

3 June 2025

Keith Ng
Team Leader, State Significant Acceleration – Affordable Housing
Department of Planning, Housing and Infrastructure
4 Parramatta Square
12 Darcy Street
Parramatta
NSW 2150

Dear Keith,

REQUEST FOR ISEARS | 18-20 BANCROFT AVENUE & 23-27 LORD STREET, ROSEVILLE

INTRODUCTION

This letter has been prepared on behalf of the landowners to provide a detailed description of the proposed residential development at 18 – 20 Bancroft Avenue and 23-27 Lord Street, Roseville (**the site**).

It has prepared to respond to a request to Department of Planning, Housing and Industry for industry-specific Secretary's Environmental Assessment Requirements ('SEARs').

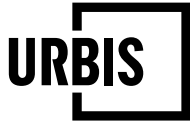
The following sections identify the applicant for the project and describe the site and proposed development.

APPLICANT DETAILS

The applicant details for the proposed development are listed in the following table.

Table 1 Applicant Details

Proponent	Mr Alex Stuart
Postal Address	20 Bancroft Avenue, Roseville NSW
Nominated Contact	Mr Alex Stuart



SITE DESCRIPTION

Table 2 Site and Project Overview

Matter	Description
The Site	
Country	<ul style="list-style-type: none"> Guringai
Street Address	<ul style="list-style-type: none"> 18-20 Bancroft Avenue & 23-27 Lord Street, Roseville, NSW 2069
Legal Description	<ul style="list-style-type: none"> 23 Lord Street – Lot 1/-/DP947351 and 1/-/DP132788 25 Lord Street – Lot 12/-/DP655064 27 Lord Street – Lot 13/A/DP5035 18 Bancroft Avenue - 1/-/DP200517 and 1/-/DP300135 20 Bancroft Avenue - 2/-/DP200517 and 26/A/DP5035
Site Area	<ul style="list-style-type: none"> 0.585ha
Development Area	<ul style="list-style-type: none"> 0.585ha
LGA	<ul style="list-style-type: none"> Ku-ring-gai
Existing development	<ul style="list-style-type: none"> Residential dwellings
Land Configuration	<p>The site is regular in shape and comprises five lots to create a developable area of approximately 0.585ha.</p> <p>The site topography has been modified to create generally level individual lots. The site generally falls to the east by approximately 1.5m with a more pronounced fall to the north (Bancroft Avenue to Lord Street) of approximately 4-5 metres across the developable area.</p>
Surrounding Land Use	<p>Surrounding land uses include:</p> <ul style="list-style-type: none"> To the north of the site the land is zoned R2 for low-density residential use. St Luke's Presbyterian Church is located opposite and to the east of the site at 28 Lord Street. To the south, land is predominantly zoned R2 low density residential with a small area of R4 for high-density residential use that extend from the Pacific Highway. Opposite the site is an SP2 zoning for Roseville College, with RE1 zoning for Bancroft Park and Roseville Lawn Tennis Club to the east of the school. To the west of the site, the land is zoned R2 for residential use. An R4 high-density residential area is approximately 150 metres west of the site. This area is adjacent to a Local Centre E1 zone that includes a mix of commercial and retail uses as part of Roseville town centre and Roseville train station To the east, the land is predominantly zoned R2 for residential use.

Matter	Description
Site Access and road network	The site is accessible from Bancroft Avenue and Lord Street. The Pacific Highway is located approximately 200m to the west.
Easements and Covenants	The Epping-to-Chatswood Rail Line tunnels are located within approximately 120m of the western boundary of the site, A Geotechnical analysis will be undertaken to confirm that any basement excavation will not have adverse effects on the rail tunnel.
Services & Utilities	The site has connections to existing services and utilities.
Acid Sulphate Soils	The site is mapped as Acid Sulphate Soils Class 5
Contamination	The site is not known to be contaminated land.
Stormwater and Flooding	The centre of the site (to the rear boundary of 23 – 27 Lord Street) is mapped as within the flood planning area - part of the Moore’s Creek catchment. The relevant flood related development controls will need to be considered in the design of the proposal in consultation with the project civil engineer.
Bushfire Prone Land	The site is not mapped as bushfire prone land.
Biodiversity	The site is not mapped as having biodiversity values.
Aboriginal Heritage	An Aboriginal Cultural Heritage Assessment is to be undertaken for the site to assess any Aboriginal cultural heritage values.
European Heritage	The site is located within the C36 - Lord Street/Bancroft Avenue Heritage Conservation Area. None of the dwellings within the site are listed as individual heritage items. Locally listed heritage items are in proximity to the site at No.’s 24 – 28 Bancroft Avenue, No’s 6-10 Bancroft Avenue and opposite the site at No.’s 19, 9 and 3 Bancroft Avenue. On the Lord Street frontage, a local heritage items are located at 19 Lord Street and at 28 Lord Street (St Luke’s church). (refer Figure 4 below).

