

Wahroonga Estate Concept Plan Modification 10 (MP07_0166-Mod-10) Public Submissions

Submission 1 – Objection

Name withheld, Wahroonga 2076

17/1/2025

An additional 6 levels over 2 buildings with an average accommodation increase of 112 occupants will overstretch an already over populated area. This will cause increased traffic congestion through the Fox Vally Rd and Comenarra parkway area that is already under strain with the amount of traffic using these roads. There is inadequate street parking available to accommodate the hospital visitors and this increase in apartments/occupants will add to the inability to park near the Hospital and school.

There is a concern about emergency evacuation due to introducing higher density housing in this area that does not seem to be able to cope with current traffic volumes.

Recent new childcare centres around the Fox Valley Rd area has already seen an increase in through traffic and delays and parking out residential streets

Other buildings within this area are not built to a level of 10 floors so this is out of alignment with the surrounds.

Submission 2 – Objection

Name withheld, Wahroonga 2076

18/1/2025

Having reviewed the application documents I hold concerns for the impact the movement of the residencies to Precinct C. It is stated that there is no increase in residencies across the entire Wahroonga Estate Concept Plan. What in fact is happening is that a significant portion are being moved from Precinct A, a precinct that would be accessed by Pennant Hills Road, and they are being moved to Precinct C which has the same access roads as Precinct B and D. So that is subsequently an increase in residencies along the Fox Valley Road. This road and surrounding area has already been significantly impacted by the development within the Wahroonga Estate including the new school, additional hospital buildings, the SAN Clinic and the existing infrastructure is under

pressure as it wasn't built/developed for the current level of usage from visitors/residents and people that use Fox Valley Road as a thoroughfare.

As one example, I cannot see anywhere in the plan where a playground has been included for the residents that will have children. In addition, what practical assessment has been made on traffic and road congestion at the intersection of Fox Valley and Comenarra and at the roads allowing residents to turn in and out of the Wahroonga Estate with the potential increase in residents in Precinct C. What changes to the entire length of Fox Valley Road, including the roundabouts that already become severely congested during peak hour, will be made to ensure traffic runs smoothly and residents in the surrounding area will not be impacted further by development on the Wahroonga Estate? What changes will be made to the parking at Fox Valley Shops to accommodate the influx of residents. Whilst many will walk to these shops, there will be many that drive and this will mean even more of a struggle for locals to park to grab a quick coffee, or visit the bakery or chemist.

What considerations are being made for residents with the huge impost of these developments? Already we are having to allow extra time to get to work, school, shopping trips, outings. Parking at Fox Valley Shops is a nightmare as workers working on Precinct C currently are parking in the spots and taking up spaces that should be otherwise available for those wanting to visit their local shops. It is impacting the businesses as residents are unable to stop. Unfortunately council does not patrol this area enough and fine those parking for more than 2 hours so the workers will continue to use those spots so they don't have to walk from one of the side streets.

Having lived on Campbell Drive for 20 years now I have seen the increase in traffic along the Fox Valley Road and Comenarra Parkway. Those proposing this development have not actually lived it and will not be living the impacts of this development each and every day.

This movement of residencies should not be approved. If the developers need to reduce numbers in Precincts because of environmental requirements then the overall number should just be reduced and not redistributed as it will have a detrimental impact on the existing residential area.

Submission 3 – Objection

Name withheld, Wahroonga 2076

19/1/2025

I object to the change from 4 storeys to 10 storeys for the central hospital apartment building. There will be a shift in number of cars from Mt Pleasant which has access to a main road (Pennant Hills Rd) to narrow roads with only one lane (apart from the short segment of 2 lanes immediately around the intersection of Fox Valley and Comenarra).

Although the traffic statement predicts only a small “imperceptible” increase in number of cars, the reality is that all the cars from the Wahroonga Adventist School which currently drop off students where building B will be built will have to move to Fox Valley Rd. Being a resident of the area (off Lucinda ave), I have already noticed a significant increase in the traffic at the Fox Valley/Lucinda Ave roundabout since the school went in. It was often faster to walk the children to Warrawee public than to drive due to traffic.

Predictions by people who do not live in the area is one thing, but the reality is quite different. The statement that external workers are likely to be a large proportion of the people who will move into the apartments is very presumptive. There is no train station within easy walking distance so it's likely that even without car spaces available, the residents will park in surrounding streets.

Submission 4 – Objection

Name withheld, Wahroonga 2076

19/1/2025

1. Introduction

This submission is made in opposition to the proposed modifications to the approved concept plan, particularly the increase in building height and dwelling concentration within Precinct C – Central Hospital. The modifications, as proposed, present significant concerns related to urban planning principles, environmental impact, residential amenity, and compliance with local and state planning frameworks.

