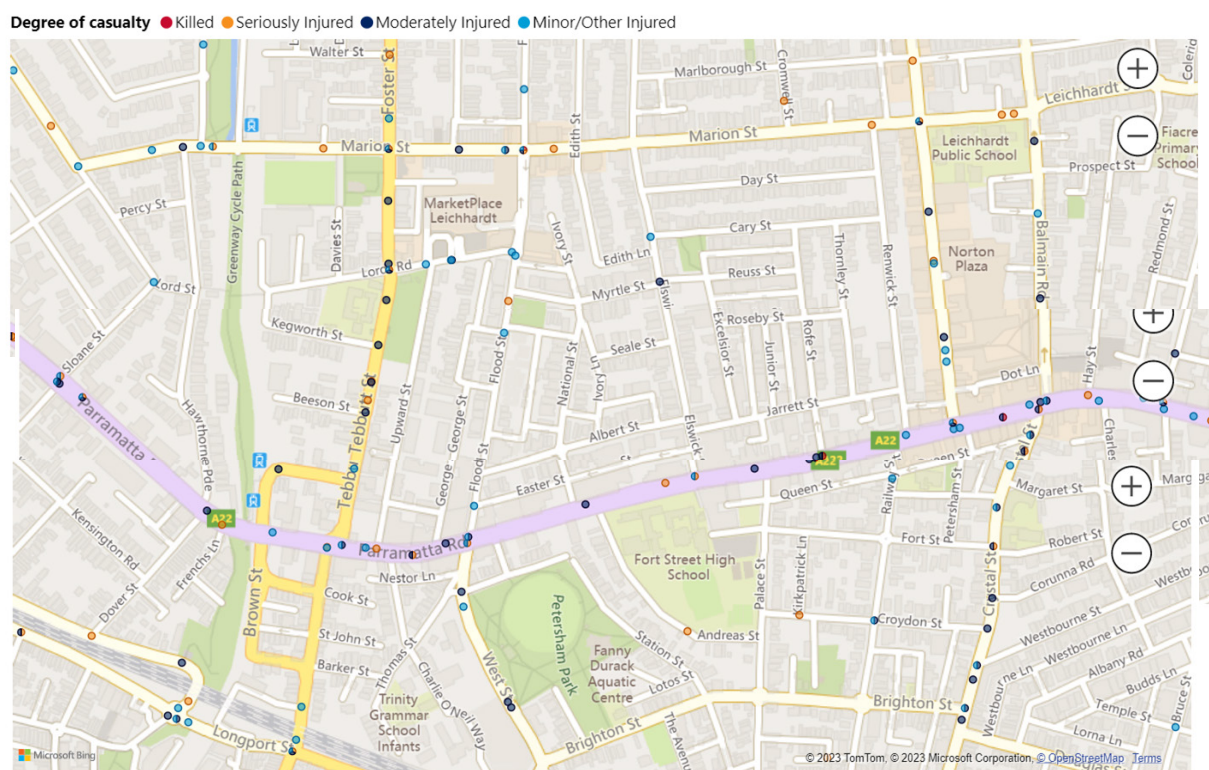


Figure: Injuries and casualties (Source: [Crash and casualty statistics - NSW general view - Interactive crash statistics - Statistics - NSW Centre for Road Safety](#))

1.5. Safety and health risks to Kegworth Infants & Primary School students

The area is located right next to Kegworth Primary School, so there are frequent drop offs and children crossing roads that coincide with peak traffic times. Additionally, there are three child care facilities in a 200m radius of the school along Tebbutt and Foster Streets.

From the 2016 – 2020 crash statistics, 7.87% of all pedestrian related crashes occurred within a school zone. Of all crashes that occurred within a school zone, 14.1% of which occurred while the school zone was active. For crashes occurring within 400 metres of a school, this significantly increases to a total of 75% (Source: IWC 10 October 2023 Item 17).

In addition to school zone speed times in operation between 8.00am -9.30am and 2.30 – 4pm, Tebbutt Street has a pedestrian bridge to link the school to the playground. The bridge was constructed prior to 2000 and links the Kegworth primary school to the playground to ensure children are safer than crossing at the lights.

In 2022 Kegworth Public Primary school raised concerns about the signalised intersection of Lords Road and Tebbutt Street which resulted in a blister lip by constructing kerb extensions at the corner of Tebbutt and Kegworth Streets. It was stated that, “*The work’s aim was to improve pedestrian safety by reducing the crossing distance.*” The Council document stated, “In response, it is noted that the proposed device will have a traffic calming impact on vehicles entering the street, and the device will improve pedestrian safety at this location by shortening the crossing distance. Additionally, there is an existing 40km/h School Zone in operation which is considered to be adequate given the low traffic volume in the street.” (Source: IWC Local Traffic Committee Meeting dated 7 February 2022).

https://innerwest.infocouncil.biz/Open/2022/02/LTC_07022022_AGN_3932_AT_WEB.htm

Increasing traffic in this area will increase more drivers getting frustrated and taking risks, which will increase the chances that a child will get injured or killed.

1.6. Significantly more pollution created

Traffic jams are not just time consuming and inconvenient, they also produce significantly more pollution (carbon dioxide, carbon monoxide and particulate matter) than free flowing traffic.

Melbourne Climate Futures Academy fellows Ms Clare Walter and Dr Kelvin Say told the Vehicle Pollution Forum on 24 February that the latest research shows that vehicle emissions in Australia may cause:

11,105 premature deaths in adults per year

12,210 cardiovascular hospitalisations per year

6,840 respiratory hospitalisations per year

66,000 active asthma cases per year.

By these figures, traffic pollution causes ten times more premature deaths than road accidents, which killed 1,123 people in 2021.

Source: Traffic emissions may cause over 11,000 deaths a year - Climate and Health Alliance (caha.org.au) (24 Feb 2023)

Increasing traffic and traffic jams will also increase the pollution produced in this area. This will be exacerbated due the lack of protection for much of the substantial tree canopy that currently cleans the air. This will mean young growing children will be exposed to more harmful fumes and particulate matter in the air they breathe at school.

Locals on Tebbutt and Hathern Streets are well aware of how much pollution the traffic on this busy arterial route creates. Walls get coated with particulate matter from the traffic.

Increasing the frequency and duration of traffic jams in this area will also significantly increase the pollution produced in the Inner West.

Exacerbating the pollution load is that rezoning this area would also facilitate the destruction of the most extensive area of large mature backyard trees in Leichhardt. Not only will the biodiversity loss be devastating, but it means far fewer trees to clean up the pollution created by the rezoning.

1.7. Proposed rezoning in Lewisham or southern side of Taverners Hill

We have focused on the traffic implications of the rezoning proposed for the Leichhardt or northern side of Taverners Hill as we know that best as residents of this area, however, there is also proposed rezoning on the other side of the Brown Street overpass in Lewisham.

The residential blocks around Brown St, Cook St, and Old Canterbury Rd are also targeted for rezoning for higher density, which will add large number of cars trying to get in and out of small one lane streets that make up this key arterial road across the city.

This will result in even more and longer traffic jams for anyone trying to get across Parramatta Road.

2. Parking

2.1. Change of approach to provide a minimum level of off-street parking in an apartment block development

As per the Parramatta Road Corridor Stage 1 Implementation document page 28, there will be a change in the approach to providing parking as follows:

*“Encouraging unbundled parking, car share schemes and decoupled parking is also consistent with PRCUTS. Unbundled parking has synergies with the **removal of minimum parking requirements** and allows for parking to be separately sold from the development of dwellings or commercial units, which in turn allows the market to allocate that parking to those with a need for parking and have a willingness to pay – this is a key move to improve housing affordability in the Inner West. PRCUTS notes that ‘this is not only more equitable but can also reduce the total amount of parking required for a building’ ”.*

Definitions of these terms are:

- ‘Unbundled parking’ means parking that is separated from the cost or rent of a dwelling, commercial units and building ownership.
- Car share scheme means a scheme in which any car share operator provides vehicles for shared use and hires those vehicles exclusively to members of the scheme for occasional use for short periods of time, on demand and on a pay-as-you go basis.
- Decoupled parking means provision of off-site car parking, usually in the form of consolidated car parking in close proximity to the development to satisfy the parking requirements.

