

Environmental Impact Statement

Infill Affordable Housing

2-16 Pockley Avenue, Roseville

Draft_V01	4 April 2025	Draft	Tom Goode	
Final Version	17 April 2025	Final	Tom Goode	

This document is a draft for discussion purposes only unless signed and dated by the persons identified.

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REAP Declaration

Project Details		
Project Name	In-fill affordable housing, Pockley Avenue, Roseville	
Application Number	SSD-77825469	
Address	2-16 Pockley Avenue, Roseville NSW 2069	
Applicant Details		
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Registration Number	4190	
Organisation Registered With	Planning Institute of Australia	
The undersigned declared that this EIS: • the statement has been prepared in accordance with the Environmental Planning and Assessment Regulation 2021, and • contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which this EIS relates, and • does not contain any information that is false or misleading, and • contains the required information under the Registered Environmental Assessment Practitioner Guidelines. • addresses the Planning Secretary’s environmental assessment requirements (SEARs) for the project; • identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; • has been prepared having regard to the Department’s State Significant Development Guidelines - Preparing an Environmental Impact Statement; • contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; • contains a consolidated description of the project in a single chapter of the EIS; • contains an accurate summary of the findings of any community engagement; and • contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.		
Signature		Date 17 April 2025

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Appendix CC	Noise and Vibration Impact Assessment	Stantec
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Executive Summary

Introduction

This Environmental Impact Statement (EIS) has been prepared by Planning & Co on behalf of Aqualand Prestige 2 Pty Ltd as The Trustee for Aqualand Prestige 2 Unit Trust (Aqualand Prestige) in support of a State Significant Development Application (SSDA) pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). This SSDA is submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) for a residential flat development including in-fill affordable housing at 2-16 Pockley Avenue, Roseville (the site). This SSDA seeks to provide market and much needed affordable housing supply within the Roseville Transport Oriented Development (TOD) catchment within the Ku-ring-gai local government area (LGA).

Development that provides infill affordable housing in the Eastern Harbour City, with an estimated development cost (EDC) of more than \$75 million, and that is not prohibited under an applicable environmental planning instrument (EPI), qualifies as State Significant Development (SSD) by virtue of Section 26A In-fill Affordable Housing of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP). In this regard:

- the proposed development is for residential flat buildings with infill affordable housing that is provided under the provisions of Chapter 2, Part 2, Division 1 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP).
- residential flat buildings are permitted with consent at the site under the provisions of Chapter 5 'Transport oriented development of the Housing SEPP.
- the proposed development's EDC is \$172,112,767 (Refer to EDC Report, **Appendix P**)

Therefore, the development is characterised as SSD.

This EIS has been prepared in accordance with the requirements of Part 4 of the EP&A Act, Section 175 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulations) and the Secretary's Environmental Assessment Requirements (SEARs) received for the preparation of this EIS. This EIS should be read in conjunction with supporting technical documentation and plans attached as appendices, accompanying this statement.

Appendix A provides a SEARs compliance table that indicates where the SEARs have been addressed in this EIS and technical reports prepared.

The Site

The site is located at 2-16 Pockley Avenue, Roseville within Ku-ring-gai LGA. The site is located at the intersection of Pockley Avenue and Maclaurin Parade. The site is situated on the traditional and of the Darramurragal and Terramerragal People.

The site is in an area transitioning to a medium density residential area within the Roseville town centre. The introduction of the TOD program is expected to continue to facilitate future higher density development within this area, particularly in currently Low Density Residential zoned land within the Roseville TOD precinct.

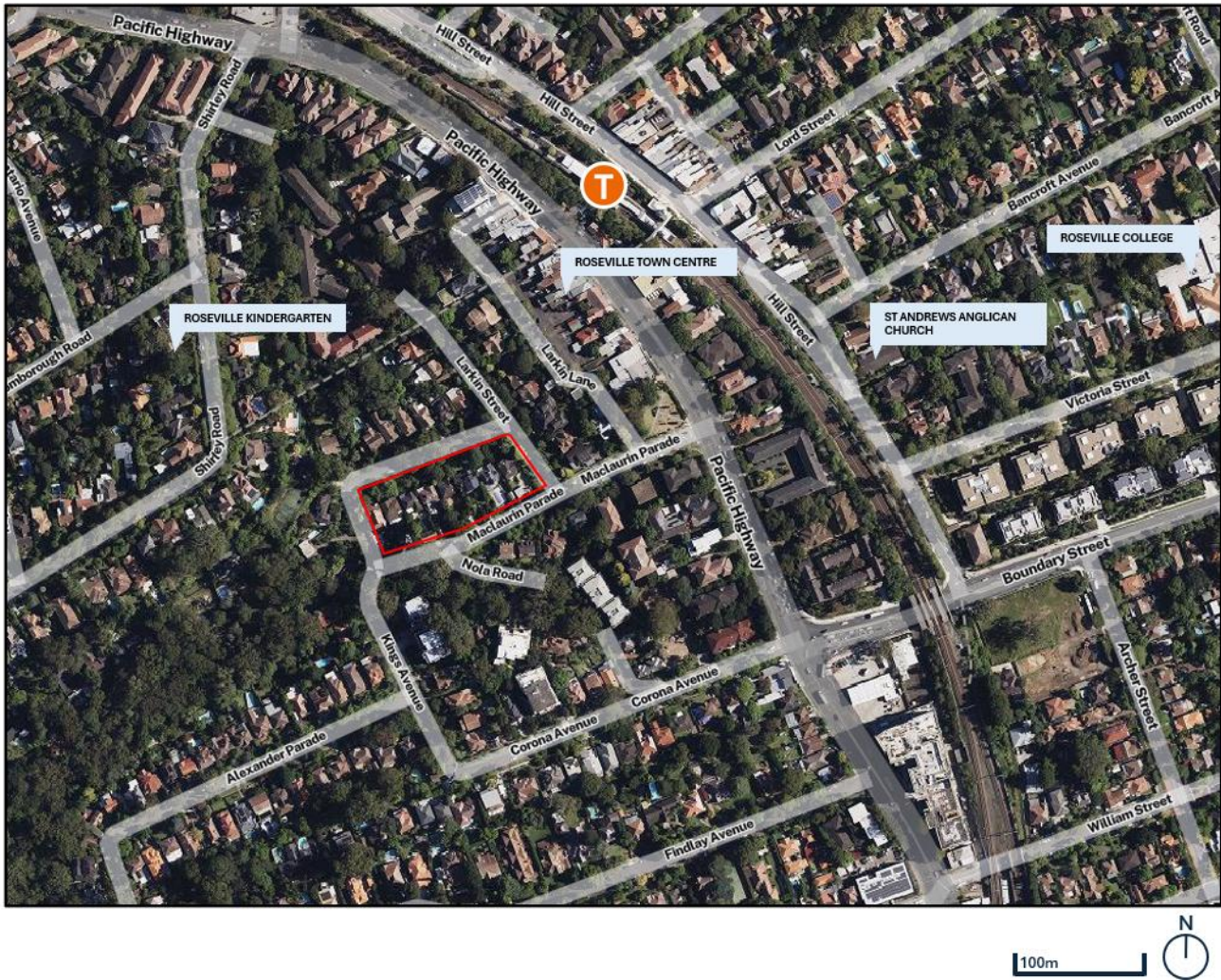


Figure 1 Subject Site (SDT Explorer and Planning & Co)

Project Description

The applicant seeks development consent under Division 4.7 State Significant Development of the *Environmental Planning & Assessment Act 1979* (EP&A Act) for a new residential development comprising three residential flat buildings which includes the provision of in-fill affordable housing on the site at 2-16 Pockley Avenue, Roseville.

Specifically, this SSDA seeks approval for:

- Site preparation including demolition, excavation and tree removal of the site;
- Construction of a residential flat building containing 3 building elements of up to 9 storeys including:
 - Part 3-, part 4- and part 5-level combined basement parking with the provision of 285 car parking spaces;
 - 178 dwellings including 39 affordable housing dwellings above carpark;
 - Ground level and on-building landscaping works including communal open spaces in Pavilion A.
- Augmentation of, and connection to, existing utilities as required.

Engagement

This EIS is supported by a Community Engagement Report prepared by Notting Hill Advisory and attached as **Appendix E**. Engagement activities for this proposal were conducted concurrently with the Proposal for another SSDA (Aqualand Prestige 1 Pty Ltd) at 2 & 4 Larkin Street and 1, 3 & 5 Pockley Avenue (SSD-77829461).

Relevant groups were consulted and engaged in the preparation of this SSDA including local residents within a defined geographic area, NSW government agencies, Ku-ring-gai Council, and Traditional Owners and Aboriginal stakeholders.

A breadth of engagement activities was used to consult with the community including public sentiment research, community drop-in session, drop-in session feedback form, and feedback mechanism via an online engagement portal. Communication tools utilized for the purposes of informing and consulting the community included information flyers, an online engagement portal, FAQs on the online portal, and project display boards.

Aqualand Prestige and the project team have responded to feedback and queries throughout the process. This engagement has helped inform design development and further details are provided in **Section 6.0**. As the Proposal evolves, Aqualand Prestige will continue to engage relevant stakeholders and the community as part of the development process.

Justification

This EIS assesses the Proposal having regard to relevant planning instruments and policies and outlines the mitigation measures to ensure that the development does not result in any unreasonable environmental impacts.

The key environmental assessment matters identified in the SEARs have been assessed in detail. The summary of the key findings, recommendations and mitigation measures from technical reports are presented in **Section 7.0**. This EIS confirms that the environmental impacts of the proposed development are positive, reasonable in the circumstances or can be appropriately managed.

Holistically, the Proposal will provide a net positive outcome for the site, the surrounding area and Sydney more broadly, for the following reasons:

- The proposal responds to the immediate strategic context:

The proposed development responds to its proximity to Roseville Station within the TOD catchment, which allows greater height and density on the site. Importantly, the proposal allows for much needed supply of both market and affordable housing in New South Wales.

- The proposal is consistent with the state and local strategic planning framework

The proposal is consistent with the relevant objectives and priorities of the following strategic documents:

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

- The proposal satisfies the applicable state and local development controls:

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

- State Environmental Planning Policy (Planning Systems) 2022
- State Environmental Planning Policy (Housing) 2021
- State Environmental Planning Policy (Transport and Infrastructure) 2021
- State Environmental Planning Policy (Resilience and Hazards) 2021

- State Environmental Planning Policy (Sustainable Buildings) 2022
- State Environmental Planning Policy (Biodiversity and Conservation) 2021
- Ku-ring-gai Local Environmental Plan 2015
- The likely environmental, economic and social impacts have been assessed as being reasonable in the circumstances as summarised below:

Natural Environment

- **Biodiversity:** A BDAR Waiver and BDAR Waiver Report supports this SSDA, confirming that the development is unlikely to have a significant impact on the site's biodiversity values.
- **Trees:** 22 trees are proposed to be removed within the site. Replacement trees are proposed throughout the proposed development. An AIA Report prepared by Naturally Trees, attached as **Appendix J** supports the proposal.
- **Landscaping:** Landscaping has been proposed to support the built form and as demonstrated in the Landscape Plan prepared by Ground Ink, attached as **Appendix H**. The proposed landscaping has been designed to extend and blend with the surrounding environment.
- **Ecologically Sustainable Development:** The ESD principles are addressed in the ESD Report attached at **Appendix I** in accordance with the requirements under Clause 191 of the *Environmental Planning and Assessment Regulations 2021*.
- **Flood risk:** A Flood Risk Impact Assessment has been prepared by Kozarovski and Partners, attached as **Appendix U**. Overall, the potential flood risk to the site is highly unlikely with the site only marginally affected by the PMF.

Built Form and Residential Amenity

- **Built Form and Urban Design:**
 - The Proposal was reviewed by the SDRP prior to the lodgement of the SSDA. The SDRP feedback is addressed in the Design Report prepared Woods Bagot, attached as Appendix D.
 - Alternatives for the massing of the built form were considered, and the proposal demonstrates the most suitable according site-specific and environmental constraints.
 - Site specific design outcomes were influenced by a Walk on Country and Design Input Session with Traditional Owners.
 - The proposal complies with the maximum permissible FSR and the proposed built form and massing responds to desired future character established by the TOD policy.
 - Minor variations to the maximum permissible building height of up to of 2.17m (7.7%) are proposed. A Clause 4.6 Variation Request has been prepared by Planning & Co, attached as Appendix M, which confirms that compliance with the maximum building height is unreasonable in the circumstances and there are sufficient environmental planning grounds to justify the proposed variation.
- **Residential Amenity:** Woods Bagot have undertaken an assessment against the Apartment Design Guide (ADG) which confirms the Proposal achieves a high level of compliance with the ADG design criteria. Where variations to the numeric criteria are proposed, it has been demonstrated that the ADG design objectives have been achieved. Affordable housing dwellings have been designed to provide equitable amenity outcomes in relation to the market dwellings.
- **Visual and View Impact:** The Visual and View Impact Assessment confirms that the Proposal is reasonable considering the objectives and intent of relevant State government strategic policy and provisions.
- **Pedestrian Wind Impact:** The proposed development has incorporated wind mitigation strategies to ensure that wind comfort complies with the relevant criteria.
- **Crime Prevention Through Environmental Design (CPTED):** The CPTED assessment confirms that the Proposal incorporates design strategies to limit potential crime opportunities and increase safety and perceived safety and recommends design and management principles to increase actual and perceived safety within the proposed development and the surrounding areas.