2. Non-Compliance with Strategic Planning Principles

2.1. Contravention of Local Planning Objectives

The modification seeks to increase the height of two buildings from 4-storeys to 10-storeys, substantially altering the approved concept plan. This is inconsistent with the established character of the area and the Ku-ring-gai Local Environmental Plan (LEP), which prioritises low- to mid-rise residential development to maintain the area's suburban character.

Further, the Ku-ring-gai Development Control Plan (DCP) sets guidelines on transition zones between precincts. By significantly increasing the building height in Precinct C while reducing density in other precincts, the modification disrupts the carefully planned balance and introduces a disproportionate concentration of dwellings in a single area.

2.2. Breach of Apartment Design Guide (ADG) Intentions

Although the proposal claims to facilitate compliance with the NSW Apartment Design Guide (ADG), the increase in density within a single precinct contradicts ADG principles of building separation, solar access, and ventilation. The proposed 10-storey buildings will overshadow surrounding developments, reducing natural light penetration and increasing wind tunnel effects—both of which impact liveability.

3. Impact on Residential Amenity

3.1. Increased Traffic Congestion and Parking Pressure

The relocation of dwellings to Precinct C will significantly increase traffic volume on already burdened road networks, particularly Comenarra Parkway and Fox Valley Road. The road infrastructure has not been designed to support high-density developments, and the proposed modification does not offer sufficient road upgrades or transport solutions to mitigate the impact.

Further, there is no clear indication that on-site parking provisions will be expanded accordingly. As a result, on-street parking demand will spill into surrounding residential areas, exacerbating congestion and reducing local amenity.

3.2. Visual Bulk and Overshadowing

The proposed increase in height from 4-storeys to 10-storeys creates a dominant and overbearing structure in the precinct. This is inconsistent with the prevailing streetscape and neighbourhood character, which is predominantly low- to mid-rise buildings.

Moreover, overshadowing impacts on public and private open spaces will reduce solar access to surrounding properties, leading to increased reliance on artificial lighting and heating.

3.3. Noise Pollution and Loss of Privacy

By shifting a higher density of dwellings to Precinct C, the modification will increase noise levels, particularly from vehicular traffic, mechanical plant equipment (such as air-conditioning units), and communal areas. This will disrupt the tranquillity of surrounding areas, impacting the amenity of existing and future residents.

Additionally, the increased height will create overlooking issues, reducing privacy for adjacent properties—a significant concern under SEPP 65 and ADG provisions.

4. Environmental and Ecological Impact

4.1. Disruption to Bushland and Green Space

The original concept plan carefully distributed density across multiple precincts to preserve the natural environment and tree canopy cover. The proposed modification, by shifting density to Precinct C, concentrates urban footprint and hard surfaces, reducing green space and impacting local flora and fauna.

Further, the increased built form may lead to stormwater runoff issues, impacting the area's hydrology and exacerbating urban heat island effects.

4.2. Inadequate Consideration of Sustainability

A 10-storey building introduces greater energy and water consumption demands compared to a low-to mid-rise development, contradicting contemporary sustainability principles. The modification lacks clarity on how increased density will be offset with renewable energy integration, water-sensitive urban design, or green infrastructure.

5. Precedent for Future Overdevelopment

Approving this modification sets a dangerous precedent for future amendments, where subsequent applications may further push increased heights and densities. The proposed increase in height and reallocation of density without holistic planning considerations raises concerns about incremental intensification, which may further strain local infrastructure.

6. Conclusion

For the reasons outlined above, the modification application should be refused or substantially revised to:

- Retain the originally approved 4-storey height limit in Precinct C;
 - Distribute additional dwellings more equitably across all precincts, rather than concentrating density in a single location;
 - Provide traffic and infrastructure studies to demonstrate how increased density will be accommodated;
 - Conduct an updated environmental impact assessment to address overshadowing, noise, and green space loss;
 - Ensure community consultation is undertaken to gauge local sentiment before approval.
- The current proposal fails to meet the principles of sustainable, liveable, and balanced urban planning and should be reconsidered.

Submission 5 – Objection

Name withheld, Wahroonga 2076

24/1/2025

I object to this modification application. The modified plan does not adequately cater for a transition between high rise high density and low rise residential on the site interface. Specifically, 10 stories on the corner of Fox Valley road and Comenarra Parkway is far too high compared to neighbouring buildings and shops across the road in this residential area. There is also not an adequate setback from the road and footpath for a multi story building. Finally, there is no community facility or open space amenity included in the modified plan to offset the additional impact to the immediate local community.

Submission 6 – Objection

Name withheld, Wahroonga 2076

27/1/2025

The proposed development's scale and mass are disproportionate to the surrounding buildings and residential areas, overshadowing the Parkway Medical Centre and the adjacent street frontages. The intended reduction in building height towards the street is minimal and insufficient to mitigate the impact of structures towering up to 194 meters. Other nine-story buildings within the hospital complex are set far back from the street and shielded by trees and landscaping, but this will not be possible with buildings placed so close to the street.

