

126

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

Dear Sir/Madam

Re: Concept Plan (MP_0207) & Project Application (MP10_0219)
Residential Development at Avon, Beechworth and Arilla Roads,
Pymble.

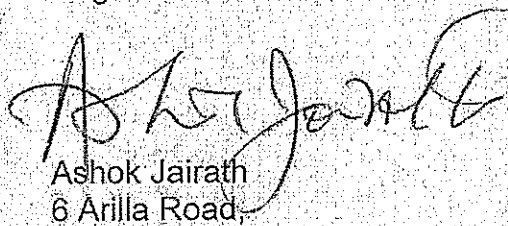
I OBJECT TO THIS PROJECT

There are so many reasons including environmental and bush fire hazard as to why this project is totally inappropriate in this area but my most pressing objection is that of children's safety.

As a father of a child attending PLC I am seriously concerned for her safety and that of the other 2000 plus children at the school in the face of the amount of new traffic that would be generated by 355 units, into an already chaotic and dangerous traffic situation in the proposed constrained area. This has recently been exacerbated by the completion of another unsuitably large development at the top of Pymble Avenue. There is limited access in and out of the proposed area and such an increase in volume of traffic will inevitably lead to a child's safety or life being compromised.

I can only assume that if this project is given the approval to proceed that the lives and well being of so many children are seen of little importance and expendable in the rapacious quest for unfettered development and profits.

Regards



Ashok Jairath
6 Arilla Road,
Pymble
NSW 2073

04/02/2011

cc

(1) The Hon Tony Kelly, MLC
Minister for Planning
Level 34, Governor Macquarie Tower
1 Farrer Place
Sydney, NSW 2000

(2) The Hon Barry O'Farrell, MP
Leader of the Opposition
Parliament House
Macquarie Street
Sydney, NSW 2000

Avon, Beechworth and Anella Woods

Major Projects Assessment

Dear Sir/Madam

My wife Elizabeth and I, both residents of
Pymble for over seventy years strongly object
to the above project.

- Excessive traffic given nature of Beechworth Road.

Two cars can't pass in opposite directions in many
sections due to resident car-side parking.

- We live in Sheldon Forest in a fire prone area
we fear evaluation in time of a fire emergency.

- As long term residents such a development is
totally out of character with our long established
North Shore residential residents.

Yours faithfully
David C. Ward

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2 Kimbarr Rd
Pymble 2073

January 2011

5-2-2011

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

1. 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,

Valerie A. Webb

P.S. I have inspected the plans at Kuringgai C.T. many people in West Pymble already drive to Pymble, park their vehicle, & catch public transport. Already vehicles are parked both sides of surrounding roads to the project & the roads are not wide enough for the safety of 4 cars. With such an increase of population in the proposed blocks of units I fear there will be more accidents.

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January 2011

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Regards,

C. McKellar
43 AVON ROAD
PYMBLE 2073

I OBJECT TO THIS PROJECT.

The rape of the Kuring-gai bushland suburbs of Sydney's Upper North Shore & particularly in AVON ROAD, PYMBLE, together with the parallel extermination of innocent wildlife & beautiful private gardens is the dictatorial creed & fanatical greed of the current Developer who devoid of all sentiment & understanding for the environment's sleek, to transform Nature's wonderland into a "HUGHRISE CONCRETE HELL" rapidly being labelled as "ASIAN HEAVEN-TOWN".

The Developer's proposal suggesting negligible impact on the flow of local traffic along Avon Road, is a complete farce, for even though the two highrise constructions in Avon Road & Pymble Ave. are presently still under construction & units therein still unsold, the increased in traffic-density is ALREADY seriously compounded by the parked vehicles on BOTH sides of Avon Road, stretching from the Avon Road Pedestrian-tunnel to them as far as Avondale Golf Club, and forcing motorists into a two-way bingle line of traffic which backs-up to give way to an equally-long line of oncoming traffic PLUS the coaching & gangs of one vehicle for every Pymble school college pupil adding to the chaos.

The writer is a fourth generation resident of Pymble, his late mother being the FIRST pupil enrolled at Pymble Ladies College in 1916, & MOCATTA Ave. in Pymble is named after her father Judge Mocatta. My mother rode her horse to school each day from WOODLANDS Ave. through a beautiful UNSPOILED bushland & wildlife environment, UNTRAMPLED BY DEVELOPERS. Concrete-bunker orientated anti-Environment Devastations.

The proposed Heights similar to the new monstrosities near the Avon Road Pedestrian tunnel are a travesty & quite absurd for a single residential area, & are well outside the Planning Limits which apply to the site as tabled in the Environmental assessment.

MONEY — the root of all evil —

Sincerely,

Colin H. MacKellar

C.H.W. MACKELLAR

in 19th Ave of Aust. Peters Doretha MacKellar)

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January 2011

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Major Projects Assessment
Department of Planning
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SYDNEY NSW 2001

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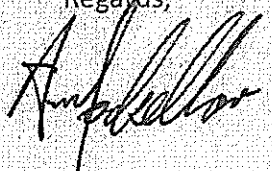
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43 Avon Road
Pymble 2073.

(131)

January 2011

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GPO Box 39
SYDNEY NSW 2001

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Regards,

J. Verhoek

IGUNEME VERHOEK

43 AVON ROAD

PYMBLE NSW 2073.

GPO Box 39,
Sydney, NSW, 2001.

