



Submissions Report and EIS Addendum

16-24 Lord Street & 21-27 Roseville Avenue

April 2026

Prepared for: Hyecorp Property Group

SSD-78996460

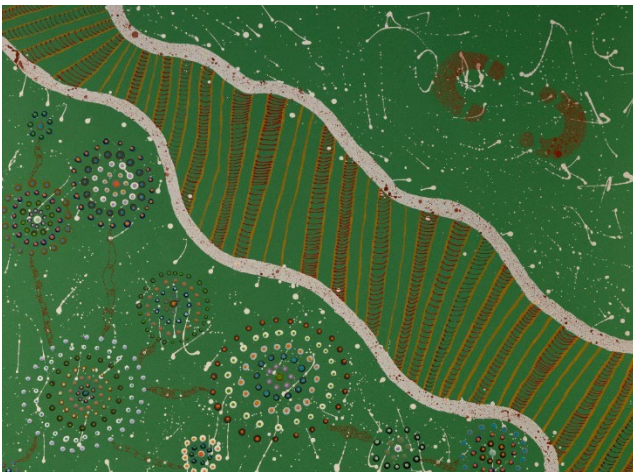
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Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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Executive Summary

This Submissions Report and Environmental Impact Statement Addendum (**Addendum EIS**) has been prepared on behalf of Hycorp Property Group (**the Applicant**) to address the matters raised by government agencies, local Council and the community during the public exhibition of amendments to the proposed development of a 9 storey residential project at 16-24 Lord Street and 21-27 Roseville Avenue, Roseville (**the site**).

The State Significant Development Application (**SSDA**) was submitted to the Department of Planning, Housing and Infrastructure (**DPHI**) on 16 April 2025 in accordance with the Environmental Planning & Assessment Act 1979 (**EP&A Act 1979**) and State Environmental Planning Policy (Planning Systems) 2021 (**Planning Systems SEPP**).

Overview of Submissions

The revised SSDA was exhibited between 20 January 2026 to 2 February 2026. Submissions were received from the following eight government agencies, alongside a 'RFI letter' from DPHI.

- DPHI
- NSW State Emergency Services (**SES**)
- Department of Climate Change, Energy, the Environment and Water (**DCCEEW**)
- Conservation Programs Heritage and Regulation (**CPHR**)
- Heritage Council of NSW (**Heritage Council**)
- Ausgrid
- Sydney Water
- Transport for NSW (**TfNSW**)
- Ku-ring-gai Council (**Council**)
- Sydney Metro.

A total of 494 submissions were received from Ku-ring-gai Council, special interest groups and individuals, including:

- 485 submissions object to the proposal (98.97%)
- 8 submissions support the proposal (1.63%)
- 1 submission commenting on the proposal (0.2%).

The key issues raised in the submissions can be broadly grouped into the following categories:

- layout and design (421 mentions),
- traffic and parking (376),
- heritage (364),
- consistency with policies, plans, strategies (361),
- visual impact (326) and
- engagement quality (248).

Based on the above categories, this Submissions Report provides a response to the key issues at **Section 4**.

Response to Submissions

The Applicant has made further changes to the design to address matters raised in the submissions and stakeholder/agency consultation.

The key changes are summarised as follows:

- Relocation of substation to eliminate the need for street tree removal on Lord Street;
- Reduction of Building D podium from 5 to 4 storeys;
- Reduction of Building A podium adjacent to Scout Hall from 4 to 3 storeys;
- Replanning of apartment layouts to respond to building massing changes as described above;
- Substitution of previously proposed podium material to darker colour as requested by Council;
- Landscape improvements to respond to Council comments;
- DDA and affordable housing allocation recalibrated to respond to revised GFA and updated apartment layouts.

Additional and updated assessments have also been prepared to respond to the issues raised within the submissions. The report is accompanied by the following supporting information addressing the key matters that have been raised through public exhibition of the SSDA:

- Updated Architectural plans
- Design Statement Addendum
- Updated Landscape Plans
- Supplementary Arboricultural Impact Assessment
- Updated Flood Impact and Risk Assessment
- Geotechnical Investigation Addendum
- Updated Access Report
- Updated Civil Engineering Plans
- Response to Community Submissions Report
- Updated Community Housing Provider Letter.

Addendum EIS

An Addendum to the submitted Environmental Impact Statement (**EIS**) has been prepared to document and assess refinements to the proposal and to provide further detail in response to matters raised during the exhibition and review process. The Addendum EIS builds on the assessments previously undertaken and presents additional information to support consideration of the proposal.

The Addendum EIS includes further information and assessment in relation to:

- Community engagement (**Section 6**)

- Statutory planning considerations (**Section 5** and **Appendix B**), and
- Assessment of key impacts (**Section 7**).

Updated Project Description

The SSDA as now presented proposes demolition of existing buildings and structures and construction of 249 residential apartments, including affordable housing, with basement parking.

Specifically, the SSDA seeks development consent for:

- Demolition of existing buildings and structures and removal of selected trees.
- Partial excavation of the site to a depth of RL76m and construction of a 3-level basement.
- Construction of a residential flat building up to 9-storeys in height (RL120.45m) to provide 249 apartments including affordable rental housing, residential amenities and services.
- Provision of car parking spaces at basement level and bicycle parking.
- Provision of hard and soft landscaping.
- Associated works for the provision of infrastructure and servicing.

Updated Justification and Evaluation

Since public re-exhibition, the proposal has been refined in response to submissions and feedback from DPPI, Council and agencies. These refinements improve the proposal's contextual fit, reduce potential environmental impacts and maintain the project's strategic objectives. While the development will result in change to the existing character of the site, this change is considered acceptable within the emerging planning framework surrounding Roseville Station, which anticipates a mix of low, medium and higher-density development.

The revised proposal comprises 249 residential dwellings, including 54 affordable rental homes (17% of total GFA), delivered across four buildings with basement parking, communal open space and landscaping. The design demonstrates a high level of amenity and compliance with the Apartment Design Guide, with built form, setbacks, massing and materials refined to better respond to the surrounding heritage conservation area.

The proposal is consistent with State and local strategic planning frameworks, including the National Housing Accord and Ku-ring-gai housing strategies, and will contribute to meeting housing supply and affordability targets in a highly accessible, transit-oriented location. Statutory assessment confirms the development continues to satisfy the requirements of the EP&A Act, relevant SEPPs and applicable planning controls, as assessed at lodgement, with updated testing against finalised local planning outcomes.

Environmental, amenity and infrastructure impacts have been comprehensively assessed and are considered acceptable, subject to mitigation measures. Key outcomes include reduced built form impacts, improved landscape and tree retention outcomes, acceptable traffic and parking performance, effective flood and water management, and mitigation of construction-related impacts. The proposal also incorporates sustainability measures consistent with ESD principles and has been supported by updated arboricultural, flood, geotechnical and access assessments.

Community and agency submissions have been carefully considered, with design refinements and additional assessment undertaken in response. Engagement outcomes and responses to submissions are documented in the Addendum EIS and supporting reports.

Overall, the site is considered suitable for the proposed development due to its proximity to Roseville Train Station, access to services and infrastructure, and absence of constraints that cannot be addressed through design and mitigation. The proposal is considered to be in the public interest, delivering high-amenity market and affordable housing, supporting government housing priorities, generating employment, and achieving acceptable environmental and social outcomes. Approval is therefore recommended, subject to appropriate conditions of consent and implementation of the proposed mitigation measures.

1 Introduction

This Submissions Report and Environmental Impact Statement Addendum (**Addendum EIS**) has been prepared on behalf of Hycorp Property Group (**the Applicant**) and relates to the residential development with in-fill affordable housing at 16–24 Lord Street and 21–27 Roseville Avenue, Roseville (**the site**). An aerial view of the site is provided in **Figure 1**. The Submissions Report has been prepared to address the matters raised by public agencies, local Council, the community and other relevant stakeholders throughout the second public exhibition period.

An Addendum to the submitted Environmental Impact Statement (**EIS**) has been prepared to document and assess refinements to the proposal and to provide further detail in response to matters raised during the exhibition and review process. The Addendum EIS builds on the assessments previously undertaken and presents additional information to support consideration of the proposal.

The Addendum EIS includes further information and assessment in relation to:

- Community engagement (**Section 6**)
- Statutory planning considerations (**Section 5** and **Appendix B**), and
- Assessment of key impacts (**Section 7**).

The State Significant Development Application (**SSDA**) was submitted to the Department of Planning, Housing and Infrastructure (**DPHI**) on 16 April 2025 (SSD–78996460). The SSDA was placed on public exhibition for 28 days between Thursday 1 May 2025 until Wednesday 28 May 2025. A Response to Submissions including amended architectural plans and amended consultant reports were submitted to DPHI in December 2025. The SSDA was re-exhibited between 20 January 2026 and 2 February 2026.

During this period, a total of 494 submissions were received from members of the public and special interest groups. In addition, agency referrals were provided along with a ‘Key Issues’ letter from DPHI.

This Submissions Report has been prepared having regard to the DPIE *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*. Specifically, this report provides the following:

- An analysis of the matters raised
- A summary of the Applicant’s actions and responses since exhibition; and,
- An updated justification for the proposed development.

The Submissions Report is accompanied by supporting documentation and technical assessments prepared by specialist consultants

Figure 1 Site Location



Source: Urbis

1.1 Exhibited Project

Approval is sought for an in-fill affordable housing development within the Roseville Transport Oriented Development (**TOD**) area under Part 5 of the *State Environmental Planning Policy (Housing) 2021*. The site is located approximately 200 metres from Roseville Station. The revised State Significant Development Application, as exhibited (20 January – 2 February 2026), proposed demolition of existing buildings and structures and construction of 252 residential apartments, including affordable housing, with basement parking.

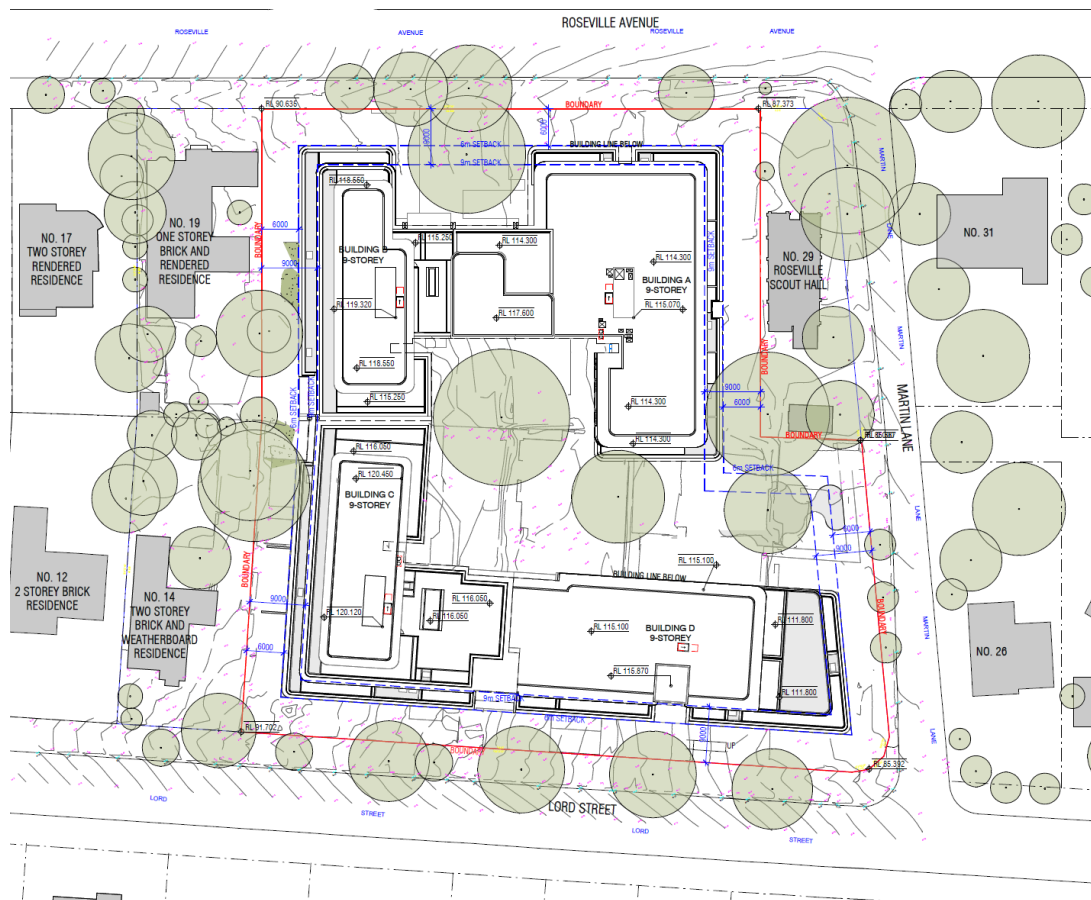
Specifically, the SSDA sought development consent for:

- Demolition of existing buildings and structures and removal of selected trees.
- Partial excavation of the site to a depth of RL76m and construction of a 3-level basement.
- Construction of a residential flat building up to 9-storeys in height (RL120.45m) to provide 252 apartments including affordable rental housing, residential amenities and services.
- Provision of car parking spaces at basement level and bicycle parking.
- Provision of hard and soft landscaping.
- Associated works for the provision of infrastructure and servicing.

This description reflects the project as publicly exhibited in January/February 2026. The design has since been refined through this Response to Submissions to address matters raised by the community, Council, and government agencies.

The re-exhibited site plan is provided below in **Figure 2**.

Figure 2 Re-Exhibited Proposed Site Plan



Source: FKA

1.2 Supporting Documentation

This Submissions Report is supported by the following technical reports and documentation.

Table 1 Supporting Documentation

Appendix	Report	Abbreviation	Prepared By
Appendix A	Ku-ring-gai Council Matters Resolved		Urbis
Appendix B	Updated Statutory Compliance Table		Urbis
Appendix C	Updated Mitigation Measures		Urbis
Appendix D	Updated Architectural Plans		FKA
Appendix E	Design Statement Addendum		FKA
Appendix F	Updated Landscape Plans		Land + Form
Appendix G	Updated Accessibility Report		ABS
Appendix H	Updated Flood Impact Risk Assessment (including updated Civil Engineering Plans)	FIRA	ptc
Appendix I	Updated Arboricultural Impact Assessment	AIA	CPS

Appendix J	Geotechnical Investigation Addendum		Douglas Partners
Appendix K	Updated BASIX & NaTHERS Certificates		Credwell
Appendix L	Updated Community Housing Provider Letter	CHP	Link Wentworth
Appendix M	Response to Community Submissions Report		Gyde
Appendix N	Updated EDC Report	EDC	Mitchell Brandtman
Appendix O	Updated Clause 4.6 Variation Request		Urbis
Appendix P	Updated Natural Ventilation Assessment		SLR

Submissions Report

2 Analysis of Submissions

This section provides a summary of the submissions received including a breakdown of respondent type, nature/ position and number of submissions received.

The revised SSDA was publicly exhibited for 14 days (20 January 2026 to 2 February 2026). A total of 494 unique public submissions and nine government agency submissions were received.

Public Submissions

A total of 494 from individual community members were received during the re-exhibition period.

- 485 submissions object to the proposal (98.97%)
- 8 submissions support the proposal (1.63%)
- 1 submission commenting on the proposal (0.2%)

Government

Eight submissions were received from agencies:

- Ku-ring Gai Council (**Council**)
- NSW State Emergency Services (**SES**)
- Department of Climate Change, Energy, the Environment and Water (**DCCEE**)
 - Conservation Programs Heritage and Regulation (**CPHR**)
 - Heritage Council of NSW (**Heritage Council**)
- Ausgrid
- Transport for NSW (**TfNSW**)
- Sydney Metro.

DPHI's 'RFI letter' was also received, dated 16 February 2026.

2.1 Breakdown of Public Submissions

Gyde Consulting (**Gyde**) has analysed the submissions (**Appendix M**) in their Response to Community Submissions report (**Gyde Report**).

All submissions were managed by DPHI, which included registering and uploading the submissions onto the 'Major Projects website' (SSD-78996460).

As set out in the Gyde Report, Gyde has undertaken a breakdown of the submissions made by issues raised. An extract of this breakdown is provided at **Figure 3**.

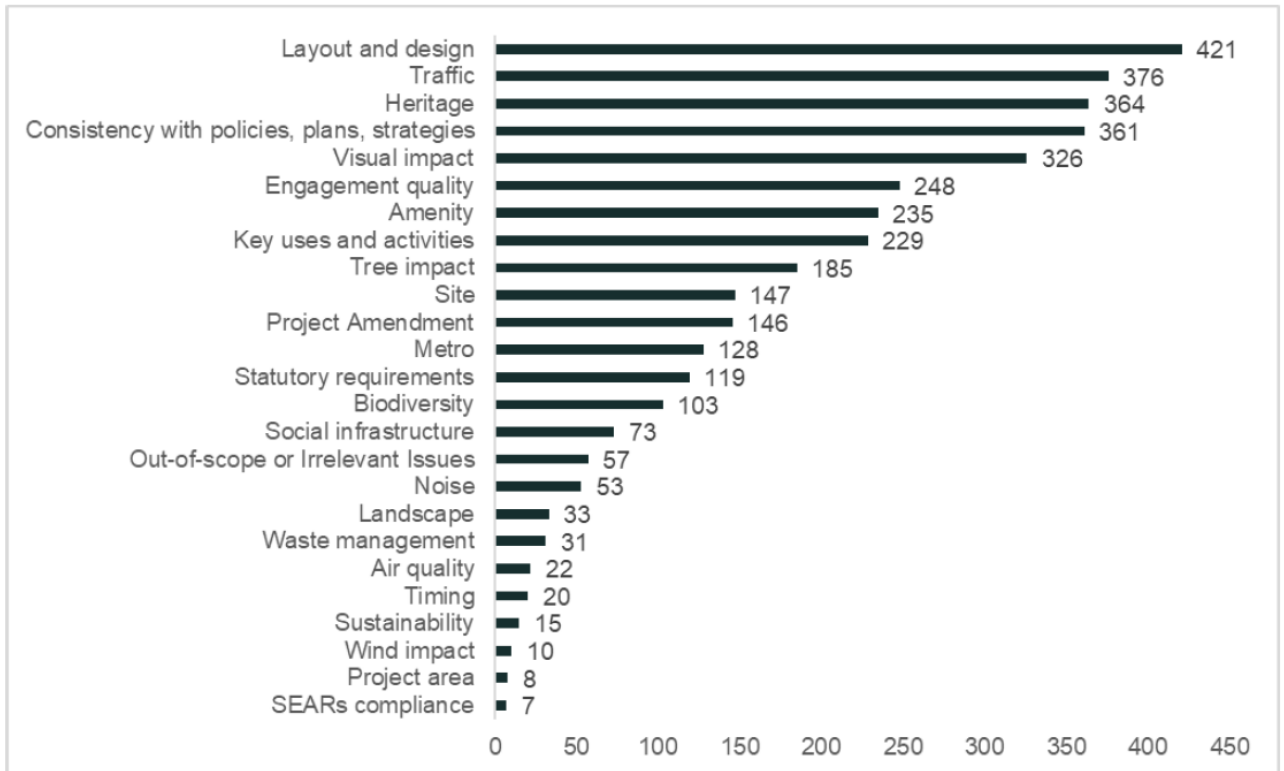
Overall, eight people supported the project and 485 objected to the project based on the submissions received.

Analysis by Gyde of the 494 submissions received shows that concerns were concentrated around several recurring themes, generally consistent with matters considered in other SSDAs within the Ku-ring-gai Local Government Area (**LGA**). The themes raised were entirely consistent with those raised during the initial public exhibition period, with no new themes identified.

As per the analysis undertaken by Gyde, the issues raised in public submissions, with the most frequently cited matters relating to:

- layout and design (421 mentions),
- traffic and parking (376),
- heritage (364),
- consistency with policies, plans, strategies (361),
- visual impact (326) and
- engagement quality (248).

Figure 3 Key issues identified in public submissions



Source: Gyde Consulting

2.2 Breakdown of Council and Agency Submissions

A total of eight submissions were received from government agencies (including Council) during the public exhibition of the revised SSDA. A summary of these submissions is provided in the **Table 3** below. All agency submissions referenced in this RTS were received after lodgement of the Response to Submission.

Table 2 Summary of the breakdown of Council and Agency Submissions

Authority	Position
DPHI RFI letter	<ul style="list-style-type: none"> ▪ Bulk and scale <ul style="list-style-type: none"> – Podium heights of Buildings A and D do not adequately respond to site topography or transition to the adjoining Scout Hall. Reduce overall podium heights and introduce additional stepping and articulation to improve scale transition and streetscape integration.

-
- Basement walls along Martin Lane and the eastern boundary present a strong visual edge to the public domain and Scout Hall interface. Reduce wall heights where feasible and revise materiality colour and detailing to soften visual impact
 - Substation interface at Lord Street is dominated by a wide and deep hardstand with constrained access. Reduce the width and excavation depth of the hardstand area.
 - Review and improve access arrangements including potential access from the internal loading area
 - Introduce landscaping to reduce visual dominance
 - **Design detail**
 - Awnings and utilities including hydrant booster cabinets are not clearly resolved in the design. Provide detailed drawings showing height extent location and integration of all awnings and utilities along Roseville Avenue and Lord Street
 - Wind mitigation measures are not clearly embedded within the architectural and landscape design. Incorporate all recommendations from the wind impact assessment and addendum into the design documentation
 - **Economic**
 - The stated construction job generation appears high compared to similar developments. Provide a breakdown of employment including direct and indirect jobs and clarify assumptions on a full-time equivalent basis
 - **Affordable housing**
 - No formal confirmation of the affordable housing management arrangement has been provided. Submit a letter from Link Wentworth confirming management of 55 affordable housing dwellings. Confirm that 47 units will be managed as in fill affordable housing for a minimum of 15 years under the Housing SEPP.
 - Confirm that 8 units will be provided as affordable housing in perpetuity under TOD provisions
 - **Documentation**
 - The sole-occupancy unit (**SOU**) Compliance Table does not clearly demonstrate compliance with the Apartment Design Guide. Update the table to include clear colour coding for internal area balcony area and storage compliance
 - **Apartment design**
 - Storage provision in some apartments is below ADG requirements including units A702 B801 and C803. Review storage provision across all units and demonstrate compliance with ADG Section 4G
 - Amend layouts to provide compliant storage where required
 - Adaptable housing provision is not clearly identified. Confirm the total number and percentage of adaptable dwellings provided in the scheme
-

-
- **Urban design**
 - The Design Statement Addendum does not accurately reflect the likely future built form along the western boundary within the LMR exclusion zone
 - Update the future character assessment to align with current planning controls
 - Prepare updated shadow diagrams based on a realistic development scenario
 - **Arboriculture**
 - There is uncertainty regarding the viability of Tree T93 a Sydney Blue Gum within the central courtyard.
 - Provide updated arborist advice confirming whether the tree can survive without direct solar access between 9am and 3pm on 21 June
 - **Flooding**
 - A shelter in place assessment has not been provided for flash flood conditions
 - Prepare an assessment in accordance with NSW SES guidance to determine suitability of on-site refuge.
 - **Consultation**
 - Council has raised matters that remain unresolved in the current documentation:
 - Provide a detailed response addressing each outstanding issue raised by Council and identify any design or documentation changes made in response

Ku-ring-gai
Council

- **Inconsistent with aim**
 - Proposal not consistent with intent of Housing SEPP and context sensitive design outcomes.
 - Reduce perceived bulk and visual dominance from Roseville Avenue Lord Street and within the HCA.
 - Reduce podium scale at Scout Hall interface including lower height and increased upper-level setbacks.
 - Provide a clear context response statement tied to actual streetscape pattern heritage rhythm and scale transition.
- **Failure to meet Schedule 9 design principles**
 - Proposal does not adequately respond to contextual design principles.
 - Provide a design principles response pack demonstrating compliance with each principle
 - Include streetscape elevation comparisons existing and proposed
 - Provide view corridor and visual sensitivity mapping from key HCA locations
 - Provide massing evolution diagrams showing how design changes reduce impacts

- **Desired future character**

Proposal inconsistent with low density HCA character and excluded TOD area

- Increase front setbacks along Roseville Avenue and Lord Street preferably to 10 metres
- Improve deep soil and canopy planting opportunities
- Reduce podium dominance and improve separation to heritage items
- Provide updated site plan showing deep soil zones
- Provide photomontages demonstrating reduced visual dominance

- **Floor space ratio and GFA**

GFA compliance generally accepted but bulk and scale still a concern.

