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**Sent:** 22/04/2020 4:23:34 PM  
**Subject:** Attn Tony Collier re 25 Kevin Avenue Avalon  
**Attachments:** 25Kevin SUBMISSION.pdf;

Kind Regards  
Louise and Matt Telfer

Sent from [Mail](#) for Windows 10

## 1. Streetscape Impact -

- a. Block Size - R2 guidelines require 700sqm blocks and this does not comply. Blocks have been recorded as 693.9sqm Lot2 and 700sqm Lot1. The driveway / carriageway accounts for a minimum of 114.78sqm and has been included as "greenspace" in Lot1 square metres. Effectively it does not relate to LOT1, (only access to Lot2) thus reducing Lot 1 to only 585.22sqm, well below minimum council requirements.
- b. Driveway - Proposed Driveway will detrimentally impact the streetscape of Kevin Avenue. Driveway access to LOT2 is a staggering 38.26 metres long to boundary of Lot 2, but in fact requires an estimated 42metres to the house.  
Currently no other dwelling within 200 metres of 25 Kevin Ave sees a driveway three quarters the length of the block. This bulk will dominate the existing character of the avenue, changing the character and aesthetics of Kevin Avenue
- c. Significant Vegetation - The proposed driveway requires the removal of 2 trees, deemed in DANO115/16 approved by council 11/04/2018, as "significant trees". Several trees were already removed for the construction of the granny flat, constructed only 12 months earlier. Now within a year further vegetation is proposed to be removed leaving the streetscape and the proposed LOT1 bare, lacking vegetation for wildlife, and permanently changing the streetscape. This has been systematic removal of trees and vegetation. This reduces the Avenues "green-feel" and character.
  - i. Proposal states that trees would be replaced on verge. The verge has a steep gradient which is not appropriate for planting large trees required to replace 2 trees removed of 'significance'
  - ii. Large replacement trees on the verge would pose a public risk to the wider community in storms and the canopy would be a risk from trucks
  - iii. Further tree removal is inconsistent with Councils policy (and suburbs persona) of "houses amongst the trees and not trees amongst the houses". There would be no trees of significance left.
- d. Privacy - Proposed Driveway, potentially 42m long, would have a significant gradient to street level. Estimated elevation of 8 meters from street level, will detrimentally impact the streetscape of Kevin Avenue. It will dominate the street and will adversely effect residents and homes on the Northern side of Kevin Avenue (30 and 28 Kevin specifically). Headlights into bedroom and living areas, reduced privacy, livability and value.  
Directly opposed to PLEP 4.1 1c)

## 2. Drainage and Site Topography -

Critical drainage issues in front of 21, 23, 25 Kevin Avenue already exists. The curb outside this area on Kevin Avenue already has significant and critical drainage issues with the camber of the road and the existing speed hump hindering stormwater drainage. It has caused past flooding into our property. (with flooding flowing through the 34 Kevin Avenue to adjoining rear property on Wollstonecraft). This is a known issue to Council, with a recent increase in manual cleanups of debris and gravels in gutter. An impenetrable driveway of such length (42 m) and gradient (over 8 m) will exasperate a currently non-functioning drain. Increased flow will be exacerbated with the inevitable reduction of penetrable

greenspace and a much larger LOT1 footprint than the newly built granny flat. The submission calls for permanently changing the gradient of the land and hence flow of the water.

Note the Submission states all stormwater to be directed to street gutter as seen here “B5.1 Water Management Plan Stormwater management plans have been prepared by SGC engineering and accompany this application. The land slopes down to Kevin Avenue enabling gravity drainage to the street. “

Please see attached photos of current issues with drainage and runoff.

### 3. Ambiguity of Development –

- a. Unknown building in LOT1; size, footprint, orientation, bedrooms, parking, elevations.
- b. Submission requires the removal of large existing trees and a plausible 2 story home which would dominate street vista, reduce privacy and change character of this section of Kevin avenue due to minimal set back. Not “houses amongst trees”.
- c. What is the plan of existing driveway? Potentially could see 2 access points, detrimental to runoff, streetscape, character of area and pedestrian safety.
- d. Is the current excavation of existing driveway going to be restored to the previous gradient and vegetation to remain consistent with area’s personality?
- e. Where is parking for LOT2? Current proposal does not have parking allocation, or any available land space for a minimum of 2 cars.
- f. Ambiguity of LOT1 buildings size and parking requirements - will it exacerbate street parking issues? Currently home to 3 cars, one which is permanently parked on street.
- g. Ambiguity raises concerns of street parking and traffic congestions issues. This means increased traffic bottlenecks at the speed hump and pedestrian blind spot. Noticeable Increase in Traffic over past 4 year - Ever increasing traffic in Kevin Avenue at all times but significantly during peak hours, as Kevin is the only street with traffic lights to allow controlled access onto Barrenjoey road.
- h. Note future building proposals would have to oppose the PLEP 4.3 Height of buildings. The elevation from street level, insufficient LOT1 size (requiring double height building very close to street frontage) would be inconsistent with the ‘desired character of the locality’ (PLEP 4.3 1a) and not ‘compatible with the height and scale of surrounding’ (PLEP 4.3 1b) and would not ‘minimize the adverse visual impact of development on the natural environment’ (PLEP 4.3 1 f).

### 4. Lot Size Non-compliance and misleading -

- a. The proposal inaccurately states the allotments are of ‘adequate size’. This is a false claim stating the driveway to LOT2 forms part of LOT1. This is incorrect and means LOT1 is only at best 585msq. This is of great concern being highly visible at street frontage.
- b. The submissions STATEMENT OF ENVIRONMENTAL EFFECTS concludes both LOT1 and LOT2 creates “a complimentary and compatible subdivision pattern, having regard to the broader subdivision pattern established within Avalon, with the proposed allotments having areas, dimensions and building platforms consistent with those established by adjoining development and allotments within the Avalon Locality generally.” This FUNDAMENTALLY INCORRECT.