Traffic, Transport and Accessibility

- The TAIA confirms that the projected change in the traffic generation as a consequence of the development is minimal and will not have any unacceptable traffic implications in terms of road network capacity.
- A dedicated loading dock is provided in the Basement 03, adjacent to the waste collection room. The manoeuvring area has been designed to accommodate the swept path requirements of Council's 5.1m long waste truck, allowing them to enter and exit the site in a forward direction.
- Construction trucks will approach and depart the site via the Pacific Highway, Maclaurin Parade, Larkin Street and Pockley Avenue. Loading and unloading activities will occur entirely within the front setback areas of the site, fronting the Pockley Avenue site frontage and therefore a work zone is not considered necessary.

Other Environmental Impacts

The EIS considers the environmental impacts of the Proposal with regard the following matters for consideration and concludes that the anticipated impacts are acceptable subject to the relevant mitigation measures.

- Noise and Vibration
 - Ground and Water Conditions
 - Water Management
 - Contamination and Remediation
 - Waste Management (construction and operational)
 - Heritage (Aboriginal Cultural and Environmental),
 - Bushfire
 - Aviation
 - Social impact
 - Economic impacts
- The proposal is suitable for the site: The site is considered highly suitable for the proposed development for reasons outlined below:
 - The proposal is consistent with the aims of the chapter for Chater 5 Transport Oriented Development and is permitted with consent under the Housing SEPP.
 - A PSI (**Appendix K**) conducted for the site concluded that the proposed use of the site as residential is appropriate for the site.
 - The site is currently underutilised in its existing condition and does not align to the density and height envisioned for the site by State government policy.
 - The site is not affected by natural hazard risk nor does it significantly impact biodiversity values.
 - The proposal is largely compliant with statutory provisions including FSR (inclusive of additional 26.8% bonus under Housing SEPP). A variation is sought for the maximum building height development standard, through the Clause 4.6 Variation Request (**Appendix M**).
 - The character and scale of the development is compatible with the existing and envisioned future surrounding context.
 - The proposal will provide the maximum GFA over the site for increased housing supply in an accessible area as envisioned by State government.
 - The proposal is in the public interest: The proposal is considered in the public interest for the following reasons:
 - The proposal delivers 39 affordable housing dwellings in an accessible location which includes the State government's mandated 2% of total GFA for affordable housing in the TOD catchment, in perpetuity, as well as an additional 13.4% of the total GFA as affordable housing as part of in-fill affordable housing delivered under the provisions of the Housing SEPP. The proposed affordable housing cannot be delivered under the provisions of the Ku-ring-gai LEP 2015.

- Considerable effort has been made to ensure there is equitable residential amenity for affordable housing dwellings and market dwellings.
- The proposal is consistent with the state and local strategic framework and largely complies with the relevant statutory controls. Importantly, the proposal provides an outcome that is consistent with the outcomes envisioned by recent State government’s TOD program.
- Subject to the implementation of the mitigation measures identified for the proposed development, potential social and environmental impacts resulting from the proposal can be appropriately managed.
- The proposal will enable key workers to live closer to their place of work through affordable housing tenancy.
- The proposal will deliver 250 jobs in the near term through construction works, providing benefits to the local economy.
- The site will facilitate the orderly and economic redevelopment of the site through the intensification of the existing residential use of the land.

We conclude that the approval of this SSDA, subject to appropriate conditions of consent, is recommended for the proposed development as it has considered all relevant matters, has demonstrated significant merit and is appropriate for the site.

1.0 Introduction

This Environmental Impact Statement (EIS) has been prepared by Planning & Co on behalf of Aqualand Prestige 2 Pty Ltd as The Trustee for Aqualand Prestige 2 Unit Trust (Aqualand Prestige) in support of a State Significant Development Application (SSDA) pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). This SSDA is submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) for a residential flat development including in-fill affordable housing at 2-16 Pockley Avenue, Roseville (the site). This SSDA seeks to provide market and much needed affordable housing supply within the Roseville Transport Oriented Development (TOD) catchment within the Ku-ring-gai local government area (LGA).

Development that provides infill affordable housing in the Eastern Harbour City, with an estimated development cost (EDC) of more than \$75 million, and that is not prohibited under an applicable environmental planning instrument (EPI), qualifies as State Significant Development (SSD) by virtue of Section 26A In-fill Affordable Housing of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP). In this regard:

- the proposed development is for a residential flat building with infill affordable housing that is provided under the provisions of Chapter 2, Part 2, Division 1 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP).
- residential flat buildings are permitted with consent at the site under the provisions of Chapter 5 ‘Transport oriented development of the Housing SEPP.
- the proposed development’s EDC is \$172,112,767.

Therefore, the development is characterised as SSD.

This EIS has been prepared in accordance with the requirements of Part 4 of the EP&A Act, Section 175 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulations) and the Secretary’s Environmental Assessment Requirements (SEARs) received for the preparation of this EIS. The EIS should be read in conjunction with supporting technical documentation attached as appendices. **Appendix A** provides a SEARs compliance table that indicates where the SEARs have been addressed in this EIS and technical reports prepared.

1.1 Applicant Details

The Applicant details for the proposed development are provided in below.

Table 1 Applicant Details

Description	Applicant Details
Applicant name	Aqualand Prestige 2 Pty Ltd as The Trustee for Aqualand Prestige 2 Unit Trust
Postal Address	Level 37, Australia Square, 264 George Street, Sydney 2000
ACN	680 535 924
ABN	42 656 135 373

1.2 Project Description

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

Specifically, this SSDA seeks approval for:

- Site preparation including demolition, excavation and tree removal of the site;
- Construction of a residential flat building development containing 3 building pavilions of up to 9 storeys including:
 - Part 3-, part 4- and part 5-level combined basement parking with the provision of 285 car parking spaces;
 - 178 dwellings including 39 affordable housing dwellings above carpark;
 - Ground level and on-building landscaping works including communal open spaces in Pavilion A.
- Augmentation of, and connection to, existing utilities as required.

Further details of the proposal are provided in **Section 4.0**. The proposal will be in accordance with the Architectural Plans as prepared by Woods Bagot (**Appendix B**).

1.2.1 Key Objectives of the Development

The overarching objectives of the proposal are summarised below:

- Deliver new homes in a highly accessible location close to public transport, shops and services.
- Deliver new infill affordable housing to meet the needs of low- and moderate-income households.
- Design a built form that is responsive and appropriate to the site context.
- Provide high-quality, well-integrated and diverse housing solutions.
- Minimise potential residential amenity impacts for neighbouring sites.

1.2.2 Site Description and Context

The site is located at 2-16 Pockley Avenue, Roseville within Ku-ring-gai LGA, approximately a 390-metre walking distance from Roseville rail station. The site is currently made up of eight sites which have a combined site area of 6,539sqm. The land is situated on land of the Darramurragal and Terramerragal People.

Refer to **Section 2.0** for a detailed Site Overview.

1.3 Transport Oriented Development

The TOD Program has been part of the planning reforms led by State Government in order to address the housing crisis. The resulting TOD amendment to the Housing SEPP was made on 24 April 2024 and has been in force from 13 May 2024. The TOD program aims to allow for development of new well-located and well-designed mid-rise housing and affordable housing within 400m of public transport to address the housing crisis.

This is discussed further in **Section 3.2.2**.

1.4 Affordable Housing

‘Affordable Housing’ in NSW is available to very low to moderate income households with rent priced so that households can meet other basic living costs. Ku-ring-gai Council exhibited their first Draft Affordable Housing Policy from 3 February 2025 to 3 March 2025. The policy sets out objectives and outlines a plan for the delivery and management of affordable housing in the LGA. Without an existing affordable housing policy in place, this draft policy recognises the need for one.

It is proposed that this development will provide 39 new affordable housing dwellings under the provisions of the Housing SEPP. Under clause 156 under Chapter 5 of the Housing SEPP, development for the purposes of residential flat buildings (with a GFA of at least 2,000 sqm) in a TOD area are required to dedicate 2% of GFA to affordable housing, managed by a registered Community Housing Provider (CHP) in perpetuity.

Further, Chapter 2 Part 2 Division 1 of the Housing SEPP applies to the proposed development. Under the Chapter 2 provisions, additional bonuses apply to the FSR and building height controls that apply under Chapter 5. The additional bonuses are subject to the provision of additional infill affordable housing. It is proposed that 13.4% of the total proposed GFA will be provided as infill affordable housing in addition to the 2% of the total GFA provided in accordance with Chapter 5. By providing 13.4% of the total GFA as affordable housing, for a minimum of 15 years, the development can access an additional 26.8% FSR and height above the 2.5:1 and 22m permitted under Chapter 5 of the Housing SEPP.

The CHP for the affordable housing component of this development is Bridge Housing. It has been agreed between the Applicant and the CHP that 6 dwellings (i.e. 2% of the total GFA) will be managed in perpetuity and 33 dwellings will be managed for at least 15 years. Refer to the CHP Supporting Letter, attached as **Appendix C**. Bridge Housing is a Tier 1 CHP registered under the National Regulatory System for Community Housing. Across Greater Sydney, Bridge Housing now own and or manage approximately 3,600 properties in 21 LGAs of Sydney providing housing and tenancy management services to over 5,300 people.

1.5 Consultation

1.5.1 Scoping Meeting

A Scoping Meeting was held on 23 October 2024 between the Applicant, DPHI and the Government Architect New South Wales (GANSW). The purpose of the meeting was to outline the nature and scope of the project, identify and discuss potential site constraints, and the process for requesting industry SEARs. GANSW discussed timing for a State Design Review Panel (SDRP). Industry specific SEARs were issued on 15 November 2024 under SSD-77825469. Refer to the SEARs Compliance Table attached as **Appendix A** which outlines where they have been addressed in the EIS and supporting documentation.

1.5.2 Meeting with Ku-ring-gai Council

A Meeting was held on 21 November 2024 between the Applicant and Ku-ring-gai Council (Council). The Applicant outlined their project objectives, discussed the scoping report and indicative timelines.

1.5.3 Traditional Owners and Aboriginal Stakeholders Consultation

Aqualand Prestige engaged JMP Aboriginal Consultancy to facilitate and coordinate meaningful engagement and learning opportunities for the project team from Traditional Owners and Aboriginal stakeholders and broader community. A Walk on Country and design input session was held on 14 February 2025, to integrate Indigenous Traditional input into design development. Refer to the First Nations Co-Design Values Report, prepared by JMP Consulting attached as **Appendix L**.

Aspects of the proposed development that particularly connect with country and acknowledge Indigenous Traditional influence are discussed in the **Section 4.8**. The final design was presented to the elders who were engaged in the Walk on Country and design input session and has been endorsed.

1.5.4 State Design Review Panel

An SDRP meeting was held on 19 February 2025. Initial designs, concepts and development metrics were presented and was overall, well received. SDRP feedback was received 3 March 2025 where the following elements of the proposal were supported:

- The rigorous testing of massing options to determine the preferred approach.
- The concept of a series of buildings grounded in the landscape.
- The simple approach to the siting of the buildings, which is a logical response to a steeply sloping site.
The open circulation spaces between the buildings which provide an opportunity for the development to connect with nature.
- The diagonal pedestrian approach from MacLaurin Parade to the building entries, allowing glimpses between the buildings upon entering the site.
- The generous apartment and balcony sizes.
- The logical approach to the typical apartment plans, subject to the advice below regarding an east-west connection.
- The distribution of affordable apartments throughout the development, subject to the advice below.
- The proposal for carpark walls to be clad in sandstone.

A detailed response to the SDRP feedback is provided in the Design Report prepared by Woods Bagot attached as **Appendix D**.

1.5.5 Community and Stakeholder Consultation

Community and stakeholder consultation was undertaken prior to lodgement to inform and provide an opportunity to give feedback. The outcomes of community engagement activities are further discussed in **Section 6.0** and the Community Engagement Report attached as **Appendix E**.

2.0 Site Overview

2.1 Site Location and Context

The site is located at 2-16 Pockley Avenue, Roseville within Ku-ring-gai LGA. The site is located between Pockley Avenue and Maclaurin Parade. The site is on the traditional land of the Darramurragal and Terramerragal People.

The site is situated in an area that is transitioning to a medium density residential area within Roseville. The introduction of the TOD program is expected to continue to facilitate future higher density development within this area, particularly in currently Low Density Residential zoned land that is identified within the Roseville TOD area.

Figure 2 indicates the site within its local context.