A map of the site in its regional setting is provided at **Figure 1**.

Figure 1 Regional Context



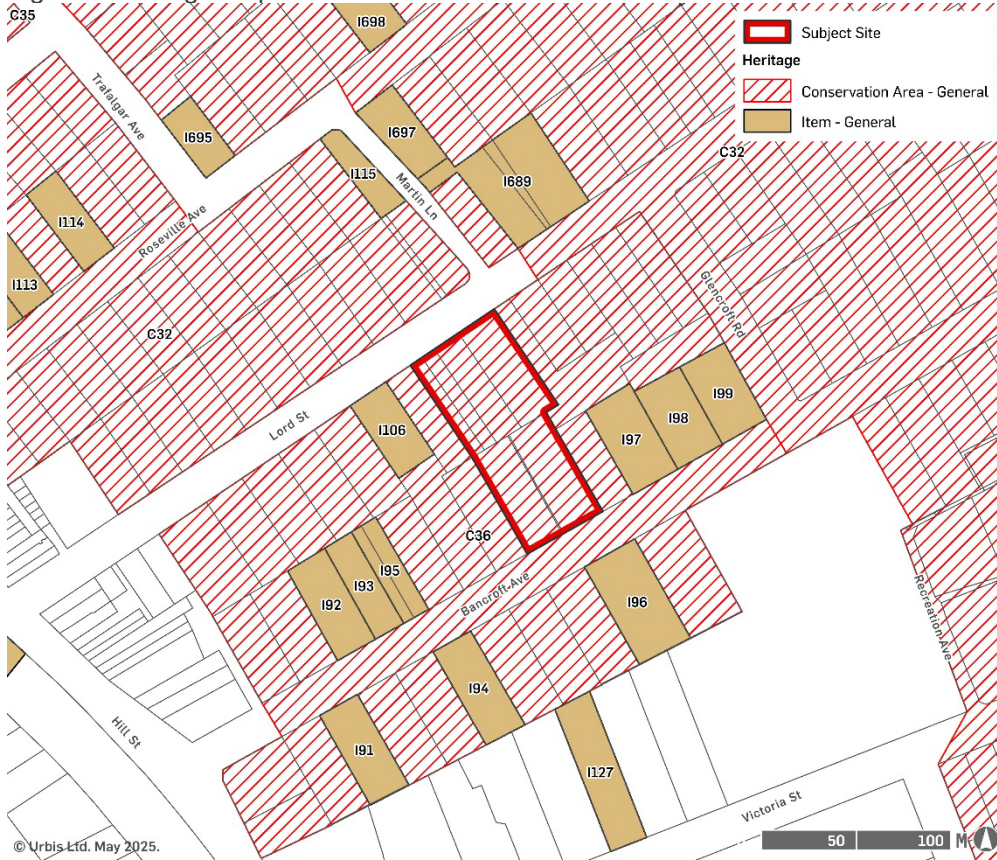
Source: Urbis

Figure 2 Aerial Photo



Source: Urbis

Figure 4 Heritage map



© Urbis Ltd. May 2025.
Source: Urbis

PROJECT OVERVIEW

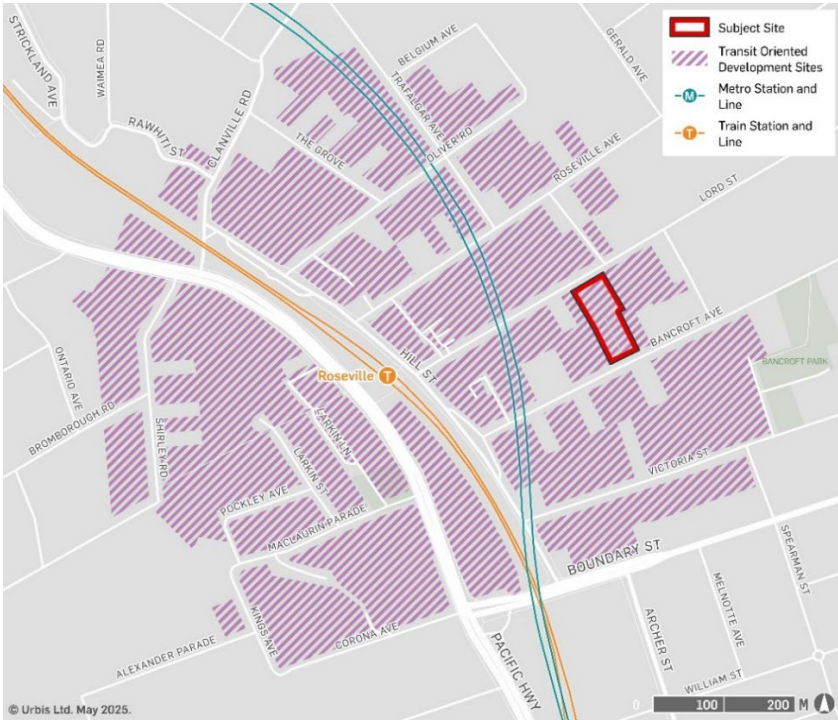
Table 3 Project Summary

Key Element	Proposal
Residential apartments	<ul style="list-style-type: none"> ▪ Construction of approximately 156 residential apartments in buildings up to 8 storeys in height. ▪ Provision of approximately 17,868m² GFA ▪ Proposed dwelling mix <ul style="list-style-type: none"> - 1 Bedroom apartments - 12 - 2 Bedroom apartments - 80 - 3 Bedroom apartments - 64 ▪ Provision of approximately 171 car parking spaces.
Affordable housing	<ul style="list-style-type: none"> • Provision of 17% affordable housing in a mix of units, including provision of 2% as required under the TOD Controls • Provision of approximately 3,038m² affordable housing GFA which includes approximately 29 dwellings.

Key Element	Proposal
Residential amenities and services	<ul style="list-style-type: none"> Four residential lobbies. Amenities may include gym, swimming pool, residents lounge, co-working facilities, media and games rooms.
Hard and soft landscaping	<ul style="list-style-type: none"> Creation of a large communal zone between the two building blocks, alongside two communal courtyards, to include: <ul style="list-style-type: none"> 1464m² Communal Open space (25% of site area) 410m² Deep Soil landscaping (7% of site area) 2,699m² Landscape zone (46% of site area)

