

27 September 2016

Commission Secretariat  
Planning Assessment Commission  
GPO Box 3415, Sydney NSW 2001  
Email: [pac@pac.nsw.gov.au](mailto:pac@pac.nsw.gov.au)

Dear Sir/Madam

**Request by Ausboa Pymble Pty Ltd (*Proponent*) for Modification to Stage 1 Project Approval for Residential Development at Avon and Beechworth Roads, Pymble (*Project*) – Your ref: MP 10\_0219 MOD 1 (Fiona Gibson)**

I refer to your letter dated 13 September 2016 advising of the above modification approval.

I object to the reduction of the car parking numbers from 257 to 244 (notwithstanding the reduction of the number of apartments from 174 to 168).

The Proponent's Traffic Impact Assessment by TRAFFIX dated August 2006 (*2016 Traffic Report*) states that Ku-ring-gai Council's Development Control Plan stipulates a minimum of 226 off-street car parking spaces [section 5.1]. It asserts that, by exceeding this minimum (with 244 spaces), the Proponent will ensure that "all reasonably anticipated parking demands are accommodated on-site and therefore do not impact upon the availability of on-street parking in the area" section 5.5]. In support of this it relies on the data and opinions in the Traffic and Parking Assessment Report prepared by Varga Traffic Planning dated 10 December 2012 (*2012 Traffic Report*) [section 6.1].

The 2016 Traffic Report notes that the 2012 Traffic Report opined that the Project "will not have any unacceptable traffic implications in terms of the road network capacity, and that there will not be any road improvements or intersection upgrade required to accommodate the projected additional traffic flows" [section 6.3].

The 2016 Traffic Report therefore concludes that, because of the proposed reduction in the number of apartments, the Project "will not have any unacceptable traffic implications in terms of the road network capacity, and that there will not be any road improvements or intersection upgrade required to accommodate the projected additional traffic flows."

In my submission dated 23 August 2014 objecting to the Project, I disputed the Proponent's contentions about the impact of the Project on traffic and on-street parking. Below is what I said about the Project at that time and which still holds true, except that I have not had a chance to check the size of the other developments referred to below and there is a further development in Pymble Avenue and one planned for Everton Street.

[the 2014 Traffic Report] ignores mentioning three important considerations:

- (1) the abnormal on-street parking demands of the locality which is used by railway commuters and senior students at Pymble Ladies College (*PLC* – a very large neighbouring school with some 2,000 day students),
- (2) the abnormal traffic resulting from the foregoing and by the large number of PLC students who are driven and collected from school each day and
- (2) other high-rise developments proposed for the area (details of which are on the Ku-ring-gai Council's web site or obvious), namely:

- (i) 40 units in 2 apartment buildings at 1A - C Orinoco Street – Development Applications approved
- (ii) 83 units in 1 apartment building at 1 Orinoco Street, 2 - 6 Livingstone, 1074 Pacific Highway – Development Application under assessment
- (iii) 34 units in 1 apartment building at 1 -1A Pymble Avenue – Development Applications under assessment
- (iv) 2 Pymble Avenue / 2 - 4 Everton Street – the land has been cleared for development for apartments but there is no pending or approved Development Application.

I estimate that the foregoing 4 developments, if they proceed, will add a similar number of residences to those in the current proposal. This will result in the area from Pymble Avenue to the Pacific Highway, via Everton Street and Livingstone Avenue, being unacceptably heavily congested and impossibly so during peak traffic periods.

Further, the current assessment relies on the traffic impact assessment in the developer's initial Traffic and Parking Assessment Report in 2012. It calculates that the impact, under the current proposal, will be less than under the proposal in 2012. It concludes that, since that 2012 assessment determined that there would not be any unacceptable traffic implications in terms of the road network capacity and that no road improvements or intersection upgrade would be required to accommodate the projected additional traffic flows at that time, that would remain the case now.

However, I continue to believe that this conclusion is wrong because the 2012 Report is wrong. Even with the proposed increase in the number of on-site parking spaces (and ignoring the additional 4 developments referred to above), the current proposed development would still exacerbate the already bad traffic conditions in the area (bounded by Avon Road and Sheldon Forest and from which Avon and Beechworth Roads are the mean of access and exit). Road improvements or intersection upgrades would be required if the proposed development alone went ahead.

Access to and exit from the area is severely restricted. Access from the Pacific Highway is via Livingstone Avenue and Beechworth Road for vehicles travelling north and only via Livingstone Avenue for vehicles travelling south.

A number of years ago, southbound vehicles on the Pacific Highway could make a right-hand turn into Beechworth Road but this was "temporarily" forbidden pending an upgrade of the intersection (which very disappointingly shows no signs of occurring).

There is already very heavy traffic on the roads bounding the development site. The traffic is primarily composed of the following:

1. Residents in the area leaving and returning to the area by car including in peak hours.
2. During the morning peak hour and in the mid-afternoon, students travelling to and from PLC by car. Most of these students are driven by car but a number of the senior students drive themselves (and park in Avon Road).
3. During the morning and evening peak hours, rail commuters (from outside the area) who drive to and from Pymble station and park their cars in the nearby streets throughout the day.