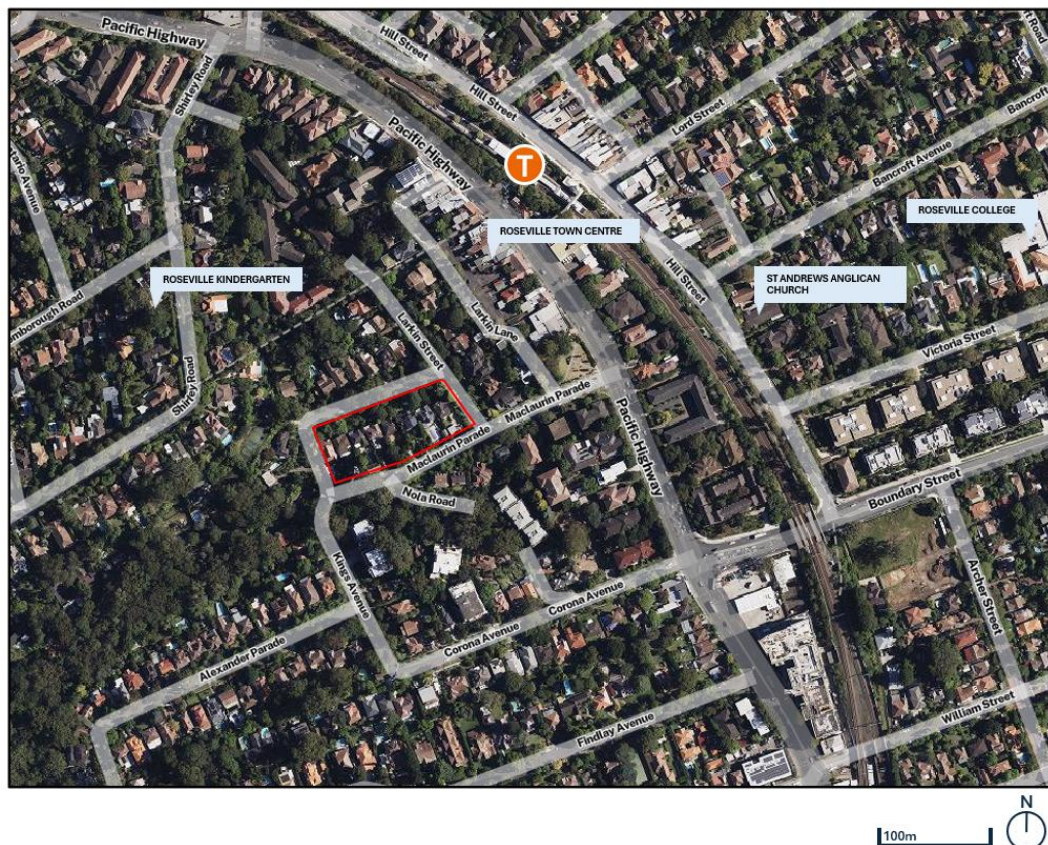


Figure 2 Site Local Context (SDT Explorer and Planning & Co)

The site is located south of Roseville station and the Pacific Highway within the Roseville TOD catchment, approximately a 390-metre walking distance from Roseville rail station. Roseville station services the T1 and T9 trainlines which connect to Chatswood, Hornsby, St Leonards, North Sydney and Sydney CBD.

Figure 3 demonstrates the regional context of the site in relation to other TOD areas.

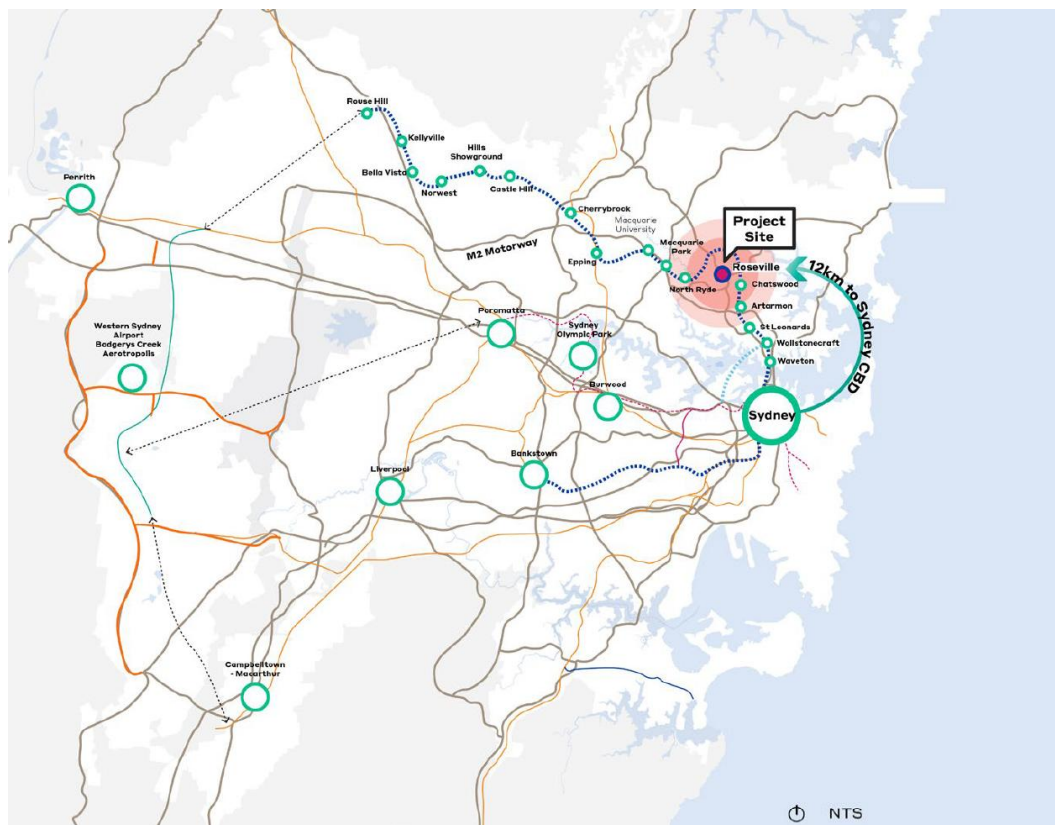


Figure 3 Regional context (Woods Bagot)

2.2 Key Features of Site and Surrounds

2.2.1 Site Description

The site consists of eight allotments. The legal description of each lot is identified in **Table 2** below. The total site area of the site is 6,539 sqm. The site's boundaries all present to a street. The site has an approximate frontage of 170m to Pockley Avenue wrapping around the north and west boundary, a 45m frontage to Larkin Street to the east, and a 135m frontage to Maclaurin Parade in the south. The site falls approximately 21.5m across the site (refer to **Figure 5**).

Table 2 Legal descriptions and areas of allotments on the Site

Address	Legal Description	Approx Site Area (sqm)
2 Pockley Avenue, Roseville	Lot 11/DP8261	775
4 Pockley Avenue, Roseville	Lot 12/DP8261	810
6 Pockley Avenue, Roseville	Lot 13/DP8261	836
8 Pockley Avenue, Roseville	Lot 14/DP8261	873
10 Pockley Avenue, Roseville	Lot 15/DP8261	823
12 Pockley Avenue, Roseville	Lot 16/DP8261	807
14 Pockley Avenue, Roseville	Lot 17/DP8261	800
16 Pockley Avenue, Roseville	Lot 18/DP8261	833



Figure 4 The Site

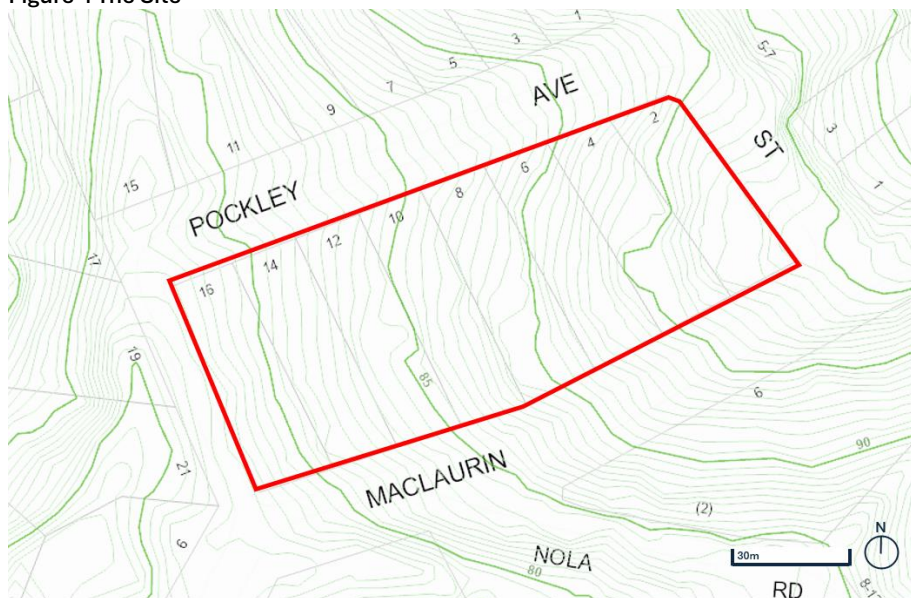


Figure 5 Site topography and site orientation (Ku-ring-gai Online Map Viewer and Planning & Co)

2.2.2 Restrictions and Covenants

The survey plan and title certificates confirm that there are no easements or restrictions that burden the site.

2.2.3 Existing Development on Site

The existing developments on the site are described in the **Table 3** below.

Table 3 Existing development on the site

Address	Description	Image
2 Pockley Avenue, Roseville	This property consists of a single detached 4-bedroom residential dwelling and garden.	
Figure 6 2 Pockley Avenue, Roseville (Google Maps)		
4 Pockley Avenue, Roseville	This property consists of a single detached 3-bedroom residential dwelling and garden.	
Figure 7 4 Pockley Avenue, Roseville (RealEstate.com)		
6 Pockley Avenue, Roseville	This property consists of a single detached 3-bedroom residential dwelling and garden.	
Figure 8 6 Pockley Avenue (Google Maps)		
8 Pockley Avenue, Roseville	This property consists of a single detached 3-bedroom residential dwelling and garden.	
Figure 9 8 Pockley Avenue, Roseville (Google Maps)		

10 Pockley Avenue,
Roseville

This property consists of a single detached 3-bedroom residential dwelling and garden.



Figure 10 10 Pockley Avenue, Roseville (Google Maps)

12 Pockley Avenue,
Roseville

This property consists of a single detached 4-bedroom residential dwelling and garden.



Figure 11 12 Pockley Avenue, Roseville
(RealEstate.com)

14 Pockley Avenue,
Roseville

This property consists of a single detached 4-bedroom residential dwelling and garden.



Figure 12 14 Pockley Avenue, Roseville (Google Maps)

16 Pockley Avenue,
Roseville

This property consists of a single detached 3-bedroom residential dwelling and garden.



Figure 13 16 Pockley Avenue, Roseville (Google Maps)

2.2.4 Natural Environmental Risks or Hazards

The site has no natural environmental constraints including bushfire or flood risk nor does it contain any significant biodiversity values. A BDAR Waiver has been prepared and is attached in **Appendix F**.

2.2.5 Aboriginal Cultural Heritage

Artefact have prepared an Archaeological Assessment, attached as **Appendix GG** and ACHAR, attached as **Appendix G**.

The ACHAR states that the site has been subject to significant levels of disturbance through residential development and associated services. The archaeological assessment and ACHAR found that the site is unlikely to contain any Aboriginal objects and therefore the proposal will not result in impacts to Aboriginal objects.

No cultural values specific to the study area have been identified, however significance of the surrounding landscape for Aboriginal people is acknowledged.

2.2.6 Environmental Heritage

The site does not accommodate any heritage items nor is located within a heritage conservation area identified in the Heritage Map and listed in Schedule 5 of the KLEP. There are also no heritage items in the immediate vicinity of the site which would be impacted by the proposal.

2.2.7 Transport and Access

The site is in a highly accessible location as described below.

Train

The site is a 390m walk to Roseville rail station. Roseville rail station is serviced by the T1 North Shore & Western Line and the T9 Northern Line which connect the site to Hornsby, Chatswood, North Sydney, Sydney CBD, Parramatta, Westmead, Rhodes and Penrith. Trains stop every 5-10 minutes in peak commuter periods. Roseville is one station away from the Chatswood M1 metro station which provides high frequency services to Macquarie Park, Macquarie University and north-western Sydney in addition to North Sydney, Barangaroo and the Sydney CBD.

Bus

The closest bus stop is located on the Pacific Highway which is a short 210m walk (3 minutes) which regularly services the following routes:

- 565 – Chatswood to Macquarie University
- 98T1 – Wynyard, Chatswood, then all stations to Hornsby (Night service)
- N90 – Hornsby to City Town Hall via Chatswood (Night service)

Cycle

The site is close to existing identified cycle routes that provide access throughout the North Shore including connections to Chatswood CBD, Artarmon local centre, Artarmon industrial area, St Leonards, and regional destinations such as Naremburn, Lane Cove, North Sydney and Macquarie Park.

Pedestrian

The main pedestrian route to the site from Roseville Station and the Pacific Highway is via MacLaurin Parade on pedestrian footpaths along the road network.

Road Network

The local road network connects to the Pacific Highway, which connects to the regional road network.

2.2.8 Surrounding Development

Development surrounding the site is predominantly residential. The Roseville town centre is northeast of the site along the Pacific Highway. The surrounding area has a diverse mix of residential typologies ranging from low density on larger lots to medium and high-density residential development as illustrated in **Figure 14**. Development in the area is continuing to transition from lower density to medium-high density residential.



