

**RE: RESIDENTIAL DEVELOPMENT WITH IN-FILL AFFORDABLE HOUSING, 16-24
LORD STREET & 21-27 ROSEVILLE AVENUE, ROSEVILLE (SSD-78996460)**

My name is [REDACTED] of [REDACTED] and I have lived there, with my wife, since 1994.

I believe that our house is some 5/600 metres from the **Proposed Development**.

I have been informed that a 'community drop-in session' was convened by the developer on 12 March, 2025 at the Lindfield Community Centre. I am not sure whether we were required to have been informed by, or on behalf of, the developer of such a community gathering but, if we had been, we would certainly have attended, For the record we have received no letterbox flyer concerning any such meeting, before or after it was convened (or of the Proposed Development itself); nor were we aware that there was (apparently) a community survey on the developer's website.

We only recently became aware of the Proposed Development through our neighbours.

We **object** to the Proposed Development

1. Our Procedural Objections to the Proposed Development

1.1 We understand that there are currently extensive discussions underway between representatives of the Ku-ring-gai Council ('the Council') and the State Government ('the Government'), in response to the Government's Transport Oriented Development ('TOD') reforms, with the Council seeking to obtain the Government's agreement to the **Council's Preferred Scenario**, ('the Preferred Scenario') which we generally support;

1.2 If those discussions result in the Government agreeing to the Preferred Scenario then surely the process of considering the TOD Proposed Development is 'putting the cart before the horse' ie any such Proposed Development would run entirely counter to the Preferred Scenario, which generally retains the existing zoning in the Eastside Roseville area, save for the Hill Street precinct and the upper part of Victoria Street;

1.3 Accordingly common sense, as well as the orderly conduct of any development plans for the Eastside Roseville area, should only proceed after a determination is arrived at between the Government and the Council and those discussions should be given every proper opportunity to be concluded before any precipitate steps are taken with respect to the Proposed Development;

1.4 Consequently, it would **not be in the public interest** for the Proposed Development to be further advanced at this time.

2. Our Substantive Objections to the Proposed Development Itself

2.1 Size, Location and Heritage Impact

(a) The very size of the Proposed Development (4 buildings up to, I understand, 9 stories each) is not only **entirely out of keeping with the surrounding area** (being 1-2 storey houses) but will cast not just a series of actual shadows over large parts of the immediately surrounding areas, but an even darker shadow over the entire Eastside Roseville area with respect to traffic increase and traffic 'flow';

(b) Under the Council's Preferred Scenario, the **future development remains the 1-2 storey house size**;

(c) The proposed site is **in the middle of three heritage conservation areas** (with 54 heritage listed houses nearby) and would require the demolition of nine houses that significantly contribute to these heritage conservation areas;

* the impact on the heritage of the suburb would be very significant;

(d) Consequently the **visual impact** of the Proposed Development is entirely inconsistent with the Eastside Roseville area;

* in that regard, we note that **page 77** of the **Environmental Impact Statement ('EIS')** seems to suggest (if we read it correctly) that this is just the first of other developments of this scale likely to be developed in this street and so the skyline will change over time; perhaps we have misunderstood but if we have not, then that reinforces the concerns we have regarding considering the TOD Proposed Development at this time -- since any such suggestion is entirely speculative and presumptuous;

* additionally, to suggest on **page 79 of the EIS** that the visual impact of several 9 storey buildings is 'reasonable and acceptable' to the most directly affected residents and to have as part support of that view, a photograph of the area from the **railway bridge**, is effectively to ignore/distract from the real issues of concern caused by the Proposed Development;

* Further, there are references on **page 79** to 'slight height limit exceedances' and 'minor height breaches'; we ask why doesn't the Proposed Development simply comply with the height requirements, since that would be 'reasonable and acceptable'.

3.1 Traffic

(a) We note that the estimated incoming population generated by this project is **728 people, with parking for up to 344 cars and that car access is solely from Lord Street**;

(b) Having read the 'Traffic, Transport and Parking' section on pages 78 to 82 of the EIS, we would respectfully suggest that this report, though no doubt framed within all the parameters of the Transport Impact Assessment ('TIA'), is quite incomplete in its analysis and assessment of both current and potential impacts 'in the day to day' usage of the streets in the Eastside Roseville area;

(c) some overall observations we would make of the TIA are that:

* Page 79 ('Traffic Management') says that, despite an allowance of 309 resident car spaces, they only expect 43 vehicle trips during weekday morning peak hours (ie **14% of the total resident vehicle allocation**) and 32 such trips in the evening peak hours (**10% of such allocation**)-- **to us that seems to be totally unrealistic;**