The consequence of this policy approach is that for residential apartments, there may not be any basement car parks provided due to decoupling and/or unbundled developments.

When the apartment is first sold, the buyer may choose to also acquire a basement parking space. It is unclear if this is a “first-in-purchase” basis or if some apartments have a designated basement car space initially. Irrespective of how this will be managed:

- Potentially it is only the first owner in the apartment block who will have this opportunity to acquire the car space.
- Even if an owner has title to both the apartment and the car space, they will have the opportunity to sell these separately if there is the opportunity to further maximise profits on the sale.
- If the owner is an investor and intends to rent the apartment, there is a high probability that more profit can be made annually by renting the apartment separate to the car space, especially if the number of on-street parking assumptions are accurate as there will not be sufficient on-street parking spaces available so these basement car spaces would be attractive.
- Someone with no association to the apartment block would be allowed to acquire/rent the parking space.

2.2. Impact on existing on-street parking

The number of units and vehicle parking potentially are already out of date with the proposed change to R3 medium density definition to allow 4-6 storey apartments blocks under the R3 medium density zone. This was announced as being considered via a media statement made on 3 December 2023 by the NSW State Government Premier.

The number of apartments and the maximum car spaces provided are as per “Parramatta Road Corridor Stage 1 Implementation” document are:

Number of apartments Total	1 Bedroom 30%	2 Bedroom 55%	3 Bedroom 15%
370 apartments	111	203.5	55.5
Maximum Number of car spaces	30%	70%	100%
231.25	33.3	142.45	55.5

The maximum number of car spaces calculation is based on council documents ([Refer Appendix 5-4](#)).

However, the maximum number of car spaces for Taverners Hill North is not being proposed, rather on Page 160 of Appendix 2A has an underlying assumption ([Refer Appendix 5-4](#)) whereby 40% of 1 and 3 bedroom apartments will be on-street parking, and 40% of 2 bedroom apartments will be off-street parking – refer calculation below:

- On-street parking - 67 car spaces required, and
- Off-street parking – 81 car spaces provided.

Number of apartments Total	1 Bedroom	2 Bedroom	3 Bedroom	Total
Apartments	111	203.5	55.5	370
Proposed Number of car spaces	40%	40%	40%	
On-street parking	44.4		22.2	66.6
Off-street parking		81.4		81.4
Total				148

This assumption is also unusual as a 3 bedroom apartment would be for a family. Parents with children are more likely to require a car as it is more difficult to do some things such as attending sports events which are not always in your local area, typically a larger grocery shop and potentially not able to leave a young child at home alone, going on a holiday outside Sydney etc.

We are not saying residents in 1 and 2 bedroom apartments would not have the same needs, purely that it is more difficult to use public transport with young children, especially if your child is in a pram.

In the event that basement parking is “de-coupled” and basement parking may not be included in the apartment purchase or rental agreement, **then there could be the need for potentially an additional 81 on-street parking places** not just the 66 (**it will be higher if 6 storey apartments blocks are allowed**), which will not be available forcing residents to park in surrounding streets outside the Taverners Hill North area.

On-street parking is currently limited, especially at certain times such as:

- During the “drop-off” and “pick-up” times at Kegworth Public School. Parents park in these streets to avoid queueing on the north side of Kegworth street. If you live in Kegworth street, you do not use your car (if possible) where you plan to be parking in the street during these times.
- Attendance at APIA soccer games (8,000 members) or the APIA Club House in the evenings during the week.
- On weekends, families with young children with prams from other parts of Leichhardt and/or surrounding suburbs also park in these streets to access the Greenway and the Bay walk – there is not always parking available at Hawthorne Parade at Haberfield.

3. Recommendations for the Parramatta Road Corridor Urban Transformation Strategy Planning Proposal Phase 1

- Inner West Council should not target sites for rezoning that would further increase the traffic on already dangerous bottlenecked roads.
- Inner West Council should require minimum not maximum parking spaces that adequately predict likely car ownership by residents in new developments.
- A new RMS traffic study of the area should be commissioned for Taverners Hill in order to understand the full traffic implications of new developments in this location.
- The PRCUTS should look to rejuvenate Parramatta Road rather than increase traffic around it.

Appendix 5-1: Table 14 ARUP Finding Summary Issues

The IWC and the state government have a duty of care to the people of the Inner West and need to accept the Arup conclusion that an authoritative and acceptable traffic study still needs to be undertaken.

#	Item	Status	Finding
1 Model Development			
1.4	Data definition and connection	Minor Issue	Database of the model was not defined correctly. PM assignment results are not existing in the model.
2 Demand Development			
2.1	Centroid configuration	Minor Issue	A zoning system refinement was expected considering the nature of the area
2.4	Unavailable PM results	Moderate Issue	No assignment results were existing in the database for PM period
2.9	Static OD Adjustment	Major Issue	Results of a re-run showed relatively different results
2.10	Static Departure Adjustment	Minor Issue	Insufficient warm-up duration was considered in the model
2.11	Dynamic OD adjustment	Major Issue	No evidence found in the model for this step
3. Modelling parameters and assumptions – General			
3.1.2	Attractiveness weight	Minor issue	It is recommended to increase this weight (from zero) to be able to consider the impact of road hierarchy in the route choice decisions of vehicles. The value of zero means that there is no difference between local and arterial roads for route choice of users
3.13	Reaction Time at Stop	Major issue	Inconsistent values used for turns in SRC and DUE assignments for both AM and PM periods
3.1.4	Reaction Time at Signals	Major issue	Inconsistent values used for turns in SRC and DUE assignments for both AM and PM periods
3.2 Modelling parameters and assumptions – Turns			
3.2.3	Give Way Time Factors	Minor Issue	Give-way Time Factor (Meso) for roundabout turns increased to 2, while not reported
3.3 Modelling parameters and assumptions - Sections			
3.3.3	Additional reaction time at stop	Moderate issue	Negative values allocated to this attribute for the approaching section of the “City Rd” to “Parramatta Rd”, which is not justifiable
3.3.4	Additional reaction time at traffic light	Moderate issue	Negative values allocated to this attribute for the approaching section of the “City Rd” to “Parramatta Rd”, which is not justifiable
3.3.6	Lane changing cooperation	Moderate issue	Lane changing cooperation of six sections increased from 50% without justification
3.3.7	Queue discharge acceleration factor	Moderate issue	This factor was reduced from 1.0 to 0.5 for Paramatta Rd” and “City-West Link Rd” sections, without justification
3.3.8	Acceleration factor	Major Issue	No logic identified in the allocation of acceleration factor to road sections (See Figure 1)
4. Intersections and signalisation			
4.4	Phases	Moderate issue	Node 82756 does not have any movement allocated to third phase. Phasing of the “N4528 SITE 47 – Parramatta Rd & Old Canterbury Rd & Tebbutt St” intersection appears to be incorrect – only one phase of movement defined (minor movements don’t have any phase) Phasing of External ID 17437 appears to be incorrect
4.6	Permitted Movements	Moderate issue	Time allocated for pedestrian crossings at signals appear to be too high (assumed 16 seconds in every 80 sec) - (External IDs: 13124, 13604337, 22438)

