

10 June 2022

Ms Debra Just  
CEO  
Willoughby City Council  
Level 4, 31 Victor Street  
Chatswood, NSW-2067

Dear Ms Just,

**RE: WCC Draft Local Environment Plan (LEP) and Development Control Plans (DCP)**

The Artarmon Progress Association (**APA**) welcomes the opportunity to comment on the draft Willoughby City Council (**WCC**) LEP and DCP. APA has sought feedback from members and encouraged the community to make their own submissions. APA applauds WCC on their efforts to engage the community with regard to these important planning documents.

We offer the following comments regarding the LEP and DCP as they relate to Artarmon:

**Local Environment Plan**

- The proposed building height limit of 17 metres in the Artarmon Local Centre between 64 and 128 Hampden Road will allow buildings to be one storey higher than currently. Some members of the APA are concerned that this limit will not provide the incentive to developers to rebuild in the area that currently needs reinvigorating. APA would support an increase to 20m in this area, if this was enough to encourage redevelopment.
- The LEP requires new developments in the Artarmon Local Centre to undergo a design excellence process and provide 10% affordable housing. Given that the village is also in the Heritage Conservation Area, APA is concerned that the LEP is too onerous on developers to encourage them to invest in the area. APA is supportive of the design excellence process but suggests that the requirement for 10% affordable housing for developments in the Artarmon Local Centre between 64 and 128 Hampden Road be removed. APA supports the 10% affordable housing requirement in other areas.
- APA supports the incorporation of planning controls to protect existing trees on private land in order to stop the decrease in Willoughby's tree canopy coverage. We look forward to seeing more information provided on the DA website about type of tree and reason for removal, and we hope to see greater enforcement of tree provisions.
- APA would support the annexation of Georges Place from the Artarmon Industrial Area so that it could be redeveloped for schools and housing.

## Development Control Plan

### **WDCP Part F: Transport and Parking Management**

There is concern that a reduction in parking requirements and a limit on the maximum number of car spaces for residential developments within the Artarmon Railway Precinct will increase pressure on the limited street parking available in the area. This would increase traffic congestion in the area and be disadvantageous for businesses in the area.

### **WDCP Part G – Vegetation Management**

Section 2.2d states that

*A permit will not be allowed to clear vegetation or prune or removal of a tree if ... the vegetation is listed as an item under Willoughby Natural Heritage Register*

but from the WCC's website it appears that this Register has not been updated for over six years, since January 2016.

APA urges WCC to update the Register as a matter of urgency if it is serious about stemming the reduction in urban tree canopy that is happening mainly on private land.

### **WDCP Part H – Heritage Items and Heritage Conservation Areas (HCA)**

APA opposes full demolition within the HCA. As such, APA requests the following changes to Section 2.4 of the DCP:

- Delete:  
*d. if, in the case of an application for total demolition, redevelopment is a reasonable alternative to retention.*
- In the sentence:

*All applications for total or partial demolition should include:*

- *a report from a structural engineer specialising in work on heritage buildings or structures. This should detail the structural condition if the proposal claims it is beyond repair, and evidence that stabilisation and/or the retention of the building or structure is unreasonable;*

we suggest replacing the word *unreasonable* with *impossible*.

### **WDCP Part L – Place Based Plans – Section 5 – Artarmon Local Centre**

- Apart from the 8m setback above 2<sup>nd</sup> storey, what ensures that upper storeys will be terraced in accordance with the slope of the terrain?
- What ensures green space will be included? APA suggests that a minimum of 1/3 of the site area must be green space.
- Need for a control to ensure articulation to break up the length of walls to reduce the bulk and visual impacts of shop top housing above the second level.

- A control is required to ensure that the façade of the buildings is in keeping with the character required for properties in a Heritage Conservation Area, not only as part of any redevelopment but also as an ongoing requirement. This should cover the paint colour palette that may be used; the style, size and appearance of signage so that it doesn't impact on the appearance of buildings; and a requirement that refrigeration/air conditioning units or other equipment not be installed in front of the façade of the building. This control needs to be enforced with both owners and tenants.
- Include a control that requires new and existing properties in the Artarmon Local Centre to be kept in good (visual and physical) order.

Yours faithfully,



Ashish Sethi  
President  
Artarmon Progress Association

**Who we are:**

*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.*