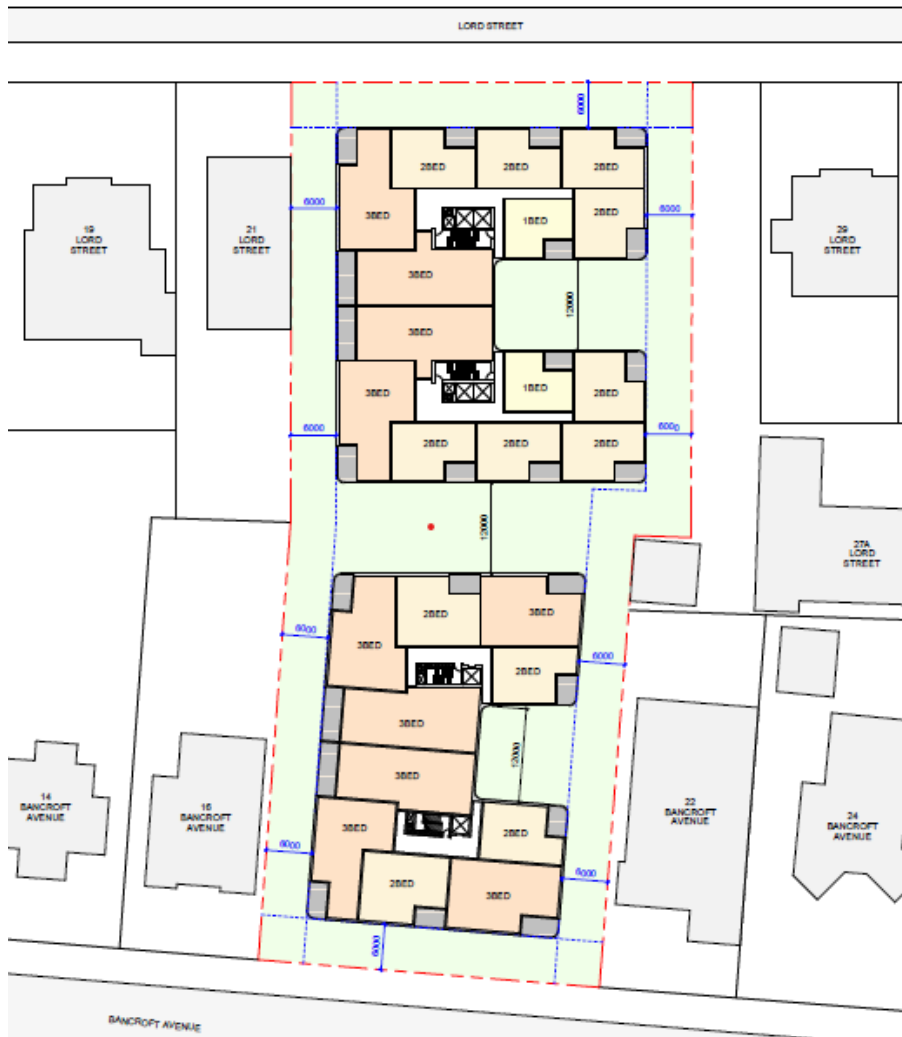
Under the Chapter 5, section 155 of the Housing SEPP, the maximum building height for a residential flat building in a Transport Oriented Development (TOD) Area is 22m and floor space ratio is 2.5:1. In accordance with Chapter 2, section 16 of the Housing SEPP, an additional 30% FSR and building height is proposed. A maximum building height of 22m allows for a development of approximately 7 storeys, with the 30% bonus allowing for a development of up to 8 storeys at the site. As shown in **Figure 5** below, the site is surrounded by other sites within the Roseville station TOD area to the north, south, east and west. The additional building height and FSR afforded by the affordable housing bonus will have limited impact in the context of the Roseville TOD area and the proposed development uplift surrounding Roseville station (refer **Figure 6** below). The additional building height and floorspace will have limited impact on the surrounding area and is expected to have similar impacts on infrastructure, e.g. traffic generation. The articulation of the proposed building form has been carefully considered to seek to minimise impacts on the surrounding area, including in relation to visual impacts and solar access.

Figure 5 Transport Oriented Development Sites Map



Source: Urbis

Figure 7 Proposed Typical Layout Plan



Source: Cove

STATUTORY CONTEXT

The following table categorises and summarises the relevant requirements in accordance with the DPHI *State Significant Development Guidelines*.

Table 4 Identification of Statutory Requirements for the Project

Details	Comment
Power to grant approval	Section 26A of Schedule 1 of the Planning Systems SEPP sets out that development which has an estimated development cost of more than \$75 million is SSD.

Details	Comment
	<p>Estimated cost of development for the proposal is in excess of \$75 million.</p> <p>The proposed development is appropriately classified as SSD.</p>
Permissibility	<p>The site is zoned R2 Low Density Residential in accordance with the KLEP2015. In accordance with Chapter 5, section 154 of the Housing SEPP, development for the purposes of residential flat buildings is permissible with development consent.</p>
