

Second Submissions Report

Infill Affordable Housing

2 - 16 Pockley Avenue, Roseville

SSD-77825469

5 March 2026

240111

planning&co

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1.0 INTRODUCTION

This Submissions Report has been prepared on behalf of Aqualand Prestige 2 Pty Ltd as The Trustee for Aqualand Prestige 2 Unit Trust (Aqualand Prestige) (**the Applicant**) to address the matters raised during the second Public Exhibition process for the State Significant Development Application (**SSDA**) for a residential development including in-fill affordable housing at 2-16 Pockley Avenue, Roseville (SSD-77825469). This SSDA seeks to provide market and affordable housing within the Ku-ring-gai local government area (**LGA**) per the provisions of the *State Environmental Planning Policy (Housing) 2021* (**Housing SEPP**).

A combined Amendment and Submissions Report was submitted 27 November 2025 in accordance with section 37 of the Environmental Planning and Assessment Regulation 2021 (**the Regulations**). The amended proposal was re-exhibited between 4 December to 17 December 2025. During the re-exhibition period 82 public submissions were received. A request for RTS Letter dated 18 December 2025 followed by Council's Submission dated 15 December 2025 and Request for Information from DPHI on 29 January 2026.

This Submissions Report provides an analysis of submissions and Applicant's response to submissions, as well as actions taken since Public Exhibition and provides a justification of the updated development proposed. It is accompanied by supporting information and technical reports (refer to the Table of Contents).

This Submissions Report, as required under section 59(2) of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation), has been prepared in accordance with the DPHI's *State Significant Development Guidelines*, including *Appendix C – Preparing a Submissions Report*.

1.1 Re-exhibited Development

The amended proposal that was re-exhibited sought the following:

Development consent is sought under Division 4.7 State Significant Development of the EP&A Act for a new residential development comprising three residential flat buildings which include the provision of in-fill affordable housing on the site at 2-16 Pockley Avenue, Roseville.

- *Site preparation including demolition, excavation and tree removal of the site;*
- *Construction of a residential flat building development containing 3 building pavilions of up to 10 storeys* including:*
 - *Part 3-, part 4- and part 5-level combined basement parking with the provision of 284 car parking spaces,*
 - *180 dwellings including 46 affordable housing dwellings above carpark;*
- *Ground level and on-building landscaping works including rooftop communal open spaces of all buildings.*
- *Augmentation of, and connection to, existing utilities as required.*

* Note: number of storeys have not changed from the EIS submission. The revised number of storeys is simply a technical numeric revision.

2.0 ANALYSIS OF SUBMISSIONS

This section provides a breakdown of the submissions received and categorises them to identify the issues raised, as well as a response to those items provided in **Section 4.0**.

2.1 Breakdown of Public Submissions

During the Public Exhibition, a total of 82 public submissions were received over the exhibition period.

A summary of the position on the re-exhibited development are summarised in **Table 1**.

Table 1: Position of Submissions

Submissions	Objection	Support	Comment	Total
<i>Council</i>	1	-	-	1
<i>Public</i>	75	3	4	82
TOTAL	76	3	4	83

2.2 Categorising Issues

The issues raised in the submissions has been categorised and summarised in **Table 2** below.

Table 2: Summary of Categorised Issues

Category	Issue	Stakeholder
<i>The Project</i>	Urban Design and Architecture	DPHI
	- The proposed building height requires additional justification and details including aspects of the proposed rooftop COS - Justification for vertical depth of the courtyard POS and COS spaces. - Requests more details on urban design matters including: - Context and neighbourhood character - Built form and scale - Unit mix - Setbacks - Density - Footpath - Amenity: Further analysis and explanation to support residential amenity particularly courtyard apartments. - Changes to the façade detailing and aesthetics	Council
	Landscaping	DPHI
	- Correct calculation of COS and deep soil including identification of principal COS - Inconsistency to garden character setting - Retaining trees - Deep soil provision	Council Public
	Traffic and Parking Provision	Council Public
	Engineering and Servicing	Council
	- Water management: condition of existing pit and pipes to Council's trunk drainage system - Clarifications of levels of stormwater pits	Public

- Hydraulics calculations
- Clarification on capacity of receiving drainage system
- Clarification on long section in Stormwater Management Report
- Details of and calculations for OSD location
- Stormwater discharge connection to the existing stormwater pit in Pockley Avenue

Procedural Matters	Future Context	DPHI Council
	• Demonstrate consistency with the desired future character of the area with further analysis and design response to the specific local character of the area • Consideration of the Ku-ring-gai Station Precinct SEPP Amendment	
	Gross Floor Area Calculations	DPHI
	• Provide correct calculations for GFA including apportioning common areas	
	Clause 4.6 Variation	DPHI Council Public
	• Provide further detailed plans and documentation in relation to the proposed building height and individual elements that contribute to the height breach • Providing justification for additional height of the amended proposal from the height submitted in the initial EIS submissions	
	SEARs	Council
	• Inadequate address of trees and landscaping SEARs.	
	ADG	Council
	• Compliance with relevant ADG criteria • Part 3E • Part 4	
	Housing SEPP Schedule 9	Council
	• Landscape design inconsistent with Schedule 9 landscape design principle due to removal of specific trees and response to landscape character of the streetscape and neighbourhood	
	Revised Technical Assessments/Reports	DPHI
	• Following additional technical assessments needed to assess and/or justify following technical concerns: – Visual impact analysis (within revised design report) – Overshadowing analysis (within revised architectural plans and design report) – Updated stormwater management plan	
	Statutory Compliance Table	DPHI
Economic, Environmental and Social Impacts	• Provide an updated statutory compliance table including an assessment against the Housing SEPP (Chapter 2 and 5) and ADG	
	Overshadowing	DPHI
	• Additional information on overshadowing diagrams including shadows from the 2-4 Larkin Street & 1-5 Pockley Avenue, and 7-11 Pockley Avenue proposals • Additional plan of sun eye diagrams including 7-11 Pockley Avenue proposal	
	Tree removal and loss of canopy cover	Council Public

- Concerns in relation to removal of significant Tree 3 and seeking design change to retain other specified trees proposed for removal to allow for mature canopy growth.

Biodiversity

Public

- Potential impacts on threatened and protected species
- Concern for potential reduction in canopy cover and ecological connectivity of new planting

Flooding Impacts

Council

Public

- Demonstrating acceptable design for 1% AEP flood levels
- Capacity of existing drainage systems and proposed detention measures to be adequate for heavy rainfall events.
- Impact of increased runoff causing concern for erosion to downstream properties

Traffic Impact

Council

Public

- Commentary on cumulative traffic impact to local road network
- Commentary on Intersection congestion issues and safety concerns
- Commentary in response to concerns that local road network is at capacity
- Opposition to the reduction in car parking numbers in the amendment with concern for additional demand for on-street carparking
- On-site bulky goods collection point as part of the entry access driveway requirement under KDCP
- Location of proposed access points in relation to Australian standards

Bushfire Risk and Emergency Evacuation

Public

- Response regarding concerns for increased bushfire risk in the area, and identification of surrounding land as bushfire prone land
- Response regarding concerns for local road network for safe evacuation in the event of a bushfire

Construction Impacts

Public

- Noise, dust and construction traffic impacting residents and nearby flora and fauna during construction

Local Infrastructure

Public

- Assess demand on schools, childcare, libraries, recreation, and community facilities
- Concern for capacity of existing local infrastructure. Seeking for developer contributions

Affordable Housing Provision

Public

- Concerns that the proposal is relying on significant uplift for the provision of affordable housing that for a limited time
-

3.0 ACTIONS TAKEN SINCE EXHIBITION

This section summarises the actions the proponent has taken since the public exhibition to address the issues raised in submissions.

3.1 Refinements to the Proposed Development

Minor adjustments have been made to the proposal in response to submissions and DPHI comments and have resulted in the following minor numerical changes:

- Site area has been revised from 6,539 sqm to 6,539.9 sqm to reflect a more accurate site area measurement.
- Minor internal adjustments resulting in a revision to the total proposed GFA from 21,252 sqm to 21,254.7 sqm. The FSR of 3.25:1 remains unchanged.

There have been no additional amendments to the project since the amendments made to the project which were exhibited (4 December 2025 to 17 December 2025) and consisted of:

- Additional GFA and FSR resulting from increased affordable housing floor space,
- A new basement level introduced to reduce the extent of deep excavation and consequential reconfiguration of carparking and ramp layout,
- Apartment reconfiguration in Pavilion C,
- Recalculation of deep soil in accordance with the ADG definition,
- Amendments to building facades, and
- Inclusion of rooftop COS, shading structures and landscaping on structure to the eastern side of each building and consequential reconfiguration of plantrooms and service areas on the roof.

The additional information requested by DPHI and responses to Council and public submissions have been sufficiently addressed through additional clarification or justification included in this submissions package.

3.2 Further Assessments Undertaken

In response to the submissions received, the following documentation has been revised to support all responses and details within this Submissions Report.

Table 3: Supporting Documentation

Report	Prepared by
Revised Clause 4.6 Variation Request	Planning & Co
Revised Architecture Plans	Woods Bagot
Addendum Design Report	Woods Bagot
Updated Statutory Compliance Table	Planning & Co
Updated Stormwater Management Report	Stantec

3.3 Revised Project Overview

Following the Public Exhibition of the proposed development, minor adjustments have been made in response to the submissions received. These adjustments remain consistent with the project objectives and project overview which was exhibited. The revised project overview does not raise any additional environmental impacts. Therefore, an amendment to the proposed development is not required.

A comparison of the project description and key project metrics from the exhibited scheme and the revised RTS scheme is provided in **Table 4** below.

