

101

Attention: Director Metropolitan Projects
Major Projects Assessment
Department of Planning
GPO Box 39
Sydney NSW 2001

26 January 2011

Dear Sir/Madam

**Re: Concept Plan (MPO8_0207) & Project Application (MP10_0219)
Residential development at Avon Beechworth and Arilla Roads, Pymble**

I OBJECT TO THIS PROJECT

The very high number of unit proposed at this site and the height of the buildings are absurd for a single residential area. There is limited traffic access in single access to the Pacific highway that is twice daily heavily burdened with traffic from the nearby girls' College. Recently after completion of other units in the area traffic has already increased with new residents using Beechworth Road to make a u- turn to head south on the highway. Commuter parking is already extending into Arilla road from the station. Have impact studies taken this into account? **If information given to the Department states that these units would have minimal impact on traffic in the area then just by the proposed number of units (355) this study must be flawed and needs to please be repeated.**

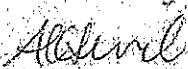
The proposed heights of 11 and 9 stories are well outside the planning limits that apply to the site as discussed in the Environmental Assessment. Even the developments in Clydesdale Place are no more than 7 stories high at the railway frontage.

There can be no valid comparison with units located on the Pacific Highway corridor or near the railway tunnel. These are either close to a main road or the railway station.

Please can you respond to me in writing to explain

1. how the potential traffic problems are going to be addressed?
2. why this particular development that is not on the highway could go ahead with 9 and 11 stories?
3. what compensation there will be given by the developer to residents who live in the narrow surrounding streets for the loss of property value, traffic congestion and loss of quality of life a development of this size will bring?
4. what compensation the developer will pay to the government for any environmental damage ensuing from the development?

Regards



Mrs Alison Sevil
11 Jubilee Ave
Pymble NSW 2073

102

30 January 2011

ATTENTION: Director Metropolitan Projects
Major Projects Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Sirs/Madam -

Re: Concept Plan (MP08_0207) & Project Application (MP10_0219)
Residential development at Avon, Beechworth and Arilla Roads, Pymble

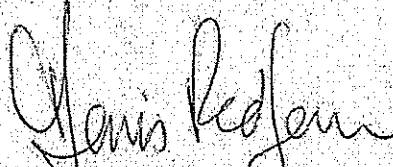
I OBJECT TO THIS PROJECT

As far as I am concerned the sheer number of units proposed (355) and the height of the buildings (11 and 9 storeys for two of the buildings) are absurd for a single residential area.

I note also that the proposed heights are well outside the planning limits that apply to the site as discussed in the Environmental Assessment.

There can be no valid comparison with units located on the Pacific Highway corridor or near the railway tunnel. These are either close to a main road or are nearby the station. And even the developments in Clydesdale Place for example are no more than 7 storeys high at the railway line frontage.

Regards,


DENIS REDFERN
83 Beechworth Rd
Pymble 2073

103

6 ORINCOO ST
PYMBLE NSW 2073
26 January 2011

ATTENTION: Director Metropolitan Projects
Major Projects Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Sirs/Madam -

Re: Concept Plan (MP08_0207) & Project Application (MP10_0219)
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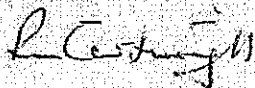
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Regards,



The Honourable Robert Cartwright,

104

"Kaludabah"
43 Beechworth Road
Pymble NSW 2073

1st February 2010.

Attention: Director Metropolitan Projects
Major Projects Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam

**Re; Concept Plan (MP08_0207) & Project Application (MP10_0219)
Residential Development at Avon, Beechworth & Arilla Roads, Pymble**

I wish to inform you that I strongly **OBJECT** to the above project.

I am very concerned that the number of units proposed (355) and the height of the unit buildings (9 and 11 storeys for two of the buildings) are not only excessive for a residential area but absurd in the light of current land usage.

I also note that the proposed heights are well in excess of the planning limits that apply to the site as discussed in the Environmental Assessment.

Clearly, an extra 355 units would significantly increase traffic in an already busy area. Avon Road is congested by PLC traffic and from commuter parking which now stretches down Avon Road to Arilla Road. Also, building construction traffic would be excessive.

The fact that the proposed development is surrounded by residential houses is also of significant concern. All other developments, albeit of a smaller size, are either close to a main road (Pacific Highway) or a railway station.

In summary, the sheer size of this project is totally inappropriate for a residential area of this nature. It will significantly increase traffic numbers and adversely affect the residential bias of this area.

Yours faithfully,

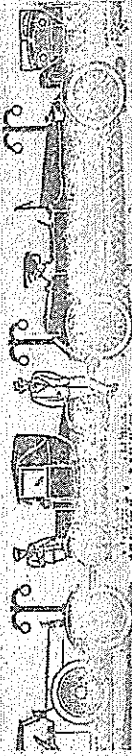

Stuart L. Cameron

Dept. of Planning
Highway

This proposed development
(MPOS-0267) (MPOC-219) between Dean
Greenworth and Miller Roads, Plymouth
is not wanted by people who live
in Plymouth.