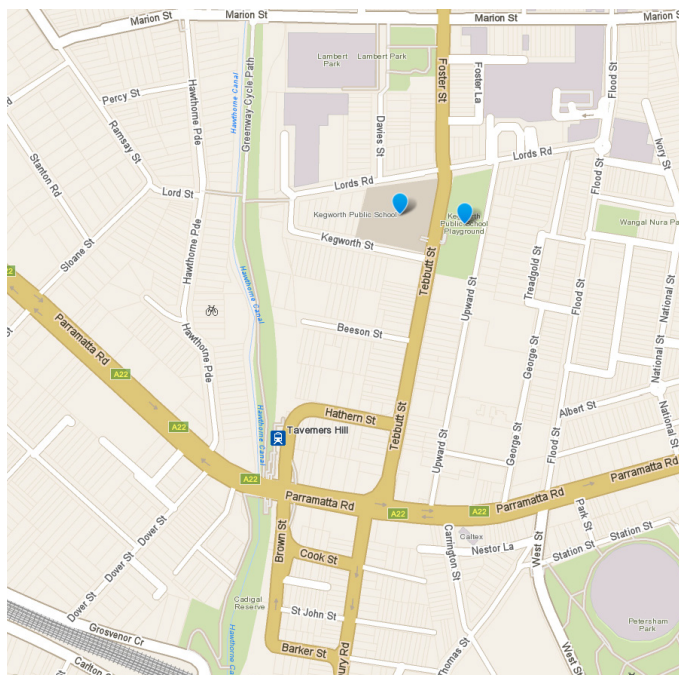
#	Item	Status	Finding
4.7	Sequences	Minor issue	Phasing of “N4528 SITE 86 - Parramatta Rd & Renwick St & Railway St” intersection appears to be incorrect – only one phase of movement defined (minor movements do not have any phase)
5. Public Transport Inputs			
5.1	Public Transport Plans /Lines	Moderate issue	44 bus routes are not connected for the PM peak model. It is caused because of a new section added to the model, but not updated in the routes of these PT lines
6. Active transport and pedestrians			
6.1	Pedestrian crossings at intersections	Minor issue	Mostly coded correctly (with some minor issues, such as Node IDs N_13124, 13604337, N_22438, where inappropriate pedestrian phase durations were defined in the model)
6.4	Allocating required time (mid blocks)	Minor issue	Mostly coded correctly (with some minor issues, such as N4528 SITE 47 (Parramatta Rd & Old Canterbury Rd & Tebbutt St)) , N_17437 and N4528 SITE 86, where phases without any movement were observed)
7. Assignment and convergence			
7.2	Assignment convergence – Static	Major Issue	Static assignment does not achieve convergence after 50 iterations for the AM period
7.3	Assignment convergence – Hybrid	Moderate Issue	Dynamic User Equilibrium (DUE) convergence criteria is relatively loose:
7.4	Route Choice	Major	Relative Gap = 3.00% (default = 0.50%)
7.5	Path Files	Minor	Do Not Consider Paths with a Percentage Below = 5.00% (default = 1.00%)
7.6	Replication Seeds (SRC runs)	Minor	Calculation of additional path for Hybrid DUE was disabled
7.7	Seed Values	Minor	Only a sub-path of static assignment was used as inputs for DUE assignment
7.8	Route Choice Variability	Moderate	Five replications were developed, but no evidence found in the report for using the results of the median seed for reporting
8. Model Calibration and Validation			
8.1	Model Calibration Check	Major	Calibration criteria for the “Core” area were not reported. Locations with GEH greater than 10 were not discussed.
8.2	Model Validation Check	Major	Sufficient information to justify the validation of travel times was not reported. It is noted that key routes did not achieve the validation criteria.
8.3	Model Stability Check	Major	Not provided
8.4	reporting	Major	GEH =5 tolerance lines are missing in observed vs modelled hourly flow plots. Average and 95 percent confidence plots for observed and modelled travel times for each route is missing

Appendix 5-2 Our Streets

Within our caring and supportive community, our streets are jam packed with semi-detached and workingman cottages, industrial sites and businesses. We are within a very constrained corridor and the map at right provides a visual representation of our community.

Where there is more traffic, drivers take

more risks to try and circumvent the traffic (e.g. residents frequently seek drivers steering into the oncoming traffic lane to get around traffic jams).



Hathern Street

Parramatta Road limits some vehicle movements to and from the precinct:

- vehicles travelling from the south cannot turn right onto Parramatta Road
- vehicles travelling west along Parramatta Road cannot turn right to enter the northern parts of the precinct.

The route utilising Foster Street / Tebbutt Street, Hathern Street, Brown Street, Cook Street/ Barker Street and Old Canterbury Road provides an important north-south connection between City-West Link Road and suburbs south of Parramatta Road such as Lewisham, Dulwich Hill and Marrickville. This route is considered the safest and main access point to cross over Parramatta Road.

Road users turn left onto Old Canterbury Road and loop around Barker Street which turns into Brown Street. Brown Street is a one-lane street in each direction within a very constrained corridor which feeds into Hathern Street. Brown Street extends north and south across Parramatta Road. It includes a constrained one-lane in each direction bridge providing connection over and across Parramatta Road.

Hathern Street has a very limited parking lane in each direction and forms a “T” interaction to Tebbutt Street. Due to the high number of accidents at this intersection, a set of lights was introduced (we think in the last 5-7 years).



Figure Brown Street feeding into Hathern Street

It is noted that during rain events, Railway Terrace Petersham which is a key arterial road to West Street the next crossing along Parramatta Road floods. It is supposed to be two-lanes in each direction. Railway Terrace curves alongside the railway line and during flood events and especially heavy rain, it is known to be reduced from four-lanes to one-lane as witnessed by locals as recently as 29 April 2023. When this occurs, traffic then reroutes even more so, onto Old Canterbury Road and subsequently Brown, Hathern and Tebbutt Streets.

Tebbutt Street

- Tebbutt Street in the Traffic report (page 64) is classified as a Tertiary Freight route. Trucks, buses and vans, as well as oversized vehicles travel along Tebbutt and Hathern Streets. These streets act as a rat run between Parramatta and Victoria Roads as well as the wider area (including to the airport).
- The report identified Foster / Old Canterbury Road as a tertiary freight route which should include Tebbutt and Hathern Streets as the route identified is Foster / Tebbutt / Hathern / Brown / Canterbury Road.
- Tebbutt street is the main throughfare for West Leichhardt and neighbouring suburbs
- In peak hour, traffic can bank up from the corner of Tebbutt and Hathern into Foster Street which gives Foster/Tebbutt St intersection an “F” AM Peak hour rating and most likely “F” (Fail) PM rating too.
- To travel Southbound from Leichhardt, this is the easiest route to allow a left-hand turn onto Parramatta Road from Cook Street
- If heading northbound on Parramatta Road, during peak hour, the queues to turn left into Tebbutt Street are frequently stopped in queue, due to congestion and does not clear until the lights at the corner of Tebbutt and Hathern turn green – this banks up the left-hand lane on Parramatta Road; it also can bank up from the corner of Tebbutt and Hathern into Foster Street. AM Peak hour “F” (Fail) rating and most likely PM “F” (Fail) rating too
- Travelling south on Parramatta Road a left-hand turn into Old Canterbury Road (have to wait for vehicles coming off Tebbutt / Hathern / Brown/ Cook Street to clear before they can proceed along Old Canterbury Road. This blocks the left hand lane on Parramatta Road
- Traffic reduces to “one lane” each direction due to parking etc.
- Tebbutt Street congestion for drop-off and pick-up at TeamKids before, during and after school care. Parents also park in Kegworth Street.
- Turning right onto Tebbutt Street from Beeson, Kegworth or Lords road is a risky exercise during peak periods.
- A new residential development has been APPROVED for the corner of Foster and Marion Streets.

Foster and Tebbutt Streets feed into each other at Lords Road. The addition of the traffic lights at Tebbutt and Hathern have reduced the number of accidents at this intersection however during peak hour the flow of traffic is slow to non-existent. It also has a flow on effect of impacting movement along Foster Street. Peak hour in Tebbutt can start during school zone times and traffic flow is further impacted during peak hour by child pickups for TeamKids daycare on Tebbutt Street.

It has further flow on effect for:

- Parramatta Road turning left into Tebbutt Street as traffic banks up at the Hathern/Tebbutt intersection blocking traffic on Parramatta Road until lights change during PM peak hour
- Parramatta Road turns into Old Canterbury Road (which has to wait for vehicles coming off Tebbutt t/Hathern / Brown/ Cook Street to clear before they can proceed along Old Canterbury Road.

