



11 April 2026

Response to EIS and Secretary's Environmental Assessment Requirements (SEARs)
State Significant Development; Build-to-Rent
607 Pacific Hwy Chatswood Dive Site

Summary

The Artarmon Progress Association's (APA) objectives are to promote the welfare, physical and intellectual advancement of the suburb of Artarmon and the City of Willoughby, to protect the interests of the residents, and to encourage a keener spirit of citizenship and mutual help amongst residents.

The APA is supportive of initiatives to increase housing density and affordability in the Sydney Basin, especially those areas which are in close proximity to public transport. The APA also recognises the need for affordable accommodation for essential workers and welcomes collaboration with the State Government in developing initiatives that complement planning within the Local Environment Plan (LEP). To ignore localised planning is to adopt a cookie cutter approach to planning disregarding the unique conditions existing in the LGA which have been incorporated into the detail of the Willoughby LEP and DCP.

It is the view of the majority of the community that town planning should remain the responsibility of local government and occur in consultation with residents. For the Housing Development Authority (HDA) to shortcut decision-making via inappropriate approvals fails to take into consideration local geography, vegetation studies, traffic patterns and existing planning, which has been agreed by the community, following a long-term consultative process.

Specific to this submission, to seek comment on Landcom's BTR development in isolation ignores impacts related to the proposed increase in population density in close proximity to the Dive Site (Nelson St/Pacific Highway/Mowbray Road). The APA is aware that in adjacent streets, 5-9 Gordon Avenue will include 91 new households and 10 Gordon Avenue/9-19 Nelson Street will have 403 new households. This is additional to the 1500 households planned for the Dive Site, including the BTR. This is nearly 2000 new residences in a small, localised area.

Therefore, the APA, representing the community of Artarmon, believes the Landcom Build to Rent (BTR) development with its 180 units should not be considered in isolation. Consideration must be given to other nearby developments: the +1300 proposed additional dwellings for the Dive Site, the Nelson Street and Gordon Avenue development PLUS the developments occurring along the Pacific Highway between Mowbray Road and Fullers Road. To NOT do this is to ignore the significant cumulative impacts of ALL proposed developments which will have huge impact on the communities in suburban Artarmon and neighbouring suburbs.

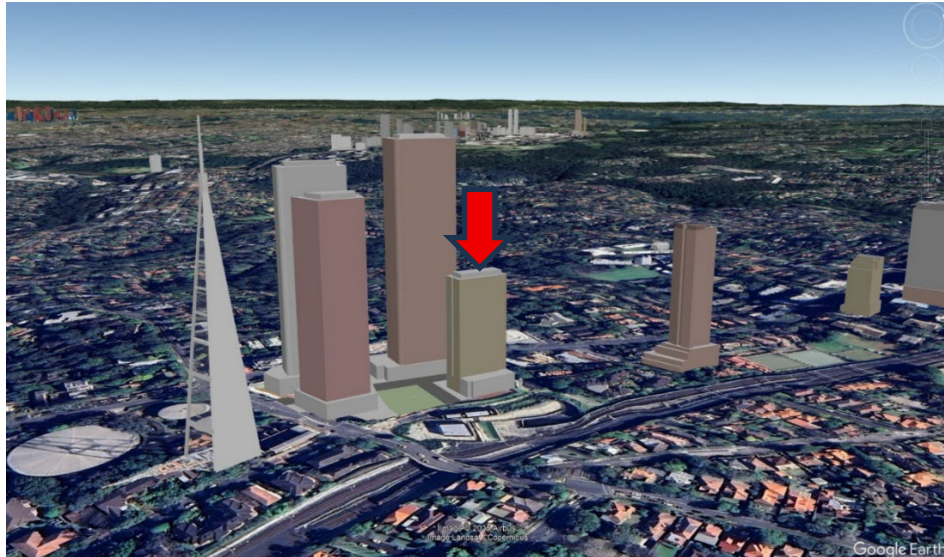
The APA requests that:

1. Current planning for the BTR development be delayed until the full impact of the transformation of the *entire* Dive Site can be properly addressed and designed for.
2. Dive Site redevelopment must include the upgrade of the Mowbray Road intersection, which is problematic even with the existing traffic load. A right-turn from Mowbray Rd West onto the Pacific highway south-bound, to funnel through-traffic off local roads, would significantly improve traffic flows and decrease vehicles on local roads.
3. Infrastructure planning (roads, water, schools, hospitals, sewerage and power) to support proposed increases in density, to be made public.