- Provide updated GFA plans and summary table
- Explain any exclusions relied upon
- Confirm design changes do not increase GFA or bulk pressure.

- **Building height**

Height exceedance still not supported, and reduction achieved through building being sunk

- Refine design to achieve compliance through actual massing reduction not excavation
- Provide roof plan over survey showing height measurement points
- Provide sections showing existing ground level and building height
- Provide comparative sections showing extent of sinking and exposed basement walls
- Provide cut and fill and excavation plan
- Reduce exposed basement walls and retaining walls at public interfaces
- Demonstrate improved tree retention outcomes

- **Building setbacks**

Front setbacks

Current 6 metre setback is inadequate for scale and HCA context

- Increase setbacks to approximately 10 metres
- Provide improved transition at Scout Hall interface
- Provide updated streetscape elevations and photomontages

- **Basement encroachments**

Basement footprint too large and impacts deep soil and trees

- Provide revised basement envelope with improved setbacks.
- Demonstrate adequate soil zones and tree viability.
- Provide basement sections showing soil depth and planting conditions.

- **Residential amenity**

Overshadowing

Impacts on existing dwelling houses not adequately addressed

- Provide updated shadow diagrams assessing impacts to houses not future apartments

-
- Provide additional mitigation where impacts remain

Sunlight to apartments

- Minor shortfall identified
- Confirm compliance with ADG or justify variation

Clothes drying

- No enforceable control provided
- Provide operational management plan preventing visible balcony drying

Affordable housing amenity

Affordable units not equitably distributed

- Distribute units across buildings rather than one tower
- Provide equity statement comparing amenity outcomes

- **Site coverage**

Built form dominance remains high despite SSD pathway

- Increase setbacks and reduce footprint
- Reduce basement extent to improve deep soil and landscape capacity.

- **Landscaping and planting**

- Reliance on planter boxes with uncertain long-term outcomes
- Provide enforceable landscape maintenance and management plan
- Provide realistic planting strategy with achievable mature heights
- Update plans to clearly show BASIX planting areas and species

- **Landscape design concerns**

Planting schedule overstates tree sizes and uses unsuitable species

- Replace with medium canopy trees suitable for urban conditions
- Relocate trees away from façades to avoid conflicts and improve usability

- **Substation frontage and public domain**

Excessive paving excavation and poor coordination

- Provide coordinated architectural and landscape design
- Ensure no conflicts with access doors
- Reduce paving and excavation depth
- Provide setbacks for retaining walls and introduce planting

- **Planting on structures**

- Insufficient soil depth for proposed trees
- Provide detailed sections showing compliant soil depths and volumes
- Coordinate structure and landscape design to support tree growth

- **Tree impacts**

Insufficient root mapping and unacceptable tree impacts

- Provide detailed root mapping including public trees
- Provide updated tree impact schedule and mitigation measures
- Confirm no removal of public trees without consent

-
- **Public domain interface**
Level changes create non-compliant access and large retaining walls
 - Provide compliant DDA access strategy with ramps and landings
 - Reduce retaining wall heights and introduce terracing and planting
 - **Vehicle access and parking**
Parking exceeds minimum requirements
 - If not reduced provide allocation strategy
 - Allocate minimum parking to affordable housing
 - Provide required visitor parking spaces
 - **Biodiversity**
BDAR waiver submitted instead of full assessment
 - Confirm compliance with Biodiversity Conservation Act
 - Have waiver reviewed by qualified ecologist
 - **Heritage**
Demolition of contributory buildings not justified
Provide stronger justification against Clause 5.10
If approved provide heritage conditions including archival recording salvage and interpretation
 - **Visual and heritage setting impacts**
Building has severe visual impact on HCA and heritage items
 - Increase setbacks and separation
 - Reduce podium height particularly near Scout Hall
 - Remove exposed basement walls
 - **Setbacks and built form**
Podium height and setbacks do not reflect heritage context
 - Reduce podium scale
 - Increase separation from Scout Hall
 - Avoid large continuous podium walls
 - **Character and bulk**
Development remains overbearing in low density context
 - Further reduce bulk scale and massing
 - **Landscape loss**
Loss of landscape character and canopy
 - Increase deep soil and tree retention
 - Improve planting outcomes
 - **Materials and colours**
Material palette not consistent with heritage character
 - Replace light podium materials with darker earthy tones
 - Ensure podium reads as recessive and compatible with HCA

Conservation Programs Heritage and Regulation	The Updated FIRA now satisfies the Secretary’s environmental assessment requirements, and no further information is required by CPHR. Any proposed emergency management should be reviewed by the NSW State Emergency Service.
-----------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

(CPHR) Group	The development is consistent with the biodiversity development assessment report (BDAR) waiver granted by CPHR on 27 November 2025. If the proposed development is changed prior to determination so that it is no longer as described in Schedule 1 of the BDAR waiver determination, the applicant will need to lodge a new BDAR waiver request or prepare a BDAR.
Heritage NSW	Heritage Council of NSW has no comment on the proposal as no Aboriginal Cultural Heritage Assessment Report was provided If Aboriginal heritage impacts are relevant provide an Aboriginal Cultural Heritage Assessment Report or supporting justification
Heritage NSW	Heritage Council of NSW has no objection to the proposal and confirms that previous environmental heritage matters have been addressed. Comply with recommended conditions and continue consultation with Council due to the Heritage Conservation Area context
Ausgrid	Ausgrid raises no objection subject to infrastructure protection requirements. <ul style="list-style-type: none"> - Ensure the development does not impact existing electricity infrastructure. - Consult with Ausgrid for any new connections or load requirements. - Maintain required safety clearances during construction. - Undertake any required asset relocation at the developer's cost.
Sydney Metro	Sydney Metro has no objection to the proposal subject to conditions. <ul style="list-style-type: none"> - Include Sydney Metro conditions in any consent and refer any amendments to the proposal back for further review
TfNSW	Transport for NSW has no objection to the proposal as it is unlikely to have a significant impact on the state classified road network. No further information is required.
NSW SES	NSW State Emergency Service raises concerns that the current Flood Impact and Risk Assessment and emergency response framework do not adequately address evacuation feasibility under rapid onset flooding conditions Update the Flood Impact and Risk Assessment to include flood warning triggers evacuation timing and feasibility time to peak flooding duration of inundation improved flood mapping and hazard mapping up to PMF and assessment of pre and post development flood conditions. Demonstrate how evacuation will operate during short duration storm events where limited warning time is available including consideration of broader road network constraints. If a shelter in place strategy is proposed provide detailed justification and demonstrate compliance with NSW Shelter in Place Guidelines including confirmation that evacuation is not feasible flood behaviour characteristics isolation duration less than 12 hours acceptable hazard conditions and detailed emergency management procedures before during and after the event

3 Actions Taken Since Exhibition

Following the public re-exhibition of the SSDA between 20 January 2026 and 2 February 2026, DPHI received submissions from government agencies, Council, special interest groups, and members of the community. These submissions raised a range of matters relating to statutory compliance, built form and design, heritage, traffic and parking, environmental impacts, and community engagement.

In response, the proponent has:

- Commissioned additional technical studies and updated existing assessments; and
- Refined the design to address key issues raised.

This section summarises the actions taken since exhibition, including:

- **Design refinements** to directly respond to matters raised in the submissions, reduce impacts and improve alignment with planning controls and design guidance; and
- **Additional and updated assessments** to respond to specific statutory matters.

Detailed outcomes of these actions are provided in the following sections, with supporting documentation included in the appendices.

3.1 Refinements to the Project

The following summarises the minor refinements and clarifications proposed since public exhibition and in response to submissions made and key issues/RFI letter issued by DPHI.

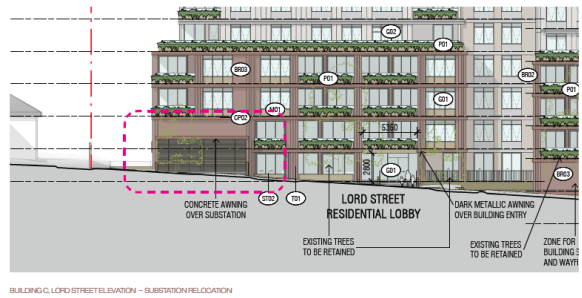
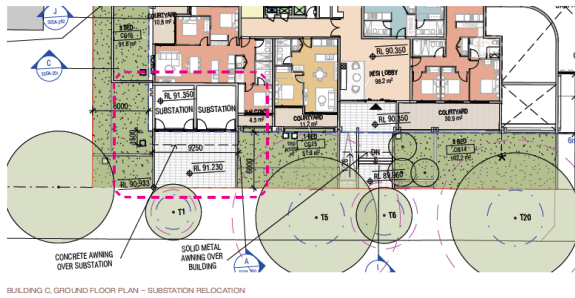
Importantly, these refinements are changes that fit within the limits set by the project description. The refinements do not change what the application is seeking consent for, and therefore an amendment to the proposal is not required.

The key design changes are described as follows:

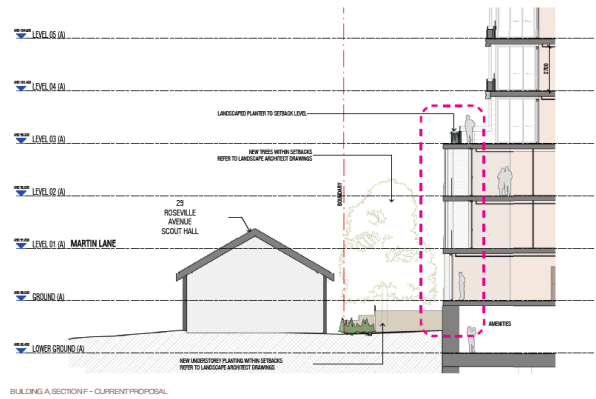
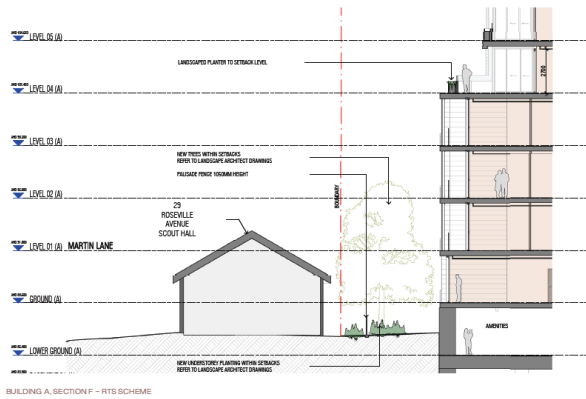
- Relocation of substation to eliminate the need for street tree removal on Lord Street;
- Reduction of Building A podium adjacent to the Scout Hall from 4 to 3 storeys;
- Reduction of the of Building D podium from 5 to 4 storeys;
- Replanning of apartment layouts to respond to building massing changes as described above;
- Substitution of previously proposed podium material for darker colour as requested by Council;
- DDA and affordable housing allocations recalibrated to respond to GFA changes and replanning of apartments.

Refer to the updated Architectural Plans (**Appendix D**) for further details on the design refinements made since re-exhibition. Extracts from the updated Architectural Plans identifying the key design changes are provided in the Figure below.

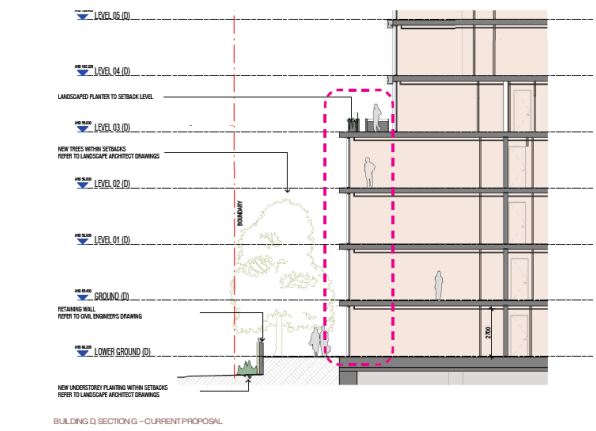
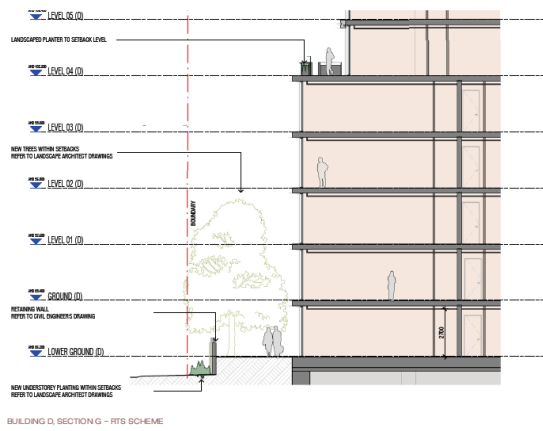
Figure 4 Key Design Updates



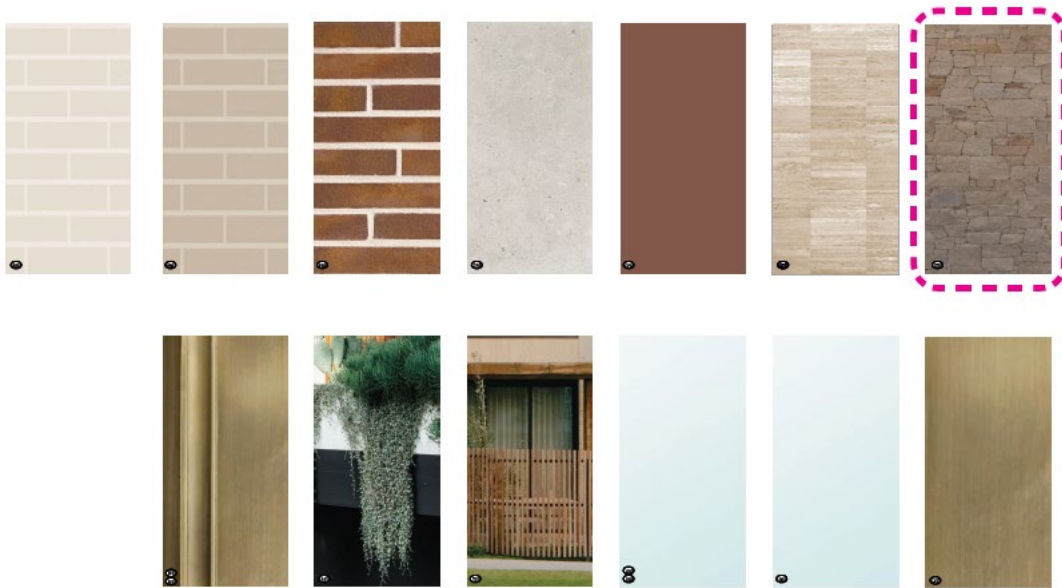
Substation relocation



Reduction of Building A podium height



Reduction of Building D podium height



Updated materials palette

Source: FKA

On the basis of the above project refinements, the revised description of the proposed development is as set out below. It is also noted that the Applicant commits to the consolidation of the existing lots comprising the site prior to the issue of a construction certificate.

Table 3 Update Project Description

Project Element	Summary
Project Summary	<ul style="list-style-type: none"> ▪ The project includes demolition of existing buildings and structures on the site and construction of 249 residential apartments with affordable housing and basement parking. Specifically, the SSDA seeks development consent for: ▪ Demolition of existing buildings and structures and removal of selected trees. ▪ Excavation & construction of a 3-level basement. ▪ Construction of a residential flat building up to 9-storeys in height (RL120.45m) to provide 249 apartments including affordable housing, residential amenities and services. ▪ Provision of car parking spaces at basement level and bicycle parking. ▪ Provision of hard and soft landscaping. ▪ Associated works for the provision of infrastructure and servicing
Site/ Project Area	The site has a total area of 9,370.9m ² . The majority of the site will be physically disturbed by the project.
Proposed Uses	Residential flat building

Project Element	Summary
Apartment Mix	<p>The proposal will deliver 249 dwellings in the following mix:</p> <ul style="list-style-type: none"> ▪ 1 bedroom: 29 – 12% ▪ 2 bedrooms: 108 – 43% ▪ 3 bedrooms: 102 – 41% ▪ 4+ bedrooms: 10 – 4% ▪ 195 of these apartments will be market housing and 54 apartments will be affordable housing (17% of overall GFA). All affordable housing units will be located in Building D.
Gross Floor Area (GFA)	<p>Total: 29,939.5 m² AH GFA: 5,099 m² (17%)</p>
Floor Space Ratio (FSR)	3.19:1
Maximum Height	<ul style="list-style-type: none"> ▪ 30.1m above existing ground level (RL 120.45) ▪ 9 storeys
Parking	<p>344 car parking spaces:</p> <ul style="list-style-type: none"> ▪ 267 residential including 35 platinum standard accessible spaces. ▪ 32 visitor spaces including 3 accessible spaces and 3 car share spaces. ▪ 8 motorcycle parking spaces ▪ 4 car wash bays ▪ 1 SRV loading bay
Bicycle Parking	312 spaces bike parking spaces
Communal Open Space	2,353.8m ² – 25% of site area
Landscaped Area	3,222.67 sqm – 34% of site area
Deep Soil Area	2,843.6m ² – 30% of site area
Tree Canopy	3,748.36m ² – 40% of site area
Trees	<ul style="list-style-type: none"> ▪ Trees within the site to be retained: 6 ▪ Trees within the site to be removed: 88 ▪ Trees outside the site to be removed: 1 ▪ Replacement trees proposed: 104

3.2 Addendum EIS

An Addendum to the submitted EIS has been prepared as part of this submissions report to document and assess refinements to the proposal and to provide further detail in response to matters raised during the exhibition and review process.

The Addendum EIS builds on the assessments previously undertaken and presents additional information to support consideration of the proposal.

The Addendum EIS includes further information and assessment in relation to:

- Community engagement (**Section 6**)
- Statutory planning considerations (**Section 5** and **Appendix B**), and
- Assessment of key impacts (**Section 7**).

Additional assessments have been prepared to respond to the issues raised within the submissions. These include:

- Design Statement Addendum
- Supplementary Arboricultural Impact Assessment
- Updated Flood Impact Risk Assessment
- Updated Access Report
- Response to Community Submissions Report.

The findings and recommendation of the additional assessments are discussed in detail within **Section 4** of this report.

4 Responses to Submissions

This section provides a detailed summary of the Applicant’s response to the issues raised in submissions. The response has been structured according to the categorisation of issues outlined in **Section 2**.