The division also asks the
state have already estimated
the North Shore, who approved the
removal of a heritage house up
here?

If there is a fire in Shilston
Forest or Rapa Park, then could it
a complete disaster because of the
lack of roads out of here the Pacific
Highway is beginning to look like a
tunnel with ugly houses on either
side.



11/200 Pacific Highway
Plymouth 31/1/11

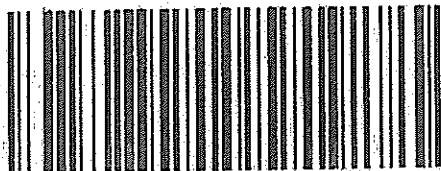
(5) Why was this all brought up in the Christmas holidays? very silly!

It seems to be when everything happens in this government. To wonder nobody trusts any decisions that are made.

Developers are building cheap public housing and they are all so ugly. There has been no room left for a garden anywhere. What are the multi-lives going to do when they have demolished all the trees and gardens?

Good seems to be the order of the day. This government will be remembered as the people who turned anything that first the North River.

Shani Reckless

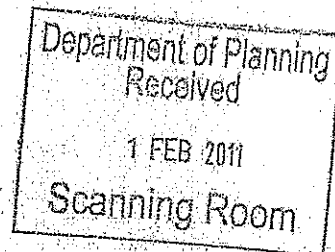


PCU019018

106

31st January 2011

ATTENTION: Director Metropolitan Projects
Major Projects Assessment
Department of Planning
GPO Box 39
Sydney NSW 2001



Dear Sirs/Madam,

Re: Concept Plan (MP08_0207) & Project Application (MP10_0219) Residential development at Avon, Beechworth and Arilla Roads, Pymble

I OBJECT TO THIS PROJECT

As far as I am concerned the sheer number of units proposed (355) and the height of the buildings (11 and 9 storeys for two of the buildings) are absurd for a single residential area.

I note also that the proposed heights are well outside the planning limits that apply to the site as discussed in the environment Assessment.

There are no valid comparison with units located on the Pacific Highway corridor or near the railway tunnel. These are either close to a main road or are near the station. And even the developments in Clydesdale Place for example are no more than 7 storeys high at the railway line footage.

Regards,

Naomi Kuk
67 Beechworth Road Pymble

107

January 2011

ATTENTION: Director Metropolitan Projects
Major Projects Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Sirs/Madam--

Re: Concept Plan (MP08_0207) & Project Application (MP10_0219)
Residential development at Avon, Beechworth and Arilla Roads, Pymble

I OBJECT TO THIS PROJECT

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Regards,

Andrew Grant
A. Grant

MR & MRS A. GRANT
50 LAWLEY CRESCENT
PYMBLE
NSW 2073

108

28 January 2011

Mr & Mrs P & J Whiting
5 Ashmore Avenue
Pymble NSW 2073

ATTENTION: Director Metropolitan Projects
Major Projects Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Sirs/Madam,

Re: Concept Plan (MP08_0207) & Project Application (MP10_0219)
Residential Development at Avon, Beechworth and Arilla Roads, Pymble

I OBJECT TO THIS PROPOSAL

As far as I am concerned, the sheer number of units proposed (355) and the height of the buildings (11 and 9 storeys for two of the buildings) are absurd for a single residential area.

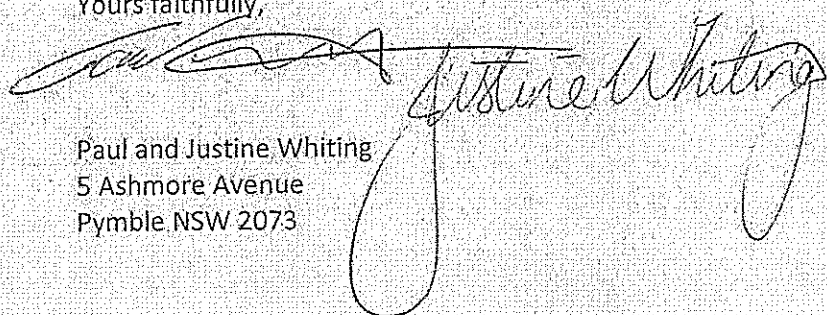
I note also that the proposed heights are well outside the planning limits that apply to the site as discussed in the Environmental Assessment.

There can be no valid comparison with units located on the Pacific Highway corridor or near the railway tunnel. These are either much closer to a main road or have direct access to the railway station. Even the development at Clydesdale Place, for example, is no more than 7 storeys high at the railway line frontage.