To adopt the current BTR proposal ignores the significant impact some local, 2000+ separate dwellings will have on the area's amenity, its existing infrastructure and its heritage value. In addition, already congested roadways will be rendered unusable by local residents and emergency services.



It clear that the BTR development (highlighted with a red arrow) within the Dive Site will be dwarfed by two other proposed developments on the site and along the Pacific Highway from St Leonards to Chatswood. All these developments should be incorporated in an all-encompassing SEARs/EIS evaluation



To reiterate, the APA's view is that approvals for development of the Dive Site as a whole AND the BTR development should be delayed until a full appraisal of the site, including a detailed traffic analysis and review of supporting infrastructure, is completed. This will ensure development includes the infrastructure requirements of the total proposed increase in households within a 1km radius of the Dive Site including the Dive Site. There are a number of immediate impacts that need to be remedied to ensure the well-being of future residents if socially resilient communities are to be the outcome of the BTR development proposal.

The following table summarises the APA's major concerns and suggestions for Artarmon (and surrounding) communities:

General

- 1 The APA is supportive of initiatives to increase housing density and affordability in the Sydney Basin, and especially those areas which are proximal to public transport.
- 2 Approvals for development of the Dive Site as a whole should be delayed until a full appraisal of the site including a detailed traffic analysis and supporting infrastructure will meet the needs of 1500 new households is completed.

Public Benefit

- 1 Reinstate the requirement of 10% of the development as affordable housing.
- 2 State Government to increase investment in education, health and infrastructure to deal with an exponential rise in population within the Dive Site/Chatswood Ridge (and the region) and make this information public.
- 3 Increased focus on public amenity such as areas for passive socialisation, green space and community engagement.
- 4 Heat mapping has identified the area as a 'hot spot': this to be addressed with dense plantings of appropriate canopy-forming trees.

Built Form, Urban Design and Visual Impact

- 1 The proposed development of the Dive Site in its entirety - as flagged in the EIS - does not provide a satisfactory visual or practical outcome for the site. Statements in the

Overarching Principles of the submission are not logical or realistic. The visual impact of full site development is out of context for the area.

- 2 The APA objects to the BTR in its current form and expects that a more adequate planning solution is achieved instead.
- 3 The APA recommends a '*back to the drawing board*' approach for the Dive Site to include the site as-a-whole, not individual buildings in isolation.

Transport, Active Transport, Traffic and Parking

- 1 Active transport is encouraged in the area. A design for a cycleway from the Dive Site to St Leonards has been underway for nearly 10 years. The APA requests that the developers of an amended BTR (to include adequate parking for essential workers) ensure construction is completed within 12-24 months.
- 2 Safe cycle routes to schools in the area must be considered as a priority. This is not recognised in the SEARs submission.
- 3 The Dive Site is associated with very congested road systems. The APA notes that the traffic study's conclusions are based on inadequate sampling. The conclusions do not reflect the reality of day-to-day experiences of local commuters.
- 4 The traffic study is reflective of the BTR initiative and not the full redevelopment of the Dive Site. Based on the conclusions of the study the traffic contribution from the full development of the site could be 8-9 times worse than that estimated in the EIS.
- 5 The APA requests a more comprehensive traffic and parking study to be conducted to address the impact of a 'fully developed' Dive Site (not the BTR in isolation).
- 6 The APA requests development options for the troublesome Pacific Highway/Mowbray Rd intersection be examined in more detail, and future planning include the provision of a right hand turn from Mowbray West turning south-bound onto the Pacific Highway.
- 7 A 40km/hour speed limit to be introduced for local (not state-controlled) streets within the block bounded by Mowbray Rd, the railway line, the Gore Hill Freeway and the Pacific Highway.

Trees, Landscaping, ESD

- 1 The APA is supportive of the concept of *Landscape Connecting with Country* using native plants. This will contribute to local biodiversity with the inclusion of a diverse range of natives that can support pollinator species.
- 2 The APA has specific recommendations regarding suitable species for planting within the Dive Site. These include the replacement of Chinese Elm with native species. The olive tree, a classified weed, should not be included in the edible garden.
- 3 The APA notes that several species mentioned are unsuitable and are replaceable with natives.
- 4 This desolate area requires an appropriate 'urban forestry' plan with suitable species to encourage canopy formation. Appropriate planting methods and subsequent care are essential.

Public Benefit

- **Affordable housing.** This proposal seeks an amendment of the application to remove the need for 10% of residences to be offered as 'affordable housing'. Surely this is contrary to the spirit of the proposal and should be withdrawn. The APA requests that this clause is not removed from the application for future developments.
- Redevelopment of the site provides an excellent opportunity to **redesign major traffic choke points**, especially the Pacific Highway/Mowbray Rd intersection. This opportunity is discussed below.
- In sections below we discuss the opportunity for the State Government to **increase investment in education, health and infrastructure** to deal with an exponential rise in population within the Dive Site and in association with other developments in the area.
- The APA urges a **focus on public amenity**, such as areas for passive socialisation, green space and community engagement.
- Heat mapping has identified the area as a 'hot spot', and this needs to be addressed with dense plantings of **appropriate canopy-forming trees**.

Urban Design

- The proposal constitutes a dramatic change to the existing environment, over-saturating a single area – previously low-rise retail - with unreasonably high population density thus creating another bottleneck for traffic while constraining thousands of dwellings between the railway corridor, Mowbray Road and Pacific Highway.
- The creation of another high-rise hub between the train and metro stations at Chatswood and Artarmon station is considered excessive in respect of density and spot overpopulation. It appears to disregard basic planning logic and will generate town planning problems in the near future.
- There is no relation (visual or functional) between the high-rise proposal and the adjacent heritage sites and buildings.
- The size and the location of the site and the adjoining sites, with the proposal for 60+ storey towers does not provide a gradual transition from existing low-rise, surrounding developments. A more modest design will serve as a far more aesthetic transition between Chatswood Interchange and the low-rise residential area along Pacific Highway and Mowbray Road.
- The proposal, as submitted, is not sustainable, not to scale, not appropriate for the site and location, not related to its surroundings and is vulnerable to creating future infrastructure and social problems. We object to its implementation in its current form and expect that a more adequate planning solution is proposed.
- The APA recommends a 'back to the drawing board' approach both for the BTR and the Dive Site as a whole.

Built Form/Visual Impact

The APA considers EIS documentation for the BTR at Chatswood Dive Site misleading. A number of negative effects noted 'mildly' in these documents will be significantly amplified when planning for the adjoining, and near-by, sites is progressed.

The APA objects to the proposed BTR development (and associated Dive Site development) without a study of the full impact of development of the Dive Site in relation to other proposed developments along the Pacific Highway.

The APA's specific issues with this development are as follows:

- **Height of Building.** The proposed height of building is 79.25 m and according to the Built-to-Rent SSDA SEARs Request: 180 m across the site. These heights grossly exceed the WDCP requirement for maximum 53 m – in the case of this proposal, by 7 floors, and for other proposed developments on the site by an astonishing 40 floors.
- **Density.** Proposed FSR is 5.81:1, while WLEP allows 4.2:1.
- **Visual Impact.** Even examined in isolation, the proposed high-rise is out-of-place. The visual effect is an exaggerated echo of the Chatswood Interchange towers. It looks foreign and artificially implanted into the otherwise calm, low-rise residential surroundings. Statements in the *Overarching Principles* of the submission such as 'the shortest tower on the site in the future' and 'enhances the existing character of the precinct' are not logical or realistic. Most advertised views from the proposed development would be obliterated once the projected adjoining 60+ storey skyscrapers are built.
- **Local Amenities.** The minimised ground floor amenities are not sufficient to cater for 180 residential units. In addition, the BTR development designed for essential workers overlooks the fact that many will be shift workers. Public transport will not meet the unique needs of these workers and proposed parking for the BTR is inadequate.

Transport, traffic and parking

Public transport

- The APA recognises the important impact of the recently commissioned Metro system for local commuters.
- The Dive Site area is well serviced by public transport and is therefore a logical site for appropriately scaled residential accommodation.

Active transport

- The APA supports the view expressed in the EIS that the location of the proposed development 'will encourage active and sustainable travel modes to promote healthy lifestyles by encouraging the use of existing public transport infrastructure, and by promoting the reduction of car dependence.'
- The site has a shared walking and cycling path to Chatswood station. The same facility should be introduced to connect the Dive Site with Artarmon Village.
- The APA understands that the Willoughby City Council (WCC) and Transport for NSW (TfNSW) are in the process of designing a shared walking and cycling path from Mowbray Rd/Hampden Rd to St Leonards Station. However, the planning for this has been underway for nearly 10 years. We urge the developers of the BTR to ensure construction is completed within 12-24 months.
- Inadequate cycle storage capacity at both Artarmon and Chatswood railway stations needs to be rectified.
- There is no safe bicycle route to any of the schools in the vicinity, the Shared User Path along the Pacific Highway has many safety issues that have not been addressed by Willoughby Council and TfNSW.

Traffic

- The Dive Site is associated with very congested road systems. With the exception of the Pacific Highway/Mowbray Rd intersection, the SEARs study concludes that two other intersections, Mowbray Rd/Hampden Rd, Mowbray Rd/Elizabeth St/Orchard Rd are classified at between 'good operation' and

‘satisfactory’ for the am and pm peak periods. It is patently obvious to anyone who regularly uses these intersections, that this is far from reality.

- The APA notes that the Pacific Highway/Mowbray Rd intersection is classified as ‘at capacity’. Experience demonstrates that this is a very congested intersection and *well-beyond* capacity. A review is required as this survey, conducted on a single day in 2025, does not reflect the experience of those regularly using the intersection. All three intersections are congested during peak periods and is not unusual for it to take 15 minutes to be able to enter Mowbray Road.
- A single-day survey is NOT ‘representative’.
- The APA notes that the consultants adjusted the data used in the analysis from 5-6pm against the acknowledged peak of 3.45-4.45pm. The ‘adjusted’ data does not reflect reality.
- The SEARs/EIS analysis suggests that the number of additional traffic movements will be minimal, driven by a restriction in the number of parking places in the building. However, no consideration was given to:
 1. The impact of the two conceptual buildings (potentially +60 storeys) designed to accommodate an additional 1320 future dwellings (1500 less 180 from the BTR). Ratioing this number up to the full conceptual development of the site (1500 dwellings) the number of vehicle trips per peak hour would increase from 29 (described by the consultants as having negligible impact) to over 240 vehicle trips per peak hour. This is likely to have a significant impact on these already congested roads.
 2. Increased traffic density is likely to result in frustrated drivers seeking alternative routes to their destination. This is already resulting in congestion and heavy traffic volumes on Orchard St, Elizabeth St, Hampden Rd, Artarmon Rd and other local suburban streets. ‘Rat running’ is not incorporated in the consultant’s report.
 3. Traffic calming. No consideration has been given to traffic calming within surrounding local streets.

The APA requests the following:

4. Landcom, WCC and TfNSW co-fund a comprehensive traffic study to representatively sample traffic behaviour around the proposed development.
5. Reassessment of solutions for the main intersection of Mowbray Rd and the Pacific Highway and improvement to what is considered to be one of the busier intersections in NSW.
6. A right hand turn from Mowbray Rd West southbound onto the Pacific Highway be constructed to funnel traffic onto the highway, thus reducing through-traffic via local suburban roads. The APA has been lobbying for this for many years.
7. Traffic calming measures be introduced throughout suburban Artarmon to deal with the increase in traffic flows associated with the Dive Site development and the cumulative impact of other developments along the Pacific Highway between St Leonards and Lindfield.
8. A 40km/hour speed limit to be introduced for local (not state-controlled) streets within the block bounded by Mowbray Rd, the railway line, the Gore Hill Freeway and the Pacific Highway.
9. An active transport connection (schools and cycling) from the Dive Site via Artarmon shops.

Parking

- The SEARs and EIS states that for the BTR development, ‘The parking accommodates only 39 spaces (37 car and 2 motorcycle spaces)’. It is the APA’s view that this is a small number of car parking spaces for 180 residences and for essential workers, particularly those who do shift work: 39 spaces will be inadequate.
- In the absence of rapid changes in human behaviour, it is the APA’s view that overflow parking from the BTR and other future developments will occur in streets around the development, with the streets around the north-east section of Artarmon being the logical target. This will further congest the high-

density western side of Artarmon around Hampden Road, Palmer Street, Robert Street, Eric Road, Buller Road, Benton Avenue and Francis Road.

