

SUBMISSION TO THE INDEPENDENT PLANNING COMMISSION

Re: NSW Planning Modification Assessment Report on MP07_0166 MOD8

We wish to submit the following comments on this report for your consideration, on behalf of members of the Fox Valley Region Action Group (FRAG).

At 4.3 the Report refers to submissions received being more in relation to the existing approval rather than the proposed MOD8 modification. We agree that this was the case, but the submissions were another attempt by residents to underline their total, wide, dissatisfaction with the original approval by the Labor Government in 2010 and modification applications since then. The 2010 decision was generally believed to have been made “under very questionable circumstances” and in the absence of wide publicity and proper consultation on the full plans for the site.

Suffice to say that the Minister concerned, Frank Sartor, left Government under a cloud soon after this was approved. He had been very heavily criticised by a Judge of the Land and Environment Court in relation to another development which he approved by use of his special powers. The developer of the Adventist site was also replaced by the Adventist Church soon after. We can only speculate on the reasons for this, and the reason that a more thorough investigation was not conducted at the time, in any forum.

This MOD8 modification now proposes an amendment to that original development proposal **nine years** after its approval. When does the opportunity to make further changes to this whole development expire? The Adventist Church seems determined to push ahead with its expanding footprint regardless of the significant changes in the area and the resulting increase in traffic that has occurred in the meantime. We want a proper public meeting to discuss all the proposals, not just a “drop in” type meeting where the developers talk at us, in small groups. We want the Adventist Church hierarchy to face the full force of public opinion, which has already been very clearly demonstrated by the church’s own congregations and the parents of students at its schools.

Section 4.3 correctly attributes the major concerns in the submissions on MOD8 to traffic, bushfire and parking impacts on the neighbourhood. Until the expansion of the Estate commenced this was a small village with little, if any, possibility to expand the road network or the public transport system, given the access/egress problems at Pennant Hills Road or the Pacific Highway. That situation still exists today.

But what we have now is a rapidly increasing number of development applications which are decided in isolation rather than as part of an overall plan for the area. Local residents see this as a recipe for disaster, be that in traffic gridlock or bushfire disaster. We want to see a full bushfire evacuation plan which gives proper protection not only to the hospital, proposed units, medical centre and child care facilities but also to the 350 households (approx 1000-1200 residents and their pets) who have, in many cases, to use exit roads which converge onto the same intersection ie Fox Valley Road and the Comenarra Parkway. Some other local roads intersect with the Comenarra Parkway but despite much increased traffic they have absolutely no traffic controls or crossings to enable them to leave their road safely in an emergency. The extra sets of traffic lights planned to enable the schools and proposed unit owners/visitors to enter Fox Valley Road will slow the day-to-day traffic even further. With that road likely to be used in a major bushfire evacuation, hopefully the traffic flow would be controlled by police.

We note that the RFS does not seem to have any real issue with the MOD 8 or the full Estate development plan. This concerns us.

The daily movement of visitors and residents may not be improved by increasing bus service frequencies to Turrumurra or Thornleigh station, but a frequent small shuttle bus from these stations (or a local parking facility) to the hospital/ medical centre/ units could be a possible solution. Parking in local streets should be strictly limited by appropriate time limits though allowing resident parking at any time. The current situation has cars on both sides of narrow local roads causing problems for drivers, cyclists and pedestrians whose view is limited by the parked vehicles. We need parking to be limited, possibly to parking on one side of the roads only, because this too would impact on a bushfire emergency.

In relation to these traffic issues, we note that the Department "*is satisfied that an updated traffic study is not required as the modification would not result in any significant changes to previous assessments*". We cannot agree with this assumption, given that previous assessments have not taken into account the **total effect of every new or proposed development in the area**. Furthermore they were not taken at the busiest time of the year, week or day. Some were even in holiday periods.

Assessments of various factors to be considered in DA's are based on the application of devised formulae which have been created over time. These are used, for example, in assessing traffic flows and creating projections. Whilst we are not suggesting that they do not form a useful basis for decision making, we know from experience that only those who live here and experience the variations in traffic movements every single day of the year, know, and can tell, what actually happens.

Unfortunately there is little time available for us to fully study, and respond to, the issues raised in this Report. We realise that many of the issues on which we have made comments are not within the scope of MOD8; but in the absence of any real consultation with the Adventist organisation at any time, we would appreciate your consideration of them and ask that you make any comments that you feel are appropriate.

Tricia White,
Yen Heng,
George Gleeson

For, and on behalf of, 135 FRAG members