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To: [IPCN Enquiries Mailbox](#)
Subject: Objection to Wahroonga Estate Concept Plan – MP07_0166 MOD 8- Addendum Report
Date: Friday, 30 October 2020 1:33:01 AM
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Dear Sir/Madam

It is with great frustration that I write to you once again re Wahroonga Estate Concept Plan – MP07_0166 MOD 8- Addendum Report. As a resident of Wahroonga, I'm mortified that you can go ahead with development that the Wahroonga community, Wahroonga Adventist school, Wahroonga Adventist Church, Fox Valley Adventist community church and Sovereign Grace Church has clearly told you multiple times they object to. How tone deaf can you be? Your job is to represent and listen to the community but you clearly have not received the message. Here I am once again writing to object.

The worst part of it is that you clearly know just like myself that we don't have the infrastructure to support this development in Ku-ring-gai. The worst part is that you are just breaking infrastructure that is barely coping, and these units will just be the tipping point. Have you stopped for a moment and realised that Wahroonga Adventist school was established in 1905, so the school has been around for 115 years and that the churches on this site have been around since the beginning 120 years ago.

Without a shadow of a doubt you know that it is not in the interest of the school or the community or the children to increase the footprint of the residential buildings A, B, C, E in Precinct B. The Wahroonga Adventist church and school are very much part of the ethos of the community and any changes that are made must very strongly take into account how that will affect the greater community.

I object to the new plans for twelve main reasons:

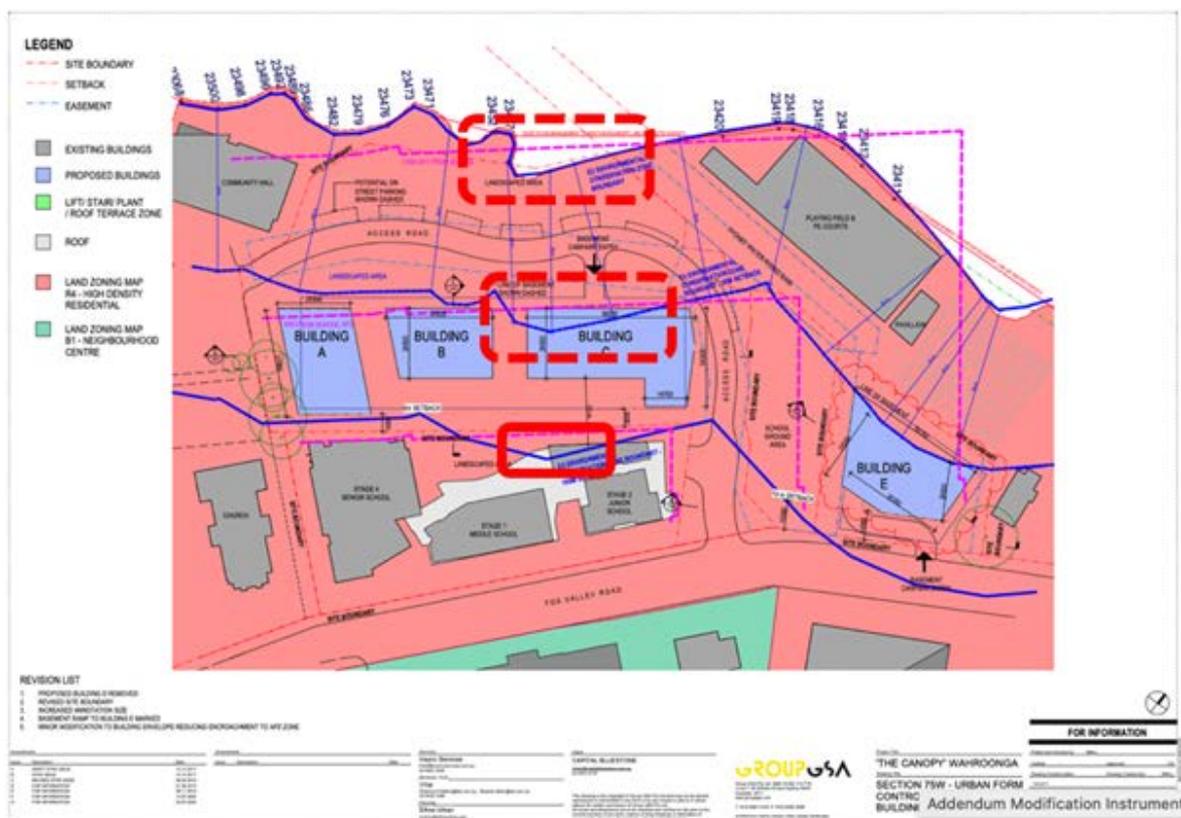
- The proposed Block C does not comply with the Asset Protection zone of 56m, from Planning for Bushfire Protection 2019
- The heights of buildings A, B, C should be 20.5m, and for building E should be 14.5m to follow the Ku-ring-gai Council Height controls in LEP 2015
- The lengths of buildings A, B, C and E should be less than the maximum of 26m per the Ku-ring-gai DCP
- The top level of buildings A, B, C and E should only be 60% of the Gross Floor Area of the storey immediately below them
- The setback of buildings A, B and C from the school boundary should be larger than 6m, in order to allow deep soil planting of trees as proposed by the developer for privacy screening
- Buildings A, B and C should not overshadow the school more than they are already
- Buildings A, B and C should not be set up as "prison wall" of buildings blocking off the bush. The partial "privacy screening" of some of the building units will only make this worse. Each design change so far has only made this worse and worse.
- Now that the school has been designed for and built to make the best of MOD 5 of buildings A, B and C, the buildings should not be made larger and closer.
- The developer should explain how the school children are to have safe access to the