Address	Lot size	
16A Kevin	478.4	Semi-detached residence. Reduces building bulk
16 B Kevin	450.4	Semi-detached residence. Reduces building bulk
19A Kevin	Combined	Semi-detached residence. Reduces building bulk
19 B Kevin	1391	Semi-detached residence
43 Kevin	556.2	Area West of Elvina Street
45 Kevin	561.6	Blocks are constrained by topography hence a smaller size
47 Kevin	561.6	
49 Kevin	556.1	This area represents a separate character to the lower section of Kevin avenue to which the DA is in Area is over 230m away
51 Kevin	556.2	
53 Kevin	556.2	
55 Kevin	556.3	
57 Kevin	556.3	
59 Kevin	556.4	
61 Kevin	556.5	
63 Kevin	612.6	
50 Kevin	464.1	Cut off at right angle by large block on Elvina @ 63 Elvina.
52 Kevin	464.2	
54 Kevin		This area is 200m away from proposal
58 Kevin	514.4	West of Elvina Avenue, where there is a steep fall into Edwin and Elvina larger blocks.
60 Kevin	474.7	
62 Kevin	474.2	Topography determines block size.
64 Kevin	473.7	
66 Kevin	473.2	A minimum of 230m away
68 Kevin	470.6	
72 Kevin	465.8	
76 Kevin	465.5	
6 Kevin	777.8	Large Block size
8 Kevin	916.9	
10 Kevin	923.2	in keeping with the relevant section of Kevin Ave & hence maintains the character and relevance of a significant Avenue in Avalon, which preserves the Suburbs profile
12 Kevin	923.2	
14 Kevin	923.2	Relevant pattern, size, character of area Predominately single dwelling properties  Proposed DA directly opposes PLEP 4.1 1a) And is changing the “desired character of the locality, and the pattern, size and configuration of existing lots in the locality”
18 Kevin	923.2	
20 Kevin	916.9	
22 Kevin	939.8	
24 Kevin	939.8	
26 Kevin	923.2	
28 Kevin	923.2	
30 Kevin	923.2	
32 Kevin	923.2	
34 Kevin	923.2	
36 Kevin	923.2	
38 Kevin	923.2	
40 Kevin	916.9	
42 Kevin	923.2	
44 Kevin	923.2	

46 Kevin	923.2	
48 Kevin	923.2	
15 Kevin	923.2	Large Block size in keeping with the relevant section of Kevin Ave & hence maintains the character and relevance of a significant Avenue in Avalon, which preserves the Suburbs desired profile
17 Kevin	1214	
19 Kevin	1391	
21 Kevin	1391	
23 Kevin	1391	
25 Kevin	1391	Blocks severely affected by topography. Significant gradient fall from Park Ave which directly affects usable land & creates issues with runoff and drainage.
27 Kevin	1391	
29 Kevin	1391	
31 Kevin	1397	
33 Kevin	1397	Proposed DA directly opposes PLEP 4.1 1a)
35 Kevin	1397	

## 5. Precedence -

It is of great concern that this is the second NON-COMPLYING subdivision proposal in this section of Kevin Avenue within 2 years from out of area developers. The proposal inaccurately claims the Lots are of 'adequate size' but takes no interest in the long-term ramifications for greenspace, flora and fauna natural corridors, neighbor's privacy, congestion, runoff and suburb character.

- I. Precedence of subdivisions in this area will result in long term traffic congestion, especially peak times, already an issue at the Barrenjoey traffic lights. (Due to the larger Childcare facility, the Sep55 Development and feeder street to wider residential area including Park, Elvina, George etc). Alone this DA could see an increase from 3 to potentially 6 cars, which would exponentially increase if precedence is set.
- II. Precedence would have far reaching negative social implications on this enclave and Avalon. Adversely increasing congestion; increased flood potential & frequency; reduced character; changed scale, bulk, mass, density of development; reduced 'green feel'; and vastly minimize Flora and Fauna in the area.
- III. Removal of vegetation and resultant fauna will be cumulative if precedence is set

## 6. Waste Management Plan is vastly underestimated –

Proposal states "little earthworks"

- I. Only 19 cubic metres of rubbish for demolition of a large rumpus room, a 2-bedroom granny flat, large driveway, 3 car garage, a garden shed. This is vastly understated
- II. Excavation of verge to implement driveway would be significant and alter street scape.

## 7. Land Ratio – Green space vs hard surface ratio

Proposal maintains existing home on LOT2 - A large 3 story home with pool, decking, paths, back patio, Cabana.

- I. LOT2 has already over 65% (estimated) impenetrable hardscaping
- II. This does not include further hardscape for driveway and parking
- III. Estimated ratio does not include square meterage floor ratios for the 3 floor dwelling LOT2 would fail land ratios, meaning reduction of the green space persona of Kevin Av, defiance of council requirements, and opposes the desired outcome of "Houses amongst the trees".

This area sees single dwelling family homes (some with Granny flats) with green space for children, families and pets; abundance of street character, gardens and wildlife. This subdivision proposal fundamentally changes the area character. There is limited subdivision within 200m sq of the DA.

Precedence would alter and change the character of the street as a whole.



*Figure 1 Driveway - showing flooding in light rain & rise from street level*



*Figure 2 Flooding in light rain*



Figure 3 Flooding - note top left runoff and driveway runoff



Figure 4 Green feel of Avenue. Shows rise from street level