* that low base, and the 'analysis' of likely travel patterns based upon those (in our opinion, inaccurate) low figures then allows for, with respect, a self-serving observation that 'the net increase in traffic generated by the proposed development is considered minor';

*** ie the EIS is saying that a project generating over 700 new people in to the Eastside Roseville, allowing for 259 apartments, will have only a 'minor' impact on the traffic flow;**

* on the one hand the EIS understandably provides no analysis of the likely ages/occupations/likely movements of the potential occupants of these new apartments, but then has no difficulty assessing how insignificant the peak hour vehicle activities of those same occupants will be ; if the majority are to be retirees, with a single car usage without need to battle the morning or evening traffic, then the EIS figures would likely have some credibility; if they are primarily occupied by at least 2 working adults the vehicle movements are going to be very much higher; on that basis we believe the **current EIS figures are completely unreliable;**

*** however, we can reasonably assume there will be a cross section of ages; further, given that all but 28 of the apartments are multi bed apartments and 114 are 3 or 4 bedroom apartments, then where is the analysis of how many future vehicle owners (ie children) will acquire their own vehicles, while staying at home with their parents for years longer than has previously been the case; where is the analysis of what those additional traffic movements will likely be on the Eastside Roseville area; indeed, in our immediate area, it has been common for 1 or 2 car families (with younger children) to quickly develop into 3 and 4 car families over (seemingly) just a few years;**

* further, where is the frank analyses of the current and likely future street parking space availability, given that current weekday parking for **each of the directly affected streets are already fully parked-out all day on every weekday;**

(d) **Martin Lane** is a narrow and often difficult-to-navigate 'roadway' which is wholly unsuitable for the current vehicle movements; one can only be horrified at the congestion that will be created should the Proposed Development ever be approved;

(e) apart from a staggering increase in traffic flows in every direction, locals will all confirm that it is impossible for 2 cars to pass each other (safely or otherwise) in **the stretch of Roseville Avenue from Martin Lane to Gerald Street;** this area will become a nightmare of traffic snarls throughout the day with the consequent increase in vehicle

movements, particularly as parking on week days extends from Roseville Station all the way down both Lord Street and Roseville Avenue to beyond Martin Lane; even though the site's access is solely in Lord Street, it is inevitable that a very significant flow of traffic from the site will seek to move north care of Martin Lane , then Roseville Avenue and end up in Clanville Road or Chelmsford Avenue, which would provide much safer left turns in to Archbold Road, than would be the case from either Lord Street or Bancroft Avenue;

(f) the congestion in the Lord Street, Martin Lane and Roseville Avenue area becomes even more impacted by the morning and afternoon use of each of those roads for drop-offs and pick-ups to and from Roseville College;

(g) to currently exit the Eastside Roseville area, both for locals and 'visitors' (seeking to cut-through the back streets of the suburb so as to get to Archbold Road/Boundary Street/Tryon Road/ Pacific Highway), drivers are met with extensive delays particularly from Clanville Road (onto the Pacific Highway) and Hill Street (onto Boundary Street) -- as to which, please also see sub-item (l) below;

(h) as a result, traffic seeks to navigate its way through each of Roseville Avenue, Martin Lane and Lord Street;

(i) mercifully (from a safety perspective, as well as sensible traffic flow) there are significant restrictions on the ability to turn right into Archbold Road; there is a 'Left Turn Only' sign from Roseville Ave onto Archbold Road; that same restriction applies to Chelmsford Road and Middle Head Road;

*** there is no right hand turn permitted from either Clanville Road or Dudley Avenue onto Archbold Road on Monday to Friday between 6.00am to 10.00am and then 3.00pm to 7.00pm;**

***SO, TO WHERE WILL TRAFFIC WANTING TO ACCESS ARCHBOLD ROAD GO IN ORDER TO TRAVEL SOUTH, TOWARDS BOUNDARY ROAD?**

(j) one of the two EIS identified and recommended routes from Lord Street (which still permits what we have always considered to be a very dangerous entitlement to make that right hand turn) --- indeed, as a car approaches the juncture of Lord Street and Archbold Road, the Lord Street sign reads, in extremely large white ink on a red background, 'DANGER LOOK OUT FOR CARS'.

*** With respect to the authors of the TIA component of the EIS, clear mention should have been made of this in their report not only because of the staggering importance of the sign (almost urging drivers to find another way onto Archbold Road) but to highlight that it is not only inherently dangerous to try to make a right hand turn onto Archbold Road, it is also a danger to make a left hand turn, given the speed with which vehicles come over the hilltop of Archbold Road, as it**

approaches Lord Street. These concerns apply, in our opinion, on an almost 24/7 basis.