Impact on Streetscape

The number of units in the development should be scaled down due to the more stringent bushfire and biodiversity guidelines that have been implemented since 2010, making development in Precincts A, B, and D more constrained. The redistribution of dwellings should not proceed for the following reasons:

- The proposed modification dramatically alters the streetscape, which cannot be considered a "minor" change. It places the new buildings in close proximity to sensitive low-density residential areas, including properties directly opposite the planned 10-story buildings. This will have a significant visual impact on the area.
- The development will require the removal of existing landscaping, and the proposed ten-story buildings cannot be adequately screened or softened by landscaping. This will significantly alter the area's visual character.
- The size and scale of the development are disproportionate to the surrounding buildings and residential areas, looming over the Parkway Medical Centre and the adjacent street frontages. The proposed reduction in building height towards the street is minimal and will not alleviate the imposing presence of structures reaching up to 194.2 meters in height. In contrast, other nine-story buildings within the hospital complex are positioned far from the street and are hidden behind trees and landscaping. This approach will not be feasible with buildings placed so close to the street.
- The Ku-ring-gai Local Strategic Planning Statement (LSPS) – K12 outlines the need to manage growth in a way that preserves and enhances Ku-ring-gai's unique visual and landscape character. The proposed modification contradicts this principle as it will radically transform the streetscape.
- It appears that development consent may be granted for buildings that exceed the maximum height limit of 194.2 meters, further exacerbating the negative visual impacts of this development on the surrounding area.

Transportation Concerns

It is crucial that development is focused around established railway stations to ensure better connectivity and accessibility. Relying solely on bus routes is not adequate for meeting the transportation needs of the area

Traffic in the area is already congested, especially during peak hours, and this development would exacerbate the situation. In the original plan traffic from Section A would likely have exited onto Mount Pleasant Avenue and Pennant Hills Road. Transferring these extra dwellings to precinct C will result in worsening traffic congestion in this area despite the minor changes to the road infrastructure completed so far. Current traffic already backs up along The Comenarra Parkway towards Pennant Hills Road in peak hour, and the situation will worsen with this added development.

Modification 10 refers to local and regional cycle connections. According to the Transport of NSW Cycleway Finder, there are no cycleway connections in this area and certainly none linking to major roads or transport connections such as railway stations. The lack of cycleway connections to major

roads and transport hubs like railway stations will hinder sustainable transport options for residents and hospital workers.

Parking

Being a local resident, I can verify that it is very difficult to impossible for local residents to park on weekdays in Fox Valley Road, Seymour Place and the upper end of the Broadway due to hospital workers and clientele of the Fox Valley Road shops parking their cars in these streets. Relocating these dwellings from Precinct A and Mount Pleasant Avenue will exacerbate this.

Submission 7 – Objection

Name withheld, Wahroonga 2076

28/1/2025

As a local resident, one of the 9 households affected directly by the modification to the development of the initial concept plan constructed in 2010 for the development of 500 apartments in the Sydney Adventist Hospital Precinct, I strongly oppose to the updated modification launched late 2024.

Primarily, I am extremely concerned about the lack of privacy, that will be lost due to several bedrooms, bathroom and living areas, and back garden, facing the apartments on the Commenarra Parkway.

The increased in height from 5 storeys to 10 means I have minimal privacy due to the apartments facing south on the Commenara having visibility into my home. The apartments would also have direct visibility into Arkie, the Childcare Centre directly opposite.

The original approved development was very considerate of the surrounding neighbourhood precinct and was able to blend into the neighbourhood, these increased numbers and heights would be an eyesore, and far too high for the immediate neighbourhood. It would be frustrating to not build as originally thought but cramming 112 extra dwellings onto a site which was approved for 105 not, 217 is just too much.

Perhaps building a modified multilevel apartments on the east side of Fox Valley Rd, near the K-Year 12 school would be better than present single dwellings that are there.

Some of the traffic issues had been improved and the intersection has improved traffic flow at times, there is still an inadequate flow of traffic down Fox Vally Road and along the Commenarra travelling west during peak hour due to the increased volume of people going into the school and

hospital. Many times, the traffic comes to a standstill, and as a local resident I avoid both roads between 7.30 and 9 am and 3-5.30 pm, which shouldn't be happening.

The NSW Government addressed the issue of Pacific Highway and Fox Valley Road due to the Pinch Road Project, which was completed in 2022, not the SAH, as stated in the report.

The modified concept plan plans to widen the road, how long would this take? After living through 18 months of night road works from 9 pm till 5.30 am and no information given to local residents, it was unbearable and caused many nights of broken sleep, agitation and stress. At least the Government compensates those that live close to the Warringah Expressway.