Table 4: Comparison of key project information

Development Aspect	Exhibited Scheme		Revised RTS Scheme	
<i>Project Description</i>	Development consent is sought under Division 4.7 State Significant Development of the EP&A Act for a new residential development comprising three residential flat buildings which includes the provision of in-fill affordable housing on the site at 2-16 Pockley Avenue, Roseville. • Site preparation including demolition, excavation and tree removal of the site; • Construction of a residential flat building development containing 3 building pavilions of up to 9 storeys including: • Part 3-, part 4- and part 5-level combined basement parking with the provision of 284 car parking spaces, • 180 dwellings including 46 affordable housing dwellings above carpark; • Ground level and on-building landscaping works including communal open spaces in Pavilion A. • Augmentation of, and connection to, existing utilities as required.		Development consent is sought under Division 4.7 State Significant Development of the EP&A Act for a new residential development comprising three residential flat buildings which includes the provision of in-fill affordable housing on the site at 2-16 Pockley Avenue, Roseville. • Site preparation including demolition, excavation and tree removal of the site; • Construction of a residential flat building development containing 3 building pavilions of up to 9 storeys including: • Part 3-, part 4- and part 5-level combined basement parking with the provision of 284 car parking spaces, • 180 dwellings including 46 affordable housing dwellings above carpark; • Ground level and on-building landscaping works including communal open spaces in Pavilion A. • Augmentation of, and connection to, existing utilities as required.	
<i>Project Site Area</i>	6,539 sqm		6,539.9 sqm	
<i>Proposed Development Type</i>	Residential flat building		Residential flat building	
<i>Gross Floor Area (GFA)</i>	21,252 sqm		21,254.7 sqm	
<i>Maximum Building Height</i>	34.95m		34.95m	
<i>Floor Space Ratio (FSR)</i>	3.25:1		3.25:1	
<i>Dwellings</i>	Market Dwellings	134	Market Dwellings	134
	Affordable Dwellings	46	Affordable Dwellings	46
	Total	180	Total	180
<i>Dwelling Mix</i>	2 Bedroom (Market)	42	2 Bedroom (Market)	42
	3 Bedroom (Market)	82	3 Bedroom (Market)	82
	4 Bedroom (Market)	10	4 Bedroom (Market)	10

Development Aspect	Exhibited Scheme		Revised RTS Scheme	
	Studio (Affordable)	7	Studio (Affordable)	7
	1 Bedroom (Affordable)	28	1 Bedroom (Affordable)	28
	2 Bedroom (Affordable)	11	2 Bedroom (Affordable)	11
Car Parking Spaces	Residential Car Spaces	252	Residential Car Spaces	252
	Visitor Car Spaces	30	Visitor Car Spaces	30
	Car Share	2	Car Share	2
	Motorcycle Spaces	11	Motorcycle Spaces	11
	Resident Bicycle Capacity	210	Resident Bicycle Capacity	210
	Visitor Bicycle Spaces	18	Visitor Bicycle Spaces	18
Communal Open Space	1,638 sqm		1,638 sqm	
Deep Soil Area	706 sqm		706 sqm	
EDC	\$172,112,767 (excl. GST)		\$172,112,767 (excl. GST)	

4.0 RESPONSE TO SUBMISSIONS

This section provides a detailed summary of the Applicant's response to the matters raised in submissions received. The Applicant's responses are provided in the following sections and have been structured as follows:

- DPHI Request for Information (**Section 4.1**)
- Ku-ring-gai Council (**Section 4.2**)
- Public (**Section 4.3**)

4.1 Department of Planning, Housing and Infrastructure

The Applicant's response to the DPHI's Request for Information is outlined in **Table 5** below.

Table 5: DPHI Response to Submission Table

Item no.	Issue/ Comment	Proponent Response
Clause 4.6 Variation Request		
1	<i>Clause 4.6 should be re-drafted to include the following:</i> <i>Height breach of top storey</i> <i>Height breach of the plantroom.</i> <i>There should be sections in the 4.6 document showing the height breach and this should be numerically tabled in the clause 4.6.</i> <i>There should be a bulleted section with reasons tabled and this should include a reason that the height breach is partly due to the COS being located at the roof top</i>	- A Revised Clause 4.6 Variation Request has been provided which addresses the separate elements that breach the height plane. - The Clause 4.6 finds that the height exceedances do not contribute to additional amenity impacts.
Amended Statutory Compliance Table		
2	<i>Please submit an amended compliance table with a comprehensive assessment of the numerics against the Housing SEPP (Chapter 2 and 5) + ADG.</i>	- An Updated Statutory Compliance Table has been provided. - ADG compliance is outlined in the revised Design Report.
Amended Drawings		
3	<i>B-80-023 – Residential GFA calculation</i> <i>GFA calculation is flawed in this drawing as the apportioning of common areas has not been shown. Consequently, this is not consistent with the GFA schedule in DA-AR-B-80-051 – C (which seems to be the correct version).</i>	The GFA Schedule has been updated and provided in the revised Architectural Plans.
4	<i>B-80-041 – COS and Deep soil calculation</i> <i>Identify all rooftop pavilions (A, B and C) as principal COS, and ensure calculation is consistent with the landscape report.</i>	- The COS calculations have been recalculated to include rooftop pavilions which now form part of the principal COS. - The total COS consists of 1,638 sqm (ground floor) and 372 sqm (rooftop) which represents a provision of 2,010 sqm (31%) of COS. - Deep soil provision has remained unchanged at 706sqm (10.8%). - Both calculations are consistent across the exhibited Landscape Report, Landscape Plans, and updated Design Report and this report.
5	<i>B-70-101 - Overshadowing diagram</i> <i>The overshadowing diagram should be updated to include the shadows from the Larkin Street and 7 – 11 Pockley Avenue proposals. I suggest that you include the shadow diagrams from the other proposals and merge the two to provide details of overshadowing.</i>	- Shadow diagrams have been updated to include the Larkin Street (SSD-77829461) and 7-11 Pockley Avenue proposals. The shadow diagrams have provided a revised legend for easier interpretation. - These have been included in the revised Architectural Plans and Design Report.

Item no.	Issue/ Comment	Proponent Response
6	<i>B-70-001 - Sun eye diagram</i> <i>This needs to be updated OR an additional plan included to include 7 – 11 Pockley Avenue and Larkin Street SSD. This diagram has been provided in the Design Report. Please include a larger version in this architectural set.</i> <i>It is evident from the updated shadow diagram that some additional lower level apartments will not receive 2-hours of solar access and the overall % will be less than 63%. Please acknowledge this and provide a general % realistically.</i>	- An additional sheet showing sun eye diagrams with 7-11 Pockley Avenue is included in the revised Architectural Plans and Design Report. - Total dwellings receiving the minimum 2 hours of sunlight between 9am and 3pm at midwinter is 114 of 180 apartments (63%) including 8 of 16 courtyard apartments (50%). - These numbers have improved from the initial SSDA submission which had 105 of 178 apartments (59%) achieving a minimum 2hours between 9am and 3pm at midwinter. - Considering the sloping nature of the site and the generally east/west nature of the site, the development is considered to have maximised the opportunity for solar orientation per ADG Objective 4A-1 which seeks to optimise the number of apartments receiving sunlight to habitable rooms, primary windows and private open space.
7	<i>B-81-001 – Unit types – Studio & 1 Bedroom</i> <i>Studio apartment layout shows depth of living room to be 8 m. The bedroom is located beyond this depth and has no opening. While this is a studio, a full height partition is proposed to the bedroom which will result in a room with no sunlight access. This apartment is also proposed to be used as an affordable apartment and the Apartment schedule in the Design report indicates that the depths comply.</i> <i>We will need some justification regarding the layout of the studio apartment and how the bedrooms will function.</i>	The studio apartment living space depth is only 5.5m deep to the bedroom area. The width of the opening between these two spaces is the entire width of the corridor and these dimensions are less than the maximum depths provisioned in the ADG.

4.2 Ku-ring-gai Council

The following provides a summary of the key items raised in Council's submission, above those already addressed previously.

Table 6: Response to Council's Key Comments

Item no.	Issue/ Comment	Proponent Response
Context and neighbourhood character		
1A	State Environmental Planning Policy (Ku-ring-gai Station Precincts) (SEPP Amendment) has not been adequately addressed in the amended information. The SEPP Amendment sets out the desired future character as defined by Building Height, FSR and zoning. Insufficient consideration of the SEPP Amendment has been undertaken.	- The exhibited Combined Submissions and Amendment Report referenced the Ku-ring-gai TOD and the most recent update of 14 November 2025 when the DPHI published the amending instrument for Council's Preferred Scenario, <i>State Environmental Planning Policy Amendment (Ku-ring-gai Station Precinct) 2025</i> (Ku-ring-gai Station Precinct SEPP Amendment). Refer to Section 1.2 of the report. - The amended LEP controls of the Ku-ring-gai Station Precinct SEPP Amendment including zoning, building height and FSR has been considered in the desired future character of the proposal detailed in Section 3.3 of the exhibited Combined Submissions and Amendment Report. - It is important to note the TOD provisions were saved for the site.
1B	Consideration of alternative siting work undertaken with State Design Review Panel (SDRP) is noted and accepted. Explanation is given as to why moving all 3 buildings (west) down the site would not materially alter the relative vertical depth of the courtyard POS and COS spaces. This is understood but does not substantially address the original key concern (relating to vertical depth of the courtyard POS and COS spaces). Nor does the applicant's response address as to how a reduction in yield would help resolve the issue and produce better amenity outcomes. The proposed bulk and height increase compounds problems identified previously.	- All courtyard POS spaces have adequate high level of amenity, privacy and security as well as an outlook to a landscaped terracing wall, and to the sky. - Reducing the height of the buildings, and consequently the yield, to fit below the height control will not result in any improvement to amenity outcomes across the site at the ground level, as the site constraints remain despite adjustments to building height. - The currently proposed level of excavation is not unusual for a site with a fall as considerable as this. The breaking of the form into three pavilions has mitigated the level of excavation required.
Built form and scale		
2	The Combined Submissions Amendment Report (Report) references Building Sections E and F in the revised Architectural Plans. These drawings cannot be located in the drawing set provided nor are they listed in the Drawing List. As noted above, consideration of alternative siting work undertaken with SDRP is noted and accepted. The key concern (relating to vertical depth of the courtyard POS and COS spaces) has not been addressed. Nor does applicant's response address how a reduction in yield would help resolve the issue and produce better amenity outcomes. The proposed bulk and height increase compounds problems identified previously.	- Sections through Communal Open Space and Streets are highlighted in drawings 'DA-AR-B-32-004_Building Elevations - Pavilion B and C East', and 'DA-AR-B-32-005_Building Elevations - Pavilion A and B West'. - The proportions of the courtyard POS ensures that all courtyard POS spaces have adequate high level of amenity, privacy and security as well as an outlook to a landscaped terracing wall, and to the sky. - The increase in building heights do not have any impact to sunlight access between building blocks.