The number of units will also cause a great increase in traffic congestion on Beechworth Road, which is already congested with traffic going to and from Pymble Ladies College. There has already been a considerable impact on the traffic congestion in Avon Road and Pymble Avenue as a result of the apartments built on Pymble Avenue.

In summary, I object to the current Concept Plan (MP08_0207) and Project Application (MP10_0219) for the Residential Development at Avon, Beechworth and Arilla Roads, Pymble.

Yours faithfully,



Paul and Justine Whiting
5 Ashmore Avenue
Pymble NSW 2073

15 Malory Avenue
West Pymble 2073

109

30th January 2011

Minister of Planning
Major Projects Assessment,
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Sir,

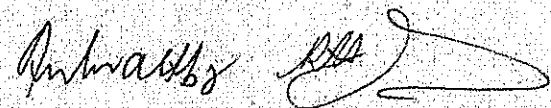
Re: Concept Plan (MP08_0207) & Project Application (MP10_0219) for residential development at Avon, Beechworth and Arilla Roads".

We are writing to lodge our objections to the development as planned on the above site for the following reasons.

- The development is incompatible in size and character for the site.
- Any development will change the water table and environment which will lead to the inevitable death of the remaining Blue Gum High Forest.
- The impact of extra traffic in the surrounding streets will be unsupportable.
- The development, while within walking distance on the map, is a steep walk to Pymble Station and too far from Turramurra for the people you are hoping to attract to buy into the development. A car would be needed for shopping and social activities. This could potentially put an extra 600 cars on an already over congested Pacific Highway, particularly in the area between Pymble and Turramurra.
- Extreme congestion on the Pacific Highway could lead to a tragedy with emergency vehicles unable to travel along the road easily.

Therefore, this development must not be allowed to be built because it massively exceeds the height, bulk and scale of the local area residences.

Yours faithfully,


Arthur and Rhondda Maltby

110

31st January 2011

ATTENTION: Director Metropolitan Projects
Major Projects Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Sirs/Madam,

OBJECTION TO

**RE: CONCEPT PLAN (MP08_0207) & Projects Application (MP10_0219)
Residential Development at Avon, Beechworth and Arilla Roads, Pymble.**

I am writing to object **VEHEMENTLY** to this **ENORMOUS** project which will destroy the ambience and character of this area of Pymble already compromised by the hideous and totally inappropriate overdevelopment of "Ironbark" which stretches from opposite the underground tunnel at the top of Pymble Ave to the ground of Pymble Ladies College. I am sure the building on the corner of Avon Road and Pymble Ave must contravene planning and building regulations relating to the distance from the front and side boundaries to the balcony edges. While this development may be near the railway station and Pacific Highway the proposed development further along Avon Road with an entry and boundary off Beechworth Road are not near public transport.

As far as I am concerned, the sheer audacity of planning (or lack of planning) for 355 more dwellings in this quiet area adjacent to Avon/Beechworth and Arilla Roads, plus the proposed heights of the buildings (9 to 11 storeys high for 2 of the buildings) are absurd and inappropriate. I note also that the proposed heights are well outside the planning limits that apply to the site as discussed in the Environmental Assessment.

There are already oversize developments in Clydesdale Place (even these are no more than 7 storeys high at the railway line frontage) but for those people who bought into these developments they must be going to have to look at and over this huge and ugliest of developments - if the concept drawings at Council are indicative of the level of "design".

Any development in this area should be sympathetic to the surrounding dwellings which in most cases were built many years ago and are predominantly single or double storey single residences. It should, I would have thought, also have complied with environment issues, like the birds and local flora and fauna which will never recover from the onslaught of this type of development.

It has been stated that there will be minimal impact on local traffic – what deluded person or company could possibly have come up with that result?

1. PLC student traffic grows year on year.
2. Everton Street is already close to capacity in the drop off/pick up hours for the school.
3. Beechworth Road, the same, and as cars cannot turn right into Beechworth Road coming south from Turramurra for some extraordinary reason all traffic has to turn down Livingstone Avenue, the highway traffic will be backed up the highway right up Pymble Hill.

4. It will be chaos when the 2011 school year resumes as cars can now park on both sides of Avon Road close to the railway tunnel – it is now impossible to drive down Avon Road without going over the white line in the middle of the road – in either direction.
5. Commuter parking is already an issue with cars parked down Livingstone, Pymble and Avon Roads as far as Arilla and beyond when the PLC girls take their cars to school.
6. 355 units mean at a minimum 355 more cars – possibly double that depending on the demographics and numbers of people living there. How many resident and visitor parking places will each of 355 units have allocated?

Another reason this development should be stopped – the old house at the heart of this development! How is it that it can be pulled down, surely it's on the list of heritage houses? Another developer already pulled down one of the local heritage houses in Beechworth Road to subdivide and build several Mac Mansions – possibly the same destroyer of the area involved with this?