Dear Sir, Re:- Concept Plan (MP 08_0207)
and Project Application (MP 10_0219)
Residential Development at Avon, Beechworth
and Arilla Roads, Yumbler.

I wish to lodge an objection to
the above Concept Plan and Project
Application for the following reasons:-

As you all know there are numerous
reasons why none of us want this
proposal to go ahead.

This area of Yumbler was never meant
to be developed in such a way.

The fact that we can only reach
the Pacific Highway by 2 exits (namely
Beechworth and Livingstone Avenue) - and
none of the roads is wide.

The huge increase in the building

The Traffic report that was seen exhibited was taken 20 months ago (the week of 25th May, 2009) and so it is completely inaccurate, and must be redone.

No mention has been made of fire safety, and the fact that Sheldon Forest and Lofe Park adjoin our area, and should there be a bushfire, the results could be catastrophic.

The notices we received were sent out (intentionally I am sure) just before Christmas, and many people have been away, and so we have had no publicity, and we desperately need this — this week — in the Sydney Morning Herald and the North Shore Times.

There are only 8 working days left before the closure date on 11th February.

If only we could get something in the Press from PLC it would help enormously, and hopefully make many of the 2000 parents aware of the

Quite a number of applications needing the special 3A approval are being pushed through by the present Government before the March State Election, because once the Minister (Mr. Tony Kelly) has granted this approval, an Act of Parliament is needed to revoke it, and this is very difficult (and costly) to achieve.

Thanking you for your attention

Yours faithfully,

(Mrs) Ruaney G. Muller.

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3 February 2011

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

Dear Sir/Madam,

Re: *Concept Plan (MP08_0207) & Project Application (MP10_0219)*
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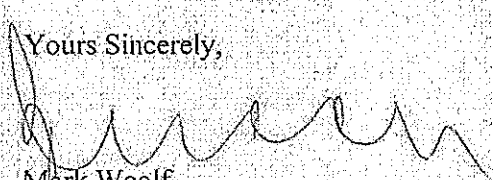
I OBJECT TO THIS PROJECT on the basis;

The number of units proposed (355) and the height of the buildings (11 and 9 storeys for two of the proposed buildings) are too high for a single residential area and the height falls well outside the planning limits that apply to the site as outlined in the Environmental Assessment.

There is 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 train station.

Please record my objection to this project.

Yours Sincerely,



Mark Woolf
14 Jubilee Ave
Pymble NSW 2073

10 Linden Avenue
PYMBLE 2073
NSW

4th February 2011

Major Projects Assessment
Department of Planning
GPO BOX 39
SYDNEY NSW 2001

ATTENTION: Director Metropolitan Projects

Dear Sir/Madam

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

As residents for the past seventeen years, we strongly OBJECT to this project.

The height of the proposed buildings is well outside the planning limits which currently apply to the site as discussed in the Environmental Assessment.

However, our main concern is the number of units/apartments proposed (355). Infrastructure will not cope with the extra traffic loads caused by this very large proposed development.

This area is bordered by The Sheldon Forest (to the North West), Avondale Golf Club (to the South West) and PLC School (to the South East). Current residents have only Beechworth Road and Livingstone Avenue to use to access the Pacific Highway to head North, South or East! Currently, due to the PLC traffic from 7.55am to 8.45 am and from 2.45pm until 3.45 pm, it is not uncommon to wait at the traffic lights at either of these intersections while the lights change up to six or seven times, before we can exit. The line of cars stretches along Avon Road, Everton Street and Livingstone Avenue. This can also be the case on Saturday mornings due to sporting activities at PLC School.

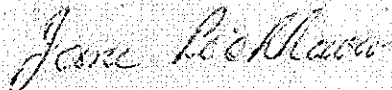
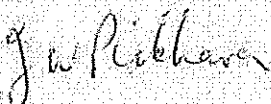
We have yet to experience the additional cars in this area as the Meriton Project in Avon Road fills with new residents and their cars.

This development will cause a huge increase in traffic, making access to the Pacific Highway extremely difficult.

Yours faithfully

John Pickhaver

Jane Pickhaver



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3 February 2011

Director Metropolitan Projects
Major Projects Assessment
NSW 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 NSW.

I OBJECT TO THIS PROJECT on the basis;

The number of units proposed (355) and the height of the buildings (11 and 9 storeys for two of the proposed buildings) are too high for a single residential area and the height falls well outside the planning limits that apply to the site as outlined in the Environmental Assessment.

There is 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 train station.

Please record my objection to this project.

Yours Sincerely,



Colleen Woolf
14 Jubilee Ave
Pymble NSW 2073

3 Dakara Close
PYMBLE NSW 2073
3 February 2011

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

Dear Sir

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Residential development at Avon, Beechworth and Arilla Roads, Pymble**

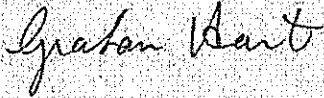
I wish to lodge my objection to the proposed residential development under the above Concept Plan and Project Application.

As a resident of Pymble for over 35 years I have witnessed the enormous growth in traffic volumes in the local roads bounded by Avon, Everton, Arilla and Beechworth roads and other minor roads in the area. As a result the area of Avon Road as entry to PLC is gridlocked at times during the day plus a steady volume of traffic to Avondale Golf Club. In addition much of the all day parking in Avon Road is being taken up by rail commuters living outside the area.