Figure 14 Existing nearby mid-rise residential buildings (Woods Bagot)

North

Several 4-5 storey residential flat buildings are located on the north side of Larkin Street. Low density detached residential dwellings are located immediately north of the site along Pockley Avenue and Larkin Street. It is noted that 2 & 4 Larkin Street and 1, 3 & 5 Pockley Avenue are currently subject to an SSDA for one part 9- part 10- residential flat building (SSD-77829461) also by Aqualand Prestige.



Figure 15 6 and 10 Larkin Street, Roseville (Google maps)



Figure 16 2 Larkin Street, Roseville (Google maps)

South

South of the site at 4A-10 Maclaurin Parade is currently under construction to be developed into a 5-storey residential flat building comprising 37 dwellings (DA038/21). Several 4-5 storey residential flat buildings are located further south along Nola Road and Kings Avenue.



Figure 17 Sites to the south at 4A-10 Maclaurin Parade, Roseville under construction (Google maps)

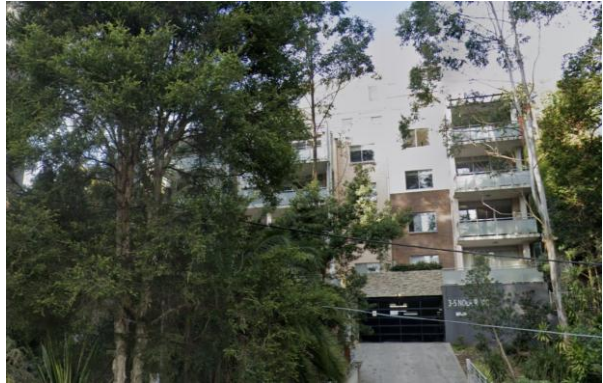


Figure 18 Sites further south at 3-5 Nola Road, Roseville (Google maps)

East

A mix of medium to low density dwellings are located east of the site. The Roseville local centre and Roseville Station are located further east of the site, along and across the Pacific Highway.



Figure 19 Local shops at Roseville local centre along Pacific Highway (Google maps))



Figure 20 5-7 Larkin Street (RealEstate.com)

West

Low density detached residential dwellings are located west of the site.



Figure 21 19 Pockley Avenue, Roseville (Google Maps)



Figure 22 6 Kings Avenue, Roseville at the intersection between Pockley Avenue, Kings Avenue, and Maclaurin Parade (Google maps)

2.2.9 Future Character

In addition to the existing mid to high density residential character in the area, as noted above, the site, along with the wider area, are included within the Roseville TOD area (**Figure 23**) which comprise of lots identified within a 400m walking catchment of Roseville Station as part of the TOD program led by State Government which aims to increase housing density around rail and metro station.

More details regarding the TOD program are discussed in **Section 3.2.2**.

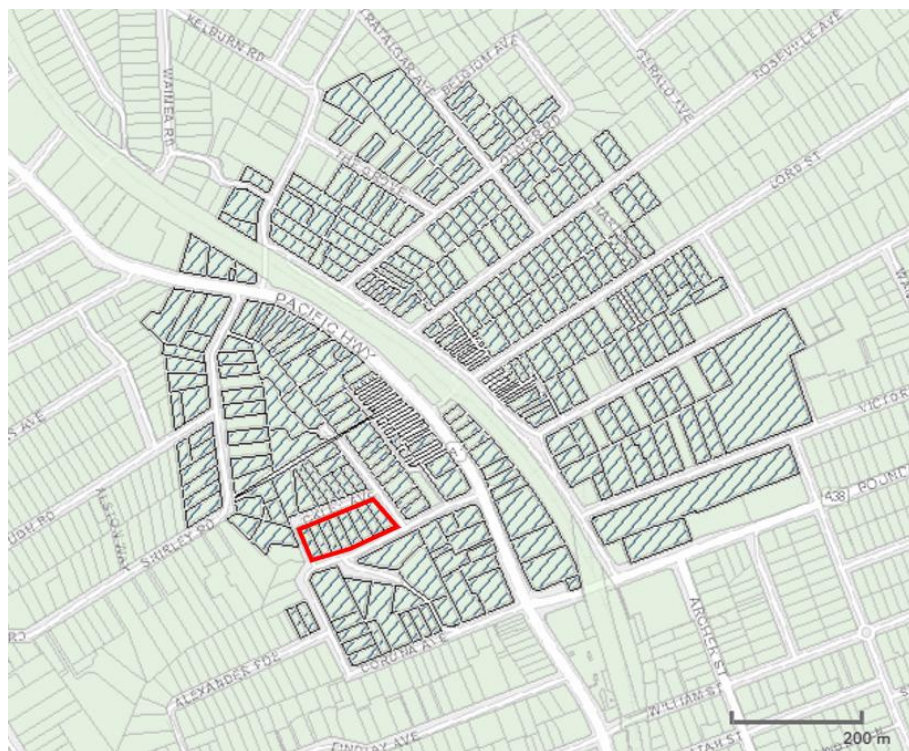


Figure 23 Roseville TOD area (NSW Planning Portal Digital EPI Viewer)

Future TOD Developments

As March 2025, the following sites are also undergoing an SSDA process within the Roseville TOD catchment.

Table 4 Current SSDAs in proximity to the site

SSD Number and status	Address	Approx. Distance from Site	Description and Key Metrics
SSD-77829461 Prepare EIS	2 & 4 Larkin Street and 1,3 & 5 Pockley Avenue, Roseville	20m	Demolition of existing buildings and construction of a residential apartment development, including affordable housing apartments, above basement car parking.
SSD-78996460 Prepare EIS	16-24 Lord Street, Roseville; 21-27 Roseville Avenue, Roseville	430m	Residential flat building development with in-fill affordable housing.

There have been no other notable residential development applications lodged with Ku-ring-gai Council in the vicinity of the site since the introduction of the TOD Program.

Low and Mid-Rise Housing Policy

Nearby residential areas within Roseville that sit outside the TOD precinct have been identified on the State Government's new mapping for land subject to the low and mid-rise housing provisions under Chapter 6 of the Housing SEPP. The new provisions facilitate attached dwellings and terraces up to a maximum height of 9.5m (i.e. 3 storeys).

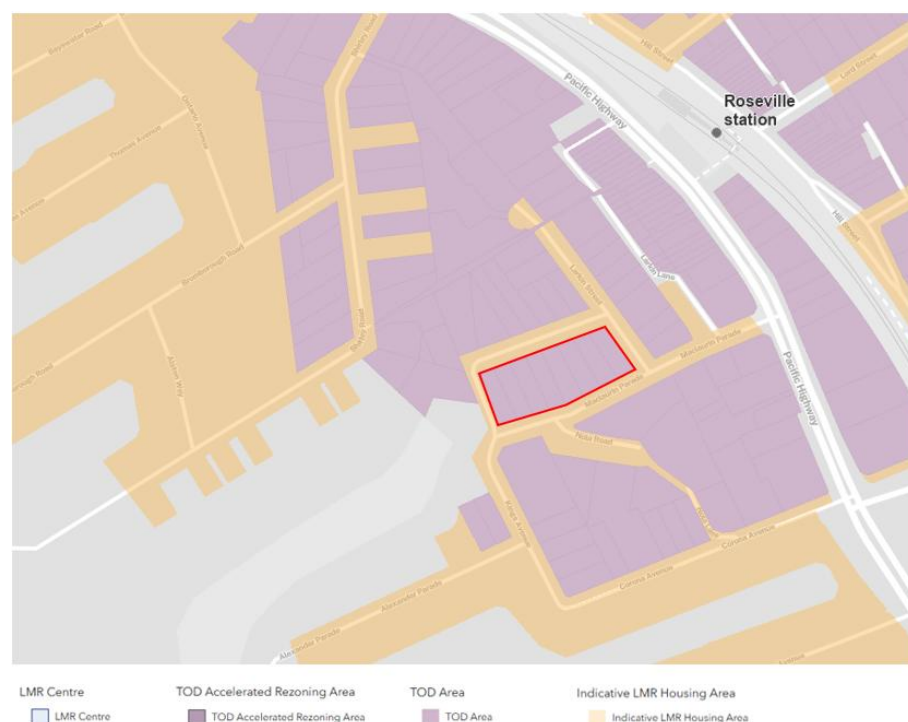


Figure 24 Excerpt of Low and Mid-Rise Housing Policy Indicative Map (NSW Government)

3.0 Strategic Context

This section identifies the key strategic issues relevant to the assessment of the Project and provides a justification in consideration of its context. This section also provides an analysis of alternatives that were considered as part of the design development.

3.1 Federal Strategic Planning Context

3.1.1 The National Housing Accord 2022

In October 2022, the National Housing Accord (Housing Accord) was announced by the Federal Government, which would aim to deliver 1.2 million new well-located homes, including 377,000 in New South Wales, to be built over 5 years from July 2024. Ku-ring-gai Council's housing target, aligned to the Accord, is to provide 7,600 new completed homes by 2029. The proposal will provide 178 new dwellings including 39 affordable dwellings, within a walking distance of public transport, employment, local businesses and open space.

3.2 State Strategic Planning Context

3.2.1 NSW Housing Strategy: Housing 2021

The *NSW Housing Strategy: Housing 2021* was released in March 2021. This strategy sets out a 20-year strategy for better housing outcomes for NSW including more high-density housing and affordable housing in order to expand housing choice. The key objectives of this proposal are to deliver exactly those, more housing in more density and the inclusion of 15.4% of total GFA as affordable housing.

3.2.2 Transport Oriented Development Program

The TOD Program is part of the planning reforms led by State Government to address the housing crisis. The TOD amendment to the Housing SEPP has been in force from 13 May 2024. The TOD program aims to allow for "development of new well-located and well-designed mid-rise housing and affordable housing within 400m of public transport" (Department of Planning) to address the housing crisis.

Chapter 5 of the Housing SEPP identifies TOD precincts around train stations in 12 local government areas. The stations were determined based on a multi-criteria assessment that was conducted by DPHI considering strategic alignment, planning status, land fragmentation, government owned land and planning for balanced growth, as well as a planning and infrastructure review.

Under the TOD provisions, the site is subject to a maximum building height of 22m and an FSR of 2.5:1. The TOD provisions have established inclusionary zoning for TOD areas that requires the delivery of a 2% affordable housing contribution for all new developments that is to be managed by a registered CHP in perpetuity.

The proposal accommodates 178 new dwellings including 39 new affordable housing dwellings within the Roseville TOD precinct that is well serviced and approximately 400m walking distance from Roseville Station. The proposal demonstrates its alignment with the aims of the TOD policy as stated in Section 150 of the Housing SEPP. This is addressed in **Section 5.1** of the EIS.

3.2.3 Greater Sydney Region Plan: A Metropolis of Three Cities

The *Greater Sydney Region Plan – A Metropolis of Three Cities* (Region Plan) sets out overarching strategic plan for the Greater Sydney Region. The 40-year vision is supported by four key directions of Infrastructure & Collaboration, Liveability, Productivity and Sustainability that collectively form a strategic framework which guides local strategic planning by councils. The Plan sets out objectives that will guide Sydney's growth. The following outlines how the proposed development aligns with the directions of the Region Plan:

Table 5 Assessment against the Region Plan

Direction	Alignment to the Direction
Infrastructure and Collaboration	
A city supported by infrastructure	The proposed development is walking distance from Roseville station, which is one rail stop from Chatswood rail and metro station and Chatswood bus interchange which provides broader access to a network of key destinations including Sydney CBD, North Sydney, Macquarie, the Hills area, and Northern Beaches.
A collaborative city	The proposal will see an increase in population on the site in a strategic location to key services and leverage off existing transport and social infrastructure and services in the area. Community engagement has been conducted to ensure a collaboration with key stakeholders to respond to the needs of the community.
Liveability	
A city for people	Through the delivery of housing and in-fill affordable housing the proposed development is addressing the changing needs of the community. The delivery of housing density towards the station through the TOD program will facilitate a healthy, resilient and socially connected community by capitalising on potential capacity for housing growth as identified by DPHI. Further long term benefits will include social cohesion, and a community feel for all residents.
Housing the city	One of the key planning priorities of this direction is to provide housing supply, choice and affordability with access to jobs, services and public transport. To facilitate greater housing supply, the Plan sets housing targets for each District. The Eastern City District, which includes Ku-ring-gai, is required to deliver an additional 157,700 dwellings between 2016 – 2036. However, as previously stated, this target has now been replaced to align to the Housing Accord’s housing targets. Ku-ring-gai Council’s housing target, aligned to the Accord, is to provide 7,600 new completed homes by 2029. The proposal will provide 178 new dwellings, within a walking distance of public transport, employment, local businesses and open space.
A city of great places	The design of the proposed development is site specific with consideration of site specific constraints as detailed in the Design Report (Appendix D), including the interface of the development with the public domain.
Productivity	
A well-connected city	The proposed development delivers 178 new dwelling including 39 affordable dwellings within a TOD area, within a 400m walking distance of the Roseville Train Station. The surrounding active transport connections are suitable for commuters.
Jobs and skills for the city	The proposed development will provide housing and in-fill affordable housing close to public transport with high frequency connections to jobs and strategic employment centres.
Sustainability	
A city in its landscape	The Ku-ring-gai LGA has a well-established landscape character and the existing surrounding area has a high level of tree canopy. The proposed development including the interface with the public domain have been designed cognisant of the existing landscape context. The Architectural Plan (Appendix B) and Landscape Plan (Appendix H) have incorporated nature and landscaping into design decisions for courtyard apartments, communal open spaces and common circulation areas.
An efficient city	The proposal integrates ESD principles (Refer to ESD Report at Appendix I). This includes numerous initiatives to ensure energy efficiency, water efficiency, thermal comfort and minimising overall environmental impact.
A resilient city	The proposed development is not subject to natural hazards such as periodic flooding or bush fire risk.