#	Intersection	Type	App.	Approach name	Turn	7:15AM - 8:15AM			8:15AM - 9:15AM		
						Volume (veh)	Delay (s)	LOS	Volume (veh)	Delay (s)	LOS

44	Tebbutt Street / Hathern Street	S	N		T	36	26.9	B	38	50.3	D
					R	825	36.7	C	829	46.1	D
			S	Tebbutt St	L	188	11.1	A	184	9.0	A
					T	63	34.4	C	80	30.8	C
			W	Hathern St	L	579	12.7	A	554	12.6	A
					R	83	26.7	B	78	29.2	C
			Total			1774	25.4	B	1763	30.3	C

- Prior to 2000, Tebbutt Street had a pedestrian bridge constructed across it to link the school to the playground so that the school children could access the playground safely rather than crossing at the lights.
- In 2022, Kegworth Public Primary school raised concerns about the signalised intersection of Lords Road and Tebbutt Street which resulted in a blister lip by constructing \$35,000 kerb extensions at the corner of Tebbutt and Kegworth Streets. It was stated that “**The works aim was to improve pedestrian safety by reducing the crossing distance.**” (see Appendix 5-3)

As noted by ARUP, no intersection data was provided for **PM peak** times which is a **much busier period** than the AM period. If the GEH is greater than 10.0, there is a high probability that there is a problem with either the travel demand model or the data.

Turn ID	Description	GEH	Model area	Modelled hours with GEH > 10	Notes
41NL	Left turn from Tebbutt Street to Railway Terrace	10.10 10.20	Meso	4:30PM – 5:30PM 5:30PM – 6:30PM	Underrepresented in the model due to the zoning system. The GEH for this turn is also not substantially above 10.

41NL 7.68 and 5.84

8.15 0 9.15 AM

#		Intersection	Type	App.	Approach name	Turn	7:15AM - 8:15AM			8:15AM - 9:15AM		
							Volume (veh)	Delay (s)	LOS	Volume (veh)	Delay (s)	LOS
47	Parramatta Road / Old Canterbury Road / Tebbutt Street	S	N	Tebbutt St	L	171	39.4	C	190	69.6	E	
			E	Parramatta Rd	L	216	24.4	B	215	15.0	B	
					T	1435	15.0	B	1340	10.7	A	
			S	Old Canterbury Rd	L	91	15.8	B	107	12.4	A	
			W	Parramatta Rd	T	1814	131.7	F	1911	142.1	F	
			Total			3727	73.5	F	3763	80.7	F	

Traffic Impacts – Taverners Hill North

#	Intersection	Type	App.	Approach name	Turn	7:15AM - 8:15AM			8:15AM - 9:15AM		
						Volume (veh)	Delay (s)	LOS	Volume (veh)	Delay (s)	LOS
42	Tebbutt Street / Lords Road	S	N	Forster St	L	187	20.0	B	174	18.6	B
					T	593	16.4	B	507	8.8	A
			E	Lords Rd	L	73	23.2	B	81	23.1	B
					T	50	22.9	B	49	14.7	B
					R	38	26.2	B	64	31.4	C
			S	Tebbutt St	L	26	45.0	D	22	17.5	B
					T	535	42.1	C	539	13.9	A
					R	264	60.7	E	260	22.9	B
			W	Lords Rd	L	17	22.2	B	35	26.4	B
					T	79	24.3	B	33	34.5	C
					R	26	18.9	B	33	35.4	C
Total						1888	31.7	C	1797	16.3	B
44	Tebbutt Street / Hathern Street	S	N	Tebbutt St	T	31	20.3	B	22	25.5	B
					R	965	25.1	B	972	32.0	C
			S	Tebbutt St	L	299	23.9	B	238	16.5	B
					T	40	41.5	C	37	42.8	D
			W	Hathern St	L	703	9.8	A	705	10.5	A
					R	83	39.3	C	121	34.4	C
			Total						2121	20.7	B

Kegworth Street

Egressing from Kegworth Street into Tebbutt is difficult, especially if drivers wish to turn right into Tebbutt Street to go to Petersham especially from school zone hours to the end of peak hour. If road users loop around and turn from Lords Road at the lights, they consider it a good day if they are one of the very few of cars and able to turn right. Normally, they snail into Tebbutt Street or don't move. Even if a road user directly crosses the intersection and proceeds down Lords Road, turning right onto Flood Street, they are also caught in traffic and add more traffic congestion to the Flood/ West

#	Intersection	Type	App.	Approach name	Turn	7:15AM - 8:15AM			8:15AM - 9:15AM		
						Volume (veh)	Delay (s)	LOS	Volume (veh)	Delay (s)	LOS

Street intersection.

51	Parramatta Road / Flood Street / West Street	S	N	Flood St	L	13	139.8	F	2	437.8	F
					T	176	163.5	F	129	486.3	F
					R	20	242.5	F	13	1207.4	F
			E	Parramatta Rd	L	16	81.2	F	18	206.4	F
					T	1050	62.2	E	1293	221.2	F
			S	West St	L	342	49.4	D	339	41.7	C
					T	267	71.4	F	342	66.8	E
					R	6	54.2	D	1	94.6	F
			W	Parramatta Rd	L	153	33.0	C	140	29.0	C
					T	1673	33.0	C	1635	28.2	B
					R	588	81.5	F	607	89.7	F
			Total					4304	57.3	E	4519

Proceeding south down Foster/Tebbutt Streets, Kegworth Street is the ingress point to access Kegworth and Davies Streets and Lords Road. Road users proceeding south to Parramatta Road are unable to turn right at the traffic lights from Foster/Tebbutt Streets into Lord Street because it is on a crest of a hill with a **NO RIGHT HAND TURN** as there have already been a number of significant and dangerous accidents.

Vehicles proceed along Tebbutt Street wishing to go to Kegworth, Davies and Lords Road have to stop (especially during peak hour and Saturdays) and turn right across oncoming traffic. Frequently the stopped vehicle blocks other vehicles trying to get past it because of the high volume of oncoming traffic. The vehicle can wait a considerable amount of time before it is safe to turn into Kegworth Street across traffic. At this particular road configuration, the ability for any other vehicle to slip around the turning vehicle is even more restricted, especially of an evening because of the parked cars of parents picking up their children from TeamKids Afterday care. It also triggers traffic delays to cars at the intersection of Lords Road, Tebbutt and Foster Streets as well as traffic travelling up Foster Street (that turns into Tebbutt and consequently impacts the Marion Street and Foster Street intersection).

In addition to Kegworth Primary School and residential housing, Kegworth Street is a gateway to two large complexes of light industrial units at the end of Lords Road as well as an access route to Davies Street.

The site at 67-73 Lords Road, at present zoned light industrial, is currently seeking rezoning to allow up to 8-storey development on the 1.2 hectare site.

Currently as a resident of Kegworth Street, the general rule of thumb is that you do not move your car between 8.30am to 10am and from 2pm to 5.30pm as there will be no available space to park.

Kegworth Primary School

According to Channel 7: School Zones (24 May 2023) **Pedestrian fatalities are up 58% on the same period last year.** It reported that 98% of schools have no red light cameras of which Kegworth

Primary School is one of them. ***The Pedestrian Council said there were 15,777 (recordable) offences or 52 offences per day over the past 10 months.***

Kegworth Public School has school pickups and drop offs on Kegworth Street. The school is very concerned about keeping their school community safe. [Location and transport - Kegworth Public School \(nsw.gov.au\)](https://www.nsw.gov.au/location-and-transport-kegworth-public-school)

Kegworth Street has frequent drop offs and children crossing roads that coincide with peak general traffic times. Allocated car dropoff and pick up spaces are very limited. A vehicle queue forms on the north side of Kegworth Street waiting their turn, they then have to exit onto Tebbutt Street as it is unsafe to do a u-turn if they wish to access Lords Road instead of Tebbutt Street.

This also occurs on Tebbutt Street, Lords Road and Kegworth Street where traffic is blocked as parents of TeamKids – Kegworth Public School - providing before and after school and vacation care during PM peak hour park to collect their children. Increasing traffic in this area will increase drivers taking risks, which will increase the chances that a child will be injured or killed.

According to a SMH article “Australian Children aren’t walking to school – but there’s a plan to change that”, dated 4 Feb 2023, Schoolchildren are more likely to be driven rather than walk or cycle to school, prompting a Sydney council to develop safe routes to encourage parents to let children navigate busy roads. But the number of children walking and cycling to school has declined from 75 per cent to 25 per cent over the past four decades – despite initiatives such as Walk Safely to School Day.

Footpaths too close to a road, especially if there is heavy traffic, also discouraged parents from letting children walk to school.