4.1 Response to Department of Planning, Housing and Industry

Table 4 Response to Department of Planning, Housing and Industry

Summary of Issues Raised	Response	Refer to
Bulk and scale		
<ol style="list-style-type: none"> 1. The proposed heights of the podiums should reflect the existing topography and provide a transition in scale to the adjoining context, particularly the Scout Hall. The Department recommends that you reduce and step the podium heights of Building A and D to further improve the relationship with the streetscape. 2. Consider further reducing the visual impact of the basement wall structures interfacing with the Martin Lane public domain and the Scout Hall along the eastern boundary of the site by reducing their height or changing its colour or materiality. 3. Reduce the width and excavation depth of the hard stand fronting the substation on Lord Street. Access to the substation from Lord Street is restricted given the level change, retaining wall to the public 	<ul style="list-style-type: none"> ▪ The proposed heights of the podiums to Buildings A and D have been reduced to reflect the existing topography and further improve the relationship with the streetscape. The eastern side of the podium of Building A has been reduced from four to three storeys in height to provide an improved transition in scale to the Scout Hall. The podium of Building D has been stepped from five to four storeys in height to provide an improved transition in scale to the adjoining context. ▪ Clarification of the material selection for the basement wall fronting Martin Lane has been added to the architectural plans. This area was always intended to be treated with the same materials as the building section immediately above. To confirm the basement wall will comprise medium dry stack stone. The material treatment of the basement wall projecting above ground level on the building's eastern facade was not previously identified. The architectural plans have been updated to clarify that this area will not be left untreated. ▪ The substation has been relocated from its previous above ground location, immediately to the west of the proposed driveway, to the south west corner of Building C. The approach eliminates the need for excavation and facilitates the retention of Lord Street street tree T20, previously proposed for removal. The revised design enables the 	<p>Updated Architectural Plans Appendix D Design Statement Addendum Appendix E</p>

Summary of Issues Raised	Response	Refer to
<p>domain and masonry wall to the vehicle access way. Consider landscaping the area and providing access to the substation from within the internal loading area</p>	<p>retention of all existing street trees along Lord Street, including street tree T1 which provides screening to the substation location from the street. This amendment together with other landscaping refinements has increased the proposed tree canopy coverage at the site to 40%. The substation has been carefully integrated into the design of the development. Access is proposed to be provided to the substation in accordance with Ausgrid requirements. Proposed site landscaping surrounding the substation has been maximised, including shrub and tree planting, whilst maintaining compliance with Ausgrid requirements.</p> <p>Minor adjustments to the stormwater and landscape strategy for the project have been adopted to respond to the revised substation location. Ausgrid servicing requirements and potential interference with residential vehicles prevent access to the substation from the internal loading area.</p>	
Other matters		
<p>4. Provide details of height and design of all awning and utilities (including hydrant booster cabinets) facing Roseville Avenue and Lord Street.</p>	<p>The height and design of all awnings and utilities are included on the updated Architectural Plans.</p>	<p>Updated Architectural Plans Appendix D Design Statement Addendum Appendix E</p>
<p>5. Incorporate the recommendations of the wind study, as updated by the wind impact assessment addendum, into the architectural plans</p>	<p>The recommendations of the wind study and wind impact assessment addendum are incorporated into the architectural plans. All the proposed glazing screens are identified on the architectural plans.</p>	<p>Updated Architectural Plans Appendix D</p>
<p>6. The proposal is expected to generate 640 construction jobs. This figure appears high considering other developments of similar size generate</p>	<p>An updated Estimated Development Cost report (EDC Report) has been prepared as part of this Response to Submissions. The proposed development is expected to result in the following employment generation:</p> <ul style="list-style-type: none"> ▪ Construction Phase – Direct: 298 jobs 	<p>Updated EDC Report Appendix N</p>

Summary of Issues Raised	Response	Refer to
fewer full time equivalent construction jobs. Please confirm the number of direct and indirect jobs.	<ul style="list-style-type: none"> ▪ Construction Phase – Indirect: 146 jobs ▪ Induced: 98 jobs ▪ Residential Operational: 3 jobs 	
<p>7. Provide a letter from Link Wentworth, the selected community housing provider, confirming they will manage 55 affordable housing apartments in the proposal, comprising:</p> <p>a) 47 apartments that are required to be in-fill affordable housing for at least 15 years commencing from the date of the relevant occupation certificate under Chapter 2 of the Housing SEPP, and</p> <p>b) eight apartments that are required to be affordable housing in perpetuity under the TOD controls.</p>	<p>An updated CHP letter from Link Wentworth is provided as part of this Response to Submissions. The letter confirms that Link Wentworth will manage the 54 proposed affordable housing apartments, comprising 47 apartments as in-fill affordable housing for at least 15 years commencing from the date of the relevant occupation certificate under Chapter 2 of the Housing SEPP, and seven apartments as affordable housing in perpetuity under the TOD controls.</p>	<p>Updated CHP Letter Appendix L</p>
<p>8. In the SOU Compliance Table, for easier reference, please colour the relevant boxes that comply with the ADG regarding internal area, balcony area and storage.</p>	<p>The SOU Compliance Table has been colour coded to distinguish between apartment types. All apartments meet the required ADG standards for internal area, balcony area and storage.</p>	<p>Design Statement Addendum Appendix E</p>
<p>9. Please review the amount of storage provided in each apartment and submit evidence that the proposal is consistent with section 4G of the ADG. In the SOU Compliance Table, apartments A702, B801 and C803 on Level 8 have undersized storage within the units.</p>	<p>All apartments meet the required ADG standards for storage. Please refer to the SOU Compliance Table at Appendix B.</p>	<p>Updated Architectural Plans Appendix D Design Statement Addendum Appendix E</p>

Summary of Issues Raised	Response	Refer to
10. Please confirm the number and percentage of adaptable dwellings.	39 dwellings are proposed to be provided as adaptable, equating to 15% of the apartments proposed.	Updated Architectural Plans Appendix D
11. The Design Statement Addendum (p25) does not properly identify the desired future character within the LMR exclusion zone, specifically the neighbours along the western boundary. The map proposes the western neighbours will redevelop into RFBs despite the current development controls limiting this. Provide updated shadow diagrams	Updated shadow diagrams are provided within the Design Statement Addendum.	Design Statement Addendum Appendix E
12. Provide advice from the arborist confirming that the central courtyard tree (T93 - a Sydney Blue Gum) can survive without any direct solar access between 9am and 3pm on 21 June.	<p>A 3D point cloud survey of Tree 93 (Eucalyptus grandis – Flooded Gum) has been modelled within the Sun Eye View drawings and Shadow Diagrams (refer to Arboricultural Statement, Appendix 2) between 9am and 3pm on 21 June. This indicates that there will be direct solar access to 55%-79% of the canopy of Tree 93 between 9am and 3pm on 21 June. As 21 June is the shortest day of the year, solar access will only increase throughout other times of the year.</p> <p>The entire canopy of Tree 93 will also have access to indirect diffuse light (scattered by clouds, dust, or urban structures) which still allows the tree to continue photosynthesis. Furthermore, Tree 93 is a native forest species characterised by strong apical dominance. Reaching heights of up to 30m in urban settings, its vertical growth habit allows it to outcompete neighbouring obstructions and secure increasing levels of solar access over time.</p> <p>In the circumstance of the subject development, it is considered likely this tree will continue to attain increased height allowing increased levels of solar</p>	Arboricultural Statement Appendix I

Summary of Issues Raised	Response	Refer to
	access as greater a proportion of the canopy extends above the proposed built form. In this regard, the reduced solar access between 9am and 3pm on 21 June is unlikely to result in decline to the long-term viability or Useful Life Expectancy of Tree 93.	
13. Provide a shelter-in-place assessment to determine whether shelter in place is appropriate during flash flooding in accordance with NSW SES advice.	A shelter-in-place assessment is provided at Section 8.1 of the updated FIRA. This confirms the flood scenarios in which shelter in place is appropriate, as well as providing detail on the shelter in place strategy. Shelter in place routes and positions for residents are provided.	Updated Flood Impact Risk Assessment Appendix H
14. Provide a further response to Council's comments, particularly the matters that Council considers unresolved.	Please refer to Table 5 below.	

4.2 Response to Ku-ring-gai Council

A response to matters that Ku-ring-gai Council has identified as not resolved in their submission is provided in the table below. For completeness, the matters that Ku-ring-gai Council has identified as resolved in their submission are provided at **Appendix A**.

Table 5 Response to Ku-ring-gai Council Submission

Summary of Issues Raised	Response	Refer to
<p>1. Inconsistent with Aim Council remains concerned that the developments–built form response (building setbacks, height and floor space) remains incompatible with the low-density character it sits within.</p> <ul style="list-style-type: none"> ▪ The Applicant should further explore the following: ▪ Reducing podium heights at the elevation adjoining the heritage, Scout Hall. 3 storey podium is recommended ▪ Increasing upper-level setbacks (front/side) to 10m minimum (12m is required per Council’s DCP for sites adjoining heritage items). 	<p>As shown in Figure 5 below, the site is located within an area of mixed future character. The precinct will transition from predominantly Federation–period single dwellings to a mixed character of single dwellings, low to mid rise apartment buildings set in a large Heritage Conservation Area (HCA) and retained locally listed heritage items (including the adjacent Scout Hall).</p> <p>The future character diagram illustrates that the precinct could feature a range of building heights from single/two storey dwellings, to four storeys under the LMR provisions plus IAH bonus, and larger apartment buildings up to 11 storeys in height (to the north and south of the site and in Roseville town centre) which includes retained TOD sites and those that benefit from uplift under Council’s alternative.</p> <p>The proposed heights of the podiums to Buildings A and D have been stepped to reflect the existing topography and further improve the relationship with the streetscape. The podium of Building A has been reduced from four to three storeys in height along its eastern facade to provide an improved transition in scale to the heritage Scout Hall. The podium of Building D has been stepped from five to four storeys in height to provide an improved transition in scale to the adjoining context.</p>	<p>Design Statement Addendum Appendix E</p>

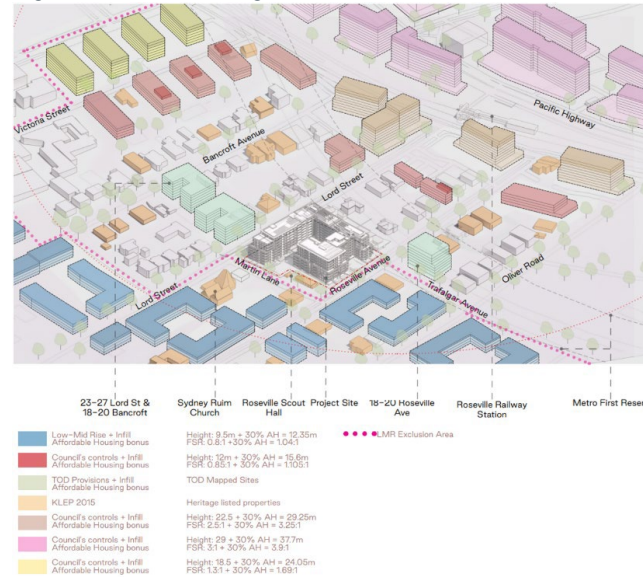
Summary of Issues Raised

Response

Refer to

As can be seen in **Figures 6 and 7** below, the reduced podium heights to Buildings A and D and change to the materiality improve the relationship of the proposal to the surrounding character. Whilst Council’s request for a minimum upper level setback 10m is acknowledged, increasing the upper-level setback by up to 1m would not be materially perceptible from the public domain. As such, it is considered that the 9m upper-level setbacks provided to all sides of the development will ensure appropriate setbacks are maintained to existing and potential future development on surrounding sites. It is also noted that the proposed upper-level setbacks are satisfactory to provide the required solar access and amenity to neighbouring single-storey dwellings.

Figure 5 Surrounding future character



Source: FKA

Summary of Issues Raised

Response

Refer to

Figure 6 Improved relationship of Building A to local context



SSSA Lodgement scheme



Updated Response to Submissions scheme

Source: FKA

Summary of Issues Raised

Response

Refer to

Figure 7 Improved relationship of Building D to local context



Previous Response to Submissions scheme



Updated Response to Submissions scheme

Source: FKA

Summary of Issues Raised	Response	Refer to
	<p>The proposal responds the site’s context by:</p> <ul style="list-style-type: none"> ▪ Aligning with 9-storey clusters to the north and south, and stepping down to three and four-storeys to the east. ▪ Incorporating a revised three and four-storey podium to match the lower-scale context, with upper levels set back to reinforce the street wall height. ▪ Designing the base of the podium and updating the proposed materiality to respond to existing dwellings to the west. ▪ Designing front and side setbacks, architectural style, and landscaping to reflect key elements of the surrounding HCA. ▪ Selecting planting and revising the materials palette to match the established local palette and garden character. 	
<p>2. Failure to meet Design Principles in Schedule 9 of the SEPP</p> <p>Council’s key areas of concern are the developments contextual response to the HCA and that it does not positively respond to the immediate context, as such requires further amendments.</p>	<p>The proposal has been comprehensively assessed against the Design Principles in Schedule 9 of the Housing SEPP (refer Submissions Report prepared by Urbis, dated 10 December 2025). To improve the proposal’s contextual response to the HCA and the immediate context, the podium heights of Buildings A and D have been stepped in height to three and four storeys respectively. Additionally, the materiality of the podium across the development has been darkened to reflect the material palette of the surrounding HCA and local character.</p> <p>While the proposal differs from the existing low-rise character, it reflects and is compatible with the future mixed character of the precinct by:</p> <ul style="list-style-type: none"> ▪ Aligning setbacks with the prevailing development pattern. ▪ Using materials and finishes drawn from the local heritage palette. ▪ Incorporating landscaping that reinforces the garden suburb identity. ▪ Responding to the mixed future scale and density envisaged under the planning framework that has been finalised for the area. 	<p>Section 7.1</p>

Summary of Issues Raised	Response	Refer to
	<p>The proposal contains, and is compatible with, the key elements that will define the desired future character including setbacks, landscaping, materiality, scale, and density. Any short-term change to the area's character will be mitigated over time as the precinct transitions to a mixed character area under the finalised planning framework.</p>	
<p>3. Desired Future Character Council maintains the proposal is inconsistent with the desired future character of the local area. The amended proposal fails to achieve consistency with the desirable elements of the character of the local area and desired future character as:</p> <ul style="list-style-type: none"> ▪ The development has not revised its setbacks, particularly on primary frontages (Roseville Avenue & Lord Street). The Applicant still maintains that 6m setback is appropriate, which Council's DCP would require 10m. ▪ The developments-built form is domineering when compared to the existing low-density context and is not mitigated through compliant building setbacks. ▪ The proposal results in significant adverse impacts upon the HCA and nearby heritage items due to the proposed residential flat buildings (RFB) incompatible response to low density dwellings. <p>Council recommends that the Applicant:</p> <ul style="list-style-type: none"> ▪ Increase primary road setbacks. Council recommends that a 10m setback be explored 	<p>As discussed in the response to item 1 above, the site is located within an area of mixed future character. This means that the future character of the local area will be a mix of single dwellings, low to mid rise apartment buildings set in a large Heritage Conservation Area (HCA) and retained locally listed heritage items. The future character will feature a range of building heights from single/two storey dwellings, to four storeys under the Low and Mid-Rise Housing (LMR) provisions plus In-fill affordable housing (IAH) bonus, and larger apartment buildings up to 11 storeys in height (to the north and south of the site and in Roseville town centre) which includes retained Transport Oriented Development (TOD) sites and those that benefit from uplift under Ku-ring-gai Council's (Council) alternative TOD scheme (Council's alternative).</p> <p>The reduction in podium heights to Buildings A and D effectively increases the portion of the development that is setback 9m from the site boundaries. This improves the relationship of the built form to the surrounding context and provides an improved transition to existing dwellings and future developments.</p> <p>For State significant development, the appropriate assessment framework is provided by State planning instruments and the Apartment Design Guide (ADG), which requires street setbacks to respond to the prevailing streetscape pattern and desired future character, rather than a fixed numerical distance. In accordance with</p>	<p>Design Statement Addendum Appendix E</p>

Summary of Issues Raised

Response

Refer to

by the applicant. Noting that there have been zero changes to the applicants' front setbacks, this matter requires further attention before consent is granted.

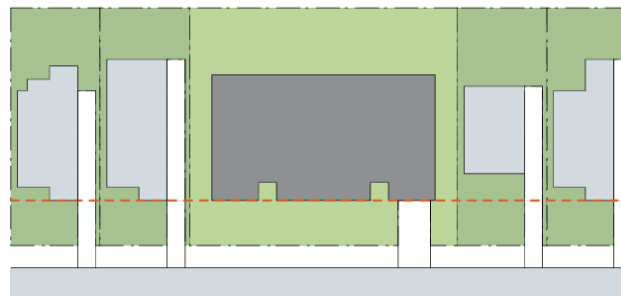
- At minimum Council would seek that building setbacks on Roseville Avenue (adjoining Scout Hall heritage item) be setback 10m to offset the buildings overbearing bulk and scale and minimise the developments visual impact on this item.
- Any 3 storey element interfacing with the Scout Hall is to be setback a minimum 12m per Council's DCP.

ADG section 2G, the proposed street setbacks should be consistent with the prevailing setback pattern in this context, where the development pattern to the west will be retained and will transition to higher densities to the east.

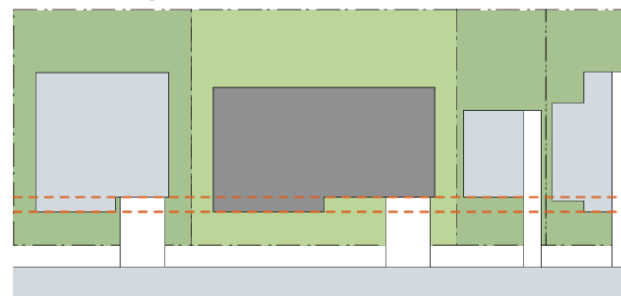
The ADG does not require that street setbacks be increased relative to a building's scale. This is demonstrated in the extract from the ADG below (**Figure 8**), where differing scales of development have a consistent street setback and front building line, defining the future streetscape.

Figure 8 ADG section 2G street setbacks (Figure 2G.4 extract)

1. Predominant setback



3. Setback range



Summary of Issues Raised	Response	Refer to
	<p>As discussed in detail within the Submissions Report prepared by Urbis, dated 10 December 2025, the proposed setbacks generally align with the prevailing setbacks within the surrounding area. It is not considered that increased setbacks to the street would result in an improved urban design outcome. The proposed setbacks will maintain the established front building line character to the west and align with the front setbacks of future apartment buildings to the east.</p> <p>The Ku-ring-gai DCP control requiring a 10m street setback does not reflect the existing streetscape condition. There is not an existing setback along Lord Street and Roseville Avenue varies, with the prevailing front setback along this part of Lord Street and Roseville Avenue being approximately 6-7m. The provision of a greater setback would undermine the continuity of the street edge, which it is considered would result in a poorer urban design outcome.</p> <p>Appropriate landscaping and heritage outcomes are achieved through design quality, not a numerical setback distance. The proposed 6m street setbacks allow for substantial tree planting and the required deep soil area. Given the courtyard design of the proposed development, the setback requirements proposed by Council cannot be achieved. The setbacks adopted, in conjunction with the proposed landscaping, the articulation of the building facades, and stepped building form provide an appropriate response for the site and no further changes to the setbacks are proposed.</p> <p>The proposed street setbacks achieve the objectives of KDCP control 7A.3 Building Setbacks, being:</p> <ul style="list-style-type: none"> ▪ <i>ensure buildings are situated within a garden setting dominated by tall trees</i> – The proposal includes extensive landscaping with 	

Summary of Issues Raised	Response	Refer to
	<p>34% of the site being provided as landscape area and 40% tree canopy coverage. Specified existing significant trees on site are retained, with a replanting ratio of 1.2:1 for those trees proposed to be removed (104 replacement trees). Significant tree planting is proposed within the street setbacks including trees with a mature height of up to 12m and a 15m mature canopy spread. The proposed tree canopy coverage is 39.7% of the site.</p> <ul style="list-style-type: none"> <li data-bbox="869 555 1742 943">▪ <i>soften the built form and maintain the garden character of Kuring-gai</i> – The proposal includes extensive landscaping and tree planting to all setbacks to soften the appearance of the built form of the development. This is in addition to landscape planting being integrated into the façade design to enhance the landscape character of the proposal. The landscape design and planting strategy have been specified to reflect Roseville’s garden character. The “garden suburb” character – generous landscaped setbacks, mature canopy trees, and a mix of native and exotic plantings – was a guiding design principle from the outset. <li data-bbox="869 991 1742 1198">▪ <i>provide effective deep soil areas that are able to create a garden setting, including medium and tall trees, to all sides of the building</i> – The proposal provides 30% of the site as deep soil area. The landscape setbacks to all sides of the building include medium and tall trees, with trees a mature height of up to 12m and a 15m mature canopy spread. <li data-bbox="869 1246 1742 1340">▪ <i>reduce the visual bulk of buildings from the street</i> – The proposed setbacks maintain the prevailing street edge along Lord Street and Roseville Avenue and allow for the built form to be setback 	

Summary of Issues Raised	Response	Refer to
	<p>from the street. The setbacks allow for landscaping and tree planting that screen the visual bulk of the building from the street.</p> <p>The proposed side setbacks allow for the required solar access to neighbouring properties and substantial landscape planting to provide privacy and screening. The reduced podium height to Building A, the proposed side and upper-level setbacks, and the proposed landscape planting provide an appropriate response to the adjoining Scout Hall. Built form above three storeys in height will be approximately 10m from the Scout Hall. The proposed Building A podium height of three storeys is not considered as overbearing bulk and scale to the neighbouring single-storey building.</p>	
<p>5. Building Height Whilst the Height of Building has decreased, this height reduction is technical only. The applicant has effectively sunk the entire building below ground to reduce height, rather than make meaningful height reductions. Council is concerned with the excessing additional excavation now associated with the development, including the sinking of the majority of the ground floor under ground.</p>	<p>Council's comments suggest that the building has been dropped to ensure that the building height does not project above the permissible building height plane. This is incorrect, and given the flood planning levels that apply to Buildings A and D would not be possible. Habitable floorspace in these buildings is entirely above ground level. Storage, car parking and residential amenities are located below ground.</p>	<p>Design Statement Addendum Appendix E</p>
<p>6. Building Setbacks <u>Front Setbacks</u> The development did not comply with the KDCP front setback requirements.</p> <p><u>Basement encroachments</u></p>	<p>Refer to discussion under item 3 (Desired future character) above.</p> <p>The proposed basement setbacks allow for 30% of the site area to be provided as deep soil. This is double the 15% ADG requirement.</p> <p>344 basement car parking spaces as proposed, broken down as follows:</p>	<p>Updated Architectural Plans Appendix D</p>

Summary of Issues Raised	Response	Refer to
<p>Council maintains that basement setbacks remain non-compliant.</p> <p>It is noted that the applicant has revised the scheme to provide “cut outs” in the basement design to ensure sufficient deep soil is maintained for key trees (Tree 88, Tree 93) to be retained.</p> <p>Council seeks that the development further increase basement setbacks by providing a compliant SEPP parking rate (noting that there is surplus 62 spaces). A reduction of parking spaces reduces the amount of basement needed.</p>	<ul style="list-style-type: none"> ▪ 267 residential spaces (including 35 platinum standard accessible spaces) ▪ 32 spaces for the affordable housing component (including 3 accessible spaces) ▪ 42 visitor spaces including 3 accessible spaces ▪ 3 car share spaces. <p>The Housing SEPP outlines a minimum parking provision for the development of 272 spaces. However, this applies to resident parking spaces only and excludes visitor and car share spaces. The proposed development includes 299 residential spaces which is 27 spaces more than the Housing SEPP minimum and 15 spaces more than the Kuring-gai DCP minimum (which is 284 spaces excluding visitor parking).</p> <p>Whilst this parking provision exceeds Housing SEPP and DCP minimums, it remains below the maximum DCP requirement of 391 (or 433 including visitor parking requirements). The proposed parking provision is also consistent with the TfNSW Guide to Traffic Impact Assessments 2024 which sets a minimum parking requirement for the site of 273 residential spaces (or 323 spaces including visitor parking). 42 visitor parking spaces are provided in accordance with the Kuring-gai DCP.</p> <p>While the site is close to Roseville Station, the area retains a suburban, family-oriented character where private vehicles are commonly used for weekend and non-work trips. Providing additional spaces is intended to meet anticipated resident demand and avoid increased reliance on on-street parking, which was raised as a concern in public submissions. The Traffic Impact Assessment confirms the proposed</p>	