Attached, from my submission in relation to the developer's 2013 proposal, are photographs showing the traffic travelling in Avon Road during the morning peak period.

The developer's survey does not acknowledge how badly congested the traffic already is during the peak periods. Road improvements and intersection upgrades are already required to alleviate this congestion not only for ordinary traffic but also for vehicles attending an emergency in the area. From personal experience, I have been waiting in peak hour traffic for several traffic light changes before entering the Pacific Highway from the area.

I asked the author of 2012 assessment for the dates and times of day on which the traffic survey was done but never received an answer. I suspect that the survey was conducted during a school holiday or outside the busy school period and after the Year 12 students (many of whom drive to school) had completed their Higher School Certificate exams.

The developer's traffic survey does not acknowledge the traffic problem below the proposed Avon Road entrance/exit for the development site. Parking is normally full on both sides of Avon Road from those points to the intersection with Arilla Road as a result of those rail commuters (and PLC staff and students) parking their cars there. As a consequence that section of Avon Road is effectively reduced to a single lane road with cars having to stop and give way to each other.

Not only is this an inconvenience to drivers of passenger vehicles and delivery vans but also it could cause critical delays to emergency vehicles, such as an ambulance or a fire engine.

The current proposal would result in an overflow of parking, by residents and their visitors, from the site onto Avon Road which is already full with parked cars. The result will be that the availability of parking in Avon Road will be reduced not only for existing residents and their visitors but also for rail commuters. It will also mean that the upper part of Avon Road will effectively continue to be a one-lane road for over 100 metres at weekends as well.

Also attached, from my submission 2013, are photographs showing parking and the 'one way' traffic in Avon Road.

Any development of the site and any of the 4 proposed additional developments referred to above, even under its current zoning, should include

- Reinstatement of the right-hand turn into Beechworth Road for south-bound traffic on the Pacific Highway with an extended waiting lane, as has been done with the south-bound turn into Livingstone Avenue . Even now an emergency vehicle can be significantly delayed in gaining access to and departing from the area and life and property are at serious risk.
- Increasing the number of off-street residential and visitors car parking spaces for the proposed development by at least 30 spaces
- Building a through-site road link between Avon and Beechworth Roads on the development site.

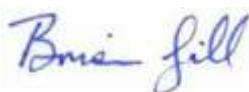
This would reduce the number of residents using the Avon Road entrance/exit where Avon Road is effectively a single lane road.

In addition, a through-site road link could save a life or property in the event of an emergency in the area (including on the development site).

- An investigation of whether traffic lights are warranted at the intersection of Livingstone Avenue, Orinoco Street and Everton Street.

As I foreshadowed in my 2014 submission, the traffic position is appalling. I would urge the Commission to require the Proponent to obtain an updated full traffic report in which the traffic flow and on-street parking are measured during a school term (and bearing in mind that, if it is done, in the latter part of this year the traffic flow and parking will be lower than in earlier in the year because the Year 12 students at PLC will not be driving to the school every day.

Yours sincerely



(Mr) F B Gill



Avon Road,  
looking south-  
east, from the  
Main Gates of  
Pymble Ladies  
College (PLC)

18 February  
2013 at 7.58 am

Note the congestion both ways and particularly in the distance where Avon Road turns into Everton Street. The majority of students driven to PLC are delivered via the entrance behind the telegraph pole in the foreground and the vehicles depart via the exit in front of the pole.



Everton Street  
looking south-east  
towards  
Livingstone  
Avenue, from the  
intersection with  
Pymble Avenue

18 February 2013  
at 8.18 am

Note (1) the line of traffic in Everton Street which continues into Avon Road, having been swollen by traffic entering Avon Road from Pymble Avenue, (2) the cars waiting to turn right from Livingstone Avenue into Everton Street and (3) the cars waiting to turn left from Everton Street, where there is a “Give Way” sign, into Livingstone Avenue. Unseen to the right in Livingstone Avenue is traffic waiting to travel across the Everton Street intersection once the traffic on the other side moves onto the Pacific Highway.



Avon Road,  
looking south-  
west, from where  
Avon Road turns  
away from the  
railway line (near  
No. 1 Avon Road).

18 February 2013  
at 9.33 am

Note that (1) the lower entrance/exit in Avon Road for the proposed development would be about where the third car down on the right is parked and (2) the parking on both sides of Avon Road effectively turns it into a single lane road.



Avon Road,  
looking north-  
east, near No. 19  
Avon Road

18 February 2013  
at 9.44 am

Note that (1) the parking on both sides of Avon Road effectively turns it into a single lane road and (2) in the foreground on the left is a short “No Parking - 8 am - 6 pm School Days” section to assist cars to enter/exit a gate to PLC opposite on the right.