Item no.	Issue/ Comment	Proponent Response
	It is noted that the increase in height is attributed to additional in-fill housing and roof top COS. The additional impact in terms of overshadowing appears to be what is labelled as “Additional shadow cast by compliant envelope more than proposal” and coloured pale green on drawing DA-AR-B-70-101. Between the hours of 12-3pm the increase in overshadowing appears to be significant. Strips of sunlight between each of the building blocks would appear to be lost. The Report makes reference to ADG Objective 3D-1, noting that its size is much more than the minimum dimension of 3m, and that COS provides significant landscaping and planting. The provision of a more generous width is noted however the proposed COS is over a basement carpark, is 2 storeys below natural ground, and is flanked on each of the 2 longest sides by 12 storey building. Additionally, the COS is located at the base of the zone between buildings and its width is 3m (25%) less than what it needs to be satisfy privacy considerations of Objective 3F. No mature landscape can therefore be provided, and privacy considerations (from over-looking) and acoustic reverberation are likely to lessen its amenity.	• New overshadowing diagrams have been included in the updated Architectural plans and the updated Design Report with revised legends for easier comprehension.
Density		
3	The proposed density remains inconsistent with the desired future character of Lindfield primarily due to inadequate setbacks and non-compliant building height. It is noted that these issues remain and are exacerbated by the amended proposal.	• Refer to the response to Item 1A in this table in relation to addressing desired future character. • The height non-compliance is addressed in the revised Clause 4.6 Variation Request for building height and demonstrates that compliance with the development standard is unreasonable or unnecessary in the circumstance and there are sufficient planning grounds to justify the contravention of the development standard as the proposed development causes no unreasonable impact in terms of overshadowing or view loss as a result of the non-compliance, and is compatible with the future desired character of the area as established by the Housing SEPP. • The proposal’s proposed FSR of 3.25:1 is compliant with the permissible FSR control of 3.25:1.
Amenity		
4	Greater amenity would be achieved if high quality landscape outcomes were addressed per the issues raised in the original submission and further pressed below. High quality COS and canopy trees will ensure the amenity for internal occupants is acceptable.	• The intended landscape character recognises that while there is a garden suburban character of the Roseville setting, the site is also adjacent to and connecting with the Blue Gum Gully with and other endemic vegetation communities. Given the departure from a garden suburban built typology as a result of the TOD – it was seen to be more appropriate to reinstate endemic vegetation, whilst exotic street trees have been proposed on the adjacent public street verges to reflect the garden character. Such considerations demonstrate a high-quality landscape strategy for the proposal. • The revised COS for the proposal is 2,010 sqm (31%) including a rooftop COS provided on each building, delivering equitable residential amenity

Item no.	Issue/ Comment	Proponent Response
		in addition to the shared groundfloor landscape experience that has imbedded connecting with country throughout its design. The total proposed tree canopy (including retained) is 1,540 sqm (23.5%) which is an improvement to the existing tree canopy cover being 1044 sqm (15.9%).
Aesthetics		
5	The drawings have been clouded but there is no detail as to what has been changed. Reference has been made to “design changes to the building facades”. These changes are not identified. Further information and detail should be requested in relation to the exact nature and scope of changes to the building façade.	Building facade changes have been included in Chapter 05.07 - Facade Amendment of the updated Design Report.
Height		
6	A revised Clause 4.6 variation request has been submitted to increase the extent of the variation sought to the maximum height standard. A maximum height of 34.95m (being located at the north-western corner of the lift overrun at Pavilion A) now results in a height exceedance of 6.35m (22.2%). Council’s objection to the building height remains for the reasons outlined in the original submission.	- The exhibited Combined Submission and Amendment Report included clarifications on the application of the additional bonuses for Height of Building under the infill affordable housing provisions of the Housing SEPP for the amended scheme. - The height non-compliance is addressed in the revised Clause 4.6 Variation Request. As stipulated under Clause 4.6 (3) of the KLEP, a consent authority is only required to be satisfied that (1) compliance with the development standard is unreasonable or unnecessary in the circumstances; and (2) there are sufficient environmental planning grounds to justify the contravention of the development standard. - The revised Clause 4.6 Variation Request has addressed these matters as well as Council’s original objection to the height non-compliance and is well founded. - It is noted that the planning context of development has changed since Council’s original submission (being the Ku-ring-gai Station Precinct SEPP Amendment) which the SSDA has addressed.
Gross Floor Area		
7	Original concerns remain.	The exhibited Combined Submission and Amendment Report included clarifications on the application of the additional bonuses for FSR under the infill affordable housing provisions of the Housing SEPP for the amended scheme.

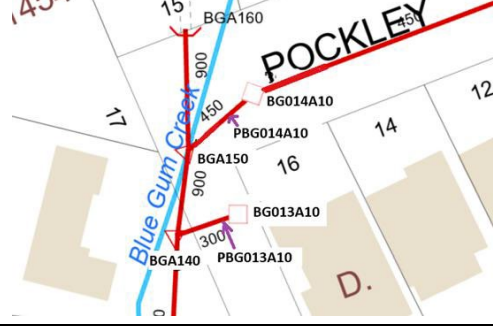
Item no.	Issue/ Comment	Proponent Response
		• Detailed information has been provided in relation to the allocation of GFA between market residential GFA, affordable housing (in-perpetuity) GFA and affordable housing (min. 15 years under infill affordable provisions) GFA. • Refer to the revised GFA Schedule and GFA Diagrams provided in architectural documentation.
Building setbacks		
8	<i>Insufficient setbacks</i> The proposed setbacks remain a key contention for Council. The result of the proposed setback deficiencies will be a building that irrevocably changes the character of Lindfield by destroying the garden setting of the neighbourhood. Considering the additional height afforded under the repealed TOD provisions, full compliance with the setbacks outlined in Council’s original submission would reduce the overbearing impact of the development. Likewise, insufficient justification has been provided to support the encroachment of balconies at ground level. Lastly, to support canopy growth for tall trees, it is recommended that the setbacks be increased. Notwithstanding the increased basement setbacks, the deep soil zones are still incapable of supporting canopy trees to maturity due to restricted airspace for copy expansion.	• The amendments made in response to the first RTS for the project included increasing basement setbacks to the east and west boundaries. • Woods Bagot has advised that the basement setback from the eastern boundary along Larkin Street has been maximised to support an increased setback from the western which to allows for a more generous COS as well as deep soil zone to this frontage that also provides a greater buffer to lower density residential areas to the south. • It is noted that the proposal has made provision for 706 sqm (10.8%) of deep soil which is beyond the 7% requirements of the ADG. Further, the 1,540sqm of tree canopy proposed (including retained), representing 23.5% of site area, is a notable improvement to the existing tree canopy context of the site at 1,044 sqm (15.9%). • The following consideration for setbacks demonstrates a reasonable response for a constrained site and that alternative solutions were investigated: – Woods Bagot advised that the decision to move the pavilions towards Larkin Street was determined carefully to provide reasonable separations between each pavilion. This was acknowledged and supported by the SDRP 01 as “rigorous testing of massing(s)” and the resulting “siting of the buildings, which is a logical response to a steeply sloping site”. – The eastern setback is also limited due to functional efficiencies of the basement layout which are already at its limit with respect to aisle widths and carpark depths. Should this arrangement change, it risks deeper excavation to attain the required number of car spaces, as well as possible further encroachment to the western COS and deep soil zone. – The proposal provides an urban and landscape design response to maintain as much space on the western boundary to enhance the proposal’s engagement with the biodiversity zone in the area and minimise impacts to lower density areas to the south. – Due to the steep slope of the site, the alternatives of moving the buildings east or west would not materially impact the vertical depth of the excavation, as the Ground Level of the lowest pavilion (Pavilion C) would

Item no.	Issue/ Comment	Proponent Response
		follow the existing ground level, meaning, if the buildings were to move west, they would also move downwards, maintaining most of the relative vertical depth of the courtyard POS and COS spaces accordingly. Overall, the proposed development has provided appropriate setbacks, building articulation and a comprehensive landscaping master plan that has considered the interface with the existing lower density sites to the west and integrates with the existing landscape character of Ku-ring-gai. Provisions to ensure privacy to surrounding developments has been implemented through increased setbacks at higher levels as well as material privacy treatment to minimise overlooking.
Landscaping		
9	SEARS The amended proposal fails to adequately address the previous issues raised. Detailed concerns raised below remain. SEARS (Secretary's Environmental Assessment Requirements) inconsistency Trees and Landscaping - Assess the number, location, condition and significance of trees to be removed and retained and note any existing canopy coverage to be retained on-site. - Provide a detailed site-wide landscape plan, that: - details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage (as a percentage of the site area). - provides evidence that opportunities to retain significant trees have been explored and/or informs the plan. - demonstrates how the proposed development would: - contribute to long term landscape setting in respect of the site and streetscape. - mitigate the urban heat island effect and ensure appropriate comfort levels on-site. - contribute to the objective of increased urban tree canopy cover. - maximise opportunities for green infrastructure, consistent with Greener Places and having regard to any bush fire risk. The proposal fails to retain significant trees that are a natural constraint to development on site including: Tree 3 Cedrus deodar (Himalayan Cedar) in excellent health and condition, of high significance (20m high) with an AA1 Rating (highest); and Tree 7 Phoenix canariensis (Canary Island Date Palm) in excellent health and condition, 14m high with an A1 rating, contributing positively to the established landscape character and context, and streetscape. Trees 3 and 7 can be viably retained by: - relocating the location of the proposed substation so as not to conflict with Trees 6 & 7	- Trees nominated and listed to be removed or retained are shown on page 11 of the Addendum to Landscape SSDA Report dated 20.11.2025 and drawing number LDA-101 of the DA plans issued to be stamped dated 21.11.2025. Both plans reference Tree Care Arboricultural Impact Assessment Report (Site B) dated 04.09.2025 for tree condition and significance. - Detailed planting plans were submitted in the Appendices of the Addendum to Landscape SSDA report issued 20.11.2025 and drawing number LDA-301, LDA-302, LDA-601 and LDA-602 of the DA plans issued to be stamped dated 21.11.2025. - Refer to canopy coverage calculation page 13 of the Addendum to Landscape SSDA Report. Existing canopy coverage = 15.9% of the site and proposed canopy coverage = 23.5%. - The development is removing 56 trees and providing 145 trees. - The current location of the sub station provided the easiest level access to the kiosk and has the least visual impact from the streetscape barring the removal of T6. - T3 is currently shown as being removed due to the over 20% encroachment into the TPZ by the extended GF PoS terraces. Although Council that T3 is able to be retained if the PoS terraces were reduced back to the building column or basement line. Basement extents would have adverse impacts to the condition of T3 if it was retained. Reducing the POS line would not improve the conditions enough for T3. - To mitigate the loss of Roseville landscape character trees from the development site due to the constraints of the sloping site and excavation requirements, the Project proposes the planting of additional landscape character trees within the wide street verges around the development.