Summary of Issues Raised	Response	Refer to
	parking can be accommodated without adverse traffic or parking impacts.	
<p>8. Site Coverage</p> <p>Council maintains that the development should increase compliance with Council's site coverage control.</p> <p>Whilst the applicant has stated that DCP's don't apply to SSD applications which is given effect by Clause 2.10 of the Planning System SEPP, compliance with the control can be increased through:</p> <ul style="list-style-type: none"> ▪ Increasing building setbacks to comply with Council's DCP ▪ Reducing the scope of parking, thereby reducing basement extent. 	<p>As part of the updated proposal, the deep soil area proposed within the site is increased by 70.3sqm to a total of 2,843.6sqm, equating to 30% of the site area. This is double the recommended ADG deep soil provision of 15%. The deep soil area has been increased through a reduction in the proposed decking within the central courtyard.</p>	<p>Updated Landscape Plans</p> <p>Appendix F</p>
<p>c) Objective 40-2 Landscape design contributes to streetscape and amenity</p> <ul style="list-style-type: none"> ▪ Council states that the small trees are still shown within the front setback along Roseville Avenue. Council recommends the following reasonable changes are considered to enable tall trees to be located within the front 6m setbacks to meet this ADG 40-2 objective. ▪ Relocate the proposed trees 5m from the façade to create a useable POS area. ▪ Change the (LAG ind) Lagerstroemia indica (Crepe Myrtle) small tree to a medium-sized species such as Nyssa sylvatica (Sour-gum), Alloxylon flammeum (Tree Waratah), and/or Corymbia eximia (Yellow Bloodwood) to soften 	<p>The proposal includes the planting of 104 additional trees within the site. In terms of the tree planting specification, large trees, Australian natives and evergreens are proposed with a mature height of up to 12m and a 15m mature canopy spread, to respond to local character and promote diversity. It is noted that, of the six existing high value trees to be retained on site, four of these are located to site boundaries, retaining existing tree canopy to the street frontages.</p> <p>In response to Council comments, the (LAG ind) Lagerstroemia indica (Crepe Myrtle) small tree has been revised to the medium-sized species of Corymbia eximia (Yellow Bloodwood) to soften the built form and adequately contribute to the streetscape and amenity.</p> <p>The substation has been relocated from its previous above ground location, immediately to the west of the proposed driveway, to the</p>	<p>Updated Landscape Plans</p> <p>Appendix F</p>

Summary of Issues Raised	Response	Refer to
<p>the built form and adequately contribute to the streetscape and amenity.</p> <ul style="list-style-type: none"> ▪ The paving adjacent to the subterranean substation remains excessive, access is unclear, and the plans are poorly coordinated, including landscaping shown in front of a substation door. The proposed 6 m wide, 3.4 m deep excavation to the boundary is unacceptable, results in a poor street frontage outcome, and is inconsistent with the HCA. ▪ Design changes are required to address level coordination issues and reduce hard paving. Excavation and paving in front of the substation should be halved, with landscaping added to soften the façade in line with ADG 40-2 ▪ The retaining wall must be set back at least 4 m from the boundary while maintaining substation access, noting concerns about the unapproved removal of Council street tree T20. 	<p>south west corner of Building C. The approach eliminates the need for excavation and facilitates the retention of Lord Street street tree T20, previously proposed for removal. The revised design enables the retention of all existing street trees along Lord Street, including street tree T1 which provides screening to the substation location from the street. The substation has been carefully integrated into the design of the development. Access is proposed to be provided to the substation in accordance with Ausgrid requirements. Proposed site landscaping surrounding the substation has been maximised, including shrub and tree planting, whilst maintaining compliance with Ausgrid requirements.</p>	
<p>Part 4P Planting on structures soil depths and soil volumes.</p> <p>Architectural sections show planter heights of only 600 mm, which is insufficient for the mature trees proposed.</p> <p>Ground level COS sections indicate soil depths of only 600 mm over the basement, not meeting ADG minimum soil depth requirements for the proposed trees.</p> <p>Council recommends that amendments to the landscape plans and architectural plans occur that</p>	<p>Planter depths have been updated to 800mm allow for sufficient soil depth for proposed shrubs and trees over the basement line. The proposed soil depths have been specified by Land + Form to enable that the proposed species to grow to maturity.</p>	<p>Updated Landscape Plans Appendix F</p>

Summary of Issues Raised	Response	Refer to
<p>demonstrate sufficient soil depths to enable mature tree growth.</p>		
<p>15. Tree removal and impacts Root mapping was not carried out on all the trees recommended. The following impacts and tree removal results are considered unacceptable by Council and as per the Applicants Arborist, design modifications are to be made to prevent any potential damage.</p> <p>Trees T5 and T49 – Brush Box (Lophostemon confertus)</p> <ul style="list-style-type: none"> ▪ Root mapping has not been undertaken, contrary to SEARs, SEPP, ADG, LEP and KDCP. ▪ Without root mapping, impacts on these public trees cannot be assessed. ▪ Further investigations are required and must be submitted, as outcomes are likely to influence the design. <p>Tree T20 – Brush Box</p> <ul style="list-style-type: none"> ▪ Root mapping shows 27% NRZ encroachment, exceeding sustainable limits. ▪ The proposal seeks removal, which Council does not support. Consent cannot be granted without Council approval. ▪ Design changes are required to retain the tree, including relocating the driveway and crossover at least 4.5 m northeast and maintaining a minimum 3.5 m setback from Tree T49, outside its SRZ. 	<p>An updated Arboricultural Statement is provided as part of this Response to Submissions, including additional root mapping.</p> <ul style="list-style-type: none"> ▪ Trees 5 & 49 Root Mapping was not carried out to Trees 5 & 49 (Lophostemon confertus) located within the Lord Street verge as impacts from the proposed development result in ‘moderate’ (12% & 17% respectively) Notional Root Zone (NRZ) encroachment (as per AS4970-2025 Protection of trees on development sites). Per the SEARs Item 14, root mapping is only required ‘if the proposal involves significant impacts to tree-protection zones of retained trees identified as being significant’. On the basis the impacts are considered moderate and tolerable, root mapping investigations have not been undertaken. <p>The anticipated impact to the health and condition of Trees 5 & 49 from construction is considered sustainable given the species’ known tolerance to high levels of root loss and disturbance. Further, all proposed works are located outside the Structural Root Zone (SRZ) and NRZ encroachment is partly offset by contiguous areas of deep soil available for compensatory root development.</p> <ul style="list-style-type: none"> ▪ Tree 20 The proposed driveway and crossover have been re-aligned and will result in ‘moderate’ (13%) NRZ encroachment (as per AS4970-2025 Protection of trees on development sites) to Tree 20. The anticipated impact to the health and condition of Tree 20 from construction is considered sustainable given the species’ known tolerance to high levels of root disturbance. Further proposed 	<p>Updated Arboricultural Statement Appendix I</p>

Summary of Issues Raised	Response	Refer to
<p>Tree T85 – Brush Box (Roseville Ave)</p> <ul style="list-style-type: none"> Root mapping shows 28% NRZ encroachment. Council considers evidence insufficient to demonstrate the tree can be viably retained. Minor design changes are required to reduce encroachment to less than 10% : Remove the superfluous path and seat shown between trees T85 and T88 	<p>works are located outside the SRZ and NRZ encroachment is partly offset by contiguous areas of deep soil available for compensatory root development.</p> <ul style="list-style-type: none"> Trees 85 & 88 The proposed landscape design has been amended to remove the pathway between Trees 85 & 88. Impacts to Tree 85 from the proposed seating and remaining pathways will result in ‘minor’ 5% NRZ encroachment, while impacts to Tree 88 from the proposed seating and remaining pathways will result in ‘moderate’ 19% NRZ encroachment (as per AS4970–2025 Protection of trees on development sites). 	
<p>Tree T88 – Chinese Elm (Ulmus parvifolia)</p> <ul style="list-style-type: none"> The boundary path results in 19% NRZ encroachment, threatening long-term viability. Council recommends removing the path and seat and replacing them with soft landscaping to create a contiguous deep soil zone. 	<p>Impacts are not expected to significantly impact Tree 88 health, condition or structural viability given the species’ known tolerance to moderate levels of root disturbance and the existing good health/vitality of the specimen, subject to the implementation of root-sensitive design and construction of pathways and seating walls, Project Arborist supervision and tree protection measures throughout construction.</p>	
<p>Level of impact Tree T93</p> <p>The impacts to Tree T93 remain unresolved. Landscape plans do not adequately reduce NRZ encroachment, which is reported as 21% but effectively exceeds 50% due to level differences and excavation on the southern side. This level of impact, combined with decking and seating beneath the tree, poses an unacceptable risk to tree stability and long-term viability and is not supported by Council.</p> <ul style="list-style-type: none"> Modify the design to significantly reduce cumulative NRZ encroachment from regrading, decking, seating and landscaping. 	<ul style="list-style-type: none"> Tree 93 Impacts to the NRZ of Tree 93 result from the proposed building/basement footprint, retaining walls, pathways, seating walls and decking. The design has been amended to remove decking to the south and west of the tree and to remove a proposed retaining wall to the south of the tree. The finished level of the deck, including 250mm profile depth, will be raised to ensure existing ground levels will be maintained. 	

Summary of Issues Raised	Response	Refer to
<ul style="list-style-type: none"> ▪ Remove decking south of the tree or step decking over natural ground levels to avoid excavation and compaction. ▪ Limit total encroachment to less than 15% (preferably under 10%) and retain the remaining NRZ as soft landscaping to support long-term tree health. 	<p>Impacts from the proposed works will result in ‘moderate’ (13%) NRZ encroachment (as per AS4970-2025 Protection of trees on development sites). This level of encroachment, as well as the modification of surrounding site conditions may alter ground water movement and availability of nutrients and has the potential to result in a reduction to the assigned Useful Life Expectancy (ULE) rating and health/condition of Tree 93. The long-term viability of Tree 93 is contingent on root sensitive design and construction of decking, pathways and seating walls, Project Arborist supervision and tree protection measures (protective fencing, mulch etc.) throughout construction as well as ongoing irrigation to supplement any reduced access to water.</p>	
<p>16. Landscape design and character</p> <p>B) Matter Not Resolved.</p> <ul style="list-style-type: none"> ▪ The landscape plans fail to provide sufficient detail as to the proposed wall heights and soil depths provided in planters in accordance with the ADG. <p>D) Matter Not Resolved.</p> <ul style="list-style-type: none"> ▪ All trees are to be relocated at least 4m from the building façade to avoid on-going maintenance issues and future infrastructure conflicts. <p>E) Matter Not Resolved.</p> <ul style="list-style-type: none"> ▪ The proposed decking over the SRZ and TPZ of Tree 93 will adversely affect growing conditions. Decking and development encroachment should be limited to no more than 15%, with the remainder of the TPZ retained as soft 	<ul style="list-style-type: none"> ▪ Planter depths are identified on the revised Landscape Plans. Planters range from 300mm to 800mm in depth. Planter depths have been updated to 800mm allow for sufficient soil depth for proposed shrubs and trees over the basement line. ▪ While it is noted that some trees are less than 4m from the building façade, they form part of the mitigation measures with respect to the visual impact and replacement tree planting. As part of the SSDA proposed mitigation measures, it will be required to maintain these trees for the life of the development. Further it is noted that section 2.10 of the Planning Systems SEPP specifically states that Development Control Plans do not apply to SSD and as such the KDCP requirements relating to tree planting does not apply. ▪ Refer to above response provided in relation to the long-term viability of Tree 93. ▪ The relocation of the substation to the south west corner of Building C has reduced the appearance of hard surface treatments within the Lord Street frontage. The areas of hard 	<p>Updated Landscape Plans</p> <p>Appendix F</p>

Summary of Issues Raised

Response

Refer to

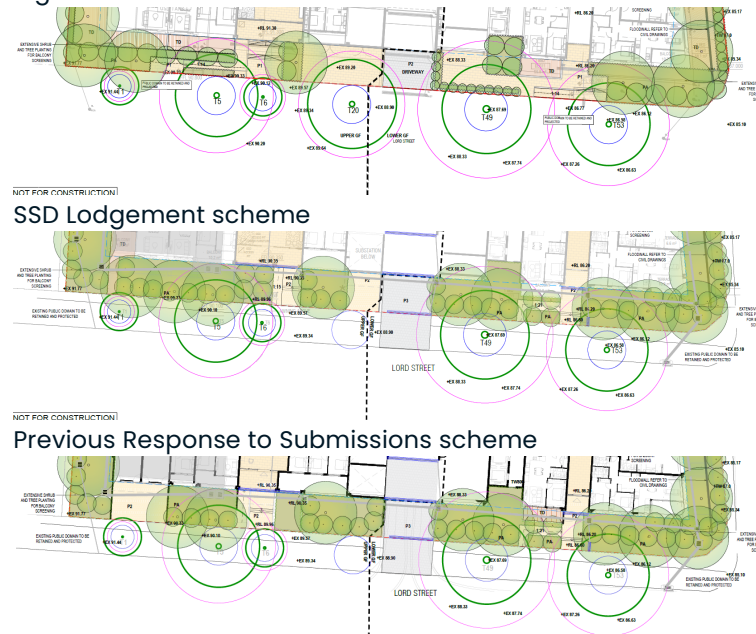
landscaping to ensure sustainable tree health

G) Matter Not Resolved

- The extent of hard surface treatments within the Lord St site frontage is uncharacteristic of the established landscape context and results in unnecessary tree impact to trees within the public domain. It is recommended the extent of BUA within the street frontage be significantly reduced and viable deep soil landscape area increased to maintain existing street trees.

surface are limited to the pedestrian and vehicular access and the access required to the substation in accordance with Ausgrid requirements. The relocation of the substation has enabled the retention of all street trees along Lord Street, which, along with the proposed landscape planting, screen and soften the appearance of the development. The landscape planting surrounding the access ways has been maximised and the widths of the access minimised as far as possible. The updated pattern of the access ways is reflective of the existing pattern of driveways within the street. Refer **Figure 9** below.

Figure 9 Reduced hard surface treatments to Lord Street



Updated Response to Submissions scheme

Source: Land + Form

Summary of Issues Raised	Response	Refer to
<p>Public domain Interface:</p> <ul style="list-style-type: none"> ▪ Due to the building being lowered, landscape levels have been adjusted, resulting in some ramps no longer being DDA compliant, including access to the Building C lobby on Lord Street. The 1:15 ramp does not provide DDA-compliant access from the existing street level (RL 89.57) to the revised lobby level (RL 90.35). No landings are shown, which may result in handrails extending into the public domain and obstructing pedestrian movement. ▪ Amended plans are required to ensure all buildings are DDA compliant and that works interface seamlessly with existing street levels along the site boundaries without obstruction. ▪ In addition, the western setback proposes level changes of 1.7 m to 3.3 m, requiring excessively high retaining walls. High solid walls are not supported and are inconsistent with the character of the Roseville HCA and KDCP Part 21.1. Retaining walls should be reduced to no greater than 900 mm (preferably 600 mm). Terraced walls are to be separated by a minimum 600 mm planting bed, with seating walls considered to manage level changes and reduce cut and fill. 	<p>Updated Architectural Plans and an updated Accessibility Report are provided as part of this Response to Submissions. The Accessibility Report confirms that the proposal can achieve compliance with the access provisions of the BCA and the Access to Premises Standard.</p> <p>The change in levels along the western boundary of the site has been carefully considered to minimise the potential for overlooking to the neighbouring properties to the west and maximise residential privacy. This setback will be extensively landscaped with large and smaller tree planting as well as shrub planting. The development of the design has given careful consideration to the sloping topography of the site, including the minimisation of any visual impacts associated with managing the change in levels across the site.</p>	<p>Updated Architectural Plans Appendix D Updated Accessibility Report Appendix G</p>
<p>H) Matter Not Resolved Tree planting outcomes to complement and enhance the tree canopy that characterises Ku ring gai and the public domain has not</p>	<p>Tree plantings within the street setbacks are expected to achieve a mature height of up to 12m, with a width of up to 15m. All trees within the public domain surrounding the site are proposed to be retained, save for Tree 86, which is proposed to be removed and replaced. The</p>	<p>Updated Landscape Plans Appendix F</p>

Summary of Issues Raised	Response	Refer to
<p>been satisfied. Increased setbacks within street frontages with increased deep soil landscape area is required.</p>	<p>retention of mature trees within the public domain to the site frontages will contribute to maintaining the established landscape context. The deep soil area has been increased as part of the updated Landscape Plans by 70.3sqm, with 30% of the site area proposed.</p>	
<p>19. Water Management 6) Matter Not Resolved The location of the access pits to the detention system and rainwater tank are to be shown outside of the communal area (not within private courtyard).</p>	<p>The relevant details are provided on the civil drawings included within the updated FIRA.</p>	<p>Updated Flood Impact Risk Assessment Appendix H</p>
<p>23. Heritage Objectives Council maintains its position from its EIS Submission dated 28 May 2025 and does not support the demolition of the 9 contributory items within the Clanville HCA. Notwithstanding this position, if DPHI is minded to grant consent, Council requests consultation on conditions of consent.</p> <p>These conditions would include but not be limited to:</p> <ul style="list-style-type: none"> ▪ Condition regarding Archival Records signed off by Council ▪ Condition regarding a detailed dilapidation report that considers and outlines appropriate protection for surrounding buildings within the HCA. ▪ Condition regarding Salvage and re-use of existing materials. This is to ensure that any suitable materials can be reused within the development or used by other sites. 	<p>Extensive assessment has been undertaken regarding the acceptability of the proposed demolition of the existing 9 dwellings on the site, as detailed in the Submissions Report prepared by Urbis, dated 10 December 2026.</p> <p>The Applicant generally accepts the conditions of consent recommended by Council but does not accept the CMP is to be approved by Council, nor that an interpretation plan is to be made available for public viewing on site noting that the site will be entirely within private ownership. A plan may be prepared for public display at a public building such as Council chambers, or the public library. As part of the proposal, the intention is to reuse suitable salvaged materials within the landscape areas of the development where possible.</p>	

Summary of Issues Raised	Response	Refer to
<p>7. It's unclear if the application seeks to retain/ reuse materials within the development. Council would recommend reuse of materials within the developments landscaped areas and façade composition.</p> <ul style="list-style-type: none"> ▪ Condition regarding a construction management plan be signed off by Council. ▪ Condition regarding a detailed Interpretation Plan that documents any demolished contributory item identified by Council, with this interpretation plan being installed for public viewing on the site. 		
<p>24. Inappropriate setting and view impacts Council maintains that the developments bulk and scale has unacceptable impacts on the adjoining heritage item and surrounding Clanville HCA. The development should be required to improve its response to the immediate context and locality. This could include:</p> <ul style="list-style-type: none"> ▪ Increasing setbacks (minimum 10 m front setback and side setbacks consistent with KDCP) ▪ Limiting the podium adjoining the Scout Hall to a maximum of 3 storeys, and ▪ Removing the exposed basement wall. 	<p>The proposed heights of the podiums to Buildings A and D have been stepped to reflect the existing topography and further improve the relationship with the streetscape. The podium of Building A adjacent to the Scout Hall has been reduced by a further storey to three storeys in height to provide an improved transition in scale to the Scout Hall. The podium of Building D fronting Lord Street has similarly been stepped from five to four storeys in height to provide an improved transition in scale to the adjoining context.</p> <p>Clarification of the material selection for the basement wall fronting Martin Lane has been added to the architectural plans. This area was always intended to be treated with the same materials as the building section immediately above. To confirm the basement wall will comprise medium dry stack stone.</p>	<p>Updated Architectural Plans Appendix D Design Report Addendum Appendix E</p>
<p>25. Inadequate setbacks The revised proposal includes a 4-storey podium over 8m high. The proposed 6 m setbacks to all</p>	<p>The proposed heights of the podiums to Buildings A and D have been reduced to reflect the existing topography and further improve the relationship with the streetscape. The podium of Building A has been</p>	<p>Updated Architectural Plans Appendix D</p>

Summary of Issues Raised	Response	Refer to
<p>frontages are not acceptable given the scale and height of the development. The revised podium presents as a 4-storey rectilinear sheer wall, which is inconsistent with the single-storey heritage buildings and results in a severe visual impact. Council considers that further amendments are required to better preserve the heritage item.</p>	<p>stepped to three storeys in height to provide an improved transition in scale to the Scout Hall. The eastern element of the podium of Building D has been reduced from five to four storeys in height to provide an improved transition in scale to the adjoining context.</p>	<p>Design Statement Addendum Appendix E</p>
<p>26. Adverse impacts on character The development is overbearing in the low density context. Refer to discussion contained in this submission, including Council’s recommended mitigation measures to address this concern.</p>	<p>Refer to discussion under item 3 (Desired future character) above.</p>	
<p>27. Incompatible bulk, massing, scale and form The proposed 9-storey residential building is inconsistent with the surrounding area’s bulk and scale</p> <ul style="list-style-type: none"> ▪ Refer to discussion contained in this submission, including Council’s recommended mitigation measures to address this concern. 	<p>The proposed heights of the podiums to Buildings A and D have been reduced to reflect the existing topography and further improve the relationship with the streetscape. The podium of Building A has been reduced by a further storey to three storeys in height to provide an improved transition in scale to the Scout Hall. The podium of Building D has been reduced from five to four storeys in height to provide an improved transition in scale to the adjoining context. Refer to discussion under item 3 (Desired future character) above.</p>	
<p>28. Landscape loss The impact on local landscaping is detrimental to the low-density character.</p> <ul style="list-style-type: none"> ▪ Refer to discussion contained in this submission, including Council’s recommended mitigation measures to address this concern 	<p>Existing vegetation of significance located on the subject site is to be retained and incorporated into the proposal to retain the established landscape character. All street trees surrounding the site are proposed to be retained, save for Tree 86, which is proposed to be removed and replaced. The proposal achieves 30% deep soil area and the planting of 104 replacement trees. The planting strategy has been specified to reflect Roseville’s garden character.</p>	<p>Updated Landscape Plans Appendix F</p>

Summary of Issues Raised	Response	Refer to
<p>29. Inappropriate form, details, materials and colours</p> <p>Council remains concerned with the developments inappropriate colours and that they are not compatible with the HCA. Council seeks those amendments occurs to the building's materiality.</p>	<p>As part of this Response to Submissions, the proposed materiality for the building podiums has been updated. The proposed finish for the podiums has been darkened in accordance with Council's comments.</p>	<p>Design Statement Addendum Appendix E</p>

4.3 Response to Agencies

Table 6 Agency Submission Summary

Summary of Issues Raised	Response	Refer to
TRANSPORT FOR NSW (TFNSW)		
TfNSW has reviewed the submitted information and has no requirements as the proposed development is unlikely to have a significant impact on the state classified road network.	Noted	
HERITAGE COUNCIL OF NSW (ACH)		
Heritage NSW reviewed the Response to Submissions and noted that the applicant submitted a Draft Aboriginal Heritage Interpretation Strategy with no additional Aboriginal cultural heritage assessment. As no Aboriginal Cultural Heritage Assessment Report (ACHAR) was provided, Heritage NSW has no comments on the application at this stage.	Noted	
HERITAGE COUNCIL OF NSW(EH)		
Heritage NSW reviewed the Response to Submissions and confirmed that the revised documentation adequately addresses their previous comments on environmental heritage matters. Heritage NSW has no further comments on the proposal and has provided recommended draft conditions of approval. As the site is located within a Heritage Conservation Area and near local heritage items, advice from the relevant local council is also recommended.	Noted	
SYDNEY METRO		
Sydney Metro reviewed the Response to Submissions for SSD-78996460. Has raised no issues. Sydney Metro requests that specific conditions be included in any consent and that any amendments to the proposal be referred back to Sydney Metro for further assessment.	Noted	
CPHR		
The Department of Climate Change, Energy, the Environment and Water (CPHR Group) reviewed the Response to Submissions for SSD-78996460.	Noted	

Summary of Issues Raised	Response	Refer to
<p>It confirmed that the updated Flood Information and Risk Assessment satisfies the Secretary’s environmental assessment requirements. The proposal is also consistent with the BDAR waiver granted on 27 November 2025.</p> <p>No further information is required unless the development changes, in which case a new BDAR waiver request or BDAR may be required.</p>		
AUSGRID		
<p>Ausgrid reviewed the EIS and noted that underground cables and overhead powerlines are located near the site.</p> <p>The proponent must ensure the development does not impact existing electricity infrastructure and must consult with Ausgrid regarding any new connections or load requirements.</p> <p>Construction must maintain required safety clearances from underground cables, overhead powerlines and electricity poles, and any asset relocation required due to the development will be at the developer’s cost.</p>	Noted	
SES NSW		
<p><u>Evacuation and Access</u></p> <p>SES supports removal of site access from Martin Lane, where flood hazard reaches H5–H6 in PMF events.</p> <p>SES recommends not directing evacuation toward Roseville Avenue due to severe flood hazard.</p> <p>Safe evacuation access should be directed west via Lord Street, connecting to High Street and Pacific Highway.</p> <p>Flood analysis should consider broader road network evacuation constraints, not only roads adjacent to the site.</p>	<p>A shelter-in-place assessment is provided at Section 8.1 of the updated FIRA. This confirms the flood scenarios in which shelter in place is appropriate, as well as providing detail on the shelter in place strategy. Shelter in place routes and positions for residents are provided.</p> <p>Section 4 of the updated FIRA identifies the flood risk on the site, Section 6 details flood risk management measures, and Section 7 discusses the pre- and post-development impacts of the proposal. Appendix 2 of the updated FIRA provides flood mapping.</p>	<p>Updated Flood Impact Risk Assessment Appendix H</p>
<p><u>Flood Impact and Risk Assessment (FIRA) - Required Improvements</u></p> <ul style="list-style-type: none"> ▪ SES recommends the FIRA be updated to include: <ul style="list-style-type: none"> – Clear flood warning triggers and response mechanisms. – Evacuation feasibility analysis, including available time before peak flooding. – Time to peak flood levels and duration of inundation. 		