The sheer number of units proposed (355) and the height of the buildings is quite out of character in a single residential area. Besides, the huge number of units being constructed along the Pacific Highway corridor are less than a third occupied, and there is already an oversupply of such units.

For this reason and the impact of more local traffic makes the proposed development unwarranted. Accordingly, I object most strongly to any development as set out in the Concept Plan and Project Application.

Yours faithfully



Graham Hart

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From: Andrew MacDonald <ajm@kimbarra.id.au>
To: Simon Truong <simon.truong@planning.nsw.gov.au>
CC: <assessments@planning.nsw.gov.au>
Date: 11/02/2011 1:27 pm
Subject: Online Submission from Andrew MacDonald of resident (object)
Attachments: ltr Director Met Projects - Concept Plan MP08_0207 10 February 2011.pdf

Please see attached letter

Name: Andrew MacDonald
Organisation: resident

Address:
17 Kimbarra Road

Pymble NSW 2073

IP Address: - 210.215.146.221

Submission for Job: #2919 MP08_0207 - Concept Plan for 5 residential building envelopes of 4 to 11 storeys in 5 stages for up to 355 units with underground car parking and landscaped open space/riparian rehabilitation
https://majorprojects.onhiive.com/index.pl?action=view_job&id=2919

Site: #1833 Avon, Beechworth and Arilla Roads, Pymble
https://majorprojects.onhiive.com/index.pl?action=view_site&id=1833



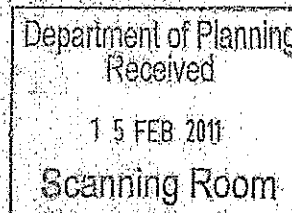
PCU019532

17 Kimbarra Road
Pymble NSW 2073

10 February 2011

Attention: Director Metropolitan Projects
Major Projects Assessment
Department of Planning
By email: plan_comment@planning.nsw.gov.au

With a copy by post to:
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 and in particular to the concept plan.

I have two main reasons for objection.

I also object on the basis that the proposed heights are materially outside the planning limits that apply to the site. The reasons given by the applicant for allowing the excess height are grossly inadequate reasons for the excess and for the site. The applicant's reasons for the excess do not address the significant enduring consequences of that height and size of building for traffic conditions, safety and general amenity in and around the development.

Context of reasons for objections

My two main reasons for objections ultimately lie in two concerns:

- (i) human lives and safety, individually and in wider emergencies; and
- (ii) avoidance of significant building property and land degradation and destruction.

The same underlying issues causing those two concerns will also critically adversely affect daily amenities in a wide locality around the proposed development, principally, traffic use and access.

In summary, a development of the size applied for could not conceivably do anything other than critically overload an already dysfunctional traffic situation extending over many streets around the site and thus affect a large number of residents, as well as non-resident users (commuters who park near Pymble Station, PLC staff, PLC parents, service providers and contractors).

This will in turn critically impact on emergency services, such as police, ambulances, fire engines, State Emergency Service (SES), water and electricity service providers.

The problems will be irretrievably compounded if there ever has to be a mass or sudden evacuation, particularly involving PLC students and staff.

Coinciding with that will be the enduring problem of incapacity to manage peak flows of water torrents. These are highly likely to be increased due to the buildings and landscapes. The proposed storm water management is grossly inadequate, probably due to inappropriate modelling and failure to take into account peak rainfall in the area.

High total rainfall, high short term peaks and high wind gusts, hail and storms are well documented for Pymble. The problems arising from the proposed project are peak problems not only for the site, but for all downstream and nearby residents' property and lives, the downstream natural bushland and ultimately the

Lane Cove River. The reports submitted for assessment of the project are alarmingly deficient in addressing those issues.

For a major project of the size applied for, the detail and the scope of the assessments, especially for bushfire management, traffic and storm water management must be at a commensurately higher standard. Once built, it will be exceedingly difficult to remediate afterwards.

More likely, it will take an individual tragedy (e.g., an inability of emergency vehicles to gain access) or a local disaster to make apparent the gross deficiencies of the current project. These are not matters which ought to be decided on the basis of modelling and quibbling over, say, a 10% traffic increase or an 11% traffic increase over a one hour time period. The potentially catastrophic consequences, for an individual or for a locality, require a development of the project's size to reject as inadequate a concept plan which relies on such pervasively deficient reports.

As we have seen from recent experiences with the Brisbane River flood, Cyclone Yasi, bushfires in Canberra, Perth and Victoria, there can be enormous loss of life, damage to personal and business property and significant, long term damage, including economic damage, as a result of incapacity in physical infrastructure and in services to contain and to manage significant or even extreme natural forces (such as, but not limited to, fire, flood, flash flood and tempest).

It is fallacious to resort to the argument that some natural events cannot be avoided; only mitigated. That has no reference to a project being built from the ground up. That has no bearing when the deficiencies will be created by reliance on reports which are demonstrably inadequate for the project's size and long term, 24 hour/365 day -year implications.

There is a huge risk that an early failure to plan properly for extreme events but instead rely on very limited modelling and plans that have not been tested will lead to extreme adverse outcomes.

Pymble is known for extreme weather peaks.