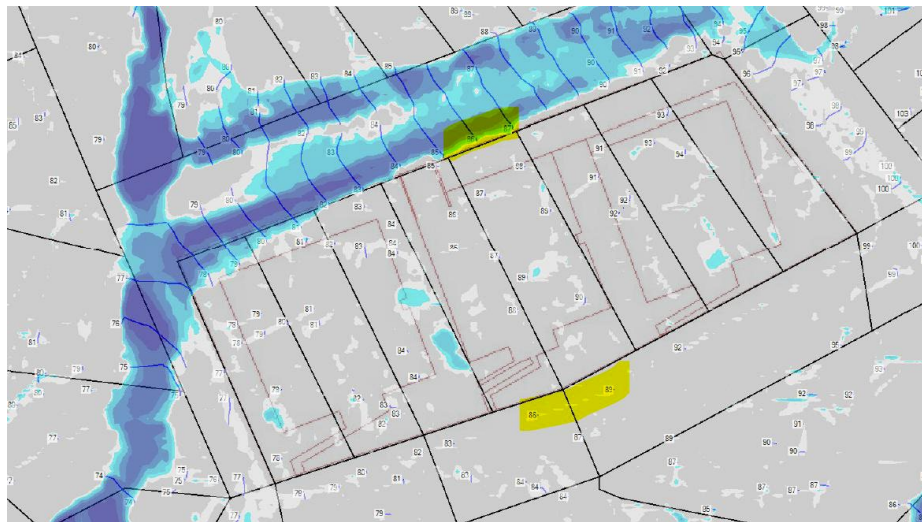
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	- maintaining existing levels and grades to the existing building line (Tree 3). - reducing excavation extent within the Tree Protection Zone (TPZ) for large areas of POS. NOTE: Palms (Tree 7) have a fibrous root system and are tolerant of disturbance within their TPZ. As per the project arborist's reporting, AA1 trees are 'important trees suitable for retention for more than 10 years and worthy of being a material constraint. AA trees are at the top of the categorisation hierarchy and should be given the most weight in any selection process.' The removal of Trees 3 and 7 fails to maintain significant trees that contribute positively to the streetscape and established landscape character. Additional trees are worthy of retention, including Trees 4, 6, 26 and 28 with locations adjacent to site boundaries, particularly with A1 category ratings. The Z12 ratings accorded to Trees 6 and 12 is disagreed with. While the trees may be co-dominant (which is quite typical of the species), they do not have any structural flaws and contribute positively to the established landscape character and context of Lindfield. With a large site area of over 6500m², there is design opportunity and flexibility to retain highly significant trees (Tree 3) and locate areas of deep soil to enable the viable retention of other trees with high and moderate landscape significance (Trees: 6, 7, 28, 35 and 36) to maintain the established landscape character. The nominated tree removal (clearing all trees and vegetation on site) is inconsistent with Issue 8 of SEARS.	The selection of tree species is indicated as Street Tree – Exotic Garden Character on page 12 of the ToA response report issued 20.11.2025. Landscape character trees can be included in the designated Blue Gum High Forest planting zone along Pockley Ave if required. This is however not suggested.
10	SEPP Housing – Schedule 9 The proposal is inconsistent with the landscape design principle due to: - The proposed removal of Trees 3, 6, 7, 28, and 35 fails to retain an existing positive natural feature that forms part of the local context and character and provides habitat (3a, d, e & f). - The proposed removal of Trees 3, 6 and 7 fails to respect neighbour's amenity (4d). - The planting of tall canopy tree species within restricted landscape areas with reduced soil volumes fails to provide for practical establishment and long-term tree management and viability (5). - The proposed landscape aesthetic that excludes the use of exotic deciduous and evergreen tree species fails to adequately respond to the landscape character of the streetscape and neighbourhood (2).	Refer to responses to Item 9 above.
11	ADG – Part 3E The location of proposed deep soil zones has not adequately considered the retention of trees with high significance including Trees 3 and 7 and fails to satisfy the design guidance to retain existing significant trees. The lack of deep soil landscape areas within the Maclaurin and Larkin Street site frontages fails to provide viable soil volumes and areas for the planting of tall canopy trees to contribute	- Where possible tall canopy trees have been planted in the designated 6m wide deep soil zones to comply with the ADG. - The site excavation will be terraced to provide 1m of soil depth for planting of trees and their long term viability for canopy trees.

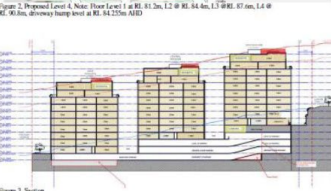
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	to the streetscape and public domain, and in turn fails to recognise the established landscape character. It is important to note that deep soil zones and canopy tree planting (existing and proposed) are considered fundamental to the desired future character of residential apartment development in Ku ring gai. This is further reinforced in the Local Strategic Planning Statement (LSPS) which describes the established tree canopy in Ku ring gai is a defining characteristic and essential to the 'look and feel' of Ku ring gai. Due to the sites context and established character, it is assessed that as the site area of 6539m² is significantly larger than 1500m² the ADG 15% deep soil should apply as a minimum. By the applicant's calculations, the proposal will result in a deep soil zone of 706m² /10.8% of the site area. The applicant's deep soil compliance plan incorrectly includes areas that are inconsistent with the definition. For example: • Sandstone log retaining walls are proposed within the Pockley Avenue site frontage. These are retaining structures/walls, and the subsequent area does not meet the minimum 6m dimension. The proposal fails to meet the enhanced 15% deep soil zone design criteria objective which is appropriate for the site's context and large size. The lack of deep soil zones within the site frontages is inconsistent with 'Greener Places' design opportunities for supplementary tall tree plantings which would be consistent with the established landscape character and streetscape. The planting of tall endemic species within restricted planting areas and limited soil volumes is considered unviable and does not provide certainty of long term planting outcomes.	• Most of the trees placed within the terraces are smaller in nature and not tall canopy trees due to the microclimate created on the southern side of the buildings. • The proposal complies with the ADG requirement for 7% deep soil. • These elevated platforms were originally included to meet the CoS calculations. If these areas are a problem for the deep soil calculations, then they may be able to be removed due to the roof top CoS. • We have identified several of the selected tree species performing quite well in far more restricted street verge environments within the Ku-ring-gai LGA.
12	ADG – Part 4 The removal of mature and significant trees in good health and condition that contribute positively to the established and desired streetscape and landscape character is inconsistent with ADG Objective Part 4O-2 and design guidance. There is design opportunity to enable the viable retention of Trees 3 and 7 (high significance) and other trees that contribute to the established landscape and streetscape character (Trees 6, 28 and 35). If the retention of Trees 6 and 28 (Jacaranda) is not favourably considered, replenishment species should be consistent to reflect and maintain the established landscape context. Stormwater The location of the proposed on-site detention (OSD) tank outside of the basement footprint within the Pockley Avenue site frontage fails to adequately consider the ability of the proposal to provide deep soil landscape zone for the planting of trees that contribute positively to the streetscape and landscape character.	• Refer to responses to Item 9 above. • Refer to responses to Item 15 in relation to OSD tank location.

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	The OSD tank location should be reconsidered and relocated within the building footprint and outside of boundary setbacks and street frontages.	
13	KDCP Part 13 The removal of trees of high significance including Trees 3 and 7 fails to protect, maintain and preserve the tree canopy and established landscape character. The removal of these trees is inconsistent with the aims, objectives and controls of the KDCP.	Refer to responses to Item 9 above.
14	Landscape design and character The planting of tall Eucalypts (>20m) with broad canopy dimensions (>20m) e.g. Eucalyptus saligna (Sydney Blue Gum) in close proximity to the building and built infrastructure is ill-advised and will lead to future and ongoing canopy and root growth conflict resulting in the planting being unviable. While the planting of tall Eucalypts that strongly define Ku-ring-gai's landscape character is encouraged, the plantings should be appropriately located with suitable setbacks to enable their future canopy growth and development. The proposed native planting aesthetic fails to adequately respond to the existing established or desired urban landscape character and broader context, where exotic trees and understorey canopy and plantings provide seasonal change and variation, and solar amenity beneath a taller endemic tree canopy. The proposed extensive use of bluestone stepping stones is uncharacteristic of Ku ring gai. The use of Sydney Sandstone is more appropriate to maintain and enhance the established landscape character and context. The lack of deep soil landscape areas to two site frontages fails to maintain established landscape character with the viable planting of tall trees. The removal of trees with broader landscape significance in good health and condition (Trees 3 and 7) fails to maintain existing landscape character.	Refer to responses to Item 9 above.
Engineering		
15A	Water Management A CCTV video and report of the existing pit and pipe fronting to Council's trunk drainage system shall form part of this required certification. The condition of the existing pipe is to be inspected by a licenced plumber to verify if the existing pipe is in good working condition. The findings of the plumber's report are to be submitted. Pre- and Post- construction CCTV inspections are required. Inspection videos and reports must be submitted to the Council for review. Council asset IDs are provided below.	- A CCTV report was previously submitted to DPHI documenting the existing conditions of the pipes surrounding the discharge location. Defect report ref "Pockley Ave CCTV defect report" and respective video files showing real-time imagery. - CCTV inspections can be conditioned in any determination and conducted as necessary.