Summary of Issues Raised	Response	Refer to
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- Improved flood mapping, including clear flood depth legends.
- Site-specific flood hazard mapping beyond the 1% AEP up to PMF events.
- Assessment of pre-development vs post-development flood conditions.

Emergency Management Concerns

- Current modelling suggests a critical storm duration of ~30 minutes, which may provide insufficient evacuation time.
- Flash flooding means Bureau of Meteorology flood warnings may not provide sufficient notice.

Shelter-in-Place Strategy

If proposed, the applicant must demonstrate compliance with NSW Shelter-in-Place Guidelines, including:

- Evidence that off-site evacuation is not achievable.
- Confirmation that flash flooding is the only flood mechanism.
- Flood isolation period < 12 hours.
- The development and surrounding roads not subject to high hazard flooding (H5-H6).
- Detailed emergency management procedures before, during, and after sheltering
- Management of secondary risks (fire, medical emergencies, etc.).

Additional Recommendation

- Consult DCCEEW regarding flood afflux increases (>50 mm) caused by the development.

4.4 Response to Public Submissions

The following response to public submissions has been structured according to the categorisation of issues and thematic breakdown provided by Gyde at section 4 of their Response to Community Submissions Report (**Appendix L**).

Table 7 Response to Public Submissions

Theme	Response
Height, Scale and Form of Buildings	
The proposed height is excessive relative to planning controls and surrounding built form.	<p>The development is acknowledged to be of a scale that exceeds the prevailing building heights and massing of existing buildings. The development has been designed with regard to the planning framework that applies under the TOD controls that apply to the site and achieves an appropriate built form outcome through considered massing, setbacks, and design detailing.</p> <p>A further review of the design of the building has been undertaken to respond to advice from Ku-ring-gai Council and DPHI. Additional modulation, including a further reduction in the eastern podium element from 4 to 3 storeys (Building A) and stepping down from 5 storeys to 4 storeys (Building D), has been introduced to accentuate the sloping building form and to further improve the visual relationship of the new development and the smaller building form to the east (Scout Hall).</p>
The proposed development is significantly larger than surrounding buildings and will dominate the streetscape.	The proposed design introduces a form that differs from established neighbouring buildings. This approach is inevitable with the TOD controls. Nonetheless, the proposal has been designed to align with neighbouring setbacks, street lines and podium heights are carefully modulated to create a coherent streetscape even though the architectural expression of the building differs from that of surrounding buildings.
The bulk and scale of the development is inconsistent with the low-density residential character of Roseville	Although the proposal introduces a contemporary built form, the bulk and scale are appropriate when assessed against the objectives of the TOD planning controls. The design mitigates visual impact through articulation, material variation, and landscaping, maintaining consistency with the desired character of the Roseville locality.

<p>The development introduces an abrupt transition between the proposed apartment buildings and adjoining single-storey dwellings.</p>	<p>The proposal satisfies the intent of the planning controls relating to built form transition. The combination of setbacks, height modulation, and landscape buffering ensures that the development integrates appropriately with the adjoining lower-scale residential properties.</p>
<p>The proposal represents overdevelopment of the site relative to the size of the amalgamated lots.</p>	<p>The proposed floorspace ratio is entirely consistent with that envisaged for the site under the TOD controls and satisfies other relevant controls relating to deep soil, landscape and open space provision.</p>
<p>The development does not appropriately respond to the established scale and character of the surrounding neighbourhood</p>	<p>The proposal is of a different scale and massing to existing development, but is nonetheless compatible with the established built form of the surrounding neighbourhood. The design adopts a built form, setbacks, and articulation that integrates with the existing development pattern, and the heavy use of landscaping will ensure that it does not detract from the character of the Roseville locality.</p>
<p>The architectural form and massing are inconsistent with the heritage character of the area.</p>	<p>While the proposal introduces a contemporary architectural expression, the form and massing have been designed to respond to the heritage character of the area. This is achieved through the modulation of building elements, articulation of facades, and the use of materials and colours that are compatible with the heritage context in which the development is located, thereby reducing visual impact and maintaining the established character.</p> <p>A further review of the design of the building has been undertaken to respond to advice from Kuring gai Council and DPHI. Additional modulation, including a further reduction in the eastern podium element from 4 to 3 storeys (Building A), has been introduced to accentuate the sloping building form and to further improve the visual relationship of the new development and the smaller building form to the east (Scout Hall).</p>
<p>Site</p>	
<p>The proposed development is not suitable for the site given surrounding heritage conservation areas and low-density zoning.</p>	<p>While the proposal introduces a contemporary architectural expression, the form and massing have been designed to respond to the heritage character of the area. This is achieved through the modulation of building elements, the articulation of facades, and the use of materials and colours that are compatible with the heritage context in which the development is located, thereby reducing visual impact and maintaining the established character.</p>

<p>The development would create an isolated high-density building within a predominantly low-density area.</p>	<p>Although the proposal introduces a contemporary built form, the bulk and scale are appropriate when assessed against the objectives of the TOD planning controls. The design mitigates visual impact through articulation, material variation, and landscaping, maintaining consistency with the desired character of the Roseville locality.</p>
<p>The proposal does not appropriately respond to the physical constraints of the site, including proximity to the Sydney Metro tunnel.</p>	<p>The development has been designed with full consideration of the site's physical constraints, including its proximity to the Sydney Metro tunnel. Specialist engineering advice has informed the building design, footing systems, and construction methodology to ensure there are no adverse impacts on the tunnel infrastructure. The proposal will comply with all relevant conditions specified by Sydney Metro and will be constructed with appropriate safeguards during construction.</p>
<p>The site selection does not align with areas identified for higher density development within Roseville.</p>	<p>The TOD controls continue to apply to the site. The scale of development proposed is consistent with applicable planning controls.</p>
<p>Layout and Design</p>	
<p>The proposed building separation distances do not comply with the Apartment Design Guide.</p>	<p>The development has been designed to ensure that adequate building separation distances are observed. A 6m setback to all property boundaries is provided. Visual privacy to surrounding buildings is addressed through planting and balcony screening elements.</p> <p>Planning circular PS17-001 clarifies that the ADG <i>is not intended to be and should not be applied as a set of strict development standards</i>. The intent of the controls relating to building separation is met by the proposal.</p>
<p>The development does not provide adequate setbacks from adjoining properties.</p>	<p>The development has been designed to ensure that adequate building separation distances are observed. A 6m setback to all property boundaries is provided. Visual privacy to surrounding buildings is addressed through planting and balcony screening elements.</p> <p>Planning circular PS17-001 clarifies that the ADG <i>is not intended to be and should not be applied as a set of strict development standards</i>. The intent of the controls relating to building separation are met by the proposal.</p>
<p>The building layout results in overlooking of neighbouring dwellings and private open space.</p>	<p>A 6m setback to all property boundaries is provided. Visual privacy to surrounding buildings is addressed through planting and balcony screening elements.</p>

The proposal does not provide appropriate transitions between buildings of different heights.

The development has been designed to ensure that adequate building separation distances are observed. A 6m setback to all property boundaries is provided. Visual privacy to surrounding buildings is addressed through planting and balcony screening elements.

Planning circular PS17-001 clarifies that the ADG *is not intended to be and should not be applied as a set of strict development standards*. The intent of the controls relating to building separation are met by the proposal.

The development footprint and basement design reduce opportunities for landscaping and deep soil planting.

Generous deep soil zones are provided. Existing large trees are retained on site, and additional opportunities for large tree planting are embedded in the landscape strategy. This is achieved through the unconventional 'L' shaped basement design, which has been purposefully included to allow for retention of significant trees.

Amenity

The development will result in significant overshadowing of neighbouring properties

A comprehensive shadow analysis has been undertaken to assess the impact of the development on neighbouring properties. The analysis indicates that while some additional overshadowing will occur, it remains within acceptable limits. The design incorporates setbacks and building articulation to minimise shadow impacts and maintain reasonable solar access to adjoining properties.

Supplementary shadow information is provided with respect to the properties immediately to the west of the proposed development. This analysis confirms that the level of overshadowing of the living spaces of neighbouring properties remains within acceptable limits. This is evidenced in the analysis contained in the Design Statement Addendum at **Appendix E**.

The proposal will reduce solar access to adjoining dwellings and private open space areas.

Comprehensive overshadowing and solar analyses have been undertaken to assess the impact of the development on neighbouring properties. The analysis indicates that while some additional overshadowing/loss of solar access will occur, it remains within acceptable limits. The design incorporates setbacks and building articulation to minimise impacts and maintain reasonable solar access to adjoining properties.

Supplementary shadow information is provided with respect to the properties immediately to the west of the proposed development. This analysis confirms that the level of overshadowing of the living spaces of neighbouring properties remains within acceptable limits.

The development will result in loss of privacy for surrounding residents due to overlooking from balconies and upper-level apartments

The development has been designed to ensure that adequate building separation distances are observed. A 6m setback to all property boundaries is provided. This increases to 9m for the upper levels of the building. Visual privacy to surrounding buildings is addressed through planting and balcony screening elements. View lines are directed over buildings rather than into adjoining properties.

The scale and proximity of the buildings will create visual dominance and reduce residential amenity.

The proposed development has been carefully designed to respond to its context, with building scale and setbacks arranged to minimise visual bulk and maintain a balanced streetscape. Variations in height, articulation, and landscaping elements help break down the perceived mass of the buildings, reducing any sense of dominance. Adequate separation distances have been incorporated to protect privacy, access to sunlight, and outlook for neighbouring properties, ensuring that residential amenity is appropriately maintained.

Increased residential density will result in increased noise and activity within the surrounding area.

While the proposal will introduce additional residents to the area, increased density does not inherently result in unacceptable noise or disruption. The development has been designed in accordance with relevant TOD planning controls and with regard to the controls that apply to surrounding properties. The design incorporates appropriate building orientation, internal layouts, and acoustic treatments to minimise noise impacts on both occupants and neighbouring properties.

Furthermore, moderate increases in activity are consistent with the intended character of a growing urban area and can contribute positively to passive surveillance, safety, and local vitality. The scale of the development is not expected to generate noise levels beyond those typically associated with residential environments, and overall residential amenity within the surrounding area will be maintained.

Traffic

The development will increase traffic congestion on surrounding local streets.

The potential traffic impacts of the development have been assessed and are not expected to result in unacceptable congestion on surrounding local streets. The anticipated increase in vehicle movements is relatively modest and can be accommodated within the existing road network, which has sufficient capacity for the projected demand.

The proposal also incorporates appropriate on-site parking, access arrangements, and safe vehicle circulation to minimise any impact on nearby streets. In addition, the site's accessibility to public transport,

	<p>walking, and cycling options is expected to reduce reliance on private vehicles. The development is unlikely to generate significant traffic congestion or adversely affect the operation of the local road network.</p>
<p>The local road network has limited capacity to accommodate additional traffic generated by the development.</p>	<p>The capacity of the local road network has been considered as part of the assessment of the proposal, and it is not expected that the development will generate traffic volumes beyond what the network can reasonably accommodate. The anticipated increase in vehicle movements is relatively small and consistent with the scale and zoning of the site.</p> <p>The surrounding road network is designed to support gradual growth and redevelopment, and the additional traffic generated by the proposal will be distributed across the network without causing significant disruption to its operation. Furthermore, the site's accessibility to public transport and active transport options is expected to reduce reliance on private vehicles.</p> <p>The development is unlikely to place undue strain on the local road network or result in unacceptable traffic impacts.</p>
<p>Existing congestion near Roseville Station and surrounding roads will be exacerbated by the proposal</p>	<p>The proposal is not expected to materially change or exacerbate existing congestion near Roseville Station or the surrounding road network. The anticipated increase in traffic generated by the development is modest and has been assessed as capable of being accommodated within the existing road capacity.</p> <p>Importantly, the site's proximity to the train station and other public transport options is likely to reduce reliance on private vehicles, with a significant proportion of trips expected to occur via public transport, walking, or cycling. This transit-oriented location is intended to support higher-density development while limiting additional traffic impacts.</p> <p>The development is unlikely to result in a noticeable increase in congestion, and the operation of the surrounding road network, including areas near the train station, will continue to function effectively.</p>
<p>The proposed parking provision may increase vehicle usage and traffic within the area.</p>	<p>The proposed parking provision is consistent with applicable planning controls and is designed to meet, rather than exceed, the reasonable needs of future residents and visitors. It is not expected to encourage excessive car use, but rather to prevent overspill parking in surrounding streets.</p> <p>The development's location, with access to public transport, walking, and cycling options, supports reduced reliance on private vehicles. In addition, the provision of appropriate parking is balanced with</p>

measures that promote alternative transport modes, ensuring that traffic generation remains within anticipated and acceptable levels.

The proposal will not result in a significant increase in vehicle usage or adverse traffic impacts within the area.

Access arrangements and traffic movements associated with the development may impact local safety and circulation.

The proposed access arrangements have been designed to ensure safe and efficient vehicle and pedestrian movement, in accordance with relevant standards and guidelines. Access points are appropriately located to maintain clear sightlines, minimise conflict with existing traffic flows, and support safe entry and exit for vehicles.

Internal circulation has been carefully planned to provide logical and safe vehicle movements within the site, while also prioritising pedestrian safety. The expected traffic volumes associated with the development are relatively low and are not anticipated to adversely affect the safety or function of surrounding streets.

The proposal will maintain safe and effective local circulation, and no significant adverse impacts on traffic safety are expected.

Heritage

The development will result in demolition of dwellings that contribute to the heritage conservation area.

The proposal has given careful consideration to the heritage significance of the conservation area and the contribution of existing dwellings. Detailed assessment has determined that the buildings proposed for demolition do not make a significant or intact contribution to the heritage values of the precinct.

The scale and design of the development are incompatible with the surrounding heritage character.

The design of the new development responds to the established character of the area through appropriate scale, form, and materiality, ensuring that the overall heritage significance of the conservation area is preserved. A design analysis has been completed by the project architects which thoroughly assesses and considers the proposal within the established context and additional analysis has been provided by the project heritage consultant.

A further review of the design of the building has been undertaken to respond to advice from Kuring gai Council and DPHI. Additional modulation, including a further reduction in the eastern podium

The proposal will adversely affect the setting of nearby heritage items and heritage conservation areas.

The proposal has been designed with careful regard to the setting of nearby heritage items and the broader heritage conservation area. The building form, scale, and setbacks have been developed to

ensure that the development sits comfortably within its context and does not visually overwhelm or detract from heritage elements.

View corridors, streetscape relationships, and the established character of the area have been considered in the design process, with articulation and material selection used to provide a complementary, rather than competing, built form. Landscaping also assists in softening the interface between the development and surrounding heritage features.

A further review of the design of the building has been undertaken to respond to advice from Kuring gai Council and DPHI. Additional modulation, including a further reduction in the eastern podium element from 4 to 3 storeys (Building A), has been introduced to accentuate the sloping building form and to further improve the visual relationship of the new development and the smaller building form to the east (Scout Hall).

The development will diminish the historic character and streetscape of Roseville

The proposal has been carefully designed to respect and integrate within the historic character and streetscape of Roseville. Its scale, massing, and architectural detailing respond to the existing rhythm and form of the area, ensuring that new buildings do not dominate the established streetscape.

Materials, finishes, and landscaping have been selected to reflect the local context and soften the transition between the development and surrounding properties.

A further review of the design of the building has been undertaken to respond to advice from Kuring gai Council and DPHI. Additional modulation, including a further reduction in the eastern podium element from 4 to 3 storeys (Building A) and 5 storeys to 4 storeys (Building D), has been introduced to accentuate the sloping building form and to further improve the visual relationship of the new development and the smaller building form to the east (Scout Hall).

Landscape/Tree Impact

The development will result in the removal of a large number of mature trees on the site

The majority of trees and vegetation on site consist of hedges and planting synonymous with suburban gardens. Significant trees are retained and further design refinement has been undertaken to further safeguard the survival of these trees during the construction and following completion of the development.

	Further work has been completed to ensure that the street tree on Lord Street (T20) previously identified for removal can be retained. This has involved relocation of the substation to the southwest corner of the development.
Tree removal will reduce local biodiversity and habitat for native fauna.	Vegetation removal is necessary for the proposal. The existing trees within the site are primarily exotic species. New planting is proposed, species selection includes a variety of species, including native vegetation, which will provide habitat for fauna. Further work has been completed to ensure that the street tree on Lord Street (T20) previously identified for removal can be retained. This has involved relocation of the substation to the southwest corner of the development.
Loss of vegetation will reduce tree canopy and contribute to urban heat impacts.	Extensive tree planting is proposed. Upon completion of the development, tree canopy coverage will increase. Further work has been completed to ensure that the street tree on Lord Street (T20) previously identified for removal can be retained. This has involved relocation of the substation to the southwest corner of the development.
The proposal does not provide sufficient deep soil areas for meaningful tree planting.	Generous deep soil zones are proposed and allow for large trees. A further review of tree species has been completed in response to comments from Council. Alternative tree species are proposed that have the potential to grow larger than those previously identified.
The extent of basement excavation limits opportunities for canopy tree retention and replacement planting.	Basement excavation is restrained and allows for the retention of significant trees and opportunities for new planting. This has been achieved by creating an unconventional U-shaped design.
Replacement landscaping is unlikely to compensate for the loss of mature vegetation on the site.	The site comprises suburban homes with manicured gardens. The majority of plants to be removed consist of exotic species. The landscape strategy is integral to the design concept for the project and includes a rich diversity of planting that will complement the building form and help to integrate the new building within the streetscape.
Social Infrastructure	
The development will increase local population without corresponding upgrades to community infrastructure	In the event that a consent for the project is issued, the relevant development contributions will be paid. It is anticipated that this contribution will be allocated to the provision of new and upgraded community infrastructure by the Council.

Existing public services and facilities may experience increased demand as a result of the development.

The proposal is not expected to place undue pressure on public services or result in a significant reduction in their availability or quality for the community. The scale of the proposal is moderate and consistent with the existing planning framework for the area, meaning any additional demand is expected to be incremental and manageable.

The site is well-serviced by existing infrastructure, including schools, parks, community facilities, and utilities, which have the capacity to accommodate additional residents. Furthermore, the development contributes to the efficient use of existing services and supports the ongoing viability of local facilities

Consistency with Policies, Plans and Strategies

The proposal is inconsistent with Ku-ring-gai Council's preferred planning framework for the area.

Kuring gai Council's preferred planning framework was amended prior to finalisation and adoption. The adopted controls recognise the site as a State Significant Development site. The relevant TOD controls continue to apply.

The development does not align with recently adopted planning strategies for Roseville.

Since the lodgement of the application, the Ku-ring-gai LEP has been updated to reflect the Council's preferred planning framework. The adopted controls recognise the site as a TOD site. The TOD controls have been removed from specified parts of the Roseville locality, but remain in effect for the site.

The proposal is inconsistent with the intended density and zoning for the site.

The proposal is consistent with the intended density and zoning for the site. The site is identified for higher-density development within a Transport- Oriented Development context, and the proposal aligns with these strategic objectives of the controls by providing additional housing while maintaining appropriate scale, setbacks, and streetscape compatibility. Consequently, the development is consistent with both the zoning and the intended density envisaged for the site.

Engagement Quality

Community consultation undertaken by the proponent was insufficient.

The engagement process was designed and delivered in line with the *NSW Government Undertaking Engagement Guidelines for State Significant Projects* (March 2024). Activities were proportional to the scale of the proposal and provided multiple avenues for feedback (website, survey, project flyer, direct contact). The engagement met all statutory requirements, providing clear, accessible project information and a variety of opportunities for input throughout the consultation period.

Local residents were not adequately informed or engaged during preparation of the proposal.

The comment relates to pre-lodgement consultation of the SSDA. As this is an important issue to residents, as evidenced by the large number of comments on this matter, a more comprehensive

response on this matter is provided within the Response to Community Submissions Report prepared by Gyde at **Appendix M**, and summarised below.

A community drop-in session was held on 12 March 2025 at East Lindfield Seniors Centre, staffed by members of the Hycorp project team, including the architect, development manager and the engagement manager.

Public submissions have indicated that residents did not have sufficient opportunity to comment on the proposal and were not aware of the community consultation session.

The drop-in session was only one of a number of opportunities for residents to provide feedback. As noted above, extended flyer distribution was implemented to increase awareness and participation in the ongoing survey.