Please send several decision makers to review this site at times of the day that the traffic flow is crucial, and to look at the surrounding houses in Avilla Road and then go down or drive up Pymble Avenue and see what uncaring, unsympathetic money grubbing developers can do to not only the houses directly affected (overshadowing and looming buildings right next door) but the area as a whole.

Yours faithfully,



Ian MacRitchie
2 Quadrant Close
PYMBLE NSW 2073

111

31st January 2011

ATTENTION: Director Metropolitan Projects
Major Projects Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Sirs/Madam,

OBJECTION TO

**RE: CONCEPT PLAN (MP08_0207) & Projects Application (MP10_0219)
Residential Development at Avon, Beechworth and Arilla Roads, Pymble.**

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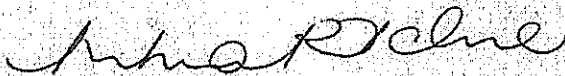
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Yours faithfully,



Marianne MacRitchie

112

Attention: Director Metropolitan Projects
Major Projects Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

January 2011

Dear Sirs/Madam -

Re: Concept Plan (MP08_0207) & Project Application (MP10_0219)
Residential development at Avon, Beechworth and Arilla Roads, Pymble

I OBJECT TO THIS PROJECT

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Regards,

Edna Greenwood
6 Ashmore Ave
Pymble
2073.

My objection is the 4 Raddie
is too endorph at present and
a lovely area will be ruined
-E.G.

W R Finney
3 Orchard Street
Pymble NSW 2073

31 January 2011

The Secretary
Major Projects Assessment
Department of Planning
GPO Box 39
Sydney NSW 2001

Dear Sir/Madam

**re: Concept Plan (MP08_0207) & Project Application(MP10_0219)
Residential Development at Avon, Beechworth and Arilla Roads, Pymble.**

I lodge this objection in the strongest terms to the above development proposal for the following reasons:

- 1) The planned development is out of character with the area which is a quite suburban neighbourhood with attractive houses in a bushland setting.
- 2) An enormous increase in traffic congestion will result without any increased traffic management planning or safety measures to support the increased traffic volume. Traffic is already at saturation point in this area, particularly in school hours. The only access to this area from the Pacific Highway is via two narrow roads not designed for the amount of traffic such a development will bring.
- 3) The increased traffic will pose a significant danger to pedestrians including 2,000 school children attending Pymble Ladies' College, most of whom are crossing daily at a pedestrian crossing in a congested, narrow 2 lane street.
- 4) Traffic is already congested in this pocket due to the restricted access to the Pacific Highway. The only road outlets for this precinct are Livingstone Ave and Beechworth Rd. Each has two lanes only for left and right hand turns onto the Pacific Highway. The traffic signals allow 8 cars at most to turn on each signal change (far fewer if pedestrians are crossing the highway). Accordingly, traffic banks back at peak times.
- 5) The degradation of the local environment will increase the flood danger in nearby areas. This area is well known historically as having amongst the highest annual rainfalls in the Sydney Metropolitan area. These proposed buildings (on the side of a hill) will create heavy and increased water run-off.
- 6) The development will have an unacceptable level of impact on views and overshadowing of adjoining sites and the public domain.

7) The height, bulk and scale of the proposed development (5 residential building envelopes of 4 to 11 storeys) is not in keeping within the context of this precinct - being single storey dwellings in a bushland setting.

8) Commuter parking for Pymble train station, already inadequate, will be impossible.

9) Commuter and resident cars parked currently on both sides of the 2 lane Avon road restrict traffic flow such that only one lane operates in peak hour (at the northern end of Avon Road). Any increase in traffic due to this development will result in a gridlock particularly on school days.

10) Trains, buses and schools will become even more overcrowded.

11) The disruption to the community during the demolition and construction period of the project.

12) Footpaths in Arilla and Avon Rd are inadequate.

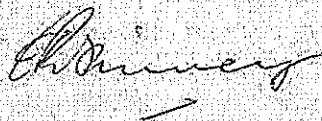
13) The heritage-listed Stationmaster's cottage off Avon Rd (next to the rail line) will be destroyed.

14) Other recent developments in Pymble Ave, the Avondale development in Clydesdale Place, major proposed development for Everton St and Pymble Ave all need to be considered in conjunction with this new proposal for overall impacts on traffic, safety, flooding, views, shadowing and height and bulk considerations

15) The area is part of the protected Blue Gum High forest, which will be in danger due to the environmental impact of this development

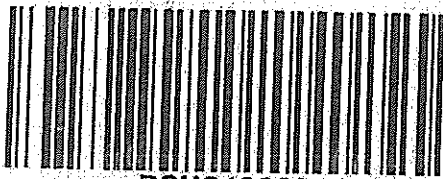
I appeal to you to reject this proposal for the reasons stated above.