Kids in Communities Study (KiCS) conducted a mix of surveys, focus groups and interviews were conducted with community members (families, service

providers, stakeholders). The results were combined with data from 25 Australian urban and regional communities. This mixed methods approach was essential to better understand local context and make sense of the data. The study reported that the international research is clear. In their list of differentiating Foundational community factors – what KiCS found differentiates disadvantaged communities doing well or poorly on Early Childhood Development Item 7 Housing Density: There is less high-rise density housing three or more storeys) and fewer than perceived high density. Stimulating and positive environments early in life provide optimal foundations for children’s ongoing development into adulthood. This in turn makes a difference to the productivity of society at large. (MCRI, 2018)

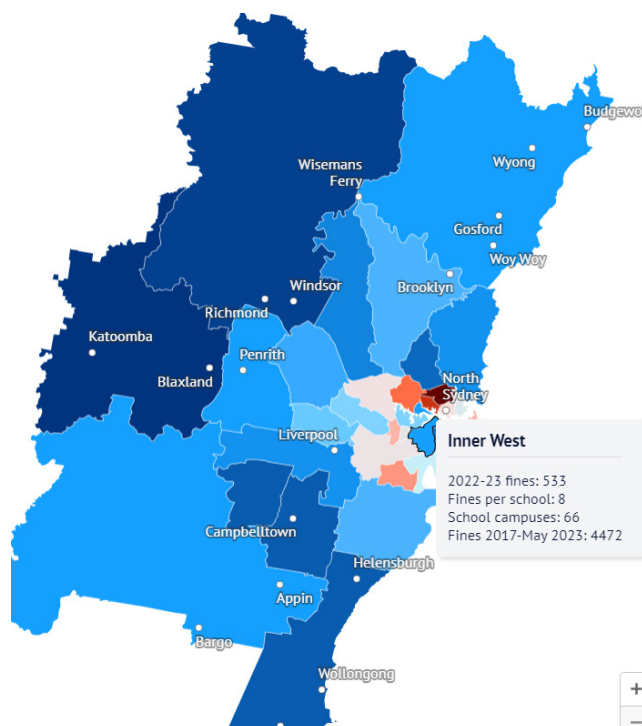


Figure : Source: SMH June 18, 2023 Most fined school zones revealed: Principals ask rangers to catch parents

Tebbutt / Kegworth / Foster Streets and Lords Road School Zone

Tebbutt, Kegworth, Foster Streets and Lords Road have a 50km speed limit which changes to a 40km when school zone time is in operation between 8.00am -9.30am and 2.30 – 4pm. There are no cameras to monitor traffic, however. Further down the road at the corner of Marion and Foster Street,

speed cameras have recently been re-activated however it does not provide visibility of traffic around the school or along Tebbutt / Forster and Kegworth Streets and Lords Road.

The scarcity of parking around schools has led to conflict across Sydney and councils are deploying rangers to catch parents during pick-up and drop-off times. Increased density is only going to add more to the mayhem.

APIA Soccer Club

The APIA Leichhardt FC is based in the heartland of Australian Football, Sydney's inner western suburb of Leichhardt. The club's home ground, Lambert Park, has been the APIA Leichhardt FC's home since its inception. Lambert Park is also located within metres of Tebbutt, Kegworth, Beeson Streets. Members travel to the APIA club for training via Tebbutt Street and parking can spill up Tebbutt and Kegworth streets.

Kegworth Street, Lords Road and Davies street is a drop off zone to the APIA Soccer Club that runs seven days a week. The APIA Club has over 1700 registered players (800 families and growing).

Davies Street is a no through road however it has an entry to Lambert Park playground which runs the side of the AIPA Soccer Club and accesses the rear entry to a childcare facility. Because of the industrial estates at the end of Kegworth/Lords Road, a wide variety of vehicles use this street. Kegworth/ Lord Road is an access point into the Greenway.

Marketplace Shopping centre

At the intersection of Lords Road, Foster and Tebbutt Street are traffic lights at Kegworth Primary School. This intersection is a key turning location to access Leichhardt Marketplace parking entry as well as deliveries for Woolworths loading dock and within the shopping centre as well as a rat run to Norton Street to avoid turning left onto Marion Street from Foster Street. Large delivery trucks and panovans travel up and down Tebbutt street to access Leichhardt Market place shopping centre.

Beeson Street

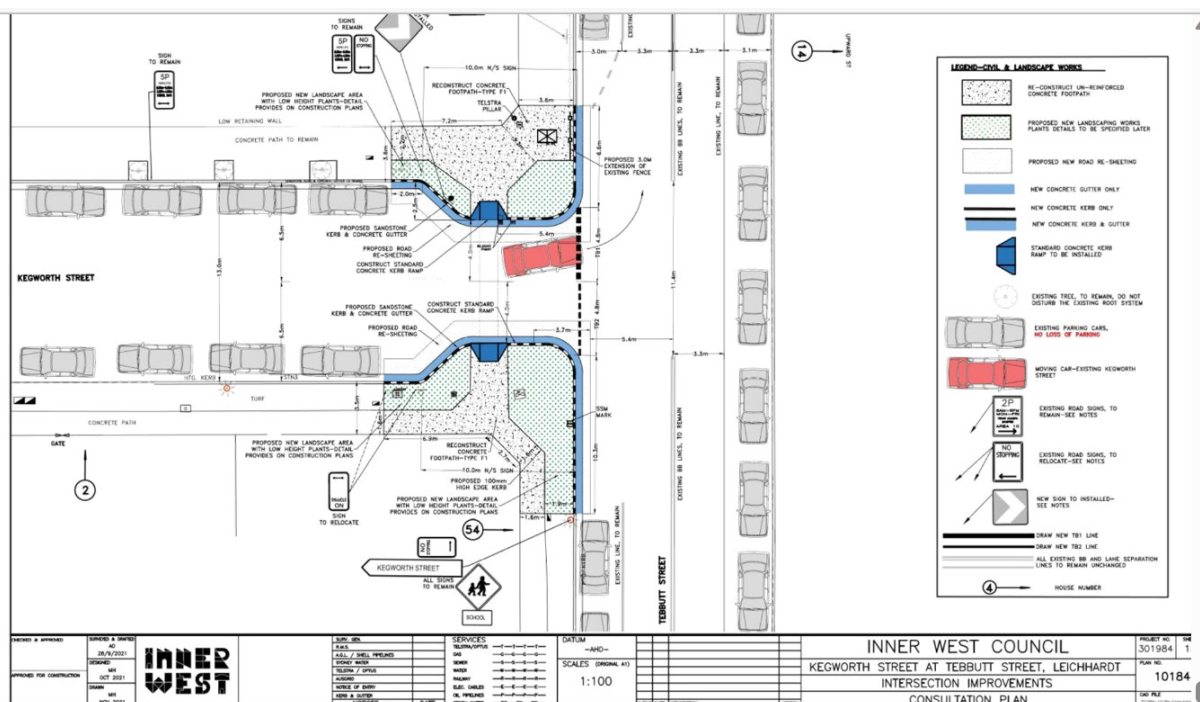
- This no-through road is frequently a place for "U-turn" for drivers – currently has 3 developments.
- It has been the location of moderate and serious accidents
- The street has 2-hour restricted parking, facilitating people visiting the gym, physio and light industry businesses on Tebbutt Street, or the light industries along Hathern Street and/or Parramatta Road.
- It is located very close to the corner of Tebbutt & Hathern street traffic light intersection with no capacity to improve the current traffic layout.
- Traffic is held up (especially during peak hours and Saturdays) when vehicles wish to turn right from the south side of Tebbutt Street into Beeson Street across oncoming traffic (no opportunity for vehicles to slip around the vehicle turning right).
- It is not unusual for vehicles to take risks when making the right turn into Beeson Street (into oncoming traffic) because of the hold up of traffic behind them during peak hour. At this particular road configuration, there is no opportunity for vehicles to slip around the vehicle turning right and vehicles turning right into Beeson Street cause traffic to stop behind them. This tends to be a regular occurrence as there are no other options to turn right into this street.
- Egressing from Beeson Street and turning right to go south into Tebbutt Street during peak times is a privilege. Because of the location of the set of lights and the volume of traffic to cross over the northbound lane of Tebbutt Street, most times this is only achieved when a stopped queued vehicle on Tebbutt Street who has the opportunity to proceed allows the vehicle in front of them.
- This is made more dangerous with large vehicles parked either side on Tebbutt St, close to Beeson Street restricting visibility (creating blind spots).
- This small street currently facilitates three developments including "The Factory" which has under one space per unit and a Townhouse development which also does not have sufficient parking.