Community concerns raised during consultation have not been adequately addressed in the revised proposal.

The revised proposal was updated in response to feedback received during the consultation process. Key concerns raised by the community, including matters relating to building scale, landscaping, and amenity, were reviewed and addressed through targeted design refinements and mitigation measures.

It has not been possible to accommodate every individual comment, noting that some comments called for significant reductions in building height and scale well below the TOD controls. The revised proposal represents a balanced approach that responds to community input, aligns with planning controls, and maintains high-quality outcomes for both future residents and the surrounding neighbourhood.

Sustainability

The proposal does not adequately address environmental sustainability outcomes.

The proposal demonstrates a considered approach to environmental sustainability through the integration of design strategies that reduce resource consumption and minimise environmental impacts.

Measures include energy-efficient building systems, water-sensitive urban design, and the use of environmentally sustainable materials. The built form is complemented with generous landscaped zones that will provide habitat for native fauna.

In addition, the development promotes sustainable transport by providing convenient access to public transport, walking, and cycling, helping to reduce reliance on private vehicles. These measures ensure

that the proposal achieves positive environmental outcomes in line with current planning and sustainability objectives.

Loss of vegetation and increased hard surfaces may contribute to urban heat and environmental impacts.

The development has been designed to minimise the impact of vegetation loss and increased hard surfaces on the local environment. Where vegetation removal is unavoidable, substantial replacement planting and landscaping are proposed to maintain canopy cover, support biodiversity, and improve microclimate conditions.

Hard surfaces have been carefully managed, with permeable paving, landscaped areas, and tree planting incorporated to reduce heat retention, manage stormwater, and mitigate potential urban heat effects. These measures ensure the proposal achieves a sustainable outcome while maintaining environmental amenity for the surrounding area.

Further design refinement has been completed to ensure that a street tree on Lord Street (T20, previously proposed for removal) can be retained. This has involved the relocation of the substation to the southwest corner of the building.

Metro

The development's proximity to the Sydney Metro tunnel may create engineering and safety concerns.

A small section of the site is within the second reserve zone of the Sydney Metro tunnels. Works proposed within this part of the site are extremely minor, involving tree removal, stormwater management and landscaping. Basements and other physical development do not extend into this area.

The full application has been referred to Sydney Metro for review and comment, and have provided conditions for inclusion in any future consent

Construction associated with the development may impact Sydney Metro infrastructure

Construction of the project will adhere to all requirements specified by Sydney Metro to ensure that adverse impacts on the tunnel do not arise

Basement excavation and proximity to tunnel pose safety risks to public and infrastructure.

Detailed geotechnical investigations and engineering design demonstrate that the proposal can be constructed safely without adverse impact on tunnel integrity. Final approval is subject to Sydney Metro/Transport concurrence and conditions.

Project Amendment

Amendments made in the Response to Submissions do not adequately address the key concerns raised by the community.

The revised proposal was updated in response to feedback received during the consultation process. Key concerns raised by the community, including matters relating to building scale, landscaping, and amenity, were reviewed and addressed through targeted design refinements and mitigation measures.

It has not been possible to accommodate every individual comment, noting that some comments called for significant reductions in building height and scale well below the development forms achievable under the TOD controls. The revised proposal represents a balanced approach that responds to community input, aligns with planning controls, and maintains high-quality outcomes for both future residents and the surrounding neighbourhood.

The changes to building height and dwelling numbers are considered minor and do not significantly reduce impacts.

It has not been possible to accommodate some comments, particularly those requesting substantial reductions in building height and scale well below the building forms achievable under the TOD controls. The revised proposal represents a balanced approach that responds to community input, remains consistent with planning controls, and delivers high-quality outcomes for both future residents and the surrounding neighbourhood.

Addendum EIS

5 Statutory Planning Assessment

This section of the report provides an overview of amendments to the key statutory requirements addressed in the EIS relevant to the site and the project, including:

- Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (**EPBC Act**)
- NSW Biodiversity Act 2016 (**BC Act**)
- Environmental Planning and Assessment Act 1979 (**EP&A Act**)
- Environmental Planning Assessment Regulation 2021 (**EP&A Regulations**)
- State Environmental Planning Policy (Planning Systems) 2021 (**Planning Systems SEPP**)
- State Environmental Planning Policy (Transport and Infrastructure) 2021 (**T&I SEPP**)
- State Environmental Planning Policy (Resilience and Hazards) 2021 (**R&H SEPP**)
- State Environmental Planning Policy (Biodiversity and Conservation) 2021 (**B&C SEPP**)
- State Environmental Planning Policy (Sustainable Buildings) 2022 (**Sustainable Buildings SEPP**)
- State Environmental Planning Policy (Housing) 2021 (**Housing SEPP**)
- Ku-ring-gai Local Environmental Plan 2015 (**KLEP 2015**)
- Ku-ring-gai Development Control Plan 2024 (**KDCP 2024**).

It identifies the key statutory matters which are addressed in detail within the EIS, including the power to grant consent, permissibility, other approvals, pre-conditions and mandatory considerations.

5.1 Pre-Conditions to Granting Consent

Table 9 outlines the pre-conditions to exercising the power to grant approval which are relevant to the project and the section where these matters are addressed within the EIS or Response to Submissions

Table 8 Pre-Conditions

Statutory Reference	Pre-Condition	Refer to
EP&A Regulations	Section 29 requires that a development application that relates to residential apartment development must be accompanied by a statement by a qualified designer.	Design Statement Addendum Appendix E
R&H SEPP – clause 4.6(1)	Potential sources of contamination exist at the site but are not expected to preclude the proposed development. Under the SEPP a consent authority must be satisfied that the land is suitable in its contaminated state – or will be suitable, after remediation – for the purpose for which the development is proposed to be carried out.	EIS Section 6.2.2 and EIS Appendix Y
T&I SEPP	Section 2.98 applies to development that involves excavation greater than 2m in, above, below or adjacent to rail corridors. A consent authority must take into consideration any response from the rail authority for the	EIS Section 6.1.4, EIS Appendix Q and EIS Appendix W

	<p>rail corridor received within 21 days after the notice is given.</p> <p>The site is adjacent to a railway corridor and involves excavation into the second reserve tunnel associated with the Epping-to-Chatswood Rail Line (i.e. Sydney Metro). Concurrence is required for development which involves penetration of ground to a depth of at least 2m below ground level on land within 25m of the ground directly above an underground rail corridor.</p> <p>Section 2.122 relates to traffic generating development and requires that before granting consent the consent authority must refer certain development with access to any road to Transport for NSW. The proposal is seeking consent for more than 200 parking spaces. The proposal is therefore considered 'traffic-generating development' under the Transport and Infrastructure SEPP.</p>	
B&C SEPP Chapter 6 Water Catchments	<p>The site is mapped within the 'Sydney Harbour Catchment' under the B&C SEPP's 'Sydney Harbour Catchment Map'. Accordingly, Chapter 6 applies to the site.</p> <p>Section 6.6 Water Quality and Quantity requires the consent authority to consider whether development in a regulated catchment protects water quality and minimises impacts on water flow in natural waterbodies.</p> <p>Section 6.7 Aquatic Ecology requires the consent authority to be satisfied that development in a regulated catchment will minimise direct, indirect and cumulative adverse impacts on terrestrial, aquatic and migratory animals and vegetation, will not have adverse impacts on aquatic reserves, and will minimise erosion and sedimentation of natural waterbodies. It also requires that any necessary approvals or permits for the clearing of riparian vegetation are obtained, and that adverse impacts on wetlands outside the coastal wetlands and littoral rainforests area are minimised.</p> <p>Section 6.8 Flooding requires the consent authority to be satisfied that development on flood liable land within a regulated catchment will not result in the release of pollutants that could adversely affect the water quality of a natural waterbody during a flood and will not adversely impact the natural recession of floodwaters into wetlands and other riverine ecosystems.</p> <p>Section 6.9 Recreation and Public Access requires the consent authority to be satisfied that development within a regulated catchment will maintain or improve public access to natural waterbodies for recreational purposes, without adverse impacts on waterbodies, watercourses, wetlands or riparian vegetation. It also requires that</p>	<p>Updated Statutory Compliance Table</p> <p>Appendix B</p> <p>Updated Flood Impact and Risk Assessment Report</p> <p>Appendix H</p> <p>Geotechnical Investigation Addendum</p> <p>Appendix J</p>

	<p>public access points are safe and stable, and that where foreshore land not in public ownership is made available for public access, that access is appropriately safeguarded.</p> <p>Section 6.10 Total Catchment Management requires, for development on land within a regulated catchment, the consent authority to consult with the council of each adjacent or downstream local government area on which the development is likely to have an adverse environmental impact.</p>	
Housing SEPP Chapter 2 Part 2 Div 1 Infill Affordable Housing	<p>Section 20 requires that the consent authority consider whether the residential development is compatible with the desirable elements of the character of the area or for precincts undergoing transition, the desired future character of the precinct.</p> <p>Section 21 requires that the consent authority must be satisfied that the affordable housing component will be maintained for at least 15 years and that it will be managed by a registered housing provider.</p>	EIS Table 11, EIS Section 6.1.1, EIS Appendix E and EIS Appendix I
Housing SEPP Chapter 5 Transport Oriented Development	<p>Section 156 requires that an affordable housing component equivalent to 2% of total GFA must be provided in perpetuity and managed by a registered community housing provider.</p> <p>Section 159 requires that development consent must not be granted for development under Chapter 5 of the Housing SEPP unless the lot is at least 21m wide at the front building line.</p> <p>Section 161 requires that the consent authority must be satisfied that the proposed development has considered the Apartment Design Guide.</p>	EIS Appendix E, EIS Appendix G and EIS Appendix I
Housing SEPP Chapter 5 Transport oriented development	<p>Section 159 states that development consent must not be granted to development for the purposes of residential flat buildings or shop top housing on a lot in a Transport Oriented Development Area, unless the lot is at least 21m wide at the front building line.</p> <p>Section 161 requires that the consent authority consider the ADG before granting consent.</p>	Updated Statutory Compliance Table Appendix B Design Statement Addendum Appendix E
Ku-ring-gai LEP	<p>Clause 5.21 Flood Planning</p> <p>Clause 6.5 Stormwater and water sensitive urban design</p> <p>Clause 6.6 Requirements for multi dwelling housing and residential flat buildings</p>	Updated Statutory Compliance Table Appendix B

Updated Flood
Impact and Risk
Assessment
Report

Appendix H

Geotechnical
Investigation
Addendum

Appendix J

5.2 Mandatory Considerations

Table 10 outlines updated relevant mandatory considerations, in addition to those specified at Table 17 of the EIS, to exercising the power to grant approval, and where these matters are addressed within the Response to Submissions.

Table 9 Additional Mandatory Consideration

Statutory Reference	Mandatory Consideration	Refer to
Mandatory relevant considerations under EPIs		
B&C SEPP	Chapter 6 – Water Catchments	Updated Statutory Compliance Table Appendix B Updated Flood Impact and Risk Assessment Report Appendix H Geotechnical Investigation Addendum Appendix J
Ku-ring-gai LEP	Clause 6.2 Earthworks	Updated Statutory Compliance Table Appendix B Updated Flood Impact and Risk Assessment Report Appendix H Geotechnical Investigation Addendum Appendix J

6 Community and Stakeholder Engagement

This section is provided as an addendum to the originally submitted EIS to summarise and reference additional information and clarifications prepared by Gyde Consulting in response to submissions received regarding the community and stakeholder engagement program. The engagement program was designed, delivered and reported by Gyde Consulting as the specialist engagement consultant for the project.

The information in this section relies on and summarises the engagement process and findings reported by Gyde Consulting, as set out in Section 4.1.1 of the *Gyde Response to Submissions Report (Appendix M)*.

6.1 Community Engagement Process – Gyde Consulting

Gyde Consulting was engaged by Hyecorp Property Group as the specialist community and stakeholder engagement consultant for the project. Gyde was responsible for designing, delivering and reporting on the engagement program, having regard to the *NSW Government Undertaking Engagement Guidelines for State Significant Projects* (March 2024) and the relevant Secretary's Environmental Assessment Requirements dated 14 January 2025.

The following text, including headings, is reproduced from Section 4.1.1 of the *Gyde Response to Submissions Report (Appendix M)*.

“Gyde Consulting was contracted by Hyecorp to design and deliver an engagement program in accordance with the Undertaking Engagement Guidelines for State Significant Projects (March 2024) (the Guideline).

A number of engagement methods provided the community with access to information about the project and its impacts, and a range of opportunities to provide their feedback to the project team.

This included:

- *a dedicated page on the Hyecorp website, <https://www.hyecorp.com.au/our-collection/roseville-ave/>*
- *a project flyer distributed to the local community, including information about the proposal, a link to the community survey, and Hyecorp contact information*
- *a community survey available over a three week engagement period*
- *a community drop in session held at a local venue*
- *email and phone contact information provided on all collateral*

Hyecorp website

A dedicated project webpage was established on the Hyecorp website. The webpage was live throughout the engagement period, but briefly inactivated following lodgement of the Test of Adequacy package to DPHI. The page was reactivated following formal lodgement and remains active to provide project updates to the community.

The website includes artist impressions of the proposal, key features and up-to-date information about the progress of the project through the planning system.

The community survey was also available on the project website for the three weeks engagement period.

Email and phone contact details for Hycorp project team are also available on the webpage.

Community flyer

A project flyer was developed to provide the local community with information about the project.

The flyer has raised significant comment in the public submissions received during the initial exhibition of the revised design. Given the interest in this matter, a more comprehensive explanation is provided below.

The flyer included a statement of the site location, artist impressions of the proposed development, information about what the proposal would offer and the planning process.

Information about a drop-in session, a survey link and QR code, and email contact information for the project team were also included in the flyer.

Flyers Direct (www.flyersdirect.com.au) were commissioned to distribute flyers to 1,300 local properties from Monday 3 March 2025.

On Friday 14 March 2025, an email from Flyers Direct to Gyde Consulting confirmed that distribution started on Saturday, 8 March and was completed on Tuesday 11 March 2025. Flyers Direct stated that distribution had been delayed due to wet weather.

Due to a low level of attendance at the community information session on Wednesday 12 March 2025, a second project flyer was distributed to obtain community feedback.

Gyde Consulting hand-delivered an additional 200 flyers seeking comments via the online survey to letterboxes in the area surrounding the site on Tuesday 18 March 2025.

The survey was available for a period of three weeks, allowing residents time to respond to the information provided to them following flyer distribution.

Community drop-in session

A community drop-in session was held at the East Lindfield Seniors Centre on Wednesday, 12 March 2025, between 4pm and 6:30pm.

The session was attended by the project architect, the Hycorp project manager and development manager, and the community and stakeholder engagement manager.

Information boards provided project information, and a range of site plans and documentation, such as shadow diagrams and traffic plans, were available to view and discuss with the project team.

Attendance at the session was low. The drop-in session was attended by five members of the community. It is acknowledged that low attendance not representative of community opinion on the project and that the delay in the distribution of flyers advising of the event may have influenced the low turnout.

Community survey

The community survey was available for a period of three weeks following the issue of the second flyer and was completed by a total of 34 respondents. The survey was advertised in the community flyer under the heading of 'Have Your Say', with both a QR and survey website address, and available on the project webpage.

Engagement with directly impacted residents

Hyecorp has maintained one-on-one engagement with the residents of directly impacted properties neighbouring the site, prior to and during the development of the SSDA. These residents had direct access to the Hyecorp project team to discuss the proposal and its impacts on an ongoing basis.

Engagement Reporting

The engagement undertaken in the development of the State Significant Development Application was developed to meet the requirements of the NSW Government Undertaking Engagement Guidelines for State Significant Projects (March 2024).

The engagement program was developed to provide the community with accessible information about the project and to offer a range of ways for the community to access and provide their feedback.

The Engagement Outcomes Report [EIS Appendix K] provides a complete summary of the engagement undertaken, the level of community participation and how the project has responded to issues arising during consultation.”

Extract above reproduced from the Gyde Response to Community Submissions Report.

6.2 Community Engagement Clarifications – EIS

This subsection has been prepared to clarify aspects of the community and stakeholder engagement program described in Section 5 of the EIS (which relied on the information, findings and conclusions of the Engagement Outcomes Report prepared by Gyde Consulting dated 16 April 2025), having regard to additional information provided by Gyde Consulting in its Response to Community Submissions Report dated 9 April 2026 and noting the strong level of community interest in this issue, as evidenced by the number of public submissions commenting on this matter.

As reported by Gyde Consulting, project information materials, including a community flyer, were prepared and arrangements were made for distribution to 1,300 local properties. Gyde Consulting has advised that Flyers Direct were engaged to distribute flyers from Monday 3 March 2025. On Friday 14 March 2025, Flyers Direct confirmed to Gyde Consulting that distribution started on Saturday, 8 March and was completed on Tuesday 11 March 2025. Flyers Direct stated that distribution had been delayed due to wet weather.

Gyde Consulting has also confirmed that the community drop-in session was held on Wednesday 12 March 2025 at the East Lindfield Seniors Centre.

Following the community drop-in session, Gyde Consulting hand-delivered an additional 200 flyers to letterboxes in the surrounding area seeking comments via the online survey.

In addition to flyer-based engagement, Gyde Consulting has reported that community members were able to access project information and provide feedback through multiple channels, including a dedicated project webpage, an online community survey available for a three-week period, and direct email and phone contact with the project team.

The EIS and this Addendum rely on the findings, reporting and professional conclusions of Gyde Consulting in relation to the design, delivery and outcomes of the community and stakeholder engagement program. As confirmed throughout Gyde’s reporting submitted with the SSDA, the engagement undertaken for the project was carried out having regard to the relevant SEARs and the *NSW Government Undertaking Engagement Guidelines for State Significant Projects*.

7 Updated Assessment of Impacts

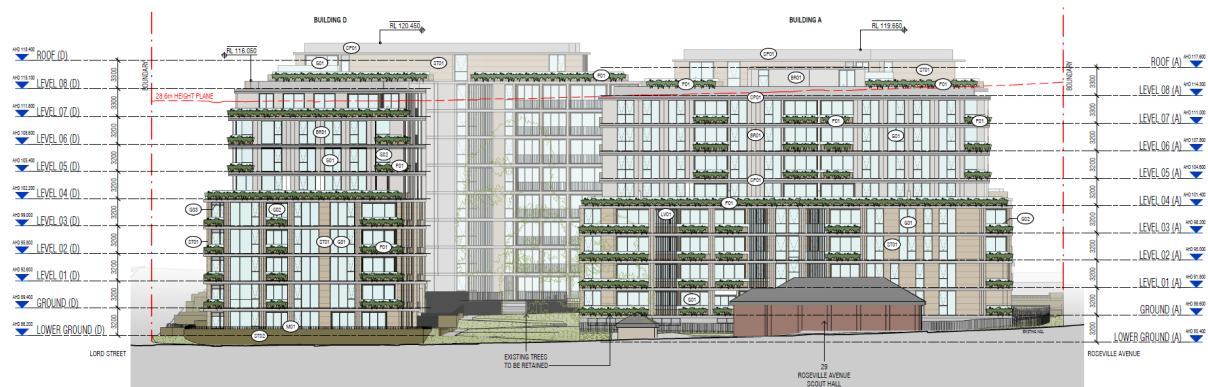
7.1 Detailed Impact Assessment

7.1.1 Built Form and Urban Design

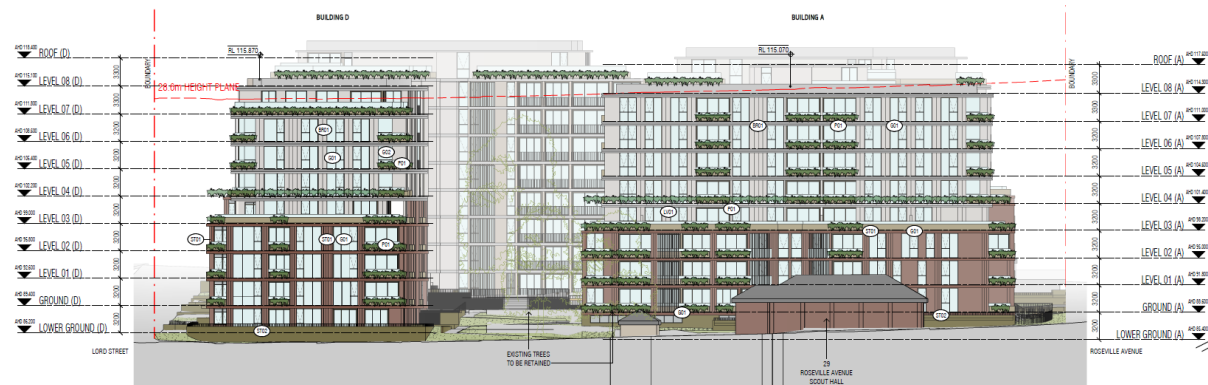
Building Form and Massing

The updated proposal has considered the site's context in relation to the massing of the building and its relationship with neighbouring properties. The bulk and scale have been minimised through reducing the podiums of Buildings A and D by one storey, to three and four storeys respectively. This reduction in the podium heights provides for an improved relationship with the neighbouring Scout Hall, as well as existing dwellings and potential future four-storey development to the east. The reduction in the podium heights also increases the number of storeys setback 9m from the site boundary, providing more 'breathing room' to the heritage listed Scout Hall.