school's green area next to building E – this is not outlined in the Wahroonga Estate Concept plan

- A Bushfire Risk Assessment needs to be completed for the entire Wahroonga Estate and surrounding residential area, before any decisions are made by the IPC Panel for Modification 8, as this proposed development dramatically increases the bushfire risk to residents.
- A clear plan to mitigate the effects on the adjacent Coups Creek reserve should be provided.
- The developer should explain how the users of the Wahroonga estate will find parking, or even be able to queue for access to the school, as they plan to dramatically reduce access.

Block C in Precinct B must comply with Planning for Bushfire Protection 2019 and have an Asset Protection Zone of 56m. The Wahroonga Estate Concept Plan MP07_0166 approved in March 2010. Has the Condition 'B5 (1) All Asset Protection Zones are to be located outside of the conservation land as shown in the approved Concept Plan unless required for development constructed prior to the date of this instrument.' The existing residential and school buildings complied with the 60m and 100m APZ lines of March 2010. Even if there were errors in the planning originally, this does not mean that it is now a free-for-all.

The developer has recommended a new APZ line that would mostly follow the E2 boundary. However the developer cannot propose a change to the area required by the school, as the 100m has to be measured from the school buildings. With that in mind, the diagram below shows that the small encroachment of the school buildings on the 100m APZ line (in solid red) is not a justification for the large proposed move (in dashed red), which is clearly just to accommodate the new development. Surely we don't move bushland boundaries and fire protection zones just to accommodate every new developer's wish for more lucrative square metres?



And why should the buildings be allowed to be so high? The Ku-ring-gai height controls in LEP 2015 should be used, not RLS heights, since the developer claims falsely that the topography of the land is acute. It is a relatively flat carpark with no ramps, and for blocks A, B and C the gradient would be between 2m and 3m. Using the slope of the grassy culvert isolated in the middle of the car park as the slope of the entire area is intentionally misleading. MP07_0166 MOD 8 Recommended Modifying Instrument A(J) should be taken out so that A8(2) applies as it should.

And the buildings are allowed to be so long? The Ku-ring-gai DCP restricts building length to 26m, but none of the building lengths of A (27.9m) B (37.2m) C (58.2m) or E (50.79m) comply. Once again, the rules are being bent until they break to make a dollar at the expense of the community.

The building shapes do not even attempt to meet the Ku-ring-gai DCP requirements to reduce their top floor footprint to 60% of the floor below, leaving them as eyesore slabs looking down over the schoolchildren.