3.2.4 North District Plan 2018

Drawing on the Region Plan, the *North District Plan* (District Plan) sets the 20 year strategic directions for City of Ryde, Hornsby, Hunters Hill, Ku-ring-gai, Lane Cove, Mosman, North Sydney, Northern Beaches, and Willoughby LGAs. The District Plan aims to help the councils of these LGAs to plan for and support growth and changes in these areas. To ensure an integrated approach between the Region Plan and the District Plan, relevant Objectives, Strategies and Actions have been embedded in each of the Planning Priorities of this plan.

The proposed development will support the overarching directions for the reasons given:

- **Infrastructure and Collaboration:** This proposed development supports the aims of TOD program by actioning the development of greater density housing within walking distance of the station to encourage the use of existing transport infrastructure.
- **Liveability:** The proposed development will deliver 178 new dwellings including 39 affordable dwellings in an established residential area. The proposed development has been designed to maximise residential amenity and incorporated creation of spaces for incidental social interactions and community cohesion.
- **Productivity:** The additional supply of residential dwellings will support the continued growth of the Ku-ring-gai LGA enabling workers, students and families to live in proximity to work or school. Further, the provision of more affordable housing in a traditionally unaffordable Ku-ring-gai will support an identified need for more supply particularly for essential workers in the area.
- **Sustainability:** Landscaping and ESD principles have been incorporated into building design to enhance amenity and character of the development. The development provides a total of 1,943.8sqm of landscaped area with particular consideration for an appropriate and site-specific response to development's interface with the public domain.

This proposal specifically aligns with Priority E5 to increase housing supply, choice and affordability with access to jobs, services and public transport by providing much needed density towards the station in the form of both market housing in a variety of sizes as well as affordable housing.

3.3 Local Strategic Context

3.3.1 Ku-ring-gai Local Strategic Planning Statement

The *Ku-ring-gai Local Strategic Planning Statement* (KLSPS), published March 2020, outlines the 20-year vision, planning priorities and actions for land use for the Ku-ring-gai LGA. Within the LSPS, Roseville has been identified as a Local Centre along the North Shore Rail Line, which is identified as a 'City Shaping Transport Corridor'. The site is within a 'Investigation Area for Future Housing (2026-2036)' identified in Ku-ring-gai's Housing Supply plan.

The LSPS identified several planning priorities which align with the proposal:

- **Planning Priority K3:** Providing housing close to transport, services and facilities to meet the existing and future requirements of a growing and changing community.
- **Planning Priority K4:** Providing a range of diverse housing to accommodate the changing structure of families and households and enable ageing in place.
- **Planning priority K5:** Providing affordable housing that retains and strengthens the local residential and business community.
- **Planning Priority K12:** Managing change and growth in a way that conserves and enhances Ku-ring-gai's unique visual and landscape character.

The proposal reinforces the plan through the provisions of additional and diverse housing, supporting housing affordability and developing in accessible areas and thriving centres.

3.3.2 Ku-ring-gai Housing Strategy

The *Ku-ring-gai Local Housing Strategy* (KLHS) was approved by then, the NSW Department of Planning, Industry & Environment (DPIE) on 5 July 2021. The KLHS sets out the strategic direction for housing in the Ku-ring-gai LGA over the next 20 years. It supports the delivery of the 0–5-year dwelling target of 4,000 dwellings and a 6–10-year housing target between 3,000 and 3,600 dwellings. However, as mentioned above, the NSW Government set updated housing targets of 7,600 new completed homes by 2029 for Ku-ring-gai Council to help achieve the target set by the Housing Accord.

Regardless, the proposal aligns to delivering on the following planning priorities:

- **Planning Priority C4:** Fostering healthy, creative, culturally rich and socially connected communities.
- **Planning Priority C5:** Providing housing supply, choice and affordability

The proposal provides housing supply, choice and affordability and is designed for positive liveability outcomes.

3.3.3 Ku-ring-gai Draft Affordable Housing Policy

Ku-ring-gai Council exhibited their first Draft Affordable Housing Policy from 3 February 2025 to 3 March 2025. The policy sets out objectives and outlines a plan for the delivery and management of affordable housing in the LGA.

Without an existing affordable housing policy in place, this draft policy addresses the need for one to address the following key facts regarding Ku-ring-gai as stated on their website:

- 71.6% of Ku-ring-gai's essential workers are living outside the Ku-ring-gai council area, and therefore more likely to be subject to long commutes and workplace burnout.
- 23% of Ku-ring-gai's renters are in housing stress.

The proposal directly supports and is aligned to the Draft Affordable Housing Policy by way of providing 39 affordable housing dwellings with equitable residential amenity outcomes.

3.3.4 Ku-ring-gai Preferred Scenario

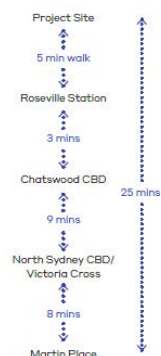
The Ku-ring-gai Council are currently exhibiting their 'Preferred Scenario' for development in the Ku-ring-gai TOD precincts. The Preferred Scenario is not a legal consideration under Section 4.15(1)(a)(ii) of the EP&A Act.

3.3.5 NSW Future Transport Strategy

The *Future Transport Strategy* sets out a 40-year vision, directions and outcomes which will guide transport investment and the movement of people in NSW. There is a new focus on the Six Cities Region to revitalise and connect neighbourhoods and key economics centres.

The proposal is consistent with the strategy as it supports the use of existing transport infrastructure by locating increased residential dwellings including affordable housing in a highly accessible location with good access to transport, jobs and services. The site is well placed in proximity via rail to the key job centres of Chatswood, North Sydney and the Sydney CBD.

Travel Times



Distance to National Parks

Blue Gum Reserve	2 min walk
Lane Cove NP	6 min drive
Garigal NP	18 min drive
Ku-Ring-Gal NP	26 min drive
Berowra Valley NP	40 min drive



Figure 25: Roseville proximity to Centres by rail

3.3.6 Better Placed

Better Placed was released by the GANSW in August 2017 as a design policy to establish priorities and objectives addressing key challenges and provides directions for good design outcomes in the built environment. The below table outlines how the proposed development is consistent with the objectives of the *Better Placed* policy.

Table 6 Assessment against Better Placed objectives

Objective	Design Response
Better Fit	The proposed development responds to the emergent and transitioning higher density residential character in Roseville. An evolving future character is taking place as part of the TOD program. Further, by the introduction of the low and mid-rise housing provisions 400-800m from Roseville Station, the densification of the precinct will further occur over time. The proposed design of the development remains sensitive to the existing low density dwelling houses, in particular, heritage items which are located near or adjoining the site.
Better Performance	The proposed development implements ESD principles (Appendix I) and meets ESD targets including BASIX (refer to Appendix T) to ensure responsiveness to environmental sustainability.
Better Community	The provision of 15.4% of GFA for affordable housing contributes the addressing an existing affordability issue in housing, particularly for key workers who would benefit from proximity to work and/or public transport. Design of the proposed development has endeavoured for equitable residential amenity outcomes to minimise disparities between affordable and market housing and foster community and social cohesion within the development.
Better for People	Residential safety and comfort are achieved through ADG compliance. Where non-compliances may exist, alternatives have been considered and justified which are further discussed in Section 7.3. Dedicated communal open spaces within the proposed development are designed for usability and convenience to improve the comfortability of residential living.
Better for Working	The proposed development involves a better utilisation of an accessible site close to public transport and existing services and shops.

	The provision of both market and affordable housing on the site support the State Government's efforts to alleviate housing affordability and increase housing supply in well located areas. Design development has considered and facilitates increased work-from-home arrangements and functionality of communal spaces to be able to adapt to a range of purposes.
Better Value	The provision of additional housing supply including affordable housing in an accessible location in proximity to Roseville Station will deliver significant return on infrastructure investment and policy investment by State Government to address the housing crisis. The proposed development provides diverse housing types for both market and affordable housing, that align to the changing needs of the community in Ku-ring-gai.
Better Look and Feel	The design of the built form and landscaping for the proposed development has taken careful consideration of the existing surrounding context and the strong affiliation of the Ku-ring-gai area with the existing landscape character. The selection of the materials and finishes have been chosen to provide a quality and aesthetic design that will integrate with the surrounding context. Influences from Traditional Owners has allowed for a proposed development which Connects with Country which weaves in cultural elements to produce an outcome that genuinely interacts with aboriginal cultural heritage of the Traditional Custodians of the land (Appendix L). The final design was presented to the elders who were engaged in the Walk on Country and design input session and has been endorsed.

3.4 Cumulative Impacts

The site is located in an evolving Roseville area which is anticipated for increased density as identified in **Section 2.2.9**. This is mainly catalysed by the TOD provisions for the Roseville TOD catchment which is defined as a 400m walking distance from the rail station. Further, 400-800m from Roseville rail station is identified as a 'low and mid-rise housing outer area' where the low and mid-rise housing provisions under the Housing SEPP apply. Due to the recency of these provisions being introduced in 2024 and 2025 respectively, it is understandable that there are not yet any developments that have been approved in the area under these provisions. However, future development in these area catchments is a sensible consideration for cumulative impacts.

3.5 Planning Agreements

This Proposal is not subject to any planning agreements.

3.6 Consistency with SEARs Request and Project Justification

The proposed development is consistent with the development described in the Scoping Report submitted for the SEARs request which was "residential flat buildings within the transport oriented development (TOD) catchment utilising the provision of in-fill affordable housing".

As detailed at **Section 7.0** of this EIS, the proposal is justified in the context of biophysical, social, and economic environments, as well as the proposal's alignment with the objectives of the EP&A Act and other statutory instruments applicable to the site.

3.7 Alternatives Considered

Alternative options for the development have been considered by Aqualand Prestige over the course of planning. This includes a Do Nothing alternative, Residential flat building without In-fill Affordable Housing Provision, and Alternative Massing Options. The chosen option is affirmed by the project objectives as stated in **Section 1.2.1**.

3.7.1 Do Nothing' alternative

Under the 'Do Nothing' option, the site would remain as eight (8) single detached residential dwellings within walking distance of Roseville station. This would be considered as a gross underutilisation of land, failing to realise the potential for redevelopment within the TOD catchment.

The “do nothing approach” would therefore be inconsistent with the future uplift envisioned and planned for by State government and their position to prioritise providing increased supply of housing and affordable housing in proximity to public transport and well-served areas.

3.7.2 Residential Flat building under TOD provisions and without In-fill Affordable Housing Provisions

An alternative option is to provide a residential flat building development without the Housing SEPP infill affordable housing provisions whereby the development would not allocate 13.4% of GFA to affordable housing (on top of the mandatory 2% TOD provisions) and would not apply the additional 26.8% height of building and FSR provisions.

This outcome would not be fully realising the potential capacity of the site and its location close to public transport and services. The provision of additional affordable housing in this proposal is a positive social outcome and ensures consistency with the state government’s overarching objective to deliver more homes in accessible locations.

3.7.3 The Proposed Development

The proposed development is utilising both the TOD provisions and in-fill affordable housing provisions under the Housing SEPP. This option facilitates the most state and local strategic planning priorities, particularly through the provision of more housing supply and affordable housing units.

At the early design phase, Woods Bagot and the project team tested and considered a myriad of alternative massing concepts, as shown in **Figure 26**. The proposed built form represents a development response that has site-specific and strategic merit, has been verified through an SDRP process and has been subject to consultation with state and local government agencies. Refer to **Section 8.0**, for the Justification of the proposal.