Figure 10 Updated Building Massing (East Elevation)



Previous Response to Submissions Scheme



Updated Response to Submissions Scheme

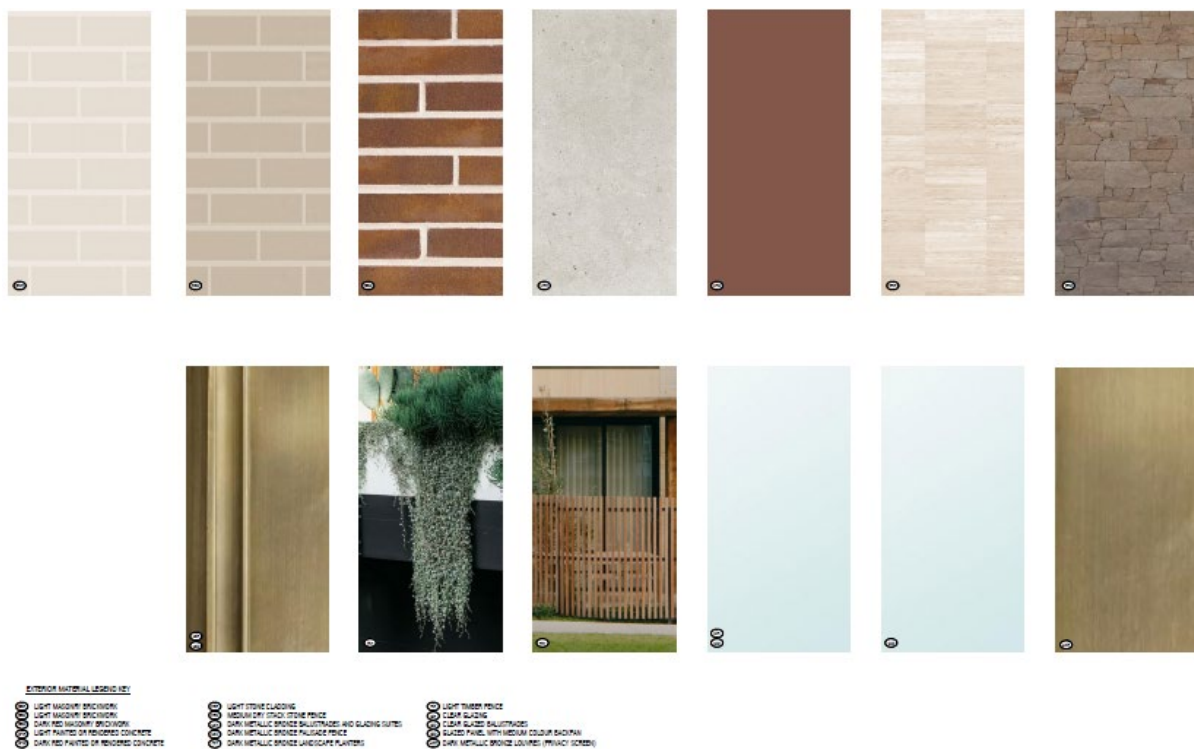
Source: FKA

Materials and Finishes

The updated proposal has responded to the Federation-period character of the locality and the Clanville Heritage Conservation Area. The proposed materials palette has been amended to include a dark material on the podium façades and the inclusion of darker brown and bronze tones to provide more contrast to the taller elements of the building. The use of darker brick for the building podium provides a more sympathetic responses to the character of the local area, reflecting the materials palette of existing residential dwellings. This creates an improved relationship of the base

of the building with the scale of existing surrounding properties. It also results in a greater contrast with the upper setback levels of the proposed building, so that they appear more recessive.

Figure 11 Updated materials and finishes



Source: FKA

Housing SEPP – Design Principles

Under Section 147 of the Housing SEPP, the updated proposal has been evaluated against the design principles within Schedule 9 and the ADG. This evaluation confirms that the design quality, amenity, and contextual response meet the required standards, further supporting its compatibility with the desired future character.

1. Context and Neighbourhood Character

- Responds sensitively to Roseville’s natural, built, social, and environmental context whilst utilising the controls available as a retained TOD site.
- Updated building massing improves the relationship with the west–east slope to integrate with terrain.
- Reflects desirable aspects of the existing character, including the garden suburb identity and heritage significance of the adjacent Scout Hall, through updated building massing and materials palette.
- Uses sympathetic updated materials (darker brick and sandstone) and reduced building massing to enhance the streetscape and reinforce heritage prominence.
- Compatible with the LMR and TOD planning frameworks and Council’s controls.

2. Built Form and Scale

- Scale and bulk updated to better respond to existing and future street character.
- Building A podium lowered by one storey to improve relationship with Scout Hall and neighbours.

- Building D podium lowered by one storey to reduce perceived bulk and reinforce human scale.
- Active frontages enhanced through the relocation of the substation to the south west corner of Building C, clear entries, and visual permeability enhance public domain.

3. Density

- Delivers high amenity while aligning with LMR and TOD controls.
- Proposed GFA continues to comply with the applicable controls.
- Strategic location near Roseville Station supports density.
- Affordable housing component addresses social needs while maintaining liveability, with provision of 17% affordable housing maintained.

4. Sustainability

- Passive solar design with operable skylights and cross-ventilation reduces reliance on mechanical systems.
- 70% of apartments receive at least 2 hours of sunlight on 21 June.
- Increased deep soil zones by 70.3sqm (30% of site area) and retained vegetation support biodiversity and microclimate regulation.
- Sustainable materials and construction methods enhance long-term performance.

5. Landscape

- Integrates architecture and landscape into a cohesive, sustainable system, including the proposed retention of street tree T20 to improve landscape integration.
- Retains mature trees, including the additional retention of T20, and reinforces neighbourhood identity.
- Landscaped setbacks soften built form and create green buffers, including the improved landscape design of the Lord Street setback through the relocation of the substation.
- Layered planting improves privacy, usability, and social interaction.

6. Amenity – Apartment Amenity

- Generous, well-proportioned rooms maximise comfort and usability.
- Layouts optimise solar access, ventilation, and views, with the updated design maintaining a high level of compliance with the ADG.
- Privacy supported through setbacks, landscaping, and screening.
- Ground-floor townhouses have direct street access; balconies and courtyards provide high-quality private open space.
- Affordable dwellings integrated with equal access to amenities.

7. Amenity – Communal Amenity

- Shared facilities include lounge, co-working area, entertainment room, communal kitchen, children's lounge, and cinema.
- Health and recreation supported by fitness centre, pool deck, and sauna.
- Mature tree canopies create a calm, retreat-like atmosphere.
- Landmark Chinese Elm at entrance forms an informal pocket park and activates the street.

8. Safety

- Designed in accordance with Crime Prevention Through Environmental Design (**CPTED**) principles (see EIS Section 1.1.5 and Appendix II).

9. Housing Diversity and Social Interaction

- Mix of apartment sizes and layouts to meet varied household needs maintained in the revised proposal.
- Family-friendly 3- and 4+bedroom units designed to Healthy Higher Density Living guidelines.
- Communal areas encourage resident interaction.
- Affordable rental housing integrated to support inclusivity.

10. Aesthetics

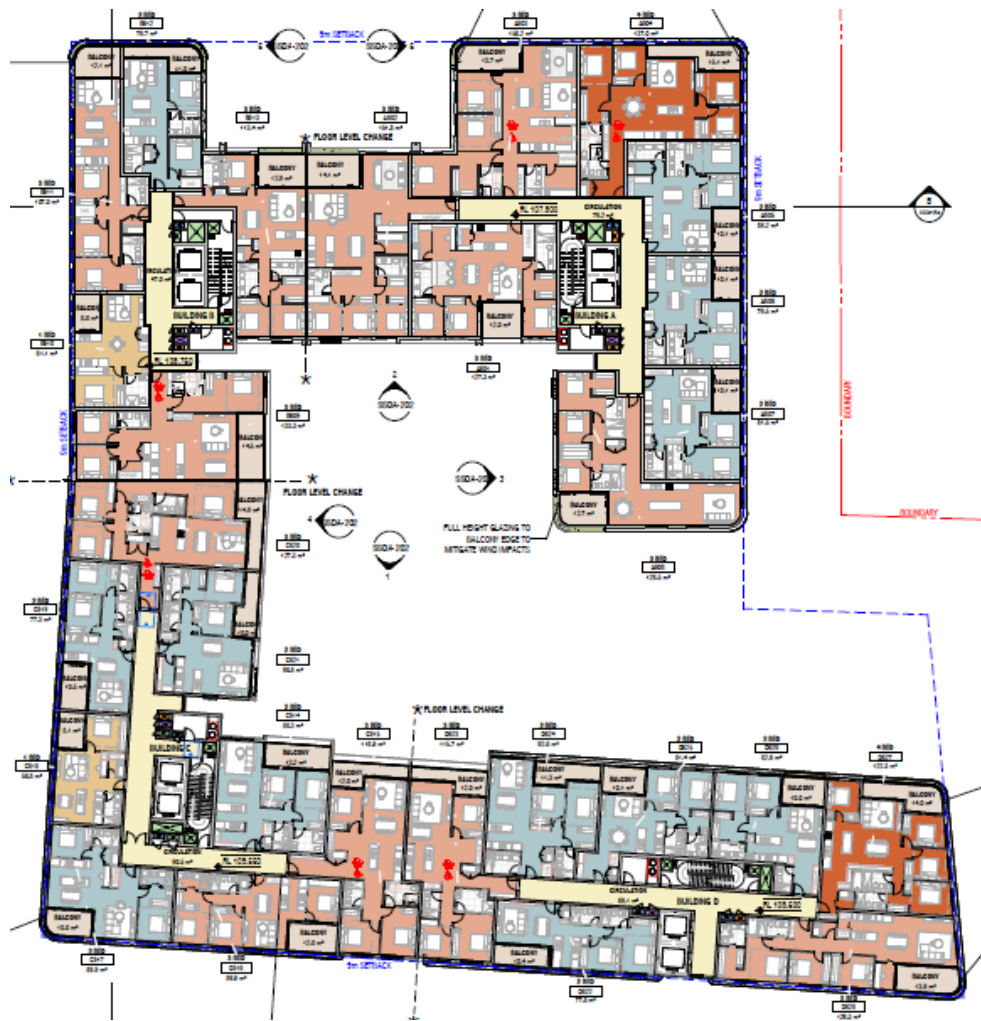
- Balanced composition of elements reflecting internal layout and structure.
- Updated materials palette to improve relationship to surrounding Federation-era character.
- Darker brick at podium level ground the building; lighter tones above reduce visual mass.
- Façade articulation through planter boxes, vertical breaks, and material variation creates a contextually responsive design.

Housing Mix and Diversity

The revised proposal continues to offer a diverse mix of apartment sizes and layouts, including a dedicated allocation for affordable housing, ensuring a wide range of housing choices for various demographics, lifestyles, and household budgets. This variety promotes a socially inclusive community, catering to individuals, families, and downsizers alike. By providing options that meet different needs and preferences, the development supports a vibrant and balanced community. Additionally, it addresses both current and future housing demands, contributing to long-term sustainability and resilience in the housing market.

The updated proposal continues to seamlessly integrates affordable housing within the development, ensuring fair and equitable access to high quality residential living for a range of household's budgets. The design includes affordable housing units on multiple levels to allow an even distribution of affordable units across the floor plate and on different elevations to enhance amenity. **Figure 12** shows the Level 6 floor plan within the development, demonstrating a mix of apartment sizes and layouts, while also incorporating seven affordable units on this level.

Figure 12 Proposed Level 6 Floor Plan Apartment Mix



Source: FKA

Affordable Housing

The proposed provision of affordable housing has been updated to reflect the amended development proposal. The proposal includes 5,099m² gross floor area (**GFA**) of affordable housing, equating to 17% of the total GFA. The proposed affordable housing floorspace is provided across 54 units. These units are provided in a variety of typologies, including one, two, and three-bedroom apartments, and integrated seamlessly into the floor plans within Building D:

- 1-bedroom: 13 units (24%)
- 2-bedroom: 26 units (48%)
- 3-bedroom: 13 units (24%)
- 4-bedroom: 2 units (4%).

Table 11 provides a breakdown of the proposed affordable housing provision. All residents will continue to have equal access to the communal open spaces throughout the building and development.

Table 10 Updated Affordable Housing Provision

AH Calculations	Required (sqm)	Proposed (sqm)
Total GFA	-	29,940 sqm
TOD AH 2%	599 sqm	600 sqm
Infill AH 15%	4,491 sqm	4,499 sqm
Total	5,090 sqm	5,099 sqm

Apartment Design Guide

A comprehensive assessment against the Apartment Design Guide (**ADG**) is provided in the Design Statement Addendum (**Appendix E**). The proposal is generally consistent with ADG objectives and delivers a high-quality residential outcome. Both deep soil provision and communal open space exceed ADG requirements, reflecting the established garden character of the local area.

The only variation is a minor non-compliance with the ADG’s solar and daylight access criterion, which requires that at least 70% of apartments receive a minimum of two hours of direct sunlight to living rooms and private open space between 9am and 3pm at mid-winter. The proposal achieves 69%, with the shortfall limited to private open space on the upper levels of Building A’s south-east corner. These apartments still receive approximately four hours of direct sunlight to living rooms daily and enjoy a strong visual connection to the prominent Eucalyptus tree (T93) from their balconies.

This variation is considered acceptable as the design meets the ADG objective of providing high-amenity apartments, and living spaces receive double the required solar access at mid-winter. All other aspects of the development comply with or exceed the relevant ADG criteria.

Solar access/overshadowing

Updated shadow diagrams have been prepared by FKA for the revised proposal (**Appendix D**). All surrounding residential properties continue to receive 3 hours solar access in mid-winter or more. Shadow impacts remain localised and primarily affect immediately adjacent buildings to the west and south.

Detailed assessment of shadow impacts to the existing residential properties to the west of the site has been undertaken, as detailed in the Design Statement Addendum (**Appendix E**). Specifically in relation to the existing property at 19 Roseville Avenue, it is anticipated that the primary living space of the property receives its sunlight from the north facing windows which face the internal courtyard. Access to sunlight to the north facing windows of the living room of the property remains unchanged by the proposed development. The space benefits from northern light at 11am and 2pm consistent with the existing situation.

The shadow analysis further demonstrates that the south-western half of the rear garden of 19 Roseville Avenue maintains solar access from 12pm. No overshadowing impacts arise from the development on the rear garden of 19 Roseville Avenue or the building from 1pm onwards. More than 2 hours of sunlight are maintained to the properties principal area of open space.

The shadows from the proposed development do not obstruct the sections of roof identified as comprising solar panels between 10am and 3pm during the midwinter period.

7.1.2 Ground and Groundwater Conditions

A Geotechnical Investigation Addendum (**Appendix J**) has been prepared by Douglas Partners to respond to the additional pre-conditions and mandatory considerations identified in **Section 5**. With respect to KLEP clause 6.2 Earthworks, the Addendum finds that the risk to drainage and soil stability is low and can be readily managed. The shoring system for the proposed basement excavation will reduce the risk of impacts on adjacent properties. This risk is further reduced through the design of the basement being set back from the site boundaries. A Geotechnical Monitoring Plan is to be developed to monitor the performance of the shoring wall during construction. The proposed basement should not affect future reuse of the land from a geotechnical point of view.

In relation to KLEP clause 6.6 Water Quality and Quantity, the Addendum finds that the proposed development will have acceptable impacts with respect to the level and quality of the water table. The works are not expected to impact any Groundwater Dependent Ecosystems or groundwater supply works in the area. Any groundwater inflow into the basement will be tested and treated in accordance with relevant guidelines and thresholds nominated by Ku-ring-gai Council prior to discharge to the stormwater system. The impacts of the development on the regulated catchment are also assessed to be acceptable, including cumulative impacts. No significant impacts to surrounding properties, groundwater systems or ecosystems are expected. Minimal impact to groundwater underlying the site is expected in accordance with the NSW Aquifer Interference Policy.

7.1.3 Trees and Landscaping

Trees

An updated Arboricultural Impact Assessment (**AIA**) has been prepared by Creative Planning Solutions (**Appendix I**). The AIA has been updated in response to the revised location of the substation and includes a detailed assessment of the long-term viability of key significant trees and street trees. As a result of the revised location of the substation, Tree T20 (within the Lord Street frontage) is now proposed to be retained. The updated AIA finds that the anticipated impact to the health and condition of Tree 20 from construction is considered sustainable given the known tolerance of this species to high levels of root disturbance.

The updated AIA also includes a detailed assessment of the long term viability of Tree 93 within the central courtyard. In relation to solar access to Tree 93, the AIA finds that there will be direct solar access to 55%-79% of the canopy of Tree 93 between 9am and 3pm on 21 June, with solar access increasing throughout other times of the year. The entire canopy of Tree 93 will also have access to indirect diffuse light (scattered by clouds, dust, or urban structures) which still allows the tree to continue photosynthesis. It is expected that this tree will continue to attain increased height allowing increased levels of solar access as greater a proportion of the canopy extends above the proposed built form. In this regard, the development is unlikely to result in decline to the long-term viability or Useful Life Expectancy of Tree 93.

The updated AIA also confirms that Lord Street, street trees T5 and T49, Roseville Avenue street tree T85, and the Roseville Avenue Chinese Elm T88 will retain long-term viability. The anticipated impact to the health and condition of these trees from construction is considered sustainable given the species' known tolerance to high levels of root loss and disturbance. Further, all proposed works are located outside the SRZ and NRZ encroachment is partly offset by contiguous areas of deep soil available for compensatory root development. Impacts are not expected to significantly impact Tree 88 health, condition or structural viability given the species' known tolerance to moderate levels of root disturbance and the existing good health/vitality of the specimen, subject to the implementation of root-sensitive design and construction of pathways and seating walls, Project Arborist supervision and tree protection measures throughout construction.

Landscaping

Updated Landscape Plans have been prepared by Land + Form (**Appendix F**) to reflect the updated design. The Landscape Plans have been updated to amend the landscape design to the Lord Street frontage to respond to the updated location of the substation and retention of Tree 20. The central courtyard landscape design has also been updated to reduce the decking within this area and increase the deep soil area by 70.3sqm to a total of 2,843.6sqm, equating to 30% of the site area. The western and southern parts of the deck within the central courtyard have been removed to allow the existing levels to be retained, while allowing sufficient space for the existing and any proposed trees with consideration to the TPZs and SRZs. The planted area on the northern part to the decked portion under Tree 93 has been extended by approximately 1400mm. In addition, planter depths have been increased and tree species amended to larger sizes in response to Council's comments.

7.1.4 Flood Risk

An updated Flood Impact and Risk Assessment Report (**FIRA**) has been prepared by ptc to respond to the additional pre-conditions and mandatory considerations identified in **Section 5**, and to respond to comments provided by the SES.

With respect to KLEP clause 5.21 Flood Planning, the updated FIRA finds that the development satisfies the flood function and behaviour of the land. The proposed development has minimal impact on the flow of flood water and does not encroach into any flood storage. The proposed development will not adversely affect the flood behaviour of other developments.

With respect to KLEP clause 6.2 Earthworks, the updated FIRA identifies that all earthworks are proposed to occur within the site, and there is no proximity to impacting waterways, drinking water catchments or environmentally sensitive area.

With respect to KLEP clause 6.5 Stormwater and Water Sensitive Urban Design, the updated FIRA finds that there is no adverse impact on urban stormwater on the land on which development is carried out and any adjoining native bushlands, waterways and groundwater systems. The proposal will result in an improvement in the water quality of the stormwater runoff from the site area.

With respect to B&C SEPP section 6.6 Water Quality and Quantity, the water quality system that has been incorporated in the proposed development will result in an improvement in the water quality of the stormwater runoff from the site area. Water management such as water quality treatment trains and stormwater detention is integrated appropriately within the landscape, and urban environment within the site area.

With respect to B&C SEPP section 6.8 Flooding, the proposed development will not affect any existing wetlands and other riverine ecosystems. The water quality system that has been incorporated in the proposed development will treat stormwater runoff to meet Ku-ring-gai Council water quality requirements. There will be no adverse impact on natural recession of floodwaters into the wetlands and other riverine systems as the proposed development is not in any floodway, or flood storage area.

In response to SES comments, a shelter-in-place assessment is provided at Section 8.1 of the updated FIRA. This confirms the flood scenarios in which shelter in place is appropriate, as well as providing detail on the shelter in place strategy. Shelter in place routes and positions for residents are provided. Section 4 of the updated FIRA identifies the flood risk on the site, Section 6 details flood risk management measures, and Section 7 discusses the pre- and post-development impacts of the proposal. Appendix 2 of the updated FIRA provides flood mapping.

7.2 Other impacts not requiring detailed assessment

7.2.1 Biodiversity

An updated BDAR Waiver was granted by the Department of Planning, Housing and Infrastructure and the Department of Climate Change Energy, Environment and Water for the proposed development on 23 April 2026 (**Appendix Q**). This updated BDAR Waiver reflects the details of the current proposal, including the retention of Tree 20.

8 Justification of the Project

This section of the report provides a comprehensive evaluation of the project having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development. It assesses the potential benefits and impacts of the revised design, considering the interaction between the findings in the technical assessments and the compliance of the proposal within the relevant controls and policies.

8.1 Project Design

Since the public exhibition of the Response to Submissions, the Applicant has refined the proposal to address matters raised in submissions and feedback from DPHI, Council and agencies. The refinements represent a series of design improvements that both enhance the proposal's contextual fit and reduce potential environmental impacts, whilst still delivering the project objectives.

The revised design of the building has been carefully considered to ensure any potential impacts are mitigated or minimised. Whilst it is acknowledged that the proposed development will result in significant change to the existing character of the site, this change is considered acceptable in the context of the emerging planning landscape in proximity to Roseville Station which will include a mix of low, medium and high-density development under a combination of applicable planning controls which includes Council's alternative, existing TOD sites and those sites eligible for the LMR controls under the Housing SEPP.

Relevantly, the proposed development will deliver a high-amenity residential development in an accessible area that will help address housing demand in Ku-ring-gai, including demand for affordable housing in addition to meeting the strategic objective to deliver housing within the National Housing Accord period.

A total of 249 residential dwellings are proposed on the site, including 54 dwellings for affordable rental housing, communal open space, landscaping and basement car parking. The revised design responds to the existing and future local character through significant changes to the massing, setbacks and articulation of the built form and refining the material palette to reflect the heritage conservation area.

The project continues to exhibit a high-quality design, with a variety of amenities provided for the future residents. The changes demonstrate a considered design response to the existing context whilst also balancing this with the controls available to this development and the transition likely to occur through the anticipated future development of existing TOD sites, adjacent LMR sites and Council's controls.

The proposal will contribute to alleviating the affordable and market housing crisis in Sydney and deliver a high level of amenity for future residents. The residential dwellings will be provided within four buildings and demonstrate a high level of compliance with the relevant provisions of the Apartment Design Guide. On balance, whilst the development will result in substantial changes to this local area the project design is appropriate for the site subject to the implementation of proposed mitigation measures to minimise the economic, environmental and social impacts of the proposal. An updated table of proposed mitigation measures is provided at **Appendix C**.

8.2 Strategic Planning Consistency

The proposal is consistent with the strategic framework and has been considered against key Government and Council documents including the following:

- National Housing Accord
- Housing 2041
- Greater Sydney Region Plan – A Metropolis of Three Cities
- Our Greater Sydney 2056: North District Plan
- NSW Better Placed
- Future Transport Strategy
- Ku-ring-gai Local Strategic Planning Statement
- Ku-ring-gai Local Housing Strategy
- Ku-ring-gai LGA housing targets set by DPHI.

The revised proposal will deliver much-needed high-amenity market and affordable rental housing, in a mix of unit-sizes from 1 to 4+bedrooms, on an accessible site in close proximity to Roseville Station. It will contribute to achieving local housing targets, NSW government priorities to deliver more housing, and the objectives of the National Housing Accord. The proposal will also deliver a significant number of affordable rental housing, equating to 17% of the overall development yield, which directly addresses the NSW Government mandate to boost housing supply tackle housing affordability. Overall, the proposed development will support local, regional and national planning policy initiatives to fast track the construction of high-quality new homes, including affordable rental dwellings, on a well-located and highly accessible site in an area that currently enjoys significant amenity.