Regards

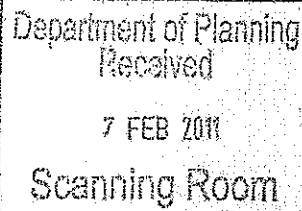


Full name: Warwick R Finney

Full residential address: 3 Orchard Street, Pymble, NSW, 2073



PCU019239



114

Charmain Boyakovsky
7 Linden Avenue
PYMBLE NSW 2073
Phone 9440 4976
Email Charmain.boyakovsky@optusnet.com.au

2 February 2011

ATTENTION: Director Metropolitan Projects
Major Projects Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam

Re: Concept Plan MP08_0207) and Project Application (MP10_0219) Residential Development at Avon, Beechworth and Arilla Roads, Pymble

I object to this project.

The development proposal sets out a plan for 355 units in 5 very large buildings. It states that the extreme height and scale of the unit complex is necessary in order to set aside land on the site for gardens, a riparian zone and stands of native trees. It is not an acceptable proposal. The claimed benefits are questionable and do little to offset the many problems the development will cause for the local community.

In summary, the scale and design of the development are entirely unsuitable for the site. The development is out of character with the surrounding residential area. Because of its height and bulk, its visual impact will be overwhelming and detract from the existing streetscape and district views. Rather than remediating a riparian zone and preserving stands of large trees on the site, the development poses significant risks to their continuing health and sustainability. The development will exacerbate the already heavy peak hour traffic congestion in surrounding streets. The proposed destruction of a house with architectural and heritage value will damage the character of the local area.

My specific reasons for objecting to the proposal are documented in pages numbered 3 to 10 attached to this letter.

Like many people in the local community my family and I are very concerned about the proposed development and the impact it would have on the area of Pymble west of the railway line, bounded by Pymble Ladies College and Sheldon Forest.

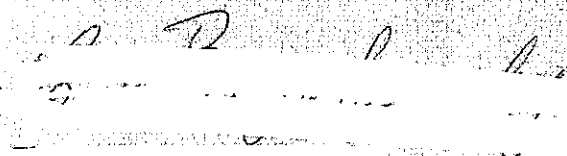
It is area that was built mainly in the interwar period by people who while prosperous did not have great wealth. What they did have was respect for the character of the local area. They built modest family homes that were varied and individual in style but maintained a similar small scale. They planted pleasant gardens and retained a canopy of tall native trees.

Together and in a very informal way over many years they created a living environment that has beauty, amenity and character. This environment will be severely damaged if the proposal is allowed to go ahead. The proposal subverts the community values that have guided previous development –limited residential scale, consideration for neighbours, appreciation of heritage and respect for the natural environment.

I declare that I have not made any reportable political donations in the previous two years.

Please note in order to protect my privacy I do not want my name to be made available to the proponent, interested public authorities or placed on the Department's website.

Yours faithfully

A handwritten signature in dark ink, appearing to be 'A. D. R. A.', written over a horizontal line.

Reasons for Objection to Concept Plan MP08_0207) and Project Application (MP10_0219) Residential Development at Avon, Beechworth and Arilla Roads, Pymble

1. The number of units is excessive

355 units are proposed. They are a mix of 1, 2, and 3 bedroom units. They could accommodate between 700 and 800 residents. This is extremely high density and out of keeping with the established residential character of the area of Pymble west of the railway line, bounded by Pymble Ladies College and Sheldon Forest. This is an area of attractive inter-war single residences set well back from the road in pleasant established gardens under a canopy of tall trees. The scale, form and style of the existing houses and gardens give the area an overall harmonious style that will be irreparably damaged by this large scale development.

2. The buildings are unacceptably tall

Two of the buildings located nearest the railway line will be 9 storeys and 11 storeys high respectively. The tallest building will be 37 metres. These buildings will be excessively tall, bulky and unsightly.

The proposed heights are much greater than the planning limits that apply to the site as set out in the Ku-ring-gai LEP (Town Centres) 2010, i.e. 'Maximum building height of 7-8 stories (23.5m)'. The buildings will be clearly visible throughout the area. The tall buildings will dominate the skyline now seen as a canopy of trees. The development proposal states that there are a number of mature trees on the property - approximately 35 to 50 metres tall – that will screen the view of the buildings. This is doubtful for several reasons:

- The development plans show the tallest trees only partly screening the buildings when viewed from Mayfield Road and part of Arilla Road. There are no significant tall trees on the site to screen the view of the buildings from Avon Road or from the top of Beechworth Road.
- Trees of 35 - 50 metres in height are very old trees. Many of the blue gums along the western boundary of the site were planted in the 1930's. In the natural course of events, tall trees on the site can be expected to die off in a few years time, leaving the high buildings exposed. It is also highly likely that the stress of large-scale construction works will damage the canopy and root systems of many trees, leading to their removal.
- Tall native trees, which regularly drop large branches, are not compatible with high density building complexes where large numbers of people and cars move around the site. As soon as branches drop from trees on the site, it is almost certain that unit owners will be mounting a case to have the trees removed, citing fears about personal safety and property damage.
- In the event that these very valuable, very old and tall trees die or have to be removed, they cannot be replaced. The project plan emphasises that it allows for open areas

where 'deep soil' plantings of trees can be made. However, page 54 of the proposal includes a definition of deep soil planting as 'areas of a site with relatively natural soil profiles that are protected to promote the healthy growth of significant trees that can mature to heights of 10-25m'. Trees of 10-25m will not be tall enough to screen the 9-11 storey buildings.