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15B	Provide invert levels and surface levels of all stormwater pits within the site.	• Invert levels and surface levels of all stormwater pits within the site have been documented on long section drawing (drawing no: STN-ZZ-000-DR-CI-5220).
15C	No supporting hydraulic calculation have been submitted to demonstrate compliance with Part 24C.3-4 of the KDCP which requires rainwater retention and re-use to be provided to achieve a 50% reduction in runoff days. A water balance model has not been submitted. No clarification has been provided as to the purpose of the proposed rainwater tank given that a retention component would also be required. Full design details including cross-section details of the OSD and on-site retention (OSR) are to be submitted. No stormwater disposal system has been submitted for the basement level. No supporting calculation for the pump-out pit based on the 100 year 2 hour storm has been submitted. The stormwater design does not show the rising main from the pump-out tank directed to the on-site detention tank.	• MUSIC model and MUSIC-Link report to follow prior to Construction Certificate stage. Model and report to show Rainwater tank retention percentage in-line with Ku-ring-gai council standards. This will be sized and accounted for 100% retention of the first 10mm of rainfall as per Part 24C – Mandatory Rainwater Rank Requirements. • The purpose of the rainwater tank is to provide potable water to the development to achieve minimum re-use targets. Overflow from the tank will connect to the proposed stormwater system via a stormwater pump solution. • Stormwater detention tank (OSD) has been detailed, and typical cross-sections have been provided on drawings “STN-ZZ-000-DR-CI 526005”. On-site retention is to be captured by the Rainwater tank located within the basement car park. • Stormwater disposal for the basement car park will be captured using a stormwater pump system under the remit of a hydraulic engineer. Calculations for stormwater pumps to be provided by hydraulic engineer. • Stormwater rising main to discharge to stormwater pit 02-14. This will be required to alleviate the pressure network before out-falling via the detention tank.
15D	According to the Updated Stormwater Management Report, the development site is proposed to discharge its stormwater into existing Council drainage pit (BG013A10), which is located opposite 19 Pockley Avenue Roseville. The accepting system contains a 300mm diameter pipe to convey surface water to the downstream drainage system.	• A capacity check of the existing system will not be necessary. The maximum permissible site discharge is significantly lower than the existing stormwater runoff from the existing brownfield site.

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	The applicant should provide evidence on the receiving drainage system, confirming whether the receiving system has capacity to convey the discharge volume without overflowing.	- As identified in table 3 of the Stormwater Management Plan, the existing runoff from the existing site far exceeds the post development runoff in the maximum rainfall event. This is engineered by introducing temporary underground storage at the location of discharge to allow flows to outfall slowly over a longer period of time. This calculation is undertaken to the 1% AEP storm event. - It is confirmed that all stormwater in-ground infrastructure from both Pockley Avenue and Maclaurin Parade discharge to the same outfall located south-west of the site. Refer to existing stormwater map below: - Stormwater discharge from the proposed development has been calculated using the requested calculation sheet as requested by DPHI (see appendix D of the Stormwater Management Report). This maximum permissible discharge is calculated using the Ku-ring-gai calculation sheet plan for the Blue-gum creek river. The wider river catchments allow this rate of flow from the development and therefore already consider the wider network. By adding temporary storage in the volume of 113m³, the stormwater network is able to discharge flows significantly lower in all rainfall events to a singular location reducing capacity concern.
15E	The information, shown in the long section (page 54 of 115 in Updated Stormwater Management Report) is confusing. The velocity and discharge volume were 5% AEP storms, but the HGL levels were 20% AEP storms. Clarification should be sought in relation to the proposed 20% AEP HGL levels.	This is a typo - the long section has been updated to reflect 5% AEP.

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	<table><tr><td>1% AEP VELOCITY (m/s)</td><td>1.1</td><td>1.4</td><td>5.8</td><td>1.2</td><td>10.0</td><td>1.2</td><td>1.3</td><td>1.2</td><td>1.8</td><td>1.8</td><td>1.2</td><td>1.8</td><td>0.7</td><td>0.4</td></tr><tr><td>1% AEP DISCHARGE (m³/s)</td><td>0.032</td><td>0.041</td><td>0.041</td><td>0.041</td><td>0.000</td><td>0.052</td><td>0.078</td><td>0.078</td><td>0.084</td><td>0.084</td><td>0.078</td><td>0.084</td><td>0.111</td><td>0.127</td></tr><tr><td>PIPE DETAILS</td><td>225</td><td>225</td><td>300</td><td>300</td><td>300</td><td>300</td><td>375</td><td>450</td><td>450</td><td>450</td><td>450</td><td>450</td><td>450</td><td>600</td></tr><tr><td></td><td>PVC</td><td>PVC</td><td colspan="3">HDPE/RCP - RJU (SPIGOT AND SOCKET) - CLASS 3</td><td>RCP</td><td>RCP</td><td>RCP</td><td>RCP</td><td>RCP</td><td>RCP</td><td>RCP</td><td>RCP</td><td>RCP</td></tr><tr><td>PIPE GRADE</td><td>12%</td><td>10%</td><td>10.0%</td><td>10.0%</td><td>13.6%</td><td>14.3%</td><td>2.8%</td><td>1.0%</td><td>1.0%</td><td>1.0%</td><td>1.0%</td><td>1.0%</td><td>1.0%</td><td>1.0%</td></tr></table> <table><tr><td colspan="15">DATUM TO 000m AHD</td></tr><tr><td>COVER</td><td>0.89</td><td>0.77</td><td>0.75</td><td>1.95</td><td>3.87</td><td>2.42</td><td>0.78</td><td>0.78</td><td>0.78</td><td>0.78</td><td>0.78</td><td>0.78</td><td>0.78</td><td>1.27</td></tr><tr><td>20% AEP HGL LEVEL</td><td>85.36</td><td>85.12</td><td>85.12</td><td>85.36</td><td>85.36</td><td>85.36</td><td>85.36</td><td>85.36</td><td>85.36</td><td>85.36</td><td>85.36</td><td>85.36</td><td>85.36</td><td>85.36</td></tr><tr><td>INVERT LEVEL</td><td>85.13</td><td>85.08</td><td>85.08</td><td>85.08</td><td>85.08</td><td>85.08</td><td>85.08</td><td>85.08</td><td>85.08</td><td>85.08</td><td>85.08</td><td>85.08</td><td>85.08</td><td>85.08</td></tr><tr><td>SURFACE LEVEL</td><td>85.68</td><td>85.68</td><td>85.68</td><td>85.68</td><td>85.68</td><td>85.68</td><td>85.68</td><td>85.68</td><td>85.68</td><td>85.68</td><td>85.68</td><td>85.68</td><td>85.68</td><td>85.68</td></tr><tr><td>RUNNING CHAINAGE</td><td>14.7</td><td>25.0</td><td>30.7</td><td>36.4</td><td>43.1</td><td>49.8</td><td>55.5</td><td>61.2</td><td>66.9</td><td>72.6</td><td>78.3</td><td>84.0</td><td>89.7</td><td>95.4</td></tr></table> C-STRM-01	1% AEP VELOCITY (m/s)	1.1	1.4	5.8	1.2	10.0	1.2	1.3	1.2	1.8	1.8	1.2	1.8	0.7	0.4	1% AEP DISCHARGE (m³/s)	0.032	0.041	0.041	0.041	0.000	0.052	0.078	0.078	0.084	0.084	0.078	0.084	0.111	0.127	PIPE DETAILS	225	225	300	300	300	300	375	450	450	450	450	450	450	600		PVC	PVC	HDPE/RCP - RJU (SPIGOT AND SOCKET) - CLASS 3			RCP	RCP	RCP	RCP	RCP	RCP	RCP	RCP	RCP	PIPE GRADE	12%	10%	10.0%	10.0%	13.6%	14.3%	2.8%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	DATUM TO 000m AHD															COVER	0.89	0.77	0.75	1.95	3.87	2.42	0.78	0.78	0.78	0.78	0.78	0.78	0.78	1.27	20% AEP HGL LEVEL	85.36	85.12	85.12	85.36	85.36	85.36	85.36	85.36	85.36	85.36	85.36	85.36	85.36	85.36	INVERT LEVEL	85.13	85.08	85.08	85.08	85.08	85.08	85.08	85.08	85.08	85.08	85.08	85.08	85.08	85.08	SURFACE LEVEL	85.68	85.68	85.68	85.68	85.68	85.68	85.68	85.68	85.68	85.68	85.68	85.68	85.68	85.68	RUNNING CHAINAGE	14.7	25.0	30.7	36.4	43.1	49.8	55.5	61.2	66.9	72.6	78.3	84.0	89.7	95.4	
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15F	The 1% AEP flood levels for both Pockley Avenue and McLaurin Parade are above 85.2m. The applicant should provide a simulation to demonstrate that the car park will not be subject to flooding. 	- Flooding information considers the existing topography of the existing road and shows water levels respectfully. As our site access is above the 1% flood level (plus freeboard) there is no benefit to simulation at this stage. - Refer to response to Item 16 in this table.																																																																																																																																																																					
15G	The response provided regarding “Stormwater Capacity Check” (on Page 115 of 115) does not contain valid references, because there was no calculation shown on page 65. Clarification on this issue should be sought.	This is a typo - Appendix D is on page 90 of 92 (Rev 004). For all future references, refer to Appendix D for On-site detention calculation.																																																																																																																																																																					