- Because Beeson Street is very close to the traffic light intersection at the corner of Tebbutt and Hathern streets, there is no capacity to improve the current traffic layout. It has been noted that Inner West Council rangers' presence in policing the Beeson Street have assisted in the management of its parking.

This unassuming dead-end street is far from quiet and has been the location of moderate and serious accidents. Currently road users are taking risks in ingressing and egressing this street which is also used as a crossing point to Kegworth School and Parramatta Road. More dwellings in this street will only create more safety issues for drivers and pedestrians in this area.

Appendix 5-3: Blister lip at Tebbutt & Kegworth Streets

In 2022, Kegworth Public Primary school raised concerns about the signalised intersection of Lords Road and Tebbutt Street which resulted in a blister lip by constructing \$35,000 kerb extensions at the corner of Tebbutt and Kegworth Streets. It was stated that “The works aim was to improve pedestrian safety by reducing the crossing distance.” It was noted that Council document stated “ In response, it is noted that the proposed device will have a traffic calming impact on vehicles entering the street, and the device will improve pedestrian safety at this location by shortening the crossing distance. Additionally, there is an existing 40km/h School Zone in operation which is considered to be adequate given the low traffic volume in the street.”



Source: IWC Local Traffic Committee Meeting dated 7 February 2022
https://innerwest.infocouncil.biz/Open/2022/02/LTC_07022022_AGN_3932_AT_WEB.htm

Appendix 5-4 – Maximum car spaces for development

28<https://www.innerwest.nsw.gov.au/ArticleDocuments/33263/Parramatta%20Road%20Stage%201%20Planning%20Proposal%20-%20Exhibition.pdf.aspx>

Table 9 – Maximum car parking rates

Category	Residential (maximum space per dwelling)
Category A (Leichhardt and Taverners Hill precinct)	• Studio – 0 • 1 Bed – 0.3 • 2 Bed – 0.7 • 3 Bed – 1 • Visitor – 0

Appendix 6: Revitalisation of Parramatta, No Infrastructure Improvements and Flooding

Table of Contents

1.	The revitalisation of Parramatta Road.....	79
1.1.	Plans don't actually renew Parramatta Road	79
1.2.	The Original Plan	80
1.3.	The original iteration was conditional upon providing transport infrastructure.....	82
1.4.	The light rail has no ability to cope with additional users	82
1.5.	Commercial and Employment Lands	82
1.6.	Vacant properties along Parramatta Road	83
1.7.	"The Housing Now Group – Missing Middle" pattern book	84
1.8.	Existing density in Taverners Hill	84
2.	No proposed infrastructure improvements	85
3.	Flooding	86
3.1.	Impact on development.....	86

Appendix 6: Revitalisation of Parramatta, No Infrastructure Improvements and Flooding

1. The revitalisation of Parramatta Road

1.1. Plans don't actually renew Parramatta Road

PRCUTS will not be successful if the aim is to revitalise Parramatta Road itself. This current Planning Proposal Stage 1 has been developed under the guise of delivering the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) but makes no effort to tackle problems pertaining to Parramatta Road at all.

By focusing on Taverners Hill North, the plan which has been devised by the IWC fails to address any improvements along Parramatta Road itself by targeting residential areas in streets surrounding Parramatta Road instead. Currently there are vacant, large commercial buildings on Parramatta Road that would be ideal for development into residential buildings. The 'for sale' signs are prominent and blocks have been vacant, in some cases, for years. These buildings are also close to the transport hub in Taverners Hill. In fact, the buildings are closer to the transport hub than some of the homes that have been identified for demolition.



Parramatta Road Corridor Urban Transformation Strategy - Inner ...

It seems illogical to destroy peoples' homes when far higher and more cost effective units could be built if properties along Parramatta Road were rezoned to mixed commercial /residential developments. This would not displace current residents at Taverners Hill North and negatively alter viable, cohesive communities. We also understand that at one community consultation, two owners on Parramatta Road actually asked why their properties were not being rezoned.

If designed appropriately, these commercial buildings could be rezoned instead and would enhance and rejuvenate not only the aesthetics of Parramatta Road but would also "increase housing, economic activity and social infrastructure, especially around centres with good public

transport access and amenity” (1.1 Purpose and Guidelines, PRCUTS Planning and Design Guidelines).

Similar developments have already been undertaken along Parramatta Road, both within the IWC area and the City of Sydney. Council is taking an inconsistent stance regarding re-zoning commercial and employment lands. This re-zoning is required to deliver renewal along Parramatta Road itself. The fundamental purpose of the PRCUTS is the revitalisation of Parramatta Road but every time we asked Council why they are not looking at empty, commercial buildings along Parramatta Rd in the Taverners Hill area, our question remains ignored. So, we are asking again – why is Council not considering these properties instead of rezoning North Taverner’s Hill R1? As indicated in Section 2 of this submission, Council would increase housing far more efficiently if they went ahead with developing disused commercial buildings on Parramatta Road. The current plan relies on individuals selling in lots of 3 or 4. Most of the residents we have spoken to do not want to move. Meanwhile, the units could be built on Parramatta Rd while the pros and cons of the current plan are still being discussed.

1.2. The Original Plan

In the Parramatta Road Corridor – Implementation Plan 2016-2023, page 37, Figure 7 clearly shows that Beeson St, Kegworth St and Lords Rd are not to be included in the first stage of the Taverners Hill Action Plan. (See [parramatta-road-implementation-plan-2016-2023.pdf](#) (landcom.com.au))

The Inner West Council’s planning proposal has taken an approach that is directly at odds with the Parramatta Road Corridor Urban Transformation Strategy 2016 (PRCUTS), the Planning and Design Guidelines and the [Parramatta Road Corridor – Implementation Plan 2016-2023](#). All documents carry statutory weight, by virtue of the Minister’s Direction.

On page 202 of the PRCUTS Planning and Design Guidelines under the heading 10.4 Future Character and Identity, it states:

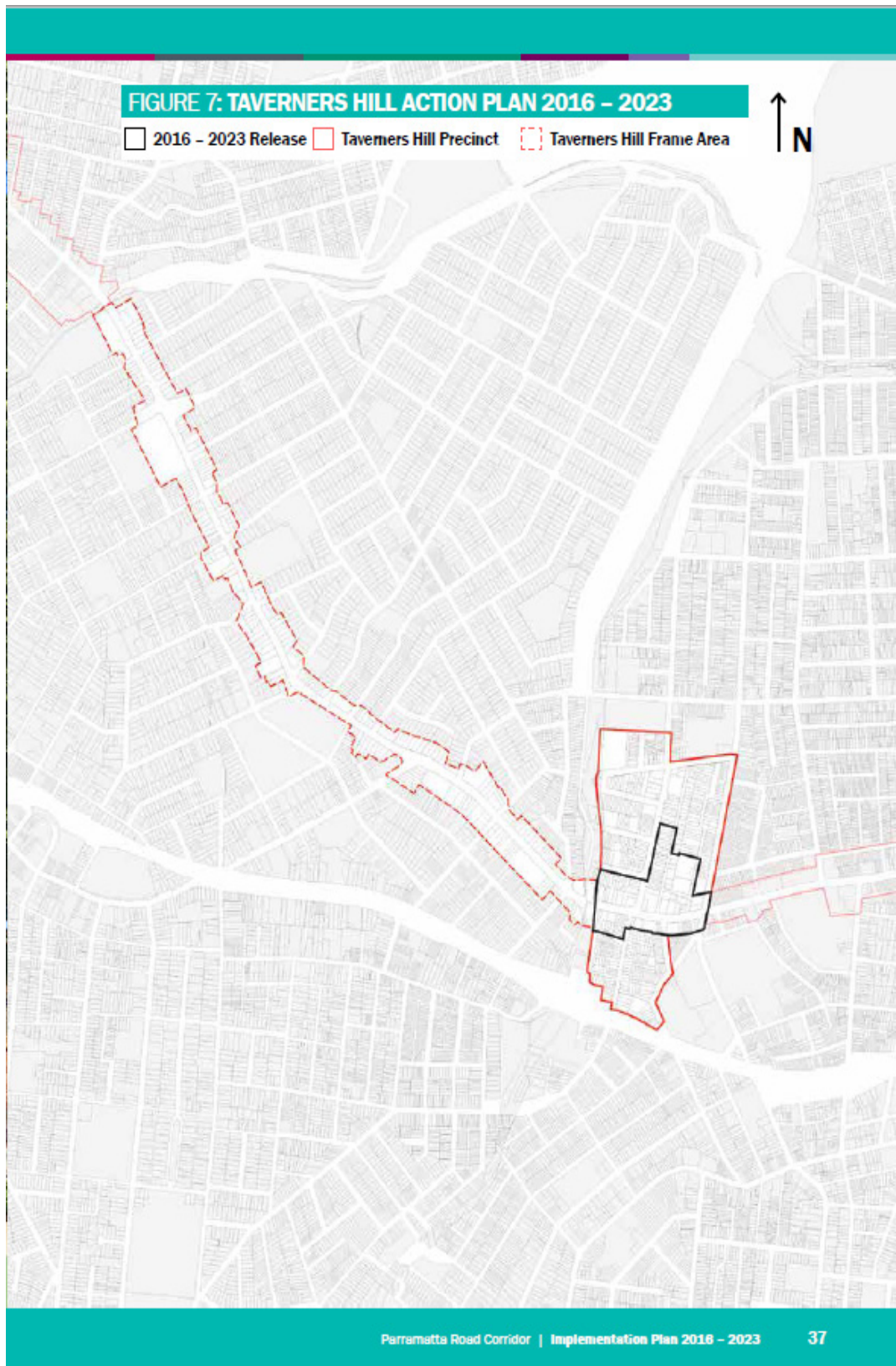
The leafy, residential and low scale characters south of Parramatta Road in the ‘North Lewisham’ area and north of Parramatta Road between Hathern Street and Lords Roads will be preserved including the pattern of grain, building typology and historic housing character. The established residential character of low scale workers cottages, detached houses and existing property setbacks of the area will be protected and preserved.

In the PRCUTS Strategy itself, it says the following about land use in the Taverners Hill precinct (page 109):

- Maintain an employment focus on both sides of Parramatta Road, Tebbutt Street, Upward Street and George Street
- **Retain the existing low-density character across the remainder of the Precinct**
- Encourage appropriately scaled residential development in select locations to attract and retain people in the core of the Precinct

Council’s proposal to rezone the south-western corner of Leichhardt close to Taverners Hill Light Rail Station, around Kegworth, Hathern, Beeson and Tebbutt Streets from R1 to R3 contravenes the PRCUTS Strategy and associated statutory documents.

In the **Parramatta Road Corridor – Implementation Plan 2016-2023**, page 37, Figure 7 clearly shows that Beeson St, Kegworth St and Lords Rd are not to be included in the first stage of the Taverners Hill Action Plan.



Source: [parramatta-road-implementation-plan-2016-2023.pdf \(landcom.com.au\)](https://landcom.com.au/parramatta-road-implementation-plan-2016-2023.pdf)

Inner West Council has ignored the Parramatta Road Corridor Implementation Plan and created their own implementation plan in their planning proposal – one which includes Beeson, Hathern, Kegworth and Tebbutt Streets.

It is evident that the Parramatta Road Urban Transformation study wanted to protect these areas, whereas Local Councils want to rezone for medium and higher density re-development.

In addition, the Parramatta Road strategy gives priority to redeveloping the blocks along Parramatta Road, **not the blocks behind it as in the planning proposal.**

1.3. The original iteration was conditional upon providing transport infrastructure

The Council planners made redevelopment conditional on the state government committing to a mass transit bus system along Parramatta Road.

Parramatta Road infrastructure that is crucial to sustain redevelopment in areas fringing it is not being delivered. The original iteration of this Planning Proposal made development conditional on a commitment from the State Government to provide a rapid public transport system for Parramatta Road. These requirements have now been deleted alongside the original urging that we need to: “retain the original low-density character across the remainder of the Precinct.

The failure to revitalise Parramatta Road means that thriving employment, or shopping and entertainment options are not happening along the road either.

The intention was for this transport system to complement WestConnex. While the relevant section of WestConnex has now been completed, the rapid transport system along Parramatta Road has not eventuated. And while the rapid transport system remains a State Government responsibility, it does not make sense to us that the only change that is being proposed relates to housing around Parramatta Road. This seems duplicitous at best. The rapid transport system was allegedly supposed to allow for increased residential and mixed-use dwellings along and surrounding Parramatta Road. Why has Council not addressed the fact that a rapid transport system has not been implemented or even planned by the State Government? Was the rejuvenation of Parramatta Road simply a convenient lie?

1.4. The light rail has no ability to cope with additional users

This proposed upzoning for residential flat buildings is now being justified on the grounds that our area is close to the light rail station. Yet the light rail is at, or near, the limit of its running capacity with it being unable to introduce more peak hours services (currently run every 8 minutes).

- a. This limit is because of constraints associated with the single track near Dulwich Hill stabling capacity, power, signalling, maintenance facilities and fleet size. **The power supply limits frequency to six minutes, while the single-track terminus at Dulwich Hill and fleet size limit frequency to eight minutes.**
- b. The light rail capacity will be put under strain by the 4,700 new dwellings either recently completed or under construction along the line including 1500 apartments in 12 towers at the Fish Markets, 265 apartments at Harbourside - Darling harbour; as well as numerous 12 to 22 storey towers of which some will be apartments at the White Bay Power Station which will impinge on light rail services; not to mention additional construction of residential apartment blocks along the light rail line.

The line carried about 4 million passengers a year before a 5.6-kilometre extension to Dulwich Hill was opened in early 2014. In contrast, government data showed almost 10 million trips were made on the line in 2016 to 2017. The 2016–2017 statistic was affected by a partial closure of the line in December 2016/January 2017 for construction works on the CBD and South East Light Rail.

1.5. Commercial and Employment Lands

Council planners have justified omitting Parramatta Road from the current Planning Proposal on the grounds that the agreement to Council's employment protection measures was not confirmed until late in the preparation of the Planning Proposal. It would, however, be consistent with the rest of the current Proposal if an amendment was now made to delete the proposed rezonings in West Leichhardt and instead publicly advertise a substitute rezoning of the Parramatta Road Taverners Hill blocks similar to what is proposed for Kings Valley in the current Proposal.

Instead, Council is taking a hard-line stance against rezoning commercial and employment lands, which is required to deliver renewal along Parramatta Road itself. The fundamental purpose of the PRCUTS was the revitalisation of Parramatta Road.

This illustrates the inherent difficulty in implementing the council's draft Community Strategic Plan priority to “protect suburban streets” and to retain and enhance “the unique character and heritage

of neighbourhoods”, while at the same time to “protect employment lands. What IWC proposes deviates, contradicts and undermines the PRCUTS Strategy.

1.6. Vacant properties along Parramatta Road

At the Taverners Hill precinct, there is no focus on properties on Parramatta Road despite the number of vacant premises and land here. We support the rezoning along Parramatta Road of mixed use and residential where developers can go higher and fast track the development process (refer Section 2 of this submission).

Older buildings, built when the road was a flourishing high street, once held lively local stores, milk bars and cafés. These have fallen into disrepair and dilapidation, with the street becoming unviable for businesses and unremarkable as a place of interest.

The real estate value of both commercial and residential property along the road is below average when compared to the average property values of the suburbs which they bound: Annandale and Camperdown. An estimate suggests two in every three shops were closed/vacant, even before COVID-19. This makes it more of a reason why Parramatta Road is ripe for renewal.

In many areas along Parramatta Road, re-development has been slow and inconsistent, not necessarily reflective of underlying planning controls.