* Similarly, real care needs to be taken in **turning left from Archbold Road into Lord Street, given the speed** from cars travelling behind the left turning vehicle and the proximity of the turn so close to the top of the hill.

*** Yet this is one of the 2 exits into Archbold Road championed by the the EIS!**

*** the other is Bancroft Avenue (in respect of which about one car only gets a chance to make such a right turn, in between the change of traffic lights at Addison Avenue -- and there is inevitably a queue trying to turn either right or left; yet there is a similar constraint/frustration on turning left, given the constant flow of traffic travelling north along Archbold Road;**

(k) Is there an alternative route to Archbold Road, in order to be able to turn right and travel south (towards the City or Roseville Bridge) or be able to turn right into Boundary Street from Archbold-- The Answer is 'NO';

* the only 'alternative' approaches are for vehicles to meander through the backstreet of Glencroft Road and then access either **Wandella Avenue, which permits a left hand turn at any time**, but no right hand turn between 7.00am to 9.330am -- but good luck trying to turn right at any time during the day; or **Clermiston Avenue, which permits a left turn only on to Boundary Street** (into which only a left hand turn is permitted during peak hours) and traffic waits in a long line of cars trying to break into the constantly flowing traffic moving along Boundary Street!

(l) as a final point on this aspect of the EIS, we would draw your attention to the Plans appearing on page 80 and make the following points:

* on any view of the traffic seeking to access the Pacific Highway from Hill Street and/or Clanville Road during morning and evening peak hours, is to watch a long sustained grid-lock scenario; one can only imagine the considerable issues that will arise as even more traffic seeks to turn from the Pacific Highway into Hill Street, having just crossed over the railway line -- perhaps not insurmountable, but not dealt within the EIS; nor were the current peak hour traffic issues;

* similar scenes occur as you drive along Hill Street towards Boundary Street, not only because of the build up of traffic wanting to turn left into Boundary Street and then get across to turn right into Archer Street, but also because of the vehicles lined up in Hill Street who want to turn into either Bancroft Avenue or, more often, into Victoria Street in order to access Roseville College drop-off and pick-up areas;

* additionally, these page 80 EIS Plans promote as 'minor' traffic issues the fact that their proposed increased traffic flows traverse 2 Pedestrian Crossings, within a few metres of each other, in the heart of the Hill Street retail precinct -- one opposite the Railway Station in Hill Street and the other, at the commencement of Lord Street; apart

from the current foot traffic of locals throughout the peak hours, there is the constant stream of young children accessing the Station area from the Eastside Roseville area and in particular the Roseville College students, all trying to safely navigate their way through the traffic.

* in summary, on the traffic issues, we feel that:

(1) the totally unrealistically low base numbers for peak hour traffic, as stated in the EIS, do not even start to properly address what we believe will be the reasonably expected very significant increased traffic movements during those hours alone;

(2) the EIS does not satisfactorily address any of the very significant traffic movements within the Eastside Roseville area for the remaining hours of Monday to Friday, nor the weekends; and

(3) a far more comprehensive study should have been undertaken to address the clear spread of traffic activities in the area, rather than, with respect, set out a simplistic expectation that every one of the vehicles entering the Eastside Roseville area will just drive in and out of the area along the dotted lines shown on page 80 of the EIS.

4. Given that it is near impossible to cut a branch from a tree on your property without Council inspection and approval, I was horrified to learn that apparently **dozens of trees are proposed to be removed** from the site to make way for this project;

5. I also understand that the proposed demolition, excavation and construction is expected to take 2 years, assuming no delays -- which is always a hoped-for outcome that is never met; accordingly, **there will be unavoidable traffic chaos for that period, followed by permanent significant and negative traffic impact thereafter.**

6. CONCLUSION

(A) As we set out in item 1 above, we strongly believe the Proposed Development should not be considered further until the Council's Preferred Scenario has been finally resolved with the Government.

(B) It is inappropriately positioned in the midst of a heritage concentrated area and seemingly ticks no boxes that allows it to sensibly, or even caringly, fit within the long established and developed Eastside Roseville area.

(C) Most significantly, however, it lacks all merit as to a sensible integration of traffic within the area.

(D) For our part, this is not a case of a 'nimby' approach to any development within the Eastside Roseville area; indeed, the Council's Preferred Scenario supports the introduction of new residents being part of the community.

(E) What we seek to raise in our objections is the damage to the community that will inevitably be caused by such an inappropriately located development, with a huge and lasting negative impact on traffic flows within the Eastside Roseville area.

Thank you for the opportunity to put our views forward for your consideration.

Yours sincerely.

A solid black rectangular box used to redact a signature.