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	Reference: Stormwater Capacity Check In response to the community submissions received in Section 4.4 (p.67), on behalf of our client Aqualand Prestige, we confirm that there is provision for on-site detention tank accordance with the requirements as follows: An On-Site Detention Calculation sheet was undertaken to determine the minimum storage capacity of the underground tank. This is calculated using Permitted Site Discharge rates from Ku-ring-gai Council technical advice document "Ku-ring-gai Council Technical Guideline for Water Management" – table 4.3. Maximum discharge rate and minimum detention volume has been calculated by council within catchments of the council boundary to ensure capacity within Blue-Gum Creek is not exceeded. Refer to the following in the previous submission for these details: Larkin & Pockley – Pockley Avenue Site – Stormwater Management Report, Appendix D On-Site Detention Calculation Sheet, page 65.  Figure 1 Site location The details of the hydraulic modelling and the applicable flood controls are described in the following: (a) the emergency flood response plan is given in Appendix A and the relevant flood maps are presented in Appendix B.  Figure 2 Proposed Level A (Note: Floor Level 4 at RL 81.3m, L2 @ RL 84.4m, L3 @ RL 87.0m, L4 @ RL 90.0m, driveway ramp level at RL 84.25m AHD)  Figure 3 Section	
16	Flood assessment Confirmation from the Design Engineer that the minimum floor levels for the proposed development as depicted on the architectural plans meet the 500mm above the 1% AEP levels as stated within Flood Risk Management Report is required.	• The Flood Risk Management Report that was prepared for the amendment package by Kozarovski and Partners confirms that for safety of life, any basement ingress, should be 500mm above 1% AEP levels. • The proposed levels for the lobbies and entries, which are considered areas at risk of potential flooding have been designed to be away from any flood affected zones, and 500mm above the 1% AEP levels where relevant, to mitigate potential flood impact to the proposed development.
17	Car Parking and Traffic Assessment The lifts and lobbies should be of a suitable size such that residents can transport their bicycles between their storage area and ground/street level without using the internal car park ramps.	• The lift and lobby dimensions of each building are suitable to enable residents to transport their bicycles between storages areas and the ground/street level and therefore do not require the usage of internal car park ramps.

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	The response by the Applicant to Traffic and Parking Matters states that this can be conditioned, so a suitable condition should be drafted that this be complied with prior to Construction Certificate. Some of the visitor bicycle parking devices from Pavilion B and C are to be redistributed to the Pavilion A Lobby. While bicycle parking devices have been shown in the amended plans at the Pavilion A Lobby, there is no level access to them due to stairs and a passenger lift. A more suitable location near the lobby should be identified that does not require use of stairs or a passenger lift. An on-site loading area should be provided; the position of which must not prevent access to and from the basement level car park, with at least one travel lane to be maintained at all times while loading/unloading takes place on the driveway. At least one on-site loading space which is at least 3.5m wide is to be provided to cater for a minimum 6.7m long service vehicle. The loading space/s should be line marked and/or signposted as a designated loading area. The controls in Section 25B.2 of KDCP state that an on-site Bulky Goods Collection Point as part of the entry access driveway is required (a separate hardstand area is not permitted). The position of the loading area must not prevent access to and from the basement level car park, with at least one travel lane to be maintained at all times while loading/unloading takes place on the driveway. Conditions of consent must require that all bulky goods waste material is placed on the on-site Bulky Goods Collection Point ready for collection. Materials placed on the footpath will not be collected and will incur a penalty fine. Also, conditions of consent must state that Bulky Goods Waste will only be collected from the on-site Collection Point, and any waste outside the development boundary will not be collected The proposed access point appears to be in a prohibited location based on Figure 3.1 of AS2890.1 (new).	• A 3.5m wide service bay is provided on Carpark Level 02 adjacent to the bin rooms. This loading dock can accommodate vehicles up to and including Council's 6.7m long waste truck, as demonstrated in the submitted Traffic Impact Assessment. Bulky waste will be collected from this service bay. • Varga Traffic Planning have advised that whilst the proposed access point is located within a prohibited location under Figure 3.1 of AS2890.1, this is considered acceptable as: – The location of the driveway provides the most adequate sight distance out of the feasible access points along the site frontage. – Nola Road is a low-traffic, local cul-de-sac road. As such, there is low potential for conflicting movements at the proposed access point.
18	Civil Plans The stormwater discharge connection to the existing stormwater pit in Pockley Avenue will need to be upgraded. Consultation with Council's Design Engineer (Operations Department) is recommended. A footpath design is to be provided along the site's frontage and is to be designed in accordance with Council drawing 2003-004 Rev. 'B as referred to within the General Specification for the Construction of Road Works dated November 2004'. A footpath longitudinal section will also be needed to show the extent of cut/fill, existing services and existing street tree locations. The project arborist will need to endorse the civil plans. All redundant driveway crossings are to be shown for removal.	• The following plans are sought as conditions of consent, to be in line with the concept designs once approved.

4.3 Public Submissions

The Applicant's response to key concerns raised in the public submissions are outlined in **Table 7** below.

Table 7: Responses to Public Submissions

Item no.	Number of Submissions Raised	Issue/ Comment	Comment
Bushfire risk of the area			
1	63	Increased risks from 1994 bushfire - Community concern for bushfire risk with reference to the 1994 bushfire (originated in Lane Cove National Park (east of De Burghs Bridge and spread via Grosvenor Road and up the Blue Gum Creek valley to Findlay Avenue) with reported issues including evacuation congestion. Since the 1994 bushfires, there have been new high-rise developments and now further 400+ additional dwellings proposed (SSDs and Council DAs) resulting in more than double vehicle volumes which have caused concerns relating to safe evacuation thresholds. - Concern for increased bushfire risk due to climate change.	- The site is not located on bushfire prone land and is beyond the bushfire risk buffer zone in Ku-ring-gai Council's online mapping tool. Therefore, a Bushfire Impact Assessment has not been prepared for this SSDA. - Further, DPHI, other government agencies and Council have not raised bushfire as a notable risk to address requiring any additional technical assessment.
2		Landlocked area with increased risk of bushfire - The South West Roseville precinct (Larkin St, Larkin Lane, Pockley Ave, Maclaurin Pde, Alexander Pde, Corona Ave, Kings Ave, Findlay Ave) is described as a <i>landlocked bushfire-prone area</i> with limited evacuation routes. - On-street parking effectively narrows Larkin Lane, Larkin Street, Pockley Avenue, Maclaurin Parade and Corona Avenue, limiting two-way emergency access. Residents raise concerns that additional traffic from new development would create a "car blockade" during a mass evacuation and impede emergency vehicle entry.	- The site has direct access to the Pacific Highway to be utilised as a route for evacuation if needed. A Bushfire Emergency/Evacuation Management Plan which may include procedures for emergency services can be conditioned in any determination if deemed as necessary. - On-street parking can be controlled by Council parking signs
3		Surrounding land identified as bushfire prone land The development site itself is not mapped as bushfire-prone, but surrounding streets are.	A Bushfire Impact Assessment has not been prepared for this SSDA as development provisions do not apply to land that is not mapped as bush-fire prone.
Traffic congestion and limited capacity of local road network			
4	58	Cumulative traffic impact to limited access and constrained road network The South West Roseville precinct is described as having limited exit routes, concentrating traffic movements onto Maclaurin Parade for access to the Pacific Highway. Population growth and additional dwellings are	Varga Traffic Planning have advised that the comments in relation to traffic impacts are addressed by the review and submission by TfNSW which has advised in their letter dated 4 June 2025 to DPHI that "<i>the proposed development is unlikely to have a significant impact on the State classified road network (i.e. Pacific Highway)</i>".

Item no.	Number of Submissions Raised	Issue/ Comment	Comment
		expected to increase pressure on an already constrained local road network. - Concerns that traffic assessments do not adequately consider combined impacts of nearby developments, including: – 2 & 4 Larkin Street and 1, 3 & 5 Pockley Avenue (SSD-77829461) – 7, 9 & 11 Pockley Avenue (eDA0189/25) – 4–10 Maclaurin Parade – “Juliet” development in Larkin Lane (Roseville Memorial Club site)	
5		Maclaurin Parade / Pacific Highway intersection congestion and project traffic increases from the development - Existing congestion at this intersection is identified as a primary issue, with current conditions described as gridlocked during peak periods, the development will contribute significantly more additional traffic congestion issues. - Traffic signal duration doesn’t allow efficient traffic flow onto the Pacific Highway. <i>“In AM peak hour it takes 2-3, sometimes as many as 4 traffic light changes for a right turn exit.”</i> - Notes that traffic considerations for the Pacific Highway from TfNSW underestimates the intersection congestion issues onto the Pacific Highway.	Refer to response for Item 4 of this table.
6		Intersection safety concerns - Potential redistribution of traffic to Shirley Road, with concerns about increased congestion and safety at the Shirley Road / Clanville Avenue / Pacific Highway intersection, described as an accident black spot. - Additional U-turn movements on Maclaurin Parade to access southbound Pacific Highway traffic are identified as worsening congestion.	Refer to response for Item 4 of this table.
7		Reliance on uncommitted infrastructure Proposed mitigation via a future road connection between Pockley Avenue and Shirley Road is noted, but concerns raised due to lack of confirmed delivery timeframe or commitment.	Refer to response for Item 4 of this table.
Concerns for emergency evacuation of the area for residents			
8	45	Evacuation capacity and access constraints Limited road egress and landlocked street network may restrict safe evacuation during bushfire events.	Varga Traffic Planning have advised that the subject site is <i>not</i> located in a bushfire prone land as identified in the Ku-ring-gai Council’s Bush Fire Prone Land Map. Nevertheless, in the event of an emergency, police vehicles will manage through movements on Pacific Highway to ensure