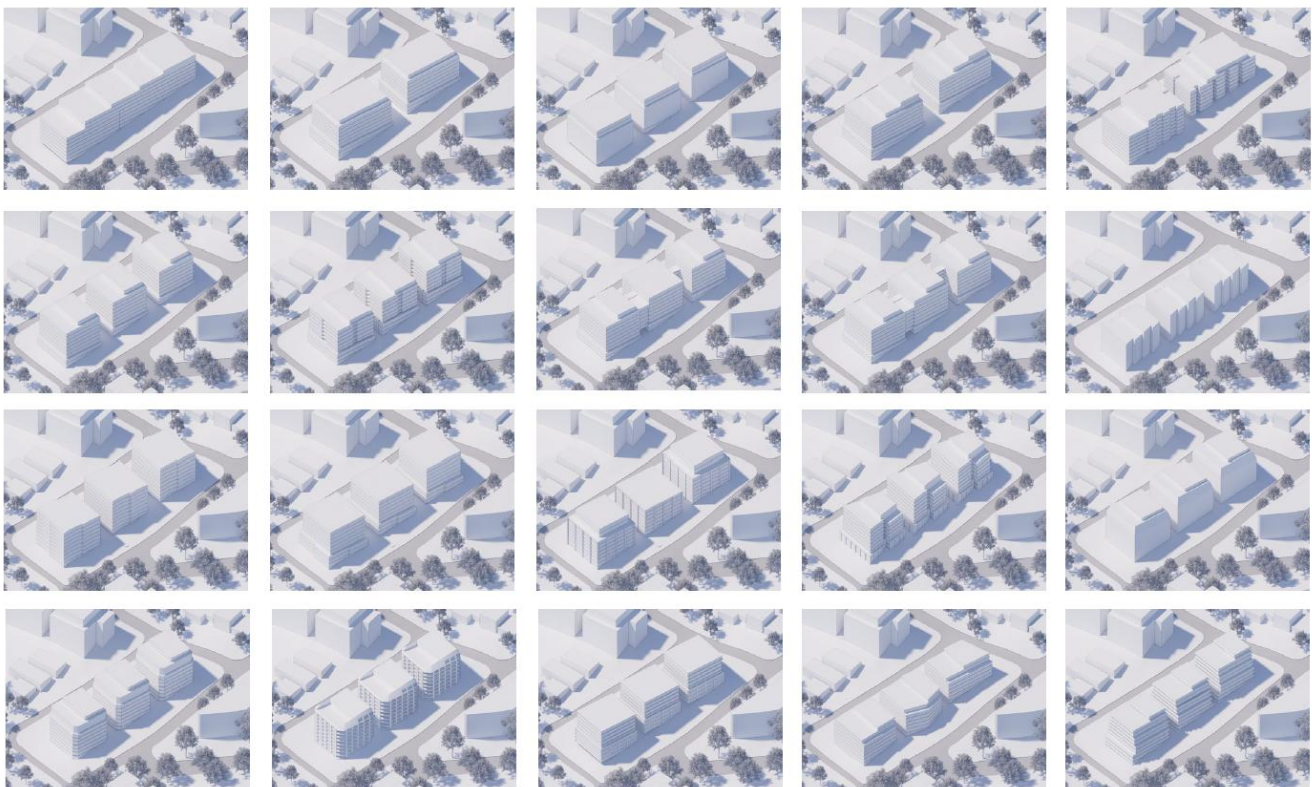


Figure 26 Massing options- selected studies (Woods Bagot)

4.0 Project Description

4.1 Project Overview

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

- Site preparation including demolition, excavation and tree removal of the site;
- Construction of a residential flat building development containing 3 building pavilions of up to 9 storeys including:
 - Part 3-, part 4- and part 5-level combined basement parking with the provision of 285 car parking spaces,
 - 178 dwellings including 39 affordable housing dwellings above carpark;
 - Ground level and on-building landscaping works including communal open spaces in Pavilion A.
- Augmentation of, and connection to, existing utilities as required.

Further key project metrics are provided in Table 7.

The proposed development is described in further detail in the following subsections and the Architectural Plans prepared by Woods Bagot (**Appendix B**) and the Landscape Plans prepared by Ground Ink (**Appendix H**).

Figure 27 provides a render of the proposed development.



Figure 27 The proposed development from north west along Pockley Avenue

Table 7 Key project metrics

Project Aspect	Project Specifications	
Project Site Area	6,539 sqm	
Proposed Development Type	Residential flat building	
Gross Floor Area (GFA)	20,702 sqm	
Maximum Building Height	32.31m	
Floor Space Ratio (FSR)	3.17:1	
Dwellings	Market Dwellings	139
	Affordable Dwellings	39
	Total	178
Dwelling Mix	1 Bedroom (Market)	0
	2 Bedroom (Market)	54
	3 Bedroom (Market)	82
	4 Bedroom (Market)	3
	1 Bedroom (Affordable)	20
	2 Bedroom (Affordable)	19
Car Parking Spaces	Residential Car Spaces	252
	Visitor Car Spaces	31
	Car Share	2
	Motorcycle Spaces	11
	Resident Bicycle Capacity	210
	Visitor Bicycle Spaces	18
Communal Open Space	1,638 sqm	
Deep Soil Area	770 sqm	
EDC	\$172,112,767 (excl. GST)	

4.2 Gross Floor Area

A detailed breakdown of the GFA per level is provided in the Design Report prepared by Woods Bagot, attached at **Appendix D**.

The total GFA allocated to affordable housing equates to 3,188 sqm. Affordable housing GFA consists of 414 sqm in perpetuity and 2,774 sqm for at least 15 years. In total, which equates to 13.4% of the total GFA (20,702 sqm).

4.3 Bonus Floor Space Ratio and Height of Building

4.3.1 Floor Space Ratio

Under section 155 of the Housing SEPP, the permissible maximum floor space ratio for a “residential flat building” in a TOD area is 2.5:1.

The proposed development provides 13.4% of affordable housing, in addition to the mandatory 2% provision under section 156 of the Housing SEPP. Therefore, the site is eligible for an additional FSR bonus of 26.8% as per section 16 of the Housing SEPP. This additional FSR bonus equates to a total maximum permissible FSR control of 3.17:1. The proposed development proposes an FSR of 3.17:1.

4.3.2 Height of Building

Under section 155 of the Housing SEPP, the permissible maximum building height for a “residential flat building” in a TOD area is 22m.

Under section 16(3) of the Housing SEPP, the site is also eligible for an additional height bonus of 26.8%, which is the same percentage as the additional floor space ratio permitted under subsection (1) section 16. This additional height uplift equates to a total maximum permissible height of building control of 27.9m.

The proposed maximum height of building on the site is the 32.31m. The exceedance consists of Western part of top habitable floors of each pavilion, lift overruns, condensers/ mechanical plant, stairwell access to roof maintenance and architectural roof features. The building exceeds the maximum permissible height plane of 27.9m by 4.31m (15.45%). A Clause 4.6 Variation has been prepared by Planning & Co and attached as **Appendix M**.

4.4 Affordable Housing

The proposed development delivers 39 affordable housing dwellings. Bridge Housing are the agreed registered CHP who will manage the affordable housing dwellings, 6 in perpetuity (to fulfill the requirements of Section 156, Chapter 5 of the Housing SEPP and 33 for at least 15 years to fulfil the requirements of Section 21, Division 1, Part 2, Chapter 2 of the Housing SEPP. Refer to **Appendix C** for the CHP Supporting Letter by Bridge Housing.

The affordable housing dwellings are provided from Level Basement 04 to Level 9 across the three pavilions.

4.5 Site Preparation Works

Site preparation and enabling work proposed for the site prior to the construction of the proposed built form include the following:

- Site establishment.
- Demolition of all existing buildings at 2-16 Pockley Avenue, Roseville.
- Removal of existing vegetation including removal of 22 trees (as identified in **Section 4.9** and the AIA attached as **Appendix J**).
- Installation of Tree Protection Zones (for trees identified to be retained in **Appendix J**).
- Disconnect from existing services.
- Site Excavation.

The proposed Demolition Plan is included in **Appendix B**, prepared by Woods Bagot. Also refer to the Preliminary Site Investigation, prepared by EI Australia and attached as **Appendix K** in relation to recommendations during the demolition and excavation stages. Note that all recommendations can be managed post demolition and through the development approval process, as conditions of consent.



Figure 28 Demolition plan (Woods Bagot)

4.6 Lot Amalgamation

This SSDA seeks consent for the lot amalgamation of the existing 8 allotments on the site as listed in **Table 2**.

4.7 Materials and Finishes

The materials schedule is included in the Architectural Plans, attached as **Appendix B**. The façade is proposed to comprise the following materials and finishes:

- Stone Look Cladding
- Vertically Ribbed Metal Cladding - Warm Charcoal colour
- Flat Metal Cladding - Warm Charcoal colour
- Vertically Expressed Metal Privacy Screen - warm charcoal colour
- Angled Flat Bar Balustrade
- Landscaped gabion walls

4.8 Connecting with Country

Aqualand Prestige engaged JMP Aboriginal Consultancy to facilitate and coordinate meaningful engagement and learning opportunities for the project team from Traditional Owners and Aboriginal stakeholders and broader community. A Walk on Country and design input session was held, leading to a collaborative and integrated outcomes of modern design and Indigenous Traditional input. Refer to the First Nations Co-Design Values Report prepared by JMP Consulting, attached as **Appendix L**. The final design was presented to the elders who were engaged in the Walk on Country and design input session and has been endorsed.

The landscape strategy for the project, as established in the Landscape Plan, attached as **Appendix H**, is informed by the following Connecting with Country principles:

- Expression of culture as public art,
- Geology,
- Aboriginal (Dharug) 6 seasons,
- Petroglyph communications & other artefacts,
- Walking paths (native gardens),
- Journey from creek to rocky outcrop,
- Sense: smell and touch,

- Tying into Blue Gum Creek.

The Landscape Plan illustrates design with country opportunities in **Figure 29**.



Figure 29 Design with Country opportunities (Ground Ink)

4.9 Landscaping

The proposed landscape strategy and plans respond to the site's natural topography. Key elements of the landscape strategy include:

- 1,943 sqm of landscaped area located around the perimeter of each pavilion and the site.
- 770 sqm of deep soil areas at various areas on the perimeter of the site.
- 1,638 sqm of communal open space (COS) located adjacent to deep soil zones on the site.
- Tree removal x 22 to accommodate the proposed building footprint (refer to **Section 7.7**).

The proposed landscape masterplan is provided in the landscape plans prepared by Ground Ink included as **Appendix H**.

4.10 Stormwater Management

The proposed stormwater management system is detailed in the Water Management Plan prepared by Stantec is attached as **Appendix O**.

The site is proposed to implement a stormwater detention basin, rainwater tank, and OceanGuard inlet filters, cartridge filters in order to minimise the development impact on the natural water cycle.

4.11 Waste Management

The waste collection room is located on the Basement 03 in proximity to the vehicular entry on Maclaurin Parade and accommodates the appropriate waste storage bins:

- General waste: 33 x 660L bins
- Paper / Cardboard recycling: 17 x 660L bins
- Comingled recycling: 17 x 660L bins

- FOGO: 9 x 240L bins
- Service bins: 3 x 660L bin

Waste management is further discussed in **Section 7.16**. Refer to the Operation Waste Management Plan prepared by Elephants Foot is attached as **Appendix FF**.

4.12 Construction, Operation and Staging

The proposed development is proposed to be constructed in two stages.

- **Stage 1:** Combined basement and above ground works for Pavilion A and Pavilion B. Pavilion C lift cores and structural risers will be constructed up to Ground Floor level at the threshold between the basement and Pavilion C. Pavilion C basement and structure will be weather proofed.
- **Stage 2:** Pavilion C above ground works.

4.13 Site Access

4.13.1 Vehicular Access and Parking

Vehicular access to the site is provided via Maclaurin Parade at the centre of the site (refer to **Figure 30**) to a part 3-, part 4- and part 5-level combined basement. The provision of parking spaces is illustrated in the Architectural Plans at **Appendix B** and detailed in the Transport and Accessibility Impact Assessment (TAIA) at **Appendix N**.

4.13.2 Pedestrian Access

Pedestrian access to the site is via both Pockley Avenue and Maclaurin Parade with north-south connections between pavilions. Residents and visitors can access the lifts from the basements and residential lobby accessible from Maclaurin Parade.



Figure 30 Ground plane interface: vehicle and pedestrian access to site (Woods Bagot)

4.14 Contributions and Public Benefit

This SSDA is subject to monetary contributions applicable under the local s7.11 Contribution Plan for Ku-ring-gai Council, *Ku-ring-gai Contributions Plan 2010*, and State Government's *Housing and Productivity Contribution*.

This SSDA is not subject to any planning agreements.

5.0 Statutory Context

Development consent is sought for this SSD pursuant of Part 4 of the EP&A Act. Section 5 highlights relevant statutory requirements for the proposal in **Table 8** and following subsections.

Refer to the Statutory Compliance Table attached at **Appendix R** which details all statutory requirements, as required by SEAR 1, and where they have been addressed in the EIS.