3. Removal of noxious species cannot be used as a justification for the scale and height of development

Page 24 of the proposal points out that one of the justifications for the very large number of units and the extreme height of the buildings is that it assists the owner to remove an infestation of weeds and noxious species on the property. It states that 'development of the site creates the opportunity to fund this work without creating an unreasonable financial imposition on the property owner.'

Control of noxious weeds is not optional depending on costs for property owners. Under the NSW Noxious Weeds Act, 1993, it is the responsibility of the occupier/owner of the land to control or eradicate noxious weeds. Control of noxious weeds is a legal obligation. It has nothing to do with the number and type of buildings on the property.

4. Preservation of blue gums cannot be used as a justification for the scale and height of development

The development proposal cites preservation of significant trees on the property as one of the justifications for the scale of development.

Under the Ku-ring-gai Council tree preservation order, the preservation of healthy native trees is a legal obligation. The trees must be preserved no matter what type and scale of development is undertaken.

As outlined in point 2 above, the scale of the development construction works followed by the stress of large numbers of residents, visitors and cars using the site are likely to lead to the degradation of trees rather than their healthy preservation.

Also, Appendix 21 of the development proposal contains an Arborist Report written in April 2002 in relation to a previous development concept for the site. The report lists 151 trees that were examined (139 within the site and 12 on neighbouring properties). It suggests that consideration be given to the retention and protection of 75 trees and the removal of 64 trees. It is not clear for this current development with its changed building placement and layout which trees the developer plans to retain.

5. Maintenance of the riparian zone is not guaranteed

The proposal makes much of the fact that the development of a small number of very large buildings will allow an area to be set aside to 'establish a modified and managed riparian zone' around a natural creek/gully on the property. Page 54 states 'in particular the area on the western side of the riparian zone will remain largely undeveloped and a deep soil zone'

The area is expected to act as a buffer between the large buildings and the houses in Arilla Road and Mayfield Avenue.

The development might create a riparian zone, but its quality will be questionable and there are risks to its sustainability.

On council maps in the Ku-ring-gai Local Environment Plan (Town Centres) 2010 the site is shown as having 'riparian sensitivity' in a diagonal zone from the north east railway boundary to the south west corner of the property. The development proposal's maps show two very large and long buildings built directly adjacent to the riparian zone running almost its entire length. Construction of these buildings will involve heavy equipment and large numbers of workers moving over the riparian zone causing significant damage. This means that the development will not just 'remediate' the riparian zone, it will probably have to reconstruct it entirely.

Even if the riparian zone can be re-established in some form when building construction is complete, the movements of large numbers of residents around and over the riparian zone are likely to continue the damage to this sensitive area.

It is also noted that the development proposal's shadow diagrams show significant and unnatural overshadowing of the riparian zone by unit blocks during the morning. This will impact flora in the riparian zone.

6. There are risks to biodiversity on the site

On council maps in the Ku-ring-gai Local Environment Plan (Town Centres) 2010 the site is shown being almost totally an area of 'biodiversity significance'. This is another aspect of the site environment that will be put at risk by large scale development. Even if parts of the site remain free of buildings, the movements of large numbers of people and vehicles are likely to have a damaging impact on the ecological sensitivity of the site.

At present bio-diversity on the site might be impacted by the growth of weeds but the impact of people, cars, buildings, lights and noise will cause far greater long term damage.

7. Appearance of stage 1 building fronting Avon Road is unacceptable

This building will be 4 storeys at the front and 6 storeys at the back. The development plans and drawings show the building very close to the footpath, much closer than the single storey houses either side. The impression from Avon Road is of a bulky oversized building, without any significant front garden to soften the effect.

This detracts from the character and amenity of the Avon Road streetscape.

The development proposal states that the stage 1 Avon Road building is screened from view along Avon Road by the trees growing inside the boundary fence of Pymble Ladies College. This may be so from far away on Avon Road, but as people come closer along Avon Road, the building will dominate the streetscape.

Also the photomontages in the development proposal show the stage 1 building and a later stage building being screened by large trees in the front gardens of neighbouring houses in Avon Road. The images are misleading because many of the trees they show in the neighbouring gardens do not actually exist.

The development proposal cannot rely on trees on properties that it does not own or control to screen the view of its buildings.