Item no.	Number of Submissions Raised	Issue/ Comment	Comment
		- Existing congestion and potential additional traffic from new development could create evacuation bottlenecks. - Increased vehicle volumes may also impede emergency service access into the area.	vehicles can exit Maclaurin Parade, and to ensure that emergency vehicles can access the area.
9		Infrastructure and emergency response capacity - Concerns regarding road width, parking, and circulation limiting emergency vehicle movement. - Historical issues with water pressure and firefighting capacity referenced as ongoing risks.	Refer to response for Item 8 of this table.
10	27	Cumulative development and population increase - Additional dwellings and recent high-density developments have increased the number of residents relying on the same constrained road network. - Concerns that cumulative growth exceeds safe evacuation thresholds identified in previous bushfire planning studies.	Refer to response for Item 8 of this table.
Building height			
11	35	- General opposition to additional height proposed - Notes that development proposals shouldn't exceed the amended Ku-ring-gai Council controls	- The additional height from the amendment is attributed to providing additional and equitable access to residential amenities on the rooftop of each building and consequential reconfiguration of services on the rooftop. - All additional environmental impacts relevant to the additional height has been addressed in the clause 4.6 variation request. - The amended LEP heights of the surrounding area as a result of the Ku-ring-gai Station Precinct SEPP Amendment, which has been implemented over the course of the SSDA process, allow for permissible heights of up to 29m, with additional opportunities for additional infill affordable housing bonuses. - Therefore, the proposal is only a minor exceedance from these amended expected heights.
FSR / Bulk and scale			
12	35	Opposition to general bulk and scale of the proposal	- The bulk and scale of the proposed development have been developed over the course of the project and in consultation with the SDRP to minimise impacts on surrounding development and public space. - A series of alternative massing options were presented at the SDRP demonstrating variations of compliant built form envelopes. These included a singular block form which maximises the potential FSR and

Item no.	Number of Submissions Raised	Issue/ Comment	Comment
			height controls and result in more adverse visual impacts to perception of scale and residential amenity impacts from a bulkier, less articulated form as well as extensive benching and excavation than that which is proposed. • The proposed massing was supported by the SDRP as it broke up the built form into three building elements. • The design of the built form allows for some visual relief and increased residential amenities including cross ventilation, and solar. • This additional 2,749 m³ of volume above the permissible height plane is considerably less than the 5,195m³ of underutilised volume under the permissible height plane whilst the proposed GFA remains compliant with the maximum permitted floor space ratio control of 3.25:1 pursuant to Chapter 2 and 5 of the Housing SEPP and in accordance with the definition of gross floor area set in the KLEP.
13	18	Out of character with the existing neighbourhood	• The proposal has interrogated all relevant factors that contribute to determining the 'desired future character of the precinct' which is a required consideration under Chapter 2 Part 2 Section 20 of the Housing SEPP for 'precinct undergoing transition'. • The surrounding context of the site is clearly an area undergoing transition as evidenced by the introduction of the TOD program and implementation of Chapter 5 Transport Oriented Development provisions for the identified Roseville Station catchment by the State Government, which has since been followed by Council's alternative Preferred Scenario, which was subsequently published as part of the Ku-ring-gai Station Precinct SEPP Amendment over course of this SSDA process.
Parking provision			
14	32	Opposition to the reduction in car parking numbers in the amendment with concern for additional demand for on-street carparking which is already at capacity and adds pressure to local road network bottlenecks, further constrain road widths and traffic flow.	• Varga Traffic Planning have advised that the proposed parking provision complies with the <i>minimum</i> and <i>maximum</i> number of spaces required under Council's <i>DCP</i>, as well as the number of spaces required under <i>SEPP (Housing) 2021</i> and is therefore considered acceptable.
15		Questions need for large quantity of parking provisions for a TOD development site with access to public transport	• Varga Traffic Planning have advised that addition to the response to Item 14 above, the number of parking spaces is not an accurate indication of projected future traffic generation potential. Nevertheless, as indicated in the Supplementary Traffic Letter to DPHI prepared by Varga, dated 21 November 2025, application of the peak hour vehicle trip rate per parking space yields an almost identical traffic generation potential when using the traffic generation rates based on number of units.

Item no.	Number of Submissions Raised	Issue/ Comment	Comment
Strain on/ limited existing local infrastructure			
16	27	Lack of pedestrian accessibility - No pram- or wheelchair-accessible footpath connection from Maclaurin Parade to the Pacific Highway, Roseville Station, and local shops. Concerns that poor pedestrian infrastructure limits safe access for young families and people with mobility needs. - Concerns for safety of pedestrian movement within peak hours amongst vehicle traffic congestion.	As per response to Item 18 of Table 6, a footpath design provided along the site’s frontage, in accordance with Council requirements can be conditioned in line with the concept design, once approved.
17		Insufficient local infrastructure - school, childcare, public open space and shops and developer contributions to local infrastructure - No local childcare centres, public park or playground within easy walking distance for children. - Concerns that existing school capacity is inadequate and will be further strained by additional development. - Absence of a nearby supermarket and essential services means most residents rely on cars despite proximity to public transport. - Requests that any approval require delivery of a local public playground and park suitable for young children. - Recommendation that approval (if granted) be subject to significant specific infrastructure contributions.	- Upon determination of the proposal, local contributions and Housing Productivity Commission contributions will be paid, which are determined proportional to increased residential density. - The requirement for these contributions is in place to ensure adequate servicing and delivery of infrastructure as needed by the community. Therefore, the developer is contributing to local infrastructure as required through due process. - Ku-ring-gai Council’s Open Space and Recreation Needs Study demonstrates there is a significant provision of open space in the LGA. With a total provision of 3,170ha. of public open space, or 25.5ha. per 1,000 people, the Ku-ring-gai LGA has an overall high provision of public open space for recreation. This provision is well above the established benchmark of 3ha. per 1,000 people (Benchmark source, City of Parramatta Community Infrastructure strategy 2020). - Additionally, the site is within 300 metres of the Blue Gum Reserve which is about 17 hectares. The Hotham Reserve is an 11-minute walk from the site. - Further, the LEP amendments resulting from the Ku-ring-gai Station Precinct SEPP Amendment has included the rezoning of the properties of 15-17 Pockley Ave and 20A-22 Shirely Road for the intention of delivering a new local road connection between Shirely Road and Pockley Avenue and public open space.
18			
Lack of deep soil provision			
19	17	Deep soil provision doesn’t satisfy Ku-ring-gai Council requirements	- The deep soil provision of the amended proposal is 706 sqm (10.8%) of the site which exceeds the ADG requirement for 7% of the site. - This provision allows for a landscaping strategy that will result in 1,540 sqm (23.5%) of tree canopy cover (including retained), which improves the current tree canopy outcomes.

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Inadequate setbacks			
20	16	Setbacks are not aligned to Ku-ring-gai Council requirements	- The building setbacks provide a site-specific response to a complex site; balancing considerations of topography, biodiversity zones, excavation implications, residential amenity and appropriate pedestrian and vehicular access, whilst being underpinned by the primary objective to deliver increased market and affordable housing to a well-located and serviced area. - The massing for the proposal was endorsed by the SDRP at early design stages, “rigorous testing of massing(s)” and the resulting “siting of the buildings, which is a logical response to a steeply sloping site”, which appreciates the consideration of site constraints involved with the site and the genuine intention of the developer to move forward with a positive built form outcome for the site.
Impacts of stormwater runoff			
21	15	Stormwater runoff and drainage impacts - Concern that increased hard surfaces and reduced natural ground permeability will increase stormwater runoff with increased runoff velocity due to steep downhill sloping site. - Risk that existing drainage systems and proposed detention measures may be inadequate during heavy rainfall events.	- The impermeable area of the proposed development mostly consists of roof catchment and balcony space. Therefore, reducing any overland flow from the site area than previously. - The quantity of flow from the in-ground stormwater network is controlled using flow control measures within the proposed on-site detention tank. Temporary storage within the tank allows the slow release of stormwater from the development via an orifice place, which has been sized relative to the Ku-ring-gai Council calculation sheet. Refer to Table 3 in latest Stormwater Management plan “301351698-Pockley Avenue Site-SWMP_005” for the discharge rate from the site post-development. - As explained above within Response Item 15 in this table- Water management, a capacity check of the existing system will not be necessary. The maximum permissible site discharge is significantly lower than the existing stormwater runoff from the brownfield site. As identified in Table 3 of the Stormwater Management Plan, the existing runoff from the existing site far exceeds the post development runoff in the maximum rainfall event. This is engineered by introducing temporary underground storage at the location of discharge to allow flows to outfall slowly over a longer period of time. This calculation is undertaken to the 1% AEP storm event.
22		Erosion to downstream property impacts Increased runoff is expected to affect Blue Gum Creek, particularly between Alexander Parade and Shirley Road, potentially causing land erosion and property damage. Residents report existing erosion and	Extensive provisions are in place to capture all stormwater runoff displacing erosion and sedimentation to the wider community. Refer to the Erosion Sediment Control Plan and Details sheet at “STN-ZZ-000-DR-

Item no.	Number of Submissions Raised	Issue/ Comment	Comment
		flooding following recent developments and are concerned impacts will worsen.	CI-070001” and “STN-ZZ-000-DR-CI-076001”. Key elements that are considered for this plan include: – Sediment basin sizing calculations – Pit sandbag barriers – Earth bank catch drain sizing based on runoff catchment
23		Adequacy of stormwater design - Concerns that the proposed on-site detention (OSD) system and discharge arrangements via Pockley Avenue may be undersized or fail during high-flow events. - Requests for review of detention sizing and discharge volumes to ensure no increase in creek flow impacts or loss of land downstream.	The OSD system was sized using Ku-ring-gai Council’s calculation sheet for the blue-gum creek catchment as requested in previous comments from DPHI and Council. The minimum volume and discharge rate have been met accordingly. As the site is not larger than 1.5 ha, no DRAINS model has been provided.
Overshadow impact			
24	13	Concern for additional overshadowing to nearby low density residential dwellings	The additional height exceedance as a result of the additional rooftop communal open space is demonstrated in the revised shadow diagram and illustrate that the additional height has only minor increases to the shadows of the proposal. Importantly the additional shadows are not cast over any building beyond imperceptible impact to the north-eastern corner of 9-15 Kings Avenue at 11am at midwinter.
Biodiversity concerns			
25	10	- Potential impacts on threatened and protected species including powerful owls microbats, particularly concern for habitat loss from tree removal and development could affect reduce habitat quality and biodiversity values within the Blue Gum High Forest. - Concern for potential reduction in canopy cover and ecological connectivity of new planting.	- A BDAR Waiver has been obtained which confirms that the development will have insignificant impacts on the biodiversity values on the site. The BDAR Waiver Request report confirmed the following: - It is considered that no threatened plant communities or threatened species, either flora or fauna, will be impacted by the proposed development, either in relation to foraging, breeding or habitat suitability. - The landscape strategy has considered compatibility with existing natural ‘garden setting’ character of the area and has incorporated a significant portion of the landscape plan to Blue Gum High Forest with ‘Garden’ character exotic street tree planting.
Visual impact			
26	6	Visual impact from the perceived bulk and scale of the proposed development considering the steep topography, particularly for residents to west, downhill	The visual impact comparison between the proposal and a compliant envelope (under Housing SEPP TOD provisions, which legally apply to the site) is demonstrated in the Updated Design Report from viewpoints including the lowest points of the site and road to the west.