- The APA requests that The State Government funds a thorough current parking study to determine resident requirements.

Health and Education

The SEARs documents fail to evaluate the impact of a dramatically growing community on health and education facilities in the area. In particular:

- There is a clear deficit of secondary school capacity within the Chatswood district. It is noted that the Dive Site was originally flagged for the site of another school. Both Chatswood High and Cammeraygal High Schools are already over capacity and with the proposed increase in density, these overcapacity schools will be unable to meet the future needs of an increase in population.
- Royal North Shore Hospital is a world class health facility, yet hospital land has been expropriated for health administrators and commercial development (Lot 4B on Herbert Street, St Leonards). As a result, future health infrastructure will not have the capacity to expand to meet the requirements of increased population, future pandemics and an ageing population.

The APA recommends that Landcom seek funding from the State Government and publish forward planning for educational and health requirements before committing to the full redevelopment of the Dive Site.

Water and landfill

The APA requests information on the investment being undertaken to improve ageing water infrastructure typified by incidents such as the March 2026 West Ryde pumping station failure and burst water mains at Willoughby Road and Lane Cove: all of which caused significant disruption within the Willoughby LGA.

These incidents relating to ageing infrastructure are increasing and water infrastructure will be a critical requirement of meeting future requirements. No information regarding parallel investment in upgrading and improving water infrastructure has been made publicly available.

It is also noted that the amount of household waste generated by an additional 1500 households (in the Dive Site alone) and additional developments within a 1-kilometre radius, will put further pressure on landfill. Based on current population projections, landfill capacity for the Sydney Basin is expected to be reached by 2030. Being unable to manage waste effectively in the future is a recipe for disease. What planning has been done to address landfill requirements resulting from the proposed developments?

Trees and Landscaping/Biodiversity

The area requires an appropriate urban forestry plan employing suitable species to encourage canopy formation. Appropriate planting methods and subsequent care are essential.

The APA supports the following:

- The concept of *Landscape Connecting with Country* using native plants. This will contribute to local biodiversity with the inclusion of a diverse range of native species that can support pollinator species.
- The selection of large trees (with the exception of Chinese elm as there are many native trees that

- could be used instead of this exotic).
- The selection of native shrubs and groundcovers to support the use of exotic shrubs for use in the edible garden except for *Olea* which should not be planted.
- The use of native plants and the design of the *Six Season's Garden*.

The APA *does not* support planting of the following species:

- *Pittosporum undulatum*. Although a native species, this species has proven to be invasive in bushland. Its berries are attractive to birds and can be deposited significant distances from the parent plant. It has become an environmental weed.
- *Beschorneria yuccoides*
- *Kalanchoe bracteate*
- *Rosemary officinalis prostratus*

There are better suited Australian native species that have similar architectural features.

Conclusion

Development considered in isolation, without supporting infrastructure, creates increased social problems, is a foundation for the breakdown of healthy communities and creates more urban heat. It also fails to consider the cumulative impacts resulting from multiple developments within close proximity.

While this submission is a response to the BTR development proposed for the Dive Site, the ramifications of considering the BTR in isolation is a reflection of short-term thinking which will lay the foundations for long term problems – essentially just swapping one problem for another in the not-too-distant future. The APA recommends a more holistic approach to planned local development in collaboration with the Willoughby City Council and residents, instead of overriding long term consultative planning which resulted in the Willoughby LEP.

The APA, on behalf and as representatives of, the community request the concerns detailed in this submission be addressed by both Landcom and its parent, the NSW State Government.

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The Artarmon Progress Association, Inc. (APA) was founded in 1906 as a not-for-profit group and our objectives are to promote the welfare, physical and intellectual advancement of the suburb of Artarmon and the City of Willoughby, to protect the interests of the residents, and to encourage a keener spirit of citizenship and mutual help amongst residents. Our newsletter, the Artarmon Gazette, is distributed quarterly to over 5,000 homes and businesses in Artarmon. We regularly communicate with residents and act as a conduit between local residents and elected representatives on matters concerning our local community.