And then why should the buildings encroach to within 6m of the school boundary? The developer proposes trees to screen buildings A to C from the school, but 6m space is hardly enough for deep soil planting of the proposed trees. At 27m high, building A is more than four times higher than its distance from the school boundary.

Because of these outrageously oversized blocky buildings jammed up against the school, this developer proposes:

- To overshadow the school, towering above the playgrounds
- Reduce the school's sunlight, especially in winter
- Reduce the flow of air through the school grounds
- Increase mould in Wahroonga's rainy climate
- Block sunlight from afterschool care in winter, from the developer's shadow diagram
- Overshadow the top green area with building E
- To cut off views of the bush
- To erect a "prison wall" around the school. I'm sure you wouldn't want *your* children in a school surrounded by tall buildings, especially with building B having the single bedroom units looking down over the playground. Guess what kind of tenants that will attract?
- During all break times, the school children will be viewed by the proposed buildings

Image 2: SE corner unit of Block A, at sixth floor window. Six metre set back from School boundary (fence line).



Image 4: SE corner unit of Block B at 22m set back and at sixth floor height



The architecture and design of the entire Wahroonga Adventist School was based on the location and height of the proposed buildings A, B and C approved in Modification 5. The school buildings were also designed on the basis that Block A, B and C had a height of 20.5 M. Please refer to the Architectural Design Report for the Wahroonga Adventist School SSD5535, page 8. Allowing the buildings to become larger and closer now that the school is built is just bait-and-switch.

And clearly setting up for another bait and switch, the developer *still* has not clearly shown how the school children will have safe access to the green space next to the proposed building E. It cannot be left to the DA stage, as the developer will not be required to provide access as it is not a condition in the Wahroonga Estate Concept Plan. KMC will also have no authority in determining the layout of the access to the green space at the DA stage.

As we have seen with the catastrophic bushfires of November last year, it has only been the availability of planes to drop fire retardant which stopped the rapidly spreading bushfire in nearby Turramurra. No building can withstand catastrophic fire conditions, what will happen when there are no resources to drop fire retardant.

Given the catastrophic bushfires of Tuesday 12th November 2019, Blocks A, B and C should be eliminated completely and the temporary carpark be converted into an evacuation site and landing site for helicopters to refill. The main water supply to Wahroonga and Normanhurst is nearby and that could be used to refill helicopters equipped to fight fires.

Coups Creek behind the school - The Sydney Turpentine – Iron Bark forest, is an Endangered Ecological Community (EEC) under the Threatened Species Conservation Act (1995). The developer needs to have an assessment of the impact of light pollution, dogs, walkers, trash, rats on so forth will impact the area, and how these impacts will be mitigated.

The developer needs to explain how (since the Hospital car park is only for the hospital staff and visitors) parking will be available for:

- The Fox Valley Community Church only has 11 carparks and requires 125 carparks for its 415 church members to attend church on a Saturday and other community events.
- The Wahroonga Adventist Church – has the capacity to sit 1,000 people. It has a

shortfall of 95 car parks. KMC requires 1 carpark for 6 seats.

- Sovereign Grace Church – operates out of the Fox Valley Community Centre on a Sunday and requires 110 carparking spaces.
- There is insufficient carparking spaces for the families of the Wahroonga Adventist School. There will be no on street parking in front of the school or along Fox Valley Road as it is planned to be widened to 2 lanes in either direction. If there is a whole school event there will be insufficient parking in the schools underground parking. There are only 124 basement car parking spaces planned for the Wahroonga Adventist School when it is fully completed.
- The school has 2 buses and there is no parking for them as they don't fit in the basement carpark.
- No off-street bus stop for the 800 students.

Thank you for considering my objections to Wahroonga Estate Concept Plan MP07_0166 Modification 8.

I really feel strongly that since the Catastrophic Bushfire Condition on Tuesday, 12th November 2019 buildings A, B and C on Precinct B: Central Church should be completely removed from the Wahroonga Estate Concept Plan. Please consider the protection of our children, because your decision will impact future generations of children, their mental health, anxiety levels, personal safety, physical health and well-being.

Kind regards

Jeanne van Warmelo