

To Ms Kiersten Fishburn
Secretary
NSW Department of Planning, Housing and Infrastructure
Submitted via the NSW Major Projects Portal

12 June 2025

Dear Ms Fishburn,

Objection to State Significant Development Application SSD-82395459 – Residential Flat Buildings at 3a,3b,5a, 7 Burgoyne and 1&3 Pearson Avenue and 4 Burgoyne Lane, Gordon

This submission objects to the proposed State Significant Development (SSD-82395459) for residential flat buildings in Gordon, NSW, citing significant environmental, heritage, and community impacts. Key concerns include:

1. **Non-Compliance with Planning Frameworks:** The proposal's scale, height, and design fail to align with Ku-ring-gai Council's draft Local Environmental Plan (LEP) and Transport Oriented Development (TOD) Preferred Scenario (5 June 2025). It undermines mediation efforts between Ku-ring-gai Council and the NSW Government, ignoring community consultation and strategic planning to protect heritage and biodiversity.
2. **Environmental and Biodiversity Impacts:** The development threatens Ku-ring-gai's urban forest and biodiversity by proposing the removal of 62 trees, including critically endangered Blue Gum High Forest and Sydney Turpentine Ironbark Forest. The Environmental Impact Statement (EIS) lacks a comprehensive biodiversity assessment and fails to address impacts on threatened species, such as the Grey-headed Flying-fox and Powerful Owl, or the ecological corridor connecting Lane Cove and Garigal National Parks.
3. **Heritage Concerns:** The proposed high-rise structures, up to 26 meters, are incompatible with Gordon's low-density, garden-suburb character and heritage conservation areas (HCAs). The development risks overshadowing heritage-listed properties, contravening Clause 5.10 of the KLEP 2015, which mandates heritage protection.
4. **Traffic and Infrastructure Strain:** The addition of 106 apartments will exacerbate congestion on Burgoyne Street, Pearson Avenue, and surrounding roads, with insufficient traffic and parking studies provided. The proposal also risks overwhelming outdated sewerage and water systems, increasing environmental degradation through stormwater runoff.
5. **Affordable Housing and Design Deficiencies:** The EIS lacks evidence of a registered community housing provider or agreement, failing to meet NSW Government affordability standards. The design is described as unsympathetic, with excessive bulk and scale disrupting the streetscape and local amenity.
6. **Social and Community Impacts:** The development threatens residents' quality of life, contributing to "solastalgia" (distress from environmental degradation). It offers no community benefits or infrastructure upgrades, risking strain on existing services.

Conclusion: The SSD-82395459 proposal should be rejected due to its non-compliance with local planning, severe environmental and biodiversity impacts, heritage incompatibility, infrastructure inadequacies, and negative social consequences. It fails to respect Gordon's unique character and the community's efforts to preserve it.

Yours sincerely,
Janine Kitson