8. Destruction of the 'Chief Railway Commissioner's Residence' will damage the Avon Road streetscape and the heritage of the surrounding area

Number 1 Avon Road, known as the Chief Railway Commissioner's Residence, has significant local value. The house is listed on the website of the Heritage Branch of the Department of Planning as having 'architectural municipal state significance'. The developer owns the house. It is proposed for demolition as part of the development.

Appendix 22, a heritage report attached to the development proposal acknowledges the heritage value of the house. It describes the architecture and history of the property in detail.

In essence, the report concludes that Ku-ring-gai Council has zoned the area for unit development, in making this zoning the Council has removed the local heritage classification of the site, so the house can be demolished and in any case there are many other inter-war houses in the area. The report under-estimates the value of the house to the local community. The house must not be destroyed:

- Despite Ku-ring-gai Council's bowing to pressure to remove the heritage classification from this and many other houses in Ku-ring-gai for the sake of unit development, this house is well known and valued by local residents.
- It is a very distinctive property. There is not another inter-war house in the local area like it. It has a particularly fanciful 'old English' facade. Its design and street presence are unique in the area, incorporating extensive use of sandstone corbels, mullioned leadlight windows, leadlight glass in the front door and surrounds, slate roof, stylish arched entry porch, decorative Tudor style half beam timbering under the gable roof line.
- Although well set back from Avon Road, the views of the house contribute to the attractiveness, character and 'sense of place' along Avon Road.
- The streetscape and history of Avon Road has already been damaged recently by:
 - The destruction of 3 houses with similar architectural merit and local significance to make way for the Ironbark Complex at the start of Avon Road.
 - The loss of number 5 Avon Road. This property is also listed on the website of the Heritage Branch of the Department of Planning. It was once a lovely cottage with decorative timberwork inside and outside. It has been vandalised and damaged beyond repair. The developer plans to demolish it entirely so the land can be used for the proposed development

Given that Avon Road has already lost these fine houses the destruction of yet another house with significant aesthetic, architectural and heritage value would be a tragedy.

- Even if the proposed site development in some form is permitted to go ahead, the house at number 1 Avon Road does not have to be destroyed. It could be left as a separate residential property. Alternatively, it could be incorporated into the development as a club house or recreation facility offering meeting rooms, a billiards room, a swimming pool, a communal garden etc.

9. Contribution to traffic congestion will be higher than estimated in the traffic analysis report

The traffic analysis report in Appendix 26 of the development proposal acknowledges the existing traffic congestion on Avon and Beechworth Roads and states on page 10 'Traffic problems in the area are largely associated with PLC and not likely to unduly affect the proposed residential developments. PLC should be required to address these traffic issues.' This is an unreasonable position.

Pymble Ladies College is a major and long-established education institution that has always generated considerable peak hour traffic in the area. Because of the geography of the area and the road layout, traffic management around the school is inherently difficult. It is wrong of the development proposal to say in effect 'We did not create the existing problems, someone else has to fix them and in the meantime we should be allowed to make the problems worse for local residents.'

The traffic analysis report concludes that that the development will have minimal impact on traffic in the area. This conclusion is questionable because of shortcomings in the assumptions and methodology used by the traffic analysis.

9.1 The report's estimate of traffic generated by the development is unduly optimistic

To estimate the total amount of traffic to be generated by the development the report uses a factor of .29 peak hour car trips per unit. The .29 factor is from an RTA analysis published in 2002: it is based on very old research, which makes its relevance to a modern development questionable. Moreover it can only be used as an average guide, not an accurate estimate.

The RTA's .29 factor is based on the assumption that residents in units near to public transport facilities will generally prefer to use public transport for peak hour travel rather than a private car. This may have been valid in 2002, however in 2011 when peak hour trains are congested, services have been cut back and schedules are often unreliable, this assumption is questionable. People are increasingly using cars rather than public transport.

A prudent traffic analysis would have presented a range of traffic estimates based on:

- Best case or optimistic scenario. Assume that most residents do not travel at peak hour and prefer to travel by train and use the .29 factor from the old RTA research.

- More likely scenarios with residents preferring to use their cars.
- Worst case scenario using a factor significantly greater than the RTA factor. A worst case scenario might be that each unit generates 1 peak hour car trip.

Assertions about the amount of traffic that the complex will generate and the impact it will have on existing traffic flows should be based on the worst case scenarios, not the best case scenario. There could be 300 to 400 peak hour car trips from the development site with a much bigger contribution to traffic congestion than the optimistic 120 car trips estimated by the development proposal's traffic analysis.

