

Subject: Objection to CPDM Development Proposal: 3-9 Park Ave, Gordon

To whom it may concern:

I am writing to formally object to CPDM's development proposal at 3-9 Park Avenue, Gordon (SSD - 78775458). It's concerning to see that the project, as described, places profit above the protection and preservation of this area's heritage and the community's well-being.

We need to carefully assess what defines "State significance," particularly focusing on the heritage homes and the Gordondale Heritage Conservation Area situated immediately opposite the site, that the proposal seems to overlook entirely.

This initiative appears to opportunistically exploit 'affordable in-fill housing' and 'Transport Oriented Development' planning laws to fast-track approvals for a set of overbearing and excessive high-rise apartments. The design maximizes density and superficially appeals to Government interests in housing supply, risking the neighbourhood's heritage significance and value.

Critical issues include:

Excessive Height: The proposed 9-story structure will dominate the east side of Gordon, imposing a heavy presence over heritage properties and compromising sightlines, privacy, and the character of the Gordondale HCA.

Inadequate Design: The building is a discordant box-type structure, ignoring the aesthetic of local heritage and streetscape. It prioritises density over visual and social harmony among existing homes. What is proposed is an abrupt and jarring interface between high-rise apartment blocks and existing low-rise heritage dwellings. We need a proper strategy to 'recognise, protect, and enhance heritage' as recently noted by NSW Heritage Minister Penny Sharpe'.¹

Heritage Disregard: The proposal neglects the historical significance of the area, dating back to the 1830s. According to the NSW Heritage Manual² and case law³, context, streetscape, and visual integrity are crucial, which this proposal does not respect.

Divergence from Council Recommendations: The proposal clashes with Ku-ring-gai Council's Preferred Scenario, developed through community consultation, which includes superior management of local character and scaling transitions, as acknowledged by the Developer.

Narrow Community Engagement: The proposal selectively ignores vital community feedback regarding its incompatibility with heritage sites. The Social Impact Assessment inaccurately minimizes the community's concerns.

Traffic Concerns: The development's 100 apartments will exacerbate traffic congestion, particularly at the Pacific Highway junction, creating additional safety problems and echoing community feedback from Council's recent survey regarding its Alternative Preferred Scenario .

Environmental Impact: The removal of over 35 trees will damage the natural landscape, erasing habitats for native species like Kookaburras and Echidnas.

Absence of Community Benefits: This project offers no tangible benefits to our community, instead threatening to erase Gordon's heritage and natural beauty.

This suburb deserves better!

Michelle Shannon

¹ Revealed: The plan to protect Sydney's heritage buildings, Julie Power, SMH, 18 May 2025.

² NSW Heritage Manual (pages 4 and 7).

³ Scott v Woollahra Council [2017] NSWLEC 81, which upheld that visual relationships and setting between heritage items are material to their ongoing value.
Millers Point Community Assoc Inc v Property NSW [2015] NSWLEC51, which found that the social and environmental context of heritage items was critical to their assessed significance.