Table 8 Statutory Context

Category	Project Details
Power to grant approval	Declaration of State Significant Development Section 4.36(2) of the EP&A Act permits a State environmental planning policy to declare a development to be State significant development (SSD). The proposal is declared State Significant under Schedule 1, Section 26A In-fill affordable housing of the Planning Systems SEPP which states: 26A In-fill affordable housing (1) Development to which State Environmental Planning Policy (Housing) 2021, Chapter 2, Part 2, Division 1 applies if— (a) the part of the development that is residential development has an estimated development cost of— (i) for development on land in the Eastern Harbour City, Central River City or Western Parkland City in the Six Cities Region—more than \$75 million, or Note— The Act, Schedule 9 sets out the local government areas in each city in the Six Cities Region. (ii) for development on other land—more than \$30 million, and (b) the development does not involve development prohibited under an environmental planning instrument applying to the land. The proposal is a residential development with infill affordable housing on land in the Eastern Harbour City with an estimated development cost of more than \$75 million and does not involve development prohibited under an environmental planning instrument applying to the land. Therefore, the development is SSD pursuant to Clause 2.6(1) of the Planning Systems SEPP. Consent authority Section 4.5 of the EP&A Act and Section 2.7 of the State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP) states that the consent authority is the Minister for Planning and Public Spaces (or delegated to DPHI) unless the development is subject to any matters identified under Section 2.7(1) of the Planning Systems SEPP whereby the Independent Planning Commission will be the consent authority.
Permissibility	The proposed land use for the site is residential flat building as defined in the <i>Ku ring gai Local Environmental Plan 2015</i> (KLEP). The land is zoned R2 Low Density Residential in the KLEP (Figure 31), where residential flat buildings are prohibited. However, under Chapter 5 of the Housing SEPP, a residential flat building is permitted with consent on land in a TOD Area when the land is in a relevant residential zone. Relevant zones include land zoned R2 Low Density Residential. In accordance with the provisions of Chapter 2, Part 2, Division 1, section 16 of the Housing SEPP, the proposed development for in-fill affordable housing is permissible a the residential flat building is permissible with consent as noted above, at least 10% of the GFA will be used for the purposes of affordable housing, not including affordable housing required to be delivered under Chapter 5 of the Housing SEPP. The site is located within an accessible area as it is 400m walking distance of Roseville Railway Station. Therefore, the proposed development is permissible with consent.

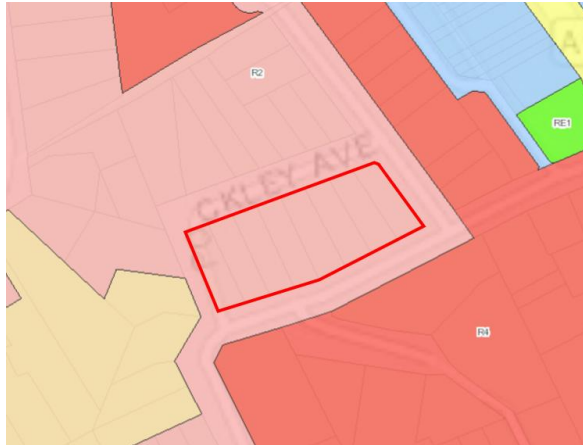


Figure 31 Land Use Zoning Map (KLEP edited by Planning & Co)

Other approvals	Approvals etc legislation that does not apply Under Section 4.41 of the EP&A Act, the following authorisations are not required for an SSD that is authorised by a development consent granted after the commencement of the Division including the following legislative approvals: • a permit under section 201, 205 or 219 of the Fisheries Management Act 1994, • an approval under Part 4, or an excavation permit under section 139, of the Heritage Act 1977, • an Aboriginal heritage impact permit under section 90 of the National Parks and Wildlife Act 1974, • a bush fire safety authority under section 100B of the Rural Fires Act 1997, • a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the Water Management Act 2000. Approvals etc legislation that must be applied consistently Under section 4.42 of the EP&A Act, the following authorisation cannot be refused if it is necessary for carrying out an SSD that is authorised by a development consent under this Division and is to be substantially consistent with the consent: • an aquaculture permit under section 144 of the Fisheries Management Act 1994, • an approval under the Coal Mine Subsidence Compensation Act 2017, section 22, • a mining lease under the Mining Act 1992, • a production lease under the Petroleum (Onshore) Act 1991, • an environment protection licence under Chapter 3 of the Protection of the Environment Operations Act 1997 (for any of the purposes referred to in section 43 of that Act), • a consent under section 138 of the Roads Act 1993, • a licence under the Pipelines Act 1967. This SSD requires consent under section 138 of the Roads Act 1993. Approval is required for vehicle connection and access to a Council owned road.									
Pre-conditions to exercising the power to grant approval	<table><tr><th>Legislation</th><th>Matters</th></tr><tr><td>Biodiversity Conservation Act 2016</td><td>Under this Act, as an SSDA for development consent under Part 4 of the EP&A Act, the SSDA is accompanied by a BDAR Waiver attached as Appendix F. Findings of the BDAR Waiver Report are detailed in Section 7.10.</td></tr><tr><td>State Environmental Planning Policy (Housing) 2021</td><td>Provisions under Chapter 2, 4 and 5 of the Housing SEPP apply to this proposal. An assessment against the relevant provisions is provided in Section 5.1. Additionally, a Design Verification Statement prepared by Woods Bagot is provided at Appendix S which provides an assessment against the relevant provisions of the ADG. Any non-compliances are assessed and justified in Section 7.3.</td></tr><tr><td>State Environmental Planning Policy (Resilience and Hazards) 2021</td><td>Section 4.6 provides a State-wide approach to the remediation of contaminated land. It requires a consent authority to assess the potential for land to be contaminated and the works required to remediate the land to ensure it is suitable for its intended use.</td></tr></table>	Legislation	Matters	Biodiversity Conservation Act 2016	Under this Act, as an SSDA for development consent under Part 4 of the EP&A Act, the SSDA is accompanied by a BDAR Waiver attached as Appendix F . Findings of the BDAR Waiver Report are detailed in Section 7.10 .	State Environmental Planning Policy (Housing) 2021	Provisions under Chapter 2, 4 and 5 of the Housing SEPP apply to this proposal. An assessment against the relevant provisions is provided in Section 5.1 . Additionally, a Design Verification Statement prepared by Woods Bagot is provided at Appendix S which provides an assessment against the relevant provisions of the ADG. Any non-compliances are assessed and justified in Section 7.3 .	State Environmental Planning Policy (Resilience and Hazards) 2021	Section 4.6 provides a State-wide approach to the remediation of contaminated land. It requires a consent authority to assess the potential for land to be contaminated and the works required to remediate the land to ensure it is suitable for its intended use.	
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The following has been submitted with the EIS:

- Hazardous Materials Survey (**Appendix V**)
- Preliminary Site Investigation (**Appendix K**)

Mandatory matters for consideration	Legislation	Matters
	Environmental Planning & Assessment Act 1979 (EP&A Act)	The proposal is consistent with the objects of the EP&A Act for the following reasons: • The proposal promotes the social and economic welfare of the community by delivering 178 new homes including 39 affordable dwellings within a short walk of Roseville station; in a manner that mitigates any unreasonable impacts on the surrounding environment. The affordable housing includes 6 dwellings to remain as affordable housing in perpetuity and 33 dwellings that will remain as affordable housing for a minimum of 15 years. • Ecologically sustainable development initiatives are incorporated into both the architectural and operational aspects of the development. • The proposal promotes the orderly and economical use of the land by providing an additional 178 dwellings within a built form that is generally consistent with the State Government's planning policies. • The proposal will not have any impact on any threatened species of species of native animals and plants, ecological communities and their habitats (refer to the BDAR Waiver Report at Appendix F). • The proposal has undergone a meaningful Connecting with Country co-design process with Traditional Owners (refer to the First Nations Co-Design Values Report at Appendix L). • The site does not contain any non-aboriginal heritage items and is not located in a Heritage Conservation Area. The proposal does not directly impact any heritage items in the area. • The proposal promotes good design and amenity as outlined in Section 7.1 to Section 7.4 below. • The construction and maintenance of the proposed development will be in accordance with the management plans that accompany this SSDA. • The proposal has undergone an engagement process with the community. • The proposed development is SSD permitted under Chapter 5 of the Housing SEPP. It has been assessed against the relevant matters for consideration under Section 4.15(1) of the EP&A Act 1979.
	Environmental Planning & Assessment Regulations 2021	The EIS contains all information required under Division 2 of the EP&A Regulations. The Project underwent the required process for SSDs by application to the Planning Secretary for the environmental assessment requirement for the EIS. SEARs were received on 15 November 2024. The EIS contains all the required information in accordance with Division 5 of the EP&A Regulations and the <i>State significant development guidelines – preparing an environmental impact statement</i>, dated July 2022. This EIS is supported by an ESD Report prepared by Stantec and attached as Appendix I, which has addressed the principles of environmentally sustainable development through the precautionary principle (and other considerations), which assesses the threats of any serious or irreversible environmental damage.
	State Environmental Planning Policy (Sustainable Buildings) 2022	This EIS is supported by an ESD Report and a BASIX Certificate both prepared by Stantec and attached as Appendix I and Appendix T respectively.
	State Environmental Planning Policy (Biodiversity and Conservation) 2021	Chapter 2 of the Biodiversity and Conservation SEPP regarding Vegetation in non-rural areas applies to the proposed development as it is zoned R2 Low Density Residential in Ku-ring-gai LGA. The AIA Report prepared by Naturally Trees attached as Appendix J and the BDAR

Waiver attached as **Appendix F** demonstrate that the proposal satisfies the requirements under this Chapter.

Chapter 6 of the Biodiversity and Conservation SEPP regarding Water Catchments applies to the site, located within the Sydney Harbour Catchment. The proposed development is compliant with the relevant controls under Division 2 as the development:

- Will not have any adverse impacts to the quality and quantity of ground water or the water table
- Will not have an adverse impact on terrestrial, aquatic or migratory animals or vegetation,
- Will not impact on periodic flood that benefits wetlands and other riverine ecosystems
- This EIS is supported by a Flood Impact Risk Assessment attached as **Appendix U** and Water Management Plan attached as **Appendix O**, both prepared by Stantec.

State Environmental Planning Policy (Housing) 2021	A detailed assessment against the relevant provisions of the Housing SEPP is provided at Section 5.1 below.
Ku-ring-gai Local Environmental Plan 2015	A detailed assessment against the relevant provisions of the KLEP is provided in Section 5.2 .

5.1 State Environmental Planning Policy (Housing) 2021

The development is permissible and applies the provisions under Chapter 5 and also proposes in-fill affordable housing utilising the provisions under Chapter 2, Part 2, Division 1 of the Housing SEPP. A summary of compliance against the Housing SEPP provisions is in **Table 9** below.

Table 9 Housing SEPP assessment

Provision	Comment
Chapter 2, Part 2, Division 1 In-fill affordable housing	
Section 15C Development to which this division applies	
(1) This division applies to development that includes residential development if—	See below.
(a) the development is permitted with consent under Chapter 3, Part 4, Chapter 5 or another environmental planning instrument, and	The development is permitted under Chapter 5 of the Housing SEPP.
(b) the affordable housing component is at least 10%, and	The affordable housing component for the proposal is 15.4%. this is made up of 2% per Chapter 5 Transport Oriented Development and 13.4% per Chapter 2 Affordable housing
(c) all or part of the development is carried out— (i) for development on land in the Six Cities Region, other than in the City of Shoalhaven or Port Stephens local government area—in an accessible area, or (ii) for development on other land—within 800m walking distance of land in a relevant zone or an equivalent land use zone.	The development is on land in an accessible area within the Six Cities Region.
(2) Affordable housing provided as part of development because of a requirement under another chapter of this policy, another environmental planning instrument or a planning agreement is not counted towards the affordable housing component under this division.	Sections 156 under Chapter 5 of the Housing SEPP requires 2% of proposed GFA as affordable housing. Therefore, including the 15.45% affordable housing delivered under the provisions of this chapter, the proposal delivers on the provision of 15.4% affordable housing GFA to satisfy all relevant affordable housing requirements under the Housing SEPP.
Section 16 Affordable housing requirements for additional floor space ratio	

(1) The maximum floor space ratio for development that includes residential development to which this division applies is the maximum permissible floor space ratio for the land plus an additional floor space ratio of up to 30%, based on the minimum affordable housing component calculated in accordance with subsection (2).

(2) The minimum affordable housing component, which must be at least 10%, is calculated as follows—

$$\text{affordable housing component} = \frac{\text{additional floor space ratio}}{(\text{as a percentage})} \div 2$$

(3) If the development includes residential flat buildings or shop top housing, the maximum building height for a building used for residential flat buildings or shop top housing is the maximum permissible building height for the land plus an additional building height that is the same percentage as the additional floor space ratio permitted under subsection (1).

The proposal provides 13.4% of the total GFA as affordable housing GFA. This equates to an equivalent 26.8% increase to the maximum FSR and maximum building height. Therefore, the resulting maximum permissible FSR for the site is 3.17:1 and the maximum permissible building height is 27.9m.

The proposed FSR is 3.17:1 which complies with the maximum FSR.

The proposed maximum building height is 32.31m which is a 4.31m (15.45%) variation to the maximum permissible building height. A Clause 4.6 variation is provided as **Appendix M**.

Section 19 Non-discretionary development standards – the Act, s 4.15

(1) The object of this section is to identify development standards for particular matters relating to residential development under this division that, if complied with, prevent the consent authority from requiring more onerous standards for the matters.