9.2 Existing peak hour traffic and congestion is high and growing

The development proposal's traffic analysis uses traffic observations made over one week in May 2009. It does not factor in any estimates of how traffic volumes in the area will increase over time. It does not take account of recent developments observed by local residents:

- The large Ironbark apartment complex at 1 Avon Road has been completed. Vehicles exit and enter the Ironbark complex using the roundabout at the intersection of Avon Road, Everton Road and Pymble Avenue. Increased traffic on this roundabout slows the peak hour traffic on Avon Road in both directions.
- Commuter parking along both sides of Avon Road now stretches back to near the intersection with Arilla Road. The commuter parking takes up road lanes and slows the through traffic.
- Pupil enrolments and activities at Pymble Ladies College are continually increasing, which generates increased traffic in both directions along Avon Road and Beechworth Road.

During school term Avon Road and Beechworth Road are heavily congested at peak hour, and the congestion is growing. Because of the level of congestion, even a small increase in traffic - let alone the volume of traffic expected from a large unit development - will have a disproportionately high impact on traffic congestion, traffic flow and safety.

9.3 Proposed roundabout at the bend in Avon Road will slow traffic and contribute to congestion

The traffic analysis report recommends that the Council build a roundabout at the bend in Avon Road where the entrance to the proposed development will be. The roundabout will allow cars to enter and leave the complex safely. However, it will slow down traffic for existing road users and add to peak hour congestion.

9.4 Traffic analysis report does not address the existing risks to pedestrians who use Avon Road

At peak hour many pedestrians walk along Avon Road to and from Pymble station.

The peculiar design of the footpath means that most pedestrians cross from one side of Avon Road to the other side when they reach the bend in the road. This is because:

- On the part of Avon Road running parallel to the railway line, there is paved footpath only on the south side of the road beside the Pymble Ladies College (PLC) boundary. The side of Avon Road along the railway line boundary is used for commuter parking.
- Where Avon Road bends and runs south, the footpath on the PLC side ends. This is because the land drops away very steeply from the road; there is no room for a proper footpath. The paved footpath continues on the other side of the road.

At present many pedestrians leave the footpath on one side of Avon Road at the bend and cross to the footpath on the other side. This is a dangerous situation because it is difficult for pedestrians and drivers to see each other around the bend, especially at night. Some pedestrians when walking to the station avoid this problem by crossing on the straight stretch before the bend and then walking on the actual road until they reach the footpath at the bend. This is also a safety risk.

The increase in commuter parking along Avon Road has compounded this problem. Many drivers who park on the non-footpath side of Avon Road walk along the road (with only centimetres between them and the passing traffic) rather than cross the road to walk on the footpath.

Adding more traffic onto Avon Road will increase the safety risks to pedestrians. The traffic report suggests that if the Council builds a roundabout at the entrance to the proposed complex, it might consider including a pedestrian refuge. This would be of limited use; any benefit would be far outweighed by the safety risks to pedestrians from the increased traffic.

9.5 Traffic analysis report does not address impact of traffic movements on residents in surrounding streets

This is a very large scale development. The development proposal certainly expects residents to have and use their cars. The traffic analysis report states that the stage 1 development actually allows for more than the maximum number of on-site parking spaces required under SEPP3 and the Ku-ring-gai Site Reports.

All these vehicles will have to enter and exit the site through private roads leading onto residential streets. This will generate noise and vehicle exhaust pollution for existing houses in these streets. The impact will be particularly severe for residential properties adjoining the proposed driveways. Also, at night residential properties near the site driveways will be affected by the lights of vehicles turning into and out of the site driveways. This is a significant loss of amenity on residential streets.

10. Emergency access to the site is likely to be difficult

At peak hour times during the school term, rapid response emergency access to the area surrounding the proposed development is impeded because of the congestion in both directions on Avon Road and Beechworth Road. This is an existing problem.

Adding 700 to 800 unit dwellers into the area exposes them to safety risks if a police vehicle, an ambulance or a fire engine is urgently required, but is delayed by traffic congestion around the site.

There may also be potential access problems for large fire engines getting into the site.

In the development proposal's Appendix 25 Bushfire Hazard Assessment Report, there is a recommendation that for adequate access to the site by large fire engines there must be 6.5 metre two way all weather roads. I assume that:

- This road width requirement applies to driveways/private roads into the complex that will enable fire engines to get near to the largest buildings in the middle of the site.
- The requirement also applies to fire engines attending any type of fire in the complex (for example a kitchen fire in a unit) not just bushfires.

Because measurements are not shown on the site maps, it is hard to see if this private road/driveway width is achievable for all private roads/driveways to the complex

The Beechworth Road driveway appears narrow and constrained by the boundaries of private properties either side.

The driveway at Arilla Road also appears to be very narrow with a particularly large tree half way down the driveway with a wide trunk and low branches that could obstruct large fire engines. This width of the driveway is also constrained by the boundaries of private properties either side.

It may be that the Avon Road entrance is the only one that could be built with sufficient width for large fire engines to drive through. This hardly seems sufficient access in the event of a major fire in or around any of the 5 large buildings spread across the site.

In the event of a major fire or disaster within the site, emergency access difficulties will be a safety risk to people and buildings inside the complex and to people and homes in the surrounding area.