In many sections of the road, the existing building stock is made up of grand heritage buildings that are simply in need of refurbishment. Clearly defined planning controls that promote good quality design and amenities will in turn allow strong market interest and incentivisation which will ultimately generate higher value outcomes.

The following are a sampling of lands for sale or vacant during 2023. This clearly illustrates that there are numerous other options available.

Suburb	Location	Status	Block size	Current site	Comments
Leichhardt	709-711 Parramatta Road	For Sale	683M2		For Sale
Leichhardt	657 – 673 parramatta Road 2 George Street Leichhardt 7 Tebbutt Street Leichhardt	For Sale	6265m2	Offices, warehouse, factory & industrial, development Sites and Land	For Sale
Petersham	680-698 A22 Parramatta Road Leichhardt (was Rick Damelian)	Vacant Property vacant since at least May 2021	4377M2	Car yard – vacant	Vacant for a number of years
Leichhardt	337 Parramatta Road	Vacant Commercial Property	208M ²	Retail and apartment	vacant
Leichhardt	339 Parramatta Road	Vacant Commercial Property	360m3	Retail and apartment	vacant
Leichhardt	361 Parramatta Road	Vacant Commercial Property	Land 234 m2		construction of a 3-5 storey mixed used development include accommodation
Leichhardt	3-5 Foster Street 41 Lords Road	Vacant	1,012.9sq m		For sale warehouse building

Suburb	Location	Status	Block size	Current site	Comments
		Residential and commercial property			with R1 general residential zoning
Croydon	146-164 Parramatta Road		3,321m ²	industrial	For sale
Camperdown	194-196 Parramatta Road		269m ²	Industrial	For sale

There is other land available, for example at a confidential Inner West Council meeting in 2023 the Inner West Council agreed to a shortlist of 10 parking lots, including a council depot, that could be developed into housing that would rent “well below” market rates. This was reported on the August 15, 2023 SMH: “The Sydney council planning to turn parking lots into housing”

1.7. “The Housing Now Group – Missing Middle” pattern book

Missing Middle Housing is a range of house-scale buildings with multiple units—compatible in scale and form with detached single-family homes—located in a walkable neighbourhood. Part of the Missing Middle is the duplex as well as the detachable single-family home. Missing Middle Housing is not a new type of building. It is a range of building types building types exist in cities and towns across the country, and were a fundamental building block in pre-1940s neighbourhoods like Taverners Hill North.

The Taverners Hill North community already follows the pattern book that the “The Housing Now group” cited in this article dated September 4, 2023.

<https://www.smh.com.au/national/nsw/we-need-30-more-surry-hills-unholy-alliance-to-push-bold-housing-reforms-20230901-p5e1et.html>

“The suburb (Surry Hills) was chosen not only because it contains about 10,000 homes but because the type of housing built there – tightly packed terraces, along with a few medium-rise apartment blocks – reflects the kind of housing the group wants to see built elsewhere.

To that end, The Housing Now Group alliance is pushing to go “back to the future” with a design pattern book, which would bring together architects and communities to pre-approve a suite of designs for townhouses, terraces and low-rise apartments. These could then be rolled out across Sydney without the need for more consultation.”

In the Government News article dated 28 November 2023 [NSW to force councils’ had on residential density](#), the NSW State Government will be introducing reforms to endorse the missing middle.

1.8. Existing density in Taverners Hill

Our area which is up for proposed rezoning has tightly packed housing, dual occupancy as well as medium-rise apartment blocks such as the Tebbutt Street, George Street and Upward Street development.

2. No proposed infrastructure improvements

No additions to existing essential infrastructure are proposed for Taverners Hill despite a projected fourfold increase in population of the area.

Crucially, no supporting infrastructure has been suggested to support the proposed increase of residents in the area. There are no infrastructure improvements beyond some possible footpath improvements envisaged for Taverners Hill, north or south, in the Planning Proposal.

In order to maintain living amenity, population and dwelling increases need to be accompanied by increased public open space, education and health facilities and services, expanded and improved transport options, and adequate energy and water services.

- a. While the Proposal recognises the importance of adequate infrastructure provision for the expanded dwelling numbers and population, it doesn't make its provision a condition for future development. All that is required under this Proposal is a letter from the secretary of the Department of Planning that adequate infrastructure, such as school places and hospital capacity, is available for the development. As the Department is the proponent of extra development, we can be certain that the assurance will be forthcoming without adequate research and modelling.
- b. An increase in population requires a commensurate increase in infrastructure provision in order to maintain and improve existing urban living amenity. When effective town planning fails, you have a larger population living in a more polluted, overcrowded, rundown and under-serviced environment.
- c. In order to maintain living amenity, population and dwelling increases need to be accompanied by increased public open space, education and health facilities and services, expanded and improved transport options, and adequate energy and water services.
- d. There are no infrastructure improvements beyond some possible footpath improvements envisaged for Taverners Hill, north or south, in the Planning Proposal.
- e. The most notable addition to infrastructure is the provision for extra public open space. West Leichhardt **already has the third lowest amount per resident in the Sydney metropolitan area.**
- f. In addition, with the increase in dwellings and population, there will be less private open space per person. Without additional planning for supporting infrastructure, this proposal will not only remove access to sizable private outdoor space, but ignore the necessity to expand public outdoor spaces.
- g. There is no commitment to increase and improve public transport in the current version of the Planning Proposal, despite the original version of the Proposal making any future redevelopment conditional on such a commitment. Now the IWC appears to believe that all it needs to do is simply lobby for more and better public transport while proceeding with its revised proposal.
- h. Despite the significant increase in traffic, there are no road improvements proposed.
- i. As for infrastructure contributions from developers, the only certainties are those required under the IWC's infrastructure contribution plan, which has a ceiling of \$20,000 for a three-bedroom apartment, and even lesser amounts for the predominant two- and one-bedroom units. To show how inadequate such contributions are, it is enough to point to the cost of land at \$5,000 per square metre. That would buy – if land for open space was even available – one square metre for each new resident of a three-bedroom unit, assuming 4 residents per unit. **By way of comparison, current public open space provision in the IWC area is 16.5m², already one of the lowest in Sydney.**

3. Flooding

The majority of the Taverners Hill North precinct proposed to be rezoned from R1 to R3 is a flood zone. Some of our streets have a topography to be lower at the back of the property than the council footpath. For instance, in Kegworth street (south side of the street), some properties have a 1.5 to 2.0 metre difference. In effect, it would be difficult to use this land, hence the design decision to have a 6 metre build exclusion for some properties.

On review of the Appendix 5 Flood Impact Report by WMS, it looks as if WMS have assumed that all buildings are above flood levels, which we believe isn't the case. In the case of Area 1 Taverners Hill Precinct (north of Parramatta Road and also known as Wes Leichhardt) we request flooding information for existing conditions on:

1. Critical durations - be detailed to identified and mapped as to which specific site locations within Area 1 selected and why, setting out the Maximum Flood depth (m) for 5%AEP, 1% AEP, 1% AEP Climate change and 1% AEP Blockage.
2. Confirm floor level survey has been completed for properties within the flood envelope (typically the 1% AEP) (we believe the mapping looks like it has been assumed buildings are above flood level).
3. We request flood model is independently verified/reviewed by a suitably qualified person (CPEng NER).

3.1. Impact on development

The main impacts are:

- Basement parking becomes an issue due to the topography of the precinct, for example:
 - Kegworth Street slopes downward from East towards West. The bottom end of the street has significant flooding
 - Tebbutt Street and Hathern street both suffer flooding
 - The entirety of Beeson is classified as a flood zone
- Increased development costs to manage storm water via water traps and pumps in the basement car park.
- Hard landscaping for apartment blocks reduces the absorption of storm water run-off. The majority of existing dwellings targeted for demolition have gardens in both the front and back which absorb excess water and reduces the overall "heat pockets" that higher density dwelling solutions create.
- More incentive for developers to offer lower purchase prices to optimise their profits.

We note that the Inner West Council added extra documents during the public consultation period which has led to not having adequate time to properly review this important issue. We estimate that at a minimum, flooding in the North Taverners area affects over a vast area of the proposed rezoned site including all properties at Beeson Street and a significant number in Kegworth Street.

Based on the above, development would be better placed on Parramatta Road.