Key development standards	<p><u>Transport Oriented Development</u> In accordance with Chapter 5 of the Housing SEPP, the site is located within a mapped Transport Oriented Development Area and a relevant residential zone, being R2 Low Density Residential, and as such development for the purposes of a residential flat building is permitted with development consent.</p> <p><u>In-fill Affordable Housing</u> In accordance with Housing SEPP section 155, the maximum building height for a residential flat building is 22m and the maximum FSR is 2.5:1. In accordance with Housing SEPP section 156, as a development for a residential flat building that has a gross floor area (GFA) of over 2,000m², at least 2% of the GFA of the building will be provided as affordable housing.</p> <p>In accordance with the provisions of Chapter 2, Part 2, Division 1, section 15 of Housing SEPP, the site is suitable for in-fill affordable housing for the following reasons:</p> <ul style="list-style-type: none"> • development for residential flat building is permitted under Chapter 5 of the Housing SEPP. • up to 15% of the GFA is proposed to be provided for the purposes of affordable housing; and • the development is within an accessible area, being within 400m walking distance of Roseville Station. <p>In accordance with Housing SEPP section 16, up to an additional 30% height and FSR is allowed, therefore an FSR 3.05:1 and building height of 8 storeys is proposed.</p> <p>In accordance with Chapter 2, Part 2, Division 1, section 19 of the Housing SEPP, the site area is greater than 450m².</p>
Other approvals	<p>The following Acts were considered but by virtue of the application being SSD and the nature of the proposal, no further approval is required under the following:</p> <ul style="list-style-type: none"> • <i>NSW National Parks & Wildlife Act 1974;</i> • <i>NSW Heritage Act 1977;</i> • <i>NSW Roads Act 1973;</i> • <i>NSW Water Management Act 2000;</i> • <i>NSW Rural Fire Service Act 1997; and</i> • <i>NSW Protection of the Environment Operations Act 1997.</i> <p>No requirements for other approvals have been identified at this stage</p>