8.3 Statutory Planning Consistency

The relevant State and local environmental planning instruments are listed in Section 4 of the EIS, **Section 5** of this Report and assessed in **Appendix B**. The updated proposal continues to satisfy the relevant requirements of the EP&A Act and Regulations, as well as the applicable State Environmental Planning Policies, including:

- *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*
- *NSW Biodiversity Act 2016*
- *Environmental Planning and Assessment Act 1979*
- Environmental Planning Assessment Regulation 2021
- State Environmental Planning Policy (Planning Systems) 2021
- State Environmental Planning Policy (Transport and Infrastructure) 2021
- State Environmental Planning Policy (Resilience and Hazards) 2021
- State Environmental Planning Policy (Biodiversity and Conservation) 2021
- State Environmental Planning Policy (Sustainable Buildings) 2022
- State Environmental Planning Policy (Housing) 2021
- Ku-ring-gai Local Environmental Plan 2015
- Ku-ring-gai Development Control Plan 2024.

In response to submissions relating to strategic and statutory planning consistency, the site remains mapped TOD site under the Housing SEPP. As such the application has been assessed in accordance with the controls in force at lodgement. Notwithstanding, the revised design has been tested against the finalised TOD Alternative and LMR Exclusion Map, with height, setbacks, and massing refined to ensure compatibility with the mixed future character envisaged under both State and local frameworks. The EIS Addendum has undertaken updated assessment against all relevant pre-conditions and mandatory considerations identified in the relevant environmental planning instruments.

Importantly, the project will deliver 17% of GFA as affordable rental housing and continues to achieve high levels of compliance with the Apartment Design Guide and the design quality principles of the Housing SEPP.

8.4 Community Views

8.4.1 Response to Submissions

The SSDA was publicly re-exhibited. The SSDA re-exhibited between 20 January 2026 and 2 February 2026. Gyde has analysed the submissions in the Response to Community Submission Report (**Appendix M**). Gyde's analysis has confirmed that 494 unique public submissions were received over the public exhibition period, including:

- 485 submissions object to the proposal (98.97%)
- 8 submissions support the proposal (1.63%)
- 1 submission commenting on the proposal (0.2%)

As detailed at section 3.2 of the Response to Community Submission Report, the key issues raised in the submissions can be broadly grouped into the following categories which have been ordered according to the number of mentions:

- layout and design (421 mentions),
- traffic and parking (376),
- heritage (364),
- consistency with policies, plans, strategies (361),
- visual impact (326) and
- engagement quality (248).

Additionally, submissions were received from nine government agencies, alongside a 'Key Issues' letter from DPHI and advice provided by the SDRP.

This Response to Submissions has provided a comprehensive response to all issues raised through the public exhibition, including a number of substantial design refinements, as well as the preparation of additional and updated technical assessments.

8.4.2 Community and Stakeholder Engagement Process

A number of submissions raised matters specifically relating to the community and stakeholder engagement process undertaken for the project, including the timing, methods and effectiveness of engagement activities.

Section 6 of the Addendum EIS has been prepared to respond to and clarify these engagement-related matters raised in community submissions, drawing on additional information provided by Gyde Consulting. This section clarifies matters raised in submissions in relation to the community and stakeholder engagement process, informed by additional information provided by Gyde Consulting.

8.5 Environmental Impacts

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- **Natural Environment:** The proposed development addresses the principles of Ecologically Sustainable Development (**ESD**) as required by Section 193 of the *Environmental Planning and Assessment Regulation 2021*. It incorporates various measures to ensure environmental sustainability, conservation, and efficiency:
 - **Precautionary principle:** The development includes environmental assessments and mitigation measures to prevent serious or irreversible damage. Features like courtyard design for runoff management and tree protection measures are included. The project aims to achieve the NSW EPA's 80% recycling target for demolition waste.
 - **Intergenerational equity:** The development considers the needs of future generations by providing high-quality, affordable rental housing near Roseville train station, reducing reliance on private vehicles and lowering carbon emissions. Energy and water efficiency measures are also incorporated.
 - **Conservation of biological diversity and ecological integrity:** A Biodiversity Development Assessment Report (**BDAR**) Waiver has been granted for the proposal. An Arboricultural Impact Assessment has been undertaken and the project includes mitigation measures to minimise impacts on biological diversity and ecological integrity. As part of the Connecting with Country and ESD strategy, native planting is proposed to contribute to ecological values.
 - **Improved valuation, pricing and incentive mechanisms:** The project values environmental factors through various ESD initiatives. A Construction Management Plan will minimize pollution and waste, and establish recycling and landfill waste streams. Environmental ratings like BASIX and NaTHERS will promote resource efficiency, reducing running costs and increasing the development's value.

The ESD Report (Response to Submissions, December 2025, Appendix Q) identifies initiatives that will be implemented to promote environmentally responsible design.

Overall, whilst the proposed development will result in significant change it has been assessed not have any unacceptable impacts on the natural environment that cannot be mitigated or minimised. The key environmental impacts and a summary of how these have been addressed in the revised design is provided below.

- **Built Form and Design:** The design has been updated to respond to the feedback of DPHI and Council, including reducing the bulk and scale of the building form, improving the materials palette, increasing tree retention and enhancing the landscape design. The revised design has improved the development's compatibility with Roseville's desired future character through updating the massing of the built form and refining the materials palette. The proposal continues to exhibit high quality-built form and design outcomes by thoughtfully integrating with its context, minimising bulk and scale, the retention of significant trees, and creating a dynamic and inclusive environment for the community. The proposal offers a diverse mix of apartment sizes and layouts, including affordable rental housing, to ensure a

wide range of housing choices. The development provides a high level of amenity for future residents, including a high level of compliance with the ADG.

The proposed building massing has been reduced to improve the relationship to the neighbouring Scout Hall heritage item and the surrounding residential context. The roof level of the building continues to comply with the maximum height control and the proposed GFA complies with the maximum FSR control.

- **Environmental Amenity:** Detailed analysis has been undertaken to demonstrate that the proposed development will achieve a high degree of amenity without creating adverse amenity impacts to surrounding development, public open spaces and existing heritage items:
 - **Overshadowing/privacy:** A detailed overshadowing analysis of the revised design is provided which assesses the shadows cast by the proposed development on the worst affected properties to the west and south of the site. All neighbouring properties will continue to receive greater than 3 hours of sunlight at mid-winter. With respect to privacy, the revised design continues to protect visual privacy and decrease potential for overlooking impacts.
 - **Wind Environment:** The proposal includes design elements to ensure an acceptable wind environment for the proposed development, including the provision of glazing screens to balconies, the retention of trees and proposed tree planting. The proposal will have acceptable wind impacts on the surrounding public realm.
 - **Visual Impact:** The revised building massing will assist in reducing visual impacts in the immediate vicinity of the site and within the broader heritage conservation area. The use of darker brick on the building podiums, light-toned materials on the upper levels of the building, and the reduced building massing soften the built form and its presentation to the streetscape. Significant landscape planting within site setbacks and the retention of all street trees also assists in minimising the appearance of the built form. Overall, the visual effects and view impacts caused by the proposed development are considered to be reasonable and acceptable in the context of the changing planning environment in the longer term.
- **Traffic, Transport and Parking:** The proposed development includes 344 car parking spaces. This provision exceeds the minimum parking requirements of the KDCP 2024 and Housing SEPP whilst remaining below the maximum KDCP 2024 thresholds. Accessible parking for residents and visitors, car share parking spaces, and motorcycle parking spaces for residents and visitors, bicycle parking are provided in accordance with or exceeding KDCP 2024 minimum requirements.

The revised proposal will not amend traffic impacts already assessed, and is not expected to have a material impact on the operation of the surrounding road network.

The Green Travel Plan sets a mode share target of 40% private vehicle, 50% public transport and 10% active transport. The target will be achieved through initiatives provided by the developer, including promoting active travel, car-pooling and public transport, as well as providing information on sustainable travel choices to residents.

A Construction Pedestrian and Traffic Management Plan (**CPTMP**) is proposed to manage any potential impacts of the construction of the development on pedestrians and traffic. The CPTMP is to manage construction activities and vehicles to minimise the impacts on pedestrians, cyclists, on-street parking, vehicular access and the road network.

- **Noise and Vibration:** A wide range of mitigation and management measures are proposed to minimise potential noise and vibration impacts on surrounding receivers during the

construction. In relation to the proposed residential apartments, specific design requirements for the built form are proposed to ensure that the surrounding rail and road network does not impact on achieving the required level of residential amenity.

- **Water Management:** A combined on-site detention/water treatment tank is proposed to reduce peak stormwater discharge from the proposed development. The principles of Water Sensitive Urban Design (**WSUD**) have been adopted in the stormwater design; firstly by minimizing impervious areas, followed by providing infiltration opportunity for runoff from impervious areas (and implementation of a rainwater tank to provide for reuse), and finally through treatment of runoff by various methods. The pervious areas of the site have been increased as part of the Response to Submissions to maximise WSUD.
- **Ground and Groundwater Conditions:** The potential impacts of the proposed development relating to excavations, shoring, foundations, groundwater and other geotechnical issues have been assessed in detail, with a range of mitigation and management measure proposed to ensure the proposal has acceptable impacts. The development of the proposal will have acceptable impacts regarding the construction of the basement and dewatering. The proposed basement construction has also been located and designed to minimise encroachment in the Metro protection reserve, thereby mitigating any potential for impacts on the Sydney Metro tunnel rail corridor beneath the western portion of the site.
- **Tree Removal:** To accommodate the proposed development, 89 trees require removal, and six trees will be retained and protected. A replacement tree planting ratio of 1:2.01 is proposed and the development will not result in any net loss of trees. All trees within the site that are assessed as having high retention value are proposed to be retained. The project design has been updated to enable the retention of street tree T20, assessed as having high retention value. The revised proposal has enhanced the landscape design to ensure the viable retention of all trees to be retained, in particular Tree 93 within the central courtyard.
- **Biodiversity:** The proposed development will require the removal of planted native vegetation, including trees and various ornamental shrubs and groundcovers; most of the vegetation consists of exotic species. None of the vegetation proposed to be removed could reasonably be assigned to a plant community type (**PCT**). The vegetation is situated in a fragmented landscape, making it unlikely to be used by threatened species. The removed vegetation is not considered high-value habitat due to surrounding residential development. No sensitive or specialist fauna habitats will be impacted. There are no prescribed impacts on threatened entities associated with the proposed development. The Departments of Planning and Environment have determined that the proposed development is not likely to have any significant impact on biodiversity values a BDAR Waiver has been granted for the proposal.
- **Flooding:** An updated FIRA (**Appendix H**) has been prepared, including a shelter-in-place assessment. This confirms the flood scenarios in which shelter in place is appropriate, as well as providing detail on the shelter in place strategy. The reports conclude that the proposal, when implemented with the proposed mitigation and management measures, will have acceptable impacts with regard to potential flood impacts, including in relation to neighbouring properties and streets.
- **Social Impact:** A SIA has been prepared by Gyde in accordance with the DPHI's 'Social Impact Assessment Guideline' (2023). The SIA considers the likely changes to the following elements of value to people: way of life, community, accessibility, culture, health and wellbeing, surroundings, livelihoods, and decision-making systems. The SIA identified the following potential positive and negative social impacts:
 - Increased supply of market and affordable rental housing.

- Increased supply of affordable rental housing to cater for an aging population within the locality.
- Impacts to the existing built form and character of the locality.
- Proximity to existing services and infrastructure within Roseville Town Centre and nearby centres.
- Reflection of Connecting with Country principles requires ongoing design to ensure satisfaction with the Connecting with Country process.
- Impacts to residential amenity resulting from the demolition of dwellings within a Heritage Conservation Area and the removal of 89 trees.
- Impacts to residential amenity through construction noise and dust.

Overall, the project is predicted to provide a range of key community benefits. In addition, the proposal will generate indirect and direct employment opportunities during construction and operation. Negative impacts can be successfully mitigated through the strategies proposed in the SIA.

- **European Heritage:** The design of the proposal has been amended to improve the relationship of the built form to the adjacent locally listed Scout Hall. The building podiums have been reduced by one storey to ensure the building massing is more sympathetic to the scale of the neighbouring heritage item and surrounding heritage conservation area. The revised three storey podium height of Building A provides an appropriate transition to the adjacent Scout Hall. The updated materials palette with the use of darker brick and brown and bronze tones better responds to the Federation-era character of the Clanville HCA and presents a building appearance that is sympathetic to local character. The conclusions of the heritage assessment remain:
 - The group of dwellings on the subject site do not provide an accurate reflection of the Clanville HCA's character as they do not feature a high degree of aesthetic significance and have been identified to not be "highly intact" or "high quality" examples of Federation houses within the area. The heritage significance of the HCA will be retained despite their removal.
 - Whilst the proposed development will be of a notably different scale and typology than that which currently exists, the proposal exists in a legislative context which will facilitate some uplift of the same type in nearby areas with vicinity to the nearby Roseville railway station. As such, the development will be in line with the planned future character of this area whilst providing in demand affordable accommodation.
 - A degree of visual impact to the setting of the HCA and the heritage item will arise as a result of the proposed development given the notable increase in scale. However, given the intended affordable residential housing programme, the proximity to the Roseville Railway corridor and the planned high-density uplift affecting the future character of the area, the proposal is on balance considered as acceptable for the subject site from a heritage perspective.
- **Aboriginal Heritage:** The Aboriginal Heritage Impact Assessment confirms that, given the widespread historical land disturbance, the likelihood of Aboriginal objects being present on the site is significantly reduced, and recommended that no further Aboriginal heritage assessments or investigations are required.
- **Archaeology:** The site's existing environment has been largely disturbed, with its current residential layout established by 1943. The updated HAA has addressed agency concerns and confirmed that due to historical high land disturbances, it is not anticipated that any

significant archaeological relics would be encountered. The site has been assessed as having nil-low archaeological potential. Mitigation measures and unexpected finds protocols will ensure any possible impacts can be minimised.

- **Contamination and Remediation:** The findings of the PSI remain; that the groundwater at the site does not present a human health or environmental risk and that the site can be made suitable for the proposed development subject to completion of the remaining recommendations listed in the PSI.
- **Code Compliance:** Reports have been prepared in support of this SSDA which confirm the proposed building is capable of compliance with the relevant BCA and accessibility standards. In addition, waste management arrangements have been designed to comply with Council's requirements.

The potential impacts can be appropriately mitigated, minimised or managed through the proposed mitigation and management measures, as detailed in the updated Mitigation Measures at **Appendix A**.

8.6 Suitability of the site

The site is considered highly suitable for the proposed development for the following reasons:

- The site is subject to the provisions of the Housing SEPP which permit high density residential development within 400m of Roseville Train Station in addition to bonus height and floor space for the provision of 15% affordable rental housing within the development.
- The site is highly accessible to high frequency public transport, services and social infrastructure (community facilities, childcare, schools and open space), supporting the '30-minute city' vision.
- The site has limited biodiversity value, meaning the development will not result in any harmful impacts on biodiversity. Further assessment has determined that Tree 93 (to be retained) is not a critically endangered ecological community (Sydney Blue Gum – Flooded Gum). Additionally, existing high value trees located on the site are able to be retained as part of the future development.
- There are no watercourses located within the site and the nearest watercourse to the site will not be affected by the proposed development.
- The Sydney Metro tunnel reserve located beneath the site will not impact on the proposed development.
- The site is not affected by critical constraints, including contamination, noise and vibration, bushfire and flooding, which cannot be addressed by appropriate design and mitigation measures.

8.7 Public interest

The proposed development is considered in the public interest for the following reasons:

- The development supports the Federal Governments National Housing Accord and the NSW Government priority to provide well designed market and affordable rental housing in a convenient and highly accessible location to meet the needs of all residents.
- The proposed development will provide 54 affordable rental dwellings that will be managed by a Community Housing Provider (Link Wentworth) ensuring the needs of essential workers and vulnerable members of the community are provided for in Ku-ring-gai.

- The revised design has responded to relevant issues raised in the public submissions and with the implementation of the recommended measures, the development will not cause significant social or environmental impacts during construction and operation.
- The development will create 545 employment opportunities during construction and operation, boosting the local economy.
- The development includes a high level of compliance with ADG design criteria, ensuring high standards of amenity for future occupants.

All submissions have been considered on their merits in accordance with the EP&A Act and relevant guidelines. This Response to Submissions provides detailed responses to matters raised during the re-exhibition of the project, supported by updated technical assessments, ensuring that the proposal can be assessed and determined transparently and on its planning and environmental merits.

Subject to the implementation of the recommended mitigation measures, no adverse social or environmental impacts result from the proposal during construction and operation of the development.

Having considered all relevant matters, we conclude that the revised development remains appropriate for the site and approval is recommended, subject to appropriate conditions of consent and implementation of the recommended mitigation measures.

Disclaimer

This report is dated 17 April 2026 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of HYECORP (**Instructing Party**) for the purpose of Response to Submission (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendix A Ku-ring-gai Council Matters Resolved

Matters Resolved	Summary of Issues Raised
4. Floor Space Ratio	
No Survey Plan provided	A survey plan has been provided that confirms the total site area.
Proposed GFA	DPHI must be satisfied of this matter at the time of granting consent and would be aware that any exceedance of the maximum GFA would require a Clause 4.6 request. Council maintains concerns that the development's bulk and scale are incompatible with the surrounding low-density HCA character. These impacts could be mitigated through increased setbacks to primary road frontages. Council also notes the SDRP's concerns regarding the interface with the Scout Hall and seeks a reduction in podium scale and increased setbacks, as outlined under Heading 3.
5 Building Height	
	The revised design has reduced the building height to positively respond to Councils concern. It's noted that the applicant has reduced the overall building height reducing the buildings height exceedance at its worst to 1.07m. The applicant has also updated its plans with levels from the survey to confirm the point of which height of building is measured.
7. Residential	
Amenity	
Privacy	The amended Architectural Plans for the previous RtS has provided privacy screens to mitigate the privacy impact on the neighbouring sites.
Overshadowing	It's noted that the Applicant has provided additional detail to enable solar assessments. This is a matter for DPHI to be satisfied of in their determination of the application. Council notes that the development will result in additional overshadowing in particularly to adjoining low density receivers at 19 Roseville Avenue and 14 Lord Street.
Sunlight to Apartments	It's noted that the development does not comply with the 70% minimum solar access requirement of the ADG and proposes 69%. This matter is for DPHI to be satisfied of in the determination of the development
Matter Resolved via condition	
Clothes Drying Facilities	The Applicant has confirmed that there will be no external cloth drying spaces on balconies. Council seeks an operational management plan for the development be prepared, that includes the following operational outcome in addition to any other operational DPHI requires. Draft condition below: <i>Clothes drying. During the operation of the development occupiers of units are not permitted to hang clothes on balconies or dry clothes in visibility of public spaces.</i>
Cross Ventilation	The Applicant has provided additional information that addresses the concern.
Internalised Living Rooms	It's noted that the Applicant has rationalised the internal arrangements of apartments to improve residential amenity.
Snorkel Bedroom Windows	Council notes improved compliance compared to the previous scheme but maintains

Inequitable Natural Cross Ventilation to affordable housing	that all affordable housing should have equitable access to amenity, ventilation and solar access. Council also notes that all affordable units are located within Tower D and recommends that affordable housing be integrated throughout the development, rather than concentrated in a single building, to support better community outcomes.
9 Affordable Housing	It's noted that affordable housing is proposed in accordance with both the Previous Chapter 5 Housing SEPP provisions, and Chapter 2 Infill provisions. DPHI as the consent authority must impose appropriate conditions regarding these matters.
10. Insufficient Information to Undertake an assessment.	The Applicant has provided the requested information.
11. SEARS (Secretary's Environmental Assessment Requirements)	<p>Matter Resolved via Condition</p> <p>The Applicants design heavily relies on the use of planter boxes to screen the development and soften the harsh building mass in an out of context location. This is done through large amounts of planter boxes.</p> <p>While planter boxes are acceptable in principle, their ongoing maintenance can be inconsistent over time. Council therefore seeks that, if approved, DPHI impose a condition of consent requiring the developer or owners corporation to maintain planter boxes to Council's satisfaction for the life of the development, to ensure landscaping continues to soften the building mass.</p>
13. State Environmental Planning Policy (Housing) 2021 (Deep Soil)	It's noted that the Applicant has increased deep soil planting and revised their landscaping outcomes to respond to Council's comment.
14. Apartment Design Guide a) Part 3E Deep soil	It's noted that the Applicant has increased deep soil planting and revised their landscaping outcomes to respond to Council's comment.
16. Landscape design and character	Matters A, C F resolved with Additional information provided.
Health	
17. Acoustic report	It's noted that the revised acoustic report outlines that noise impacts from any condenser would comply with the relevant standard.
18. Contamination report	DPHI as the consent authority will need to be satisfied of this matter and impose appropriate conditions of consent.
19. Water Management	<p>The Applicant has submitted satisfactory information that addresses this matter.</p> <p>1, It's proposed that 55% reduction is provided</p> <p>2, A section was provided that shows a 20KL rainwater tank.</p> <p>3, 4, 5, 7 The Applicant has submitted satisfactory information that addresses this matter.</p>
20. Vehicle Access and Parking	<p>Matter resolved via condition.</p> <p>1) Council notes the development provides surplus parking above the Housing SEPP minimums, while Council's DCP requires 43 visitor spaces. If parking is not reduced, Council seeks a condition of consent requiring appropriate allocation to affordable housing, as follows:</p> <p>Affordable housing for 15 years to be allocated parking in accordance with the Housing SEPP minimums</p>

- Affordable housing in perpetuity (Chapter 5 of the Housing SEPP) to be allocated one parking space per dwelling
 - A minimum of 42 visitor parking spaces to be provided
- 2) Whilst the Applicant did not show the minimum sight lines on the architectural plans, the traffic and parking assessment has suitably addressed this matter.

21 Waste Management	The Applicant has submitted satisfactory information that addresses this matter. DPHI must be satisfied of this matter prior to granting consent.
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Appendix B Updated Statutory Compliance Table

Appendix C Updated Mitigation Measures

Appendix D Updated Architectural Plans

Appendix E Design Statement Addendum

Appendix F Updated Landscape Plans

Appendix G Updated Accessibility Report

Appendix H Updated Flood Impact Risk Assessment

Appendix I Updated Arboricultural Impact Assessment

Appendix J Geotechnical Investigation Addendum

Appendix K Updated BASIX & NaTHERS Certificates

Appendix L Updated Community Housing Provider Letter

Appendix M Response to Community Submissions Report

Appendix N Updated EDC Report

Appendix O Updated Clause 4.6 Variation Request

Appendix P Updated Natural Ventilation Assessment

Appendix Q Updated BDAR Waiver



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