Let Pymble be thought of as a safe haven from such newsworthy extremes, as a non-exhaustive illustrative list:

- Pymble had a significant wind tempest in 21 January 1991 causing major loss and damageⁱ.
- The fires in Lane Cove River Forest in January 1994 rained down embers in the part of Pymble near the proposed development (we were there at the time; perhaps the experts were not). This emphasises how (i) fire can spread in Pymble skipping over intermediate neighbourhood; and (ii) how the locality is potentially at risk of a short term, comprehensive evacuation crisis. It seems to be a recurring feature of Australian regulatory governance that lessons for bushfire management are not learnt until well after disaster has struck (recall at least the Canberra and Victorian bushfires and the commissions of enquiry which followed). Ideally, consideration of this project's concept plan will not make similar mistakes and so will not rely on grossly inadequate bush fire risk management reports.
- Flash flooding occurred in Pymble in February 1996ⁱⁱ.
- In April 1998 heavy rain falls, including peak rains in Pymble, caused flash floodsⁱⁱⁱ.
- Significant rain and flash flooding occurred in Pymble in January 1999^{iv}.
- Hail storms over Sydney 14 April 1999 caused widespread and massive damage.
- Bushfires were alight in the Lane Cove River State recreation area in January 2002, affecting South Turramurra and Pymble.
- During the December 2001 Sydney storms, one official storm spotter recorded hailstones at Pymble measuring 3cm in diameter^v. At that time, Pymble was the site of two storm cells merging, increasing the intensity of the storm over Pymble.
- In December 2003, a heavy downpour caused flooding in Pymble^{vi}.
- Moderate wind frequently fells trees or major boughs, blocking roads, including one-exit/entrance roads. A major tree blocked the North Shore railway line at Pymble as recently as 2 August 2010.

Roads in the locality around the site are regularly totally or partly blocked by fallen trees or boughs, frequently bringing down power lines too.

In view of the known peak ferocious weather conditions in and around Pymble, a major development this size should have reports on key issues to a degree commensurate with the potential impact. The reports submitted to date are materially deficient in meeting those standards and potential impacts, to the point that if they are relied upon to approve the concept plan, then those individual persons who approve it ought to have their names inscribed on stone monuments in and around the development, so affected persons or their family may later know exactly who is responsible for approving the flawed designs.

The traffic situation in the local streets nearby the proposed development is far worse than appears from the traffic report. These are known issues from daily living around the area for over 17 years, compared with a few hours' work over a couple of days and then processed under flawed assumptions and defectively constrained modelling. Reliance on the reports is setting up the development for significant failures in at least traffic use and access, storm water management and bushfire risk management.

I do not object on the basis of minor increases of inconvenience in local traffic, increased noise, loss of trees, loss of natural heritage and adverse change in character of the neighbourhood. The NSW Government has made it clear that these are not matters legally to be considered as relevant or important.

This project of this size will unavoidably lead to utterly dysfunctional traffic at key times over at least 6 days a week and will most likely lead directly to later incidents of severe loss and harm as a result of incapacity to handle peak storm flows, emergency vehicle access, individually and comprehensively during local emergencies.

On reading the application and the accompanying reports, it is easy to get the impression that the size applied for has increased not only as part of the usual tactic of overreaching, but also because the stakes of the development have increased so that more units are needed to compensate for the costs of development. I have no problem with development and those involved earning a profit. The point is that this change in the project size, with scope for a further increase of 45 units more has the hallmarks of an inadequately designed and ill-prepared major project extending beyond the logic and feasibility of earlier proposals and in the course of a flurry of inadequate reports, it is at risk of bedazzling advisers and supporters because the risk of failure is getting too high for those involved in it.

The ultimate risk, however, lies with residents in and around the project, for years after it is built.

Need for sufficient evidence and robust modelling

In making this objection, I confirm I have read the Environmental Assessment report, including the many reports attached as Appendices.

The characteristic features of those reports are:

- They are strictly technical responses, following minimal requirements, rather than addressing the substance of issues. For example, the traffic report ignores actual traffic speed, Saturday morning peaks, and the effect of the subsequent opening of new units at the corner of Avon Road and Pymble Avenue.
- The reports tend to be narrow (e.g., bushfire response for the development only, not taking into account the inevitable effect of bushfire activity and rapidly changing responses elsewhere in the locality). There is little or no assessment of the *overall* impact of the locality, including bushfire access management. The analysis of the "public access" for fire response is misleading and inadequate in that it does not take into account peak traffic flows (which could 100% prevent access by road, suggesting an all-terrain access fire engine would be required).
- There are frequent material inaccuracies:
 - E.g., in respect of Avon Road parking, it is stated: "Direct access to the site will be off Avon Road. The section of Avon Road, west of Everton Street has a four lane undivided carriageway (including parking) reducing to three lanes (9m) east of the right angle bend opposite No 1 Avon Road; the remaining section of Avon Road has a three lane undivided carriageway (about 9m)."^{vi} In fact, it rarely operates as four lanes – traffic at peak times frequently is reduced to one lane for both directions, due to bad car placement on the carriageway, bad parking and lengthy queues for turning vehicles.