The local shops at Fox Valley are a great community resource and create a lovely village feel, the business is flourishing and doing well especially post COVID.

Why the need to put more shops and medical centre into closer proximity. We have several shops close by, a refurbished Woolworths and many others, we don't need any more. The shop top living will have a negative impact on these small businesses.

Presently, I can see an original portion of the hospital, I do not want to look out my kitchen window and see walls of apartments and balconies. If I wanted to live in an area with high density housing and shop top living, I would live in another suburb.

The Adventist Hospital expansion has been continuing for 15 years, it has grown and serves the community and beyond very well. I have lived through those 15 years and enough is enough.

Keep with the initial approved plan, do not increase the height from 5 storeys to 10 storeys. If the 112 dwellings aren't approved to be built, I am sure the SAH will recoup the loss of income another way.

Submission 8 – Objection

Name withheld, Wahroonga 2076

28/1/2025

Dear Minister for Planning and Public Spaces,

Re: Objection to the Wahroonga Estate Concept Plan - Modification 10 (MP07_0166 MOD 10).

We are writing to formally object to the modification application for the proposed increase in building height and dwelling density within Precinct C, Central Hospital, which seeks to raise buildings height from 4 storeys to 10 storeys and accommodate an additional 112 residential dwellings, that cannot be included in other precincts as previously planned and approved.

While we recognize the need for increasing housing availability, we believe this modification raises

several significant concerns that must be addressed before approval can be considered.

Specifically, we would like to highlight the following points:

1. **Impact on Local Infrastructure, Traffic & Services:** The proposal to add 112 residential dwellings in this specific area, raising buildings of 10 storeys, will put considerable pressure on local infrastructure, particularly transportation and traffic management. We are concerned about the adequacy of current public transport systems and the potential increase in road congestion. The local roads are already experiencing significant traffic during school and peak hours, and the addition of these many dwellings will exacerbate these issues, potentially leading to gridlock and safety concerns.

2. **Overdevelopment and Overcrowding:** building heights in this zone, with the exception of the Hospital infrastructure, has been limited to two to three storeys to avoid overdevelopment, overcrowding, obstructions of views and drastic change to biodiversity. There are concerns that the proposed development may overwhelm the existing amenities, parks and schools, and will put more pressure on services. Furthermore, the local character and aesthetic would be compromised, as such a large development may not be in keeping with the existing surrounding buildings and infrastructure. The proposed change does not fit within the established character of the area and it must be considered out of context for the locality. The proposed development result in substantial view impacts.

3. **Environmental Impact and Sustainability:** The environmental impact of this modification is a significant concern. Increasing the height and the number of dwellings in this specific area could result in a loss of green space, increased energy consumption, and pressure on local resources such as water and waste management. It is critical to assess whether this development aligns with sustainable urban planning principles, including green building standards, energy efficiency, and maintaining open spaces for residents' well-being.

4. **Loss of Privacy and Amenity:** The proposed 10-storey buildings could severely impact the privacy and amenity of existing residents and surrounding properties. The increased height may lead to overshadowing, loss of natural light, and reduced air circulation for neighbouring houses and small buildings. These factors should be carefully considered in order to maintain a high quality of life for current residents.

5. **Stormwater management:** The development of additional dwellings often raises concerns about

how stormwater will be managed, especially if the current drainage system may not be designed to handle increased runoff.

6. Social and community effects: The development may change the social dynamics of the area, possibly pricing out current residents, reducing the overall sense of community and affecting the tranquillity of a suburb with a significant number of residences for over's 55 and houses.

7. Community Consultation and Transparency: The level of community consultation surrounding this modification application appears to be insufficient. Local residents and stakeholders should have had a more comprehensive opportunity to review the plans, ask questions, and raise concerns, especially taking into account that the majority of people living in this area are seniors which potentially do not have sufficient support to write objections, submit them via internet and could feel overwhelmed with the complexity of the modification and the amount of information to be reviewed. Transparent communication is essential to ensure that developments align with the interests and needs of the community.

Conclusion: While we understand the need for housing and urban development in growing areas, we believe this proposal, in its current form, fails to adequately consider the potential negative impacts on infrastructure, the environment, and the local community of Wahroonga, and specifically the impact for owners and residents of houses and units near this Precinct C. We urge the planning authorities to carefully review the objections raised, reconsider the scale of the proposed development, and explore more balanced and sustainable alternatives that align with the character and needs of the area. If it is not possible to keep the project as it was initially approved, with those 112 dwellings distributed among Precincts A, B and D, another possible consideration is to reduce permanently the number of total dwellings of this project towards the protection of our community and the preservation of such a beautiful neighbourhood.