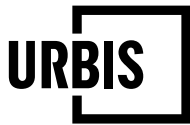
Details	Comment
Pre-conditions to exercise the power to grant consent	<ul style="list-style-type: none"> ▪ <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> ▪ <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> ▪ <i>State Environmental Planning Policy (Sustainable Buildings) 2022</i>
Mandatory Matters for Consideration	<ul style="list-style-type: none"> ▪ <i>State Environmental Planning Policy (Housing) 2021</i> ▪ <i>State Environmental Planning Policy (Planning Systems) 2021</i> ▪ <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> ▪ <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> ▪ <i>State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004</i> ▪ <i>State Environmental Planning Policy (Sustainable Buildings) 2022</i> ▪ <i>Ku-ring-gai Local Environmental Plan 2015</i>

KEY ASSESSMENT ISSUES

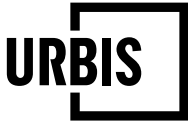
The following table outlines the key issues and impacts of the project which will be addressed in detail within the EIS. It also outlines any matters raised by the community and other stakeholders.

Table 5 Key Assessment Issues

Matter	Consideration
Design Excellence	<p>Section 3 the SEARs issued for the project will require that the development exhibit design excellence. An assessment against the relevant matters for consideration will be undertaken in the Urban Design Report and EIS which will set out a design excellence strategy for the development of the site.</p> <p>The project is required to be reviewed by the State Design Review Panel (SDRP).</p>
Connection with Country	<p>All future development will consider the Connection to Country Framework prepared by the NSW GA. The design has been informed by Country and will clearly demonstrate how the frameworks has been implemented and reflected the design</p>
Urban Design and Landscaping	<p>The SSDA will include an urban design and landscaping report to ensure the proposal is of a high quality and landscape led design. The project will be aiming to provide a high-quality landscaped outcome on the site that will maximise tree canopy to optimise shade and reduce urban heat island effect. The urban design will be informed by Country and will reflect and embed the recommendations of the appointed cultural advisor to address the Connection to Country Framework.</p>
Amenity	<p>The SSDA will address key environmental amenity matters to ensure the project can provide a high-quality outcome with strong liveability attributes. Key technical studies to inform the EIS will include overshadowing diagrams; noise and vibration impact assessment, visual impact assessment; and landscape strategy.</p>
Noise & Vibration	<p>The proposed development is expected to have acoustic and vibration impacts through the construction phase. A Noise and Vibration Impact Assessment (NVIA) will accompany further assessment of this matter in the EIS, to satisfy the Environmental Protection Authority's (EPA's) Noise Policy for Industry, Interim Construction Noise Guideline and Road Noise Policy. Mitigation, management, and monitoring measures</p>