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			The visual analysis demonstrates that the view impact is similar to what could be expected from a compliant scheme and imperceptible from the public domain and therefore is reasonable in terms of impact.
Noise impact			
27	1	Residential noise from use of rooftop communal open space impacting neighbouring residential amenity	Operational building management requirements for appropriate usage of the rooftop communal open space can be conditioned for OC.
28	2	Construction noise impacting neighbouring residential amenity	Mitigation measures for the construction phases as recommended in the NVIA report provided with the EIS will be implemented to minimise noise impact to nearby sensitive receivers.
29	3	Cumulative traffic noise from additional cars on the road network being stuck in traffic congestion in the area	Cumulative traffic noise cannot be mitigated by this proposal alone.
Amenity impacts from construction phase			
30	2	Concerns for health impacts to local residents including dust, noise, traffic.	- A detailed Construction Management Plan can be conditioned as part of any determination to include mitigation measures for air pollution for both workers and nearby residents. - Mitigation measures for the construction phases as recommended in the NVIA report provided with the EIS will be implemented to minimise noise impact to nearby sensitive receivers. - A construction traffic management plan has been prepared for this proposal and will be following accordingly.
Affordable housing provision			
31	2	Concerns that the proposal is relying on significant uplift for the provision of affordable housing that for a limited time	Sections 156 under Chapter 5 of the Housing SEPP requires 2% of proposed GFA as affordable housing. Therefore, including the 15% affordable housing delivered under the provisions of Chapter 2, Part 2, the proposal delivers on the provision of 17% affordable housing GFA to satisfy all relevant affordable housing requirements under the Housing SEPP.

5.0 UPDATED PROJECT JUSTIFICATION

This section provides an updated justification and evaluation of the project as a whole, incorporating any relevant issues raised in submissions and the Applicant's response to these issues.

Design refinements and assessments undertaken in response to submission or further design development have not resulted in any additional environmental impact. As such, the project justification presented in the EIS is reinforced and further supported through the amendments to support this proposal.

5.1 Design of the Proposed Development

The design of the proposed development has been carefully considered to ensure that potential impacts are suitably mitigated or minimised. Design refinements have considered the desired future context for the surrounding area which has shifted since the lodgement of the EIS from State Government's TOD provisions under Chapter 5 of the Housing SEPP to draft amendments proposed by Ku-ring-gai Council under Council's Preferred Scenario. A detailed consideration of future character is discussed in **Section 3.1.3**.

5.2 Strategic Context

Since the lodgement of the SSDA, Ku-ring-gai Council adopted a Preferred Scenario on 5 June 2025 (refer to **Figure 1** to **Figure 3**) which was submitted to DPHI and is currently being assessed. DPHI removed Ku-ring-gai TOD catchments from the TOD Sites Map under the Housing SEPP on 13 June 2025. On 19 June, DPHI published updated maps under the KLEP Housing Map which identify the locations where local development applications and state significant development applications have been 'saved' and the TOD controls still apply. Following these events, the future surrounding context excluding these 'saved' sites are based on Council's Preferred Scenario.

Notwithstanding, the proposal remains demonstrating a strong alignment to the strategic planning context. Specifically, the proposed residential development is consistent with what is envisioned for the site under the applicable planning controls for the site, being Chapter 5 TOD provisions under the Housing SEPP. Therefore, the bulk and scale of the proposal reflect the FSR, and storeys expected on the site considering the addition of the 30% uplift pursuant to the Housing SEPP due to the provision of affordable housing. Importantly, the development will deliver increased housing supply (including affordable housing) in a well-serviced area within walking distance of Roseville Train Station.

The priority for increased housing stock in well-located areas is a clear strategic goal as outlined in:

- The National Housing Accord 2022,
- NSW Housing Strategy: Housing 2021,
- Greater Sydney Region Plan: A Metropolis of Three Cities,
- North District Plan 2018,
- Ku-ring-gai Local Strategic Planning Statement,
- Ku-ring-gai Housing Strategy,
- Ku-ring-gai Draft Affordable Housing Policy,
- NSW Future Transport Strategy, and
- Better Placed.

5.3 Statutory Context

The proposal is permissible with consent under the Housing SEPP and meets the relevant statutory requirements of the relevant EPLs including:

- State Environmental Planning Policy (Planning Systems) 2022,
- State Environmental Planning Policy (Housing) 2021,
- State Environmental Planning Policy (Transport and Infrastructure) 2021,
- State Environmental Planning Policy (Resilience and Hazards) 2021,
- State Environmental Planning Policy (Sustainable Buildings) 2022,
- State Environmental Planning Policy (Biodiversity and Conservation) 2021,
- Ku-ring-gai Local Environmental Plan 2015.

5.4 Likely Impacts of the Development

The likely impacts of the proposed development will remain consistent with the submitted EIS. The potential environmental, economic and social impacts are summarised.

5.4.1 Natural and Built Environment Impacts

The site's location within an urbanised setting ensures that the development is consistent with the future desired character of the area, as discussed in the above.

The distribution of building mass and the overall architectural approach, which incorporated SDRP feedback, is compatible with the surrounding built environment and minimises environmental impact to the surrounding area and residents on a steeply sloping constrained site. Further, the additional refinements and technical assessments prepared as part of the Response to Submissions have addressed matters raised by DPHI, Council and the community to a satisfactory level. On balance, the proposal achieves acceptable outcomes through its design and mitigation measures.

The proposal will deliver an improved ecological outcome for the site through landscaping that replaces underutilised areas and considered vegetation with to provide a quality landscape design that will integrate with the established landscaped character of the area. The integration of Ecologically Sustainable Development (ESD) initiatives further ensures that the project minimises potential adverse impacts and contributes to the long-term environmental sustainability of the site. A revised BASIX Certificate and Support Letter (**Appendix R**) confirms that the revised SSDA drawings will not hinder the development's ability to demonstrate future compliance against the ESD Report, including BASIX design targets.

5.4.2 Social and Economic Impacts

The proposed development will generate the following positive social and economic impacts:

- Deliver new homes in a highly accessible location close to public transport, shops and services.
- Deliver new infill affordable housing to meet the needs of low- and moderate-income households.
- Provide high-quality, well-integrated and diverse housing solutions and residential amenities including the provision of rooftop communal open spaces on each building.
- The wider community will benefit from development that does not increase Sydney's sprawl with all the associated costs of residential development without amenity.
- Promotes efficient use of existing transport infrastructure for work and education travel.
- Increasing densification will bring economic benefits to local businesses along Roseville Village and activation from the proposal will create a new market for the Village.

- Deliver jobs at the construction phase, generating approximately 250 jobs.

5.5 Suitability of the Site

The site remains to be considered highly suitable for the proposed development for reasons outlined below:

- The proposal is consistent with the aims of the chapter for Chapter 5 Transport Oriented Development and is permitted with consent under the Housing SEPP.
- The Preliminary Site Investigation submitted as part of the EIS submission concluded that the proposed use of the site as residential is appropriate for the site.
- The site is currently underutilised in its existing condition and does not align to the density and height envisioned for the site by State government policy under Chapter 5 of the Housing SEPP as well as the future desired character of Roseville under the recent Ku-ring-gai Station Precinct SEPP Amendment.
- The site is not affected by natural hazard risk nor does it significantly impact biodiversity values. All relevant agencies have reviewed and provided recommendations for the development including the obtainment of a BDAR Waiver demonstrating that the development is not likely to have any significant impact on biodiversity values.
- The proposal is largely compliant with statutory provisions including compliance with the maximum permissible FSR control (inclusive of additional 30% bonus under Housing SEPP). A variation is sought for the maximum building height development standard, through a revised Clause 4.6 Variation Request.
- The character and scale of the development is compatible with the envisioned future surrounding context.
- The proposal will provide the maximum GFA over the site for increased housing supply, including much needed affordable housing supply in an accessible area as envisioned by State government.

5.6 Public Interest

The proposal is considered in the public interest for the following reasons:

- The proposal delivers 46 affordable housing dwellings in an accessible location which consists of the State government's mandated 2% of GFA for affordable housing in the TOD catchment in perpetuity, as well as an additional 17% of GFA as affordable housing as part of in-fill affordable housing delivered under the provisions of the Housing SEPP for a minimum period of 15 years.
- The proposal will allow key workers to be located closer to their place of work through affordable housing tenancy.
- Considerable effort has been made to site planning to ensure equitable residential amenity outcomes for affordable housing dwellings in comparison to market dwellings.
- The proposal is consistent with the state and local strategic framework and largely complies with the relevant statutory controls. Importantly, the proposal provides an outcome that is consistent with the outcomes aligned to NSW's priorities to increase housing supply aligned with the National Housing Accord.
- Building height non-compliances will not result in any undue solar or view impacts. The height exceedance comes about as a result of the steeply sloping nature of the site.
- Setbacks to Larkin Street have been reduced from that of the Ku ring gai DCP to provide greater rear setbacks in order to provide a greater buffer to future redevelopments west – and downhill – of the subject site. Considering the development site is at the mid-point of a cul de sac, the setback variation will be imperceptible.
- The proposal will deliver 250 jobs in the near term through construction works, providing benefits to the local economy.
- The site will facilitate the orderly and economic redevelopment of the site through the intensification of the existing residential use of the land.
- Subject to the implementation of the mitigation measures identified for the proposed development, potential social and environmental impacts resulting from the proposal will be eliminated or minimised to an appropriate extent.