(2) The following are non-discretionary development standards in relation to the residential development to which this division applies—

(a) a minimum site area of 450m ² ,	The site has an area of 6,539 sqm.
(b) a minimum landscaped area that is the lesser of— (i) 35m ² per dwelling, or (ii) 30% of the site area,	The proposal has a landscaped area of 1,943.8 sqm which is 29.7% of the site area.
(e) the following number of parking spaces for dwellings used for affordable housing— (i) for each dwelling containing 1 bedroom—at least 0.4 parking spaces, (ii) for each dwelling containing 2 bedrooms—at least 0.5 parking spaces, (iii) for each dwelling containing at least 3 bedrooms— at least 1 parking space,	The total parking provisions of the proposal comply with the rates under this section. Refer to the TIA at Appendix N .
(f) the following number of parking spaces for dwellings not used for affordable housing— (i) for each dwelling containing 1 bedroom—at least 0.5 parking spaces, (ii) for each dwelling containing 2 bedrooms—at least 1 parking space, (iii) for each dwelling containing at least 3 bedrooms—at least 1.5 parking spaces,	The total parking provisions of the proposal comply with the rates under this section. Refer to the TIA at Appendix N .
(g) the minimum internal area, if any, specified in the Apartment Design Guide for the type of residential development,	The proposal complies with minimum internal areas as specified in the ADG (Refer to Appendix S)

Section 20 Design requirements

(3) Development consent must not be granted to development under this division unless the consent authority has considered whether the design of the residential development is compatible with—

(a) the desirable elements of the character of the local area, or	The site is part of the Roseville TOD precinct that has been identified by the State Government for greater density and increased housing density because it is walking distance to Roseville Station and town centre. Further, the areas outside of the immediate TOD precinct are identified for Low and Mid-rise Housing under chapter 6 of the housing SEPP, making residential flat buildings permissible to greater heights and FSRs than currently available under the Kuring Gai LEP.
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For further details refer to Section 7.2.4.

(b) for precincts undergoing transition—the desired future character of the precinct.	As above
Section 21 Must be used for affordable housing for at least 15 years	
(1) Development consent must not be granted to development under this division unless the consent authority is satisfied that for a period of at least 15 years commencing on the day an occupation certificate is issued for the development—	The 13.4% (2,774 sqm) of affordable housing under the provisions of section 16 under Chapter 2 of the Housing SEPP will be managed by Bridge Housing, a registered community housing provider for a period of at least 15 years.
(a) the development will include the affordable housing component required for the development under section 16, 17 or 18, and	
(b) the affordable housing component will be managed by a registered community housing provider.	
Chapter 4 Design for residential apartment development	
Section 147 Determination of development applications and modification applications for residential apartment development	
(1) Development consent must not be granted to residential apartment development, and a development consent for residential apartment development must not be modified, unless the consent authority has considered the following—	Woods Bagot have comprehensively addressed the design principles and the ADG. Refer to the Design Report at Appendix D and Design Verification Statement at Appendix S .
(a) the quality of the design of the development, evaluated in accordance with the design principles for residential apartment development set out in Schedule 9,	
(b) the Apartment Design Guide	
Section 148 Non-discretionary development standards for residential apartment development – the Act, s 4.15	
(1) The object of this section is to identify development standards for particular matters relating to residential apartment development that, if complied with, prevent the consent authority from requiring more onerous standards for the matters.	
(2) The following are non-discretionary development standards—	See below.
(a) the car parking for the building must be equal to, or greater than, the recommended minimum amount of car parking specified in Part 3J of the Apartment Design Guide,	The car parking provision for the proposal is compliant with the recommended car parking in Part 3J of the ADG (refer to Appendix S).
(b) the internal area for each apartment must be equal to, or greater than, the recommended minimum internal area for the apartment type specified in Part 4D of the Apartment Design Guide,	The internal areas for each apartment of the proposal are compliant with minimums specified in Part 4D of the ADG (refer to Appendix S).
(c) the ceiling heights for the building must be equal to, or greater than, the recommended minimum ceiling heights specified in Part 4C of the Apartment Design Guide.	The ceiling heights for the proposal are compliant with minimum ceiling heights specified in Part 4C of the ADG (refer to Appendix S).
Chapter 5 Transport oriented development	
Section 150 Aim of chapter	
The aims of this chapter are as follows—	See below
(a) to increase housing density within 400m of existing and planned public transport,	The proposal is consistent with the aims of this chapter in that:
(b) to deliver mid-rise residential flat buildings, seniors housing in the form of independent living units and shop top housing around rail and metro stations that—	- It will deliver a residential flat building within 400m of Roseville train station. - Has undergone an SDRP process
(i) are well designed, and	- The proposed bulk and scale is an appropriate site-specific design response to the existing and future context. - The proposal has been designed to achieve the ADG design criteria or otherwise, design guidance. - It is delivering 39 affordable housing dwellings.
(ii) are of appropriate bulk and scale, and	
(iii) provide amenity and liveability,	
(c) to encourage the development of affordable housing to meet the needs of essential workers and vulnerable members of the community.	
Section 154 Development permitted with development consent in Transport Oriented Development Areas	

(1) Development for the purposes of residential flat buildings is permitted with development consent on land in the following zones in a Transport Oriented Development Area—

(a) a relevant residential zone,

The site is zoned R2 Low Density Residential in a TOD area, which is a ‘relevant residential zone’ under Section 151 Definitions for Chapter 5.

Section 155 Maximum building height and maximum floor space ratio

(2) The maximum building height for a residential flat building in a Transport Oriented Development Area is 22m.

The infill affordable housing provisions apply to the site including Section 16 of the Housing SEPP which allows for an addition of up to 30% on top of the maximum building height control. Through the provision of 13.4% of affordable housing GFA, an addition 26.8% is applicable to the maximum building height resulting in a maximum building height control of 27.9m. The proposed maximum building height of the proposal is 32.31m which is a 4.31m (15.45%) exceedance to the development standard. A Clause 4.6 Variation has been prepared for the variation to the building height development standard (refer to **Appendix M**).

(4) The maximum floor space ratio for the following in a relevant residential zone or relevant employment zone in a Transport Oriented Development Area is 2.5:1—

(a) a residential flat building,

The infill affordable housing provisions apply to the site including Section 16 of the Housing SEPP which allows for an addition of up to 30% to the maximum FSR control. Through the provision of 13.4% of affordable housing GFA, an addition 26.8% is applicable to the maximum building height resulting in a maximum FSR control of 3.17:1. The proposed FSR of the proposal is 3.17:1 which complies with the maximum FSR control.

Section 156 Affordable housing

(1) This section applies to development for the purposes of residential flat buildings, independent living units or shop top housing in a Transport Oriented Development Area if the building has a gross floor area of at least 2000sqm.

The proposal has a proposed gross floor area (GFA) of 20,702 sqm.

(2) Development consent must not be granted unless the consent authority is satisfied that—

See below.

(a) at least 2% of the gross floor area of the building will be used for affordable housing, and

(b) the affordable housing will be managed by a registered community housing provider in perpetuity.

The proposal includes 3,188 sqm for affordable housing which included the required 2% (414 sqm) under this section. The 414 sqm of affordable housing will be managed in perpetuity by Bridge Housing, a registered community housing provider.

The provision of infill-affordable housing is addressed below.

(3) A requirement under a provision of another chapter of this policy, another environmental planning instrument or a planning agreement that requires the development to provide more affordable housing prevails over this section.

The proposal relies on Section 16 under Chapter 2 of the Housing SEPP for up to 30% infill affordable housing to permit additional height and FSR of up to 15%.

(4) Affordable housing provided as part of the development because of a requirement under another chapter of this policy, another environmental planning instrument or a planning agreement is not counted towards the affordable housing required under this section.

The proposal includes 13.4% of the total GFA as infill-affordable housing. Therefore, including the 2% affordable housing delivered under the provisions of this chapter, the proposal delivers on the provision of 15.4% affordable housing GFA to satisfy all relevant affordable housing requirements under the Housing SEPP.

Section 157 Affordable housing parking spaces

(1) This section identifies a development standard for development under this chapter that, if complied with, prevents the consent authority from requiring more onerous standards for the matters.

See below.

(2) Development to which section 156 applies must provide the following number of parking spaces for each affordable housing dwelling required under that section—

The parking provisions comply with the rates under this section. Refer to the TAIA at **Appendix N**.

(a) for each dwelling containing 1 bedroom—0.4 parking space,

(b) for each dwelling containing 2 bedrooms—0.5 parking space,

(c) for each dwelling containing 3 or more bedrooms—1 parking space.

(3) This section prevails over a provision in another chapter of this policy or another environmental planning instrument to the extent that other provision permits a lower number of parking spaces for dwellings used for affordable housing on the land.

Section 158 Exception to minimum lot size

(1) This section applies if another environmental planning instrument applying to the land specifies a minimum lot size for development for the purposes of residential flat buildings or shop top housing (a minimum lot size restriction).

Clause 4.1 of the KLEP imposes a 790 sqm minimum lot size control on the site. Site amalgamation will result in a lot size of approximately 6,539 sqm.

(2) Development consent may be granted to development for the purposes of residential flat buildings or shop top housing on land in a Transport Oriented Development Area, despite a minimum lot size restriction.

Section 159 Minimum lot width

Development consent must not be granted to development for the purposes of residential flat buildings, independent living units 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.

The site has a front building line of at least 21m wide.

Section 161 Consideration of Apartment Design Guide

Development consent must not be granted for development for the purposes of residential flat buildings, independent living units or shop top housing on land in a Transport Oriented Development Area unless the consent authority has considered the Apartment Design Guide.

The proposal has considered the Apartment Design Guide (ADG). Refer to the Design Verification Statement (**Appendix S**) for assessment of compliance of key ADG criteria. Any non-compliances are assessed and justified in **Section 7.3**.

5.2 Ku-ring-gai Local Environmental Plan 2015

An assessment of the proposed development against the relevant provisions of the KLEP is provided below.

Table 10 Assessment against KLEP 2015

Provision	Comment
Clause 2.3 Zone objectives and Land Use Table Zone R2 Low Density Residential	The site is zoned R2 Low Density Residential Zone under the KLEP. Chapter 5 of the Housing SEPP permits residential flat buildings with consent on land zoned R2 Low Density Residential within a TOD area. The proposal is consistent with the aims of Chapter 5 of the Housing SEPP. Further discussion is provided at Section 5.1 above.
Clause 2.7 Demolition requires development consent The demolition of a building or work may be carried out only with development consent.	The proposal seeks consent for the demolition of all existing buildings on the site.
Clause 4.3 Height of buildings	• The maximum permissible building height under the KLEP is 9.5m. • Notwithstanding, the site is subject to a maximum height of building control of 22m under the provisions of Chapter 5 of the Housing SEPP. • Under the provisions of section 16 under Chapter 2, Part 2, Division 1 of the Housing SEPP, the proposal is subject to an additional height of 26.8% which equates to a maximum permissible height limit of 27.9m. • The maximum height of building proposed is 31.63 m which exceeds the maximum permissible height by 3.73 m (15.45%). A Clause 4.6 Variation Request for Building Height has been prepared by Planning & Co and attached at Appendix M.
Clause 4.4 Floor space ratio	• The maximum permissible FSR under the KLEP is 0.3:1. • Notwithstanding, the site is subject to a maximum FSR control of 2.5:1 under the provisions of Chapter 5 of the Housing SEPP. • Under the provisions of section 16 under Chapter 2, Part 2, Division 1 of the Housing SEPP, the proposal is subject to an additional FSR of 26.8% which equates to a maximum permissible FSR of 3.17:1. • The maximum GFA proposed is 20,702 sqm which equates to an FSR of 3.17:1.
Clause 4.6 Exceptions to development standards	A Clause 4.6 Variation Request for building height has been prepared by Planning & Co and attached as Appendix M .
Clause 6.1 Acid sulfate soils	The Preliminary Site Investigation prepared by EI Australia attached as Appendix K concluded that acid sulfate soils are unlikely to be present on-site.
Clause 6.2 Earthworks	Excavation is proposed to facilitate the basement and structural columns. The Geotechnical Report (Appendix W) addresses the considerations under clause 6.2(3).
Clause 6.3 Biodiversity protection	The SSDA is accompanied by a BDAR Waiver Report attached as Appendix F . Findings of the BDAR Waiver Report are detailed in Section 7.10 .

6.0 Community Engagement

This section summarises the findings of the community engagement that was carried out for the project during the preparation of the EIS. It is supported by a Community Engagement Report prepared by Notting Hill Advisory and attached as **Appendix E**.

6.1 Engagement Carried Out

6.1.1 Identify Stakeholders

The following groups of stakeholders were engaged in the community engagement process:

- Residents living in Roseville, Roseville Chase, Lindfield and East Lindfield. This geographic area was selected as best representing the community with a personal, economic, and/or civic interest in the Proposal;
- NSW Government – DPHI, GANSW;
- Ku-ring-gai Council; and
- Traditional owners and Aboriginal stakeholders.

6.1.2 Traditional Owners and Aboriginal Stakeholders Consultation

Aqualand Prestige engaged JMP Aboriginal Consultancy to facilitate and coordinate meaningful engagement and learning opportunities for the project team from Traditional Owners and Aboriginal stakeholders and broader community. A Walk on Country and design input session was held on 14 February 2025, to integrate Indigenous Traditional input into design development. Refer to the First Nations Co-Design Values Report prepared by JMP Consulting attached as **Appendix L**.

Aