

Submission Against SSD-82395459 – Proposed Development at Burgoyne St, Burgoyne Lane, and Pearson Ave, Gordon

Dear Planning Officer,

As a long-term resident of Gordon living in the immediate vicinity of the proposed development site, I am writing to formally object to the proposed State Significant Development (SSD-82395459) submitted by Develotek Property Group. The scale, character, and process surrounding this development raise significant concerns across multiple critical areas. I urge the Department to reject the current proposal for the following reasons:

1. Flawed and Misleading Traffic Impact Assessment

Inadequate Data Collection

The traffic impact assessment relies on a single day of traffic data (22 October 2024, 7–9am and 4–6pm), which is grossly insufficient to represent the typical traffic conditions in this area (Appendix 10, Section 3.4). A more robust, multi-day study is required.

Critical Intersections Omitted

The analysis omits major congestion points, including the junctions at:

- Park Avenue and Wade Lane
- Park Avenue and Pacific Highway

These intersections regularly experience gridlock during peak hours. Exclusion of these choke points renders the analysis incomplete.

Pedestrian Crossings Ignored

The zebra crossings on Park Avenue, Werona Avenue, and Pearson Avenue carry substantial pedestrian traffic. Increased foot traffic from this development will directly impact vehicle movement, exacerbating delays and safety risks. These pedestrian effects are not adequately considered.

Misrepresentation of Street Configuration

The modelling fails to reflect that Pearson Avenue and Werona Avenue are not directly aligned. Vehicles must turn onto Park Avenue before proceeding. This routing complication—especially with Park Avenue frequently queued by Pacific Highway traffic lights—further undermines the proposal's traffic viability.

Lack of Transparency in Modelling Assumptions

The traffic model does not disclose key assumptions such as:

- Time for vehicles to exit Pearson Ave
- Time to enter/exit Werona Ave
- Interaction with Pacific Highway traffic light cycles
- Pedestrian crossing frequency and delay impact

Without this transparency, the model's reliability is questionable. The conclusions drawn should be discarded as unsound.

2. Disingenuous and Ineffective Community Engagement

Community engagement has been superficial at best. A black-and-white flyer was placed in my letterbox, with no identifying markers to confirm its legitimacy. Calls to the listed number went unanswered.

This minimal outreach fails to meet the Department of Planning, Housing and Infrastructure's (DPHI) own Social Impact Assessment guidelines. There were:

- No community briefings
- No webinars or information sessions
- No effort to address resident queries

The proponent's Social Impact Evaluation is pseudo-scientific. Statements like "Almost Certain + Minor = Medium" are presented without context or methodology. Key mitigations (e.g. Visual Impact Assessment) lack explanation and fail to address residual impact risks. This reduces the evaluation to a box-ticking exercise.

More importantly, the developer has completely disregarded the Ku-ring-gai Council's **Preferred Alternative Scenario**, which explicitly excludes this site from high-rise development due to its environmental and heritage significance.

This is not genuine community consultation; it is tokenistic and misleading.

3. Unacceptable Impact on Heritage and Conservation Areas

The proposed twin towers directly abut the **Gordondale Estate Conservation Area**, a heritage precinct of significant cultural value. Additionally, the properties at **9 Burgoyne Street** and **8 Pearson Avenue** are individually heritage-listed.

Despite this, the proposal offers no credible visual integration or transition between high-rise and the existing low-rise heritage homes. The contrast in scale and style is stark, abrupt, and incompatible with the character of Gordon.

The development will irreversibly alter the streetscape, destroy the visual harmony of the area, and undermine the preservation efforts of both the Council and the community.

4. Severe Environmental and Tree Canopy Loss

The proposal includes the removal of **62 out of 115 trees**, including mature native and exotic specimens, some dating back to the Federation era. This represents over **50% of on-site tree loss**, with unclear survival prospects for the remainder due to lack of root mapping or preservation planning.

There has been no attempt to preserve trees of significance. At minimum:

- All trees over 5m in height should be retained.
- A post-construction health guarantee (e.g. bond with two-year monitoring) should be mandated for remaining trees.

The cumulative environmental damage from this level of canopy loss is unacceptable and contrary to Council's environmental policy.

Conclusion

This proposal is an opportunistic misuse of housing and transport policy to push through an overbearing, ill-suited, and environmentally destructive development. It:

- Ignores key planning principles,
- Undermines local democracy and Council plans,
- Dismisses community concerns,
- Damages Gordon's character beyond repair.

I respectfully urge the Department to reject this application and refer it to the **Independent Planning Commission** for a comprehensive and transparent review, including public hearings and site inspections.