- o There is no evidence cited to support using the 2002 RTA guidelines of 0.29 peak hour trips per unit. There is no allowance for the likely kind of dwellers relative to their car usage or sociological factors in relation to the location of Pymble (which are material because they underpin the planned style of accommodation and the planned sale prices). A better assumption would be to take the actual peak period trips from the new unit development at the corner of Avon Road and Pymble Avenue.
- o There is no assessment of whether the RTA assumption of "good access to public transport" applies to Pymble. It seems to be inferred that the railway line automatically applies as "good access". We would all like to think that is the case, but in fact it does not necessarily qualify as "good access to public transport". There should have been an examination of the actual usage of the railway services compared with the likely usage by the occupants of the new units. It is grossly inadequate, for a project of this size, to assume that most residents of the 355 to 400 units (as scoped in the reports) would be train commuters. If so, why have so many car parking spaces prepared for in the project?
- o While the traffic report summarised traffic data over short periods over two days, the peak usage was summarised for only 7:15 am and conclusions appeared to be based on the curtailed data, let alone a more realistic assessment not covered by the report: until 8:15 a.m. Actual daily experience over many years has shown the peak is from 7 am to after 9: am. It is highly inaccurate to make such a report based on data over two days, not taking into account variations close to 9:00 am (in view of the PLC traffic), variations over Monday to Friday (which I have experienced daily for over 17 years), variations at different times of the year relative to seasons, school terms and public holidays (which can either exacerbate or lessen the traffic, depending on the timing). For a project of this size, it is highly inaccurate to extrapolate from data collected over a couple of hours two days in late May for an outcome that will have effect 24 hours a day, 7 days a week, for all the years to follow.
- o The peak usage ignored Saturday morning, when frequently the traffic in the streets immediately around the project site can be far worse, to the point of regularly being stationary or near stationary for 20 minutes or more, *even outside of PLC school term.*
- o There is no consideration of the *actual effect* of the model's increased numbers of vehicles. The traffic report appears to assume that an increase in numbers has no other effect than putting more cars on the road. However, in real life it is not as though a 10% increase is simply 10% more cars, even if that modelled 10% increase will be proven to be accurate (which I doubt). Rather, traffic in that locality gets to a critical stage where, due to volume, sight lines at intersections (including Arilla Road and Avon Road, and the bend in Avon Road), parking, badly positioned parking, bad driving habits (large cars taking up two lanes, school traffic sitting outside the confines of a right turn bay), *traffic comes to a standstill* for a long period of time. Not just slow – *a complete standstill.*

Imagine an ambulance, fire engine, SES vehicle or electricity repair vehicle unable to travel in those streets, *at all*

The data in the Traffic report's Table 3.4 for Operational Delays at intersections defies belief, since they are so remote from the reality.

It is alarming that a project of this size could ignore, or be dismissive of, such real life experiences of the traffic in the immediate locality.

- The modelling does not address realities.

- o The use of modelling for roundabouts does not address real life actualities, as demonstrated by the recurring failure of the roundabout at the top of Pymble Avenue. For example, in real life (not the dreaming of "ModelWorld" which is used for the environmental assessment), on a daily basis we see cars *unable to exit* from the car park of the new units immediately on the roundabout for extended periods; *cars stopping in the roundabout* to let off passengers for the railway (children and adults); cars stopping on the pedestrian crossing or in the no-stopping zone nearby to let passengers alight or to collect them, affecting traffic going into or out of the roundabout.

A roundabout for the Avon Road frontage of the proposed development site, whatever size, should not be based on inadequate and unrealistic modelling of roundabouts without regard

to real experiences in the locality and actual human behaviour, particularly in narrow roads, particularly near a railway station close to a large school.

The railway-commuter car parking is now stretching down Avon Road from the bend. This has suddenly increased as a result of the loss of car parking on the road near the pedestrian tunnel under the highway, due to the new units at the top of Pymble Avenue (something not addressed by the outdated traffic report).

The proposed street sign changes for reducing parking and the proposed new roundabout will push commuter traffic back further, and thus exacerbate difficulties in narrowed roads, limited sight lines at intersections, increase temporary double parking, encourage misuse of the new roundabout (As regularly occurs in the Pymble Avenue roundabout) and, ultimately, also the dangerous stopping behaviour of drivers in and around the roundabout at the top of Pymble Avenue.

- o Despite long, slow queues of traffic along Pacific Highway in afternoon peak hours, sometimes extending well beyond 7:30 pm, the Traffic Report states that "Traffic generated by the proposed residential development is not likely to affect the operation of these two intersections." No explanation or analysis is given - it is just an assertion, which is grossly deficient to support a project of this size and potential impact, especially since it is so comprehensively inconsistent with actual experience of the area.

On the contrary, from extensive actual experience over many years, there is a two to three hour window in the afternoon peak when the traffic on the highway near there is so bad that we make no attempt to travel north along the Pacific Highway beyond the intersection with Mona Vale Road. The only feasible access other than sitting in crawling traffic is to travel down Mona Vale Road, enter a side street to get to Livingstone Avenue then travel up to Everton Street.

Sometimes, the traffic along Pacific Highway in the afternoon on regular work days is so bad all the way down to Linfield, that the only feasible way to avoid stopped or crawling traffic is via back streets in East Gordon approaching St Ives, then down Mona Vale Road. (The approach from North Ryde along Mona Vale can be worse and The Comerara Parkway frequently blocks to a slow crawl of traffic, due to the volume of traffic using it and the roundabout at West Pymble).

The Traffic report seems to have little or no reliance on actual, regular experiences of the peak afternoon traffic on the Pacific highway.

- o So, when the traffic report (at 3.4) states: "In view of the existing traffic volumes on the surrounding road network, it is unlikely that traffic generated by the proposed residential developments would have an impact on the amenity of residences along these streets," it is utterly divorced from daily recurring experiences and is fundamentally flawed due to poor modelling, poor assumptions, poor design of the modelling and poor data.
- The storm water management report is deficient because it does not account for the weather patterns in Pymble. This flaw is common with flaws in modelling elsewhere in Australia. There has been an undue reliance on statistical modelling for peak events that are generalised and, ultimately, show little relevance to the locality. This modelling for a 100 year peak may in fact only be modelling for a statistical approach to a generalised 100 year peak which is not at all a 100 year peak for the locality. (Consider how often supposedly "100 year" peaks in floods, rain fall peaks and storm water torrents are regularly exceeded.)

For a project of this size and locality, the storm water management ought to be focused on the actual data for the locality and cover much more than a model's statistical 100 year benchmark due to the unsafe illusion of safety margin in that assumption.

After all, who wants to approve the development and later deny responsibility for loss and damage on the basis that the storm water management report relied on hitherto acceptable modelling yet known to be deficient for the locality?

In a project of this size, whether it be the 150 units proposed in 19995, the 240 units proposed in 2009 or the 355 units proposed in the current plan, there is an increasing need for the project to be considered on the

basis of real evidence and very robust modelling, rather than conjecture or glib assertions (whether by the developer, by local residents or those responsible for considering the development application).

Road Use

Before the new units at the corner of Arilla Road and Pymble Avenue opened in 2010:

- Morning car traffic on Saturday mornings regularly backs up all the way *into* Arilla Road, over 1.7 km away from the intersection of Livingstone Avenue and the Pacific Highway.
- Morning car traffic on a week-day regularly backs up into Avon Road, beyond the bend.
- This deficiently excludes the effect of new car traffic from new units at the corner of Avon Road and Pymble Avenue. Since this complex is only steadily filling with residents, the full impact of its residents on traffic is yet to be known.
- These traffic banks occur regularly *outside* of PLC school term.
- At the commencement of the 2011 school year, PLC school traffic added to the local traffic and caused the cars existing Beechworth Road to back down, at a crawl to nearly Kimbarra Road, and also caused a bank up of traffic down Mayfield Avenue and also into Arilla Road (that is, travelling away from PLC).

It will be inevitable that a project of this size will lead to its residents trying to exit into Beechworth Road to access the highway but will be unable to exit even onto Beechworth Road without difficulty and without causing more bank up of traffic back to PLC's parent access gates on Avon Road.

After the new units at the corner of Avon Road and Pymble Avenue commenced occupation, during these morning peak periods it has been observed that cars cannot exit from the car park entrance/exit of the new units at the roundabout near the corner of Avon Road and Pymble Avenue due to the banked (i.e., stationary/crawling) traffic.

This is exacerbated because of a strong, recurring pattern of drivers entering the roundabout and blocking it, becoming stationary in the roundabout.

There are regularly times when traffic is at a standstill along Livingstone Avenue near the Pacific Highway, Everton Street, Pymble Avenue, Avon Road, through to Arilla Road, in both directions, so that cars cannot leave or enter the car park under the new units at the corner of Avon Road and Pymble Avenue.

We have regularly been in situations where cars, previously stationary for extended times, are turning around in Avon Road or in Arilla Road to reverse direction to approach Pacific Highway from Beechworth Road. Worse, car drivers travel along Avon Road on the wrong side, to pass traffic at a standstill (assumed to be headed for the lights at Livingstone Avenue and Pacific Highway), and then they go over the roundabout (because the roadway is blocked) and then travel down Pymble Avenue, circumventing the stalled traffic waiting for exit to the highway at Livingstone Avenue.

These recurring extended blockages, regularly occurring, 6 days a week, throughout the year, must raise serious doubts about safety in emergencies, let alone cause serious concerns about daily amenities for residents in adjacent and nearby streets.

It is obvious that there ***only two entrance/exit points from the highway*** for numerous residents as far away as Quadrant Close, the end of Beechworth Road, Kimbarra Road, Jubilee Avenue, Myoora ~~Street~~, Albion Avenue, Ashmore Avenue, Lawley Crescent, St Andrew's Drive and Troon Place. This applies for daily amenities and for emergency services – Beechworth Road and Livingstone Avenue via Arilla Road, Avon Road and Everton Street.

The potential requirements for emergency vehicle access are heightened by the dense bush adjoining many of those roads' properties.

Even an exit via Pymble Avenue and via many streets to Mona Vale Road is difficult to access due to the frequent banked traffic congestion on upper Pymble Avenue and Avon Road (unless drivers travel on the wrong side of the road to bypass the stationary traffic, which regularly occurs).

Commuter car parking is already increasing along Avon Road, reaching Arilla Road. This has rapidly increased, in my experience, over the last couple of years.

At times of significant PLC activities, including sport on Saturday and major school events, PLC-related parking increases along Arilla Road and sometimes beyond. With commuter car parking numbers steadily increasing in that area, and more car spaces being lost due to signing changes, commuter and PLC-peak street parking would inevitably increase beyond Arilla Road.

The significance of this safety and amenity issue includes:

- Traffic lights at Beechworth Road and Pacific Highway and Livingstone Avenue and Pacific Highway are currently inadequate to serve peak loads at least in morning traffic, including on week-ends, even before an increase due to full occupancy of the new units at Pymble Avenue/Avon Road.
- Emergency and safety vehicles, such as ambulances and fire engines, would have severe difficulties in having access in and around those areas.

PLC has only one entrance and exit point for school parent traffic. Both are in difficult positions for efficient or even tolerable traffic flow and both immediately and significantly impact on non-school traffic, including commuter traffic, services and emergency and utility vehicles.

It is of significant concern that the principal behind the development application, Mr. Neale, could be reported¹⁰⁰ as saying that traffic would actually be reduced during peak hours because residents would walk to the area's two major destinations – PLC and the Pymble Station. This attitude is staggering in its remoteness from reality, lack of basis in evidence and is a fundamentally poor foundation to receive development approval.

- First, the "old homes" he refers to as supplying the project's residents for 355 - 400 units will have their own new occupants, possibly more in number due to more development. Those new occupants will have cars and overwhelming will commute from Pymble.
- Secondly, it assumes the net change in the locality's residents will be nil, wrongly ignoring a net total of new occupancy from at least 355 units.
- Thirdly, it blithely assumes no resident of the 355 units will commute by car, ignoring the implications of having car parking spaces for 355 units.
- Fourthly, it ignores the inevitable service vehicles tending to the residents.

In short, the area suffers major traffic congestions already, particularly at peak times, over 6 days. The traffic will increase due to a number of factors, some not at all addressed in the traffic report submitted for the project.

The only comment in favour of the project's traffic implications, Mr. Neale's reported comment that traffic would reduce, defies belief and is contrary to 17 years' daily experience of the traffic in the area, some of which has been spent sitting in a car in Beechworth Road, Arilla Road, Avon Road, Everton Street and Livingstone Avenue, waiting for extensive periods for traffic to move, hoping that there will not be an accident beside me while other cars drive on the wrong side of the road to circumvent the stalled traffic.

Water run off

The concept plan does not adequately, or safely, account for management of water runoff from the buildings of the proposed development.

A major concern, and point of objection, is the report submitted for approval of the project fail to have robust modelling relevant to the site, so approval on that basis would lead to poor development plans which in turn will lead to long term significant degradation and at peak times, disastrously distinctive volumes.

My experience of this issue comes from (i) having a natural watercourse from Sheldon forest travel through our property and (ii) regular walks before during and after rain and bushfires along Sheldon forest and its many watercourses and throughout the Lane Cove River Forest.

Obviously our watercourse is on a much smaller scale than the watercourse through the proposed development's site. Also, the proposed development has far larger and more sophisticated water management plans. I do not make the same mistake of extrapolation from a smaller site I am very familiar with to the project's site. The point, though, is that the actual experience spurs awareness that modelling does not often reflect reality, and that it is the peak events, not yearly totals and yearly generalisations, that cause massive damage over a large course of the water flow downstream.

I challenge whether the suppliers of expert reports to the development proposal and the regulators who vet it have ever actually seen what happens in the locality after rains and fires in the locality and know how much things have changed over several years.

In my direct experience, the actual watercourses feeding into the Lane Cove River from the western side of the ridge along the Pacific Highway at Pymble and Turramurra range throughout the year from mostly dry, to small trickles to raging torrents.

The raging torrents have huge volumes and speeds of water, at very high levels, moving at tremendous speed, carrying silt and debris, natural and manmade. They transfer huge amounts of debris, natural and manmade, destroy vegetation in their path and lower down the system in and around the River, deposit enormous bodes of sand (in volumes higher than a house). This is apart from distributing weeds along the river system.

This has increased over the last 17 years, and relatively more so in the last few years.

Storm water culverts have not accommodate the torrents and in fact cause damage and flooding by way of creating dams due to stopping vegetation barriers. In other words, inadequate storm water infrastructure cause problems mostly in the peak torrents, when the destructive force is most applicable – the storm water management infrastructure fails when it is most needed – at the top peaks, due to grossly under estimating Pymble's peak flows.

The main consequence from the increasing peak flows is that the drainage system, whether natural, man-made or adapted, must plan for and accommodate the inevitable occasional huge peaks of torrents which *actually* occur in the area. This applies to all parts of the system, from the top of the ridge line down to Lane Cove River, since it is all part of one system.

For example, the project's massive development of units near the top of the ridge line might not itself be damaged by peak torrents, but its buildingscape and its landscape could cause enormous increase in the destructive force of a higher peak torrent after the water leaves the boundary line of the development. This could have devastating effects on properties in and around the water courses below.

Given the massive effect on accumulating water from the design of the project, the modelling of water retention and water velocity after leaving the site must be checked to an extremely high degree, given the potential impact on the entire system downstream.

If the project's proposed storm water retention storage fails, or fails to accommodate the *high short term* peaks, or fails to reduce velocity of water or fails to manage debris in the water torrents, there is highly likely to be increasing severe property damage.

I object to the concept plans because the concept plans omit the degree of actual local research data and modelling appropriate for the peak water events likely to occur in the locality. There is substantial risk that indicative approval to proceed may rely on superficial identification of these issues without adequate detailed analysis commensurate with the size of the project and the size of the consequential effects downstream, both in normal weather events and in peak weather events.

Further Steps

The key reports for the concept plan fall materially short of the standards needed to advance this stage.

There is an unacceptable risk that even indicative or in-principal approval will later lead to compromises, oversights (deliberate or otherwise) and adaptations that do not take into account factors not considered by the concept plan's reports.

I strongly recommend:

1. The concept plan not be approved in its current form.
2. The development not proceed without adequate traffic management based on recent and reliable evidence appropriate for the locality and the size of the project. The traffic analysis must directly address issues of individual emergency vehicle access and egress (e.g., ambulances and fire engines); wider emergencies (bushfires, major building fires at PLC or golf course) and daily peaks, morning and afternoon, Monday to Saturday. The report must use more comprehensive, relevant and local data, not rely on isolated, unrepresentative data or unsupported assertions and generalisations.
3. The development not proceed at all without primarily rely on new access directly to the Pacific Highway (and not just at Beechworth Road close to the Pacific Highway).
4. The development not proceed without extensively detailed analysis of water management, both for the site and down to the Lance Cove River, particularly having regard to the cumulative effect of water torrent volumes and speed at peak times specific to the site.

Yours sincerely

Andrew Mac Donald

Andrew MacDonald

¹ From article *Meteorologist recalls January 21, 1991*, 20 January 2011, North Shore Times:

"The massive storm - our most ferocious since 1914 - struck the North Shore from the north-east at 4.40pm, devastating St Ives, Pymble, Turramurra and Wahroonga, with hail, flash flooding and wind gusts of up to 230km/h.

One person was killed and more than 10,000 houses and 50,000 trees were destroyed, with damage estimated at \$138 million.

Weather Channel meteorologist Whitaker said the storms were the biggest since a tornadic thunderstorm struck Lindfield in November, 1914.

Whitaker, who was driving home from the Central Coast, said: "My initial thought was that it was a tornado but it was a severe downburst storm or microburst.

"Trees were blown everywhere but they were all blown down in one direction.

"There was also a lot of hail that was blown at high speed and some hail hit a tree in my front yard and the whole tree looked like it had been hit with a scattergun."

The Bureau of Meteorology described the storm at the time as the worst natural disaster on the upper North Shore since settlement.

A massive clean up involving volunteers and emergency services cleared 50,000 cubic metres of vegetation from houses and streets involving more than 1500 workers, 502 vehicles, 42 trucks, cherry pickers and so-called "high towers".

Whitaker said the North Shore ridge along the Pacific Highway exposed the area to thunderstorms.

"The North Shore has a perfect set-up for thunderstorms and has a history of severe thunderstorms," he said.

"The elevated terrain along the North Shore ridge assists the storm development."

¹⁶ At Pymble 22mm of rain fell in 15 minutes which caused flash flooding.

on the website of Bureau of Meteorology, accessed at http://reg.bom.gov.au/inside/services_policy/public/siqwxsum/siqw0296.shtml

¹⁷ 9-10 April 1998

Heavy rain causes flash flooding in Sydney

Heavy rain and thunderstorms occurred over the Sydney Metropolitan area late Thursday 9 April and into Friday 10 April. Much damage was reported primarily due to flash flooding. Tragically, a young boy drowned after he was swept away in a swollen creek on Friday afternoon. Hundreds of SES workers and volunteers battled to protect homes around the Narrabeen Lake area, on the northern beaches, as levels rose to a 15-year high. Three houses were evacuated at the beach suburb that were threatened by a torrent of stormwater coming over a cliff at their rear. About 5,000 homes lost power after the heavy rains were concentrated on the coast between the Hunter & Illawarra districts. The total damage bill was \$10 million.

The event was caused by an upper level system interacting with warm, moist onshore flow lifted by a trough off the coast. Some rainfall totals in the 48 hour period 9am Thursday to 9am Saturday include:

- Belrose 293mm,

- Frenchs Forest 260mm,
- Observatory Hill 239mm,
- Avalon 209mm,
- Pymble 202mm,
- Gordon 200mm"

From the website of Bureau of Meteorology, accessed at <http://reg.bom.gov.au/nsw/sevwx/9000summi.shtml>

^{iv} "1st At Pymble/Schofields (Metropolitan) 26mm of rain fell in 20 minutes at Pymble and 32mm in 30 minutes at Schofields. Flash flooding occurred in the Ryde/Pymble area and the Schofields/Box Hill area."

From "SIGNIFICANT WEATHER - JANUARY 1999" on the website of Bureau of Meteorology, http://www.bom.gov.au/inside/services_policy/public/sigwxsum/sigw0199.shtml

^v Reported by the Bureau of Meteorology, accessed at: http://reg.bom.gov.au/inside/services_policy/public/sigwxsum/sigw1201.shtml

And see page 5, "HAILSTORMS AND THE ESTIMATION OF THEIR IMPACT ON RESIDENTIAL BUILDINGS USING RADAR", Sandra Scheuster and Russell Blong, Natural Hazards Research Centre, Macquarie University, paper presented at the Sixth International Symposium on Hydrological Applications of Weather Radar, February 2004. Summarised in "Hail damage on Radar", Risk Frontiers, September 2003 newsletter of the Natural Hazards Research Centre, Macquarie University, accessed at http://www.riskfrontiers.com/nhq/rfnews3-1/RFnews3_1.htm.

^{vi} "On the 4th at Pymble (Metropolitan) flooding resulted after 20mm of rain fell in 10 minutes."

From the website of Bureau of Meteorology, accessed at Bureau of Meteorology, accessed at http://reg.bom.gov.au/inside/services_policy/public/sigwxsum/sigw1203.shtml

^{vii} In paragraph 3.1.1 of Parking & Traffic Report, Geniaoui Consulting Pty Ltd, November 2009.

^{viii} North Shore Times, 4 February 2011