Matter	Consideration
	will be documented and implemented over the demolition, construction, and operation of the site.
Visual	Visual impact will be assessed in the EIS. As a part of this, impacts on viewpoints and vistas will be assessed as well as visual amenity assessment of landscaping, design and supporting works. The Visual Impact Assessment (VIA) will include an assessment at suitable intervals from construction (e.g. 0, 5, 10 years) to demonstrate the appearance of the development prior to and following the establishment of landscaping. The site's proposed use is suitable in terms of visual amenity.
Access & Transport	A Traffic Impact Assessment (TIA) to assess key traffic considerations in relation to the site and its development will be obtained and evaluated in the EIS. Existing and estimated future traffic conditions, parking, and access as well as the impact on surrounding road capacity and pedestrian/cycling routes are all key features to be analysed.
Water and Flooding	<p>Analysis of the site's water and stormwater conditions will be included in the civil infrastructure report and plans. A Soil and Water Management plan (SWMP) will be prepared alongside the completion of an Erosion and Sediment Control Plan and Stormwater Management Strategy (SMS). These will help inform further site analysis in the EIS surrounding catchment capacity on and around the site as well as any irrigation risks.</p> <p>A Flood Impact Risk Assessment in accordance with the NSW Floodplain Development Manuel 2005 will be provided in the SSDA and analyse any further potential flood impacts on the site and surrounds.</p>
Contamination	The suitability of the site in terms of existing contamination, to undergo the proposed development is expected to be appropriate. A Preliminary Site Investigation (PSI), Hazardous Buildings Material Survey, and a Salinity Investigation will be prepared as required. Any necessary further investigation will be conducted and explored in the EIS.
Geotechnical	A Geotechnical Report will provide an assessment of the ground conditions of the site and any risks associated with ground stability or proposed excavation. The report will detail the findings from desktop review of the site and borehole testing where necessary. The report will recommend appropriate temporary and permanent site support and retention measures if required. The Geotechnical Report will also assist to determine any required engineering and earthworks to achieve the proposed development outcome.
Waste	The proposed development is expected to generate waste during the demolition, construction, and operation phases. A Waste Management Plan (WMP) will be prepared to determine the extent of management required and will be in accordance with waste regulatory frameworks and legislation.
Biodiversity	<p>The site currently consists of trees and vegetation associated with the existing residential dwellings. A BDAR Waiver will be prepared for the proposal.</p> <p>An Arboricultural Impact Assessment will be undertaken to assess the value of existing trees on the site that are proposed to be removed to facilitate the development, and management measures for those trees proposed to be retained.</p>
Heritage	Where required, an Aboriginal Cultural Heritage Assessment Report (ACHAR) will be prepared as part of the SSDA, including consultation with Aboriginal Community representatives.



Matter	Consideration
	In terms of European Heritage, a Heritage Impact Assessment will be undertaken to assess impacts on the Conservation Area and adjacent local heritage items.
ESD	An Ecologically Sustainable Development (ESD) Report will be prepared to provide a sustainability assessment development. The ESD report will provide an assessment of the building design and demonstrate ways in which the development can achieve best practice and compliance with sustainability requirements.
Social Impact	Where required, a Social Impact Assessment will be prepared assess the social consequences the project, namely the impacts on affected groups of people and on their way of life, life chances, health, culture, and capacity to sustain these. The SIA will address the positive and negative impacts associated with the project, as well as the measures to mitigate these impacts. The SIA will be prepared in line with the NSW Guidelines for Social Impact Assessments.
Community Engagement	An Engagement Outcomes Report will be provided as required by the SEARs. The Report will outline the engagement carried out to date, the outcomes of that engagement and how it has informed the proposal. The report will provide evidence of a transparent and collaborative engagement process. This document will be included in the EIS as part of the SSDA. The document will also outline: <ul style="list-style-type: none">▪ Issues raised by surrounding landowners & stakeholders.▪ Project response to issues▪ Proposed future community and stakeholder engagement based on the results of consultation.

CONCLUSION

This letter has outlined preliminary information regarding the proposed development at 18-20 Bancroft Avenue & 23-27 Lord Street, Roseville. The report has outlined preliminary information regarding the site and proposal, identified the relevant strategic and statutory context, summarised the approach to engagement with stakeholders and, identified the scale and nature of the impacts of the project.

As outlined in **Section 3**, the Proposal is declared State Significant Development under Schedule 1, section 26A of *State Environmental Planning Policy (Planning Systems) 2021*. We trust that the information detailed in this report is sufficient to enable the Secretary to issue SEARs for the preparation of an Environmental Impact Statement.

Yours sincerely,

Holly McNamara
Associate Director
+61 2 8233 9924
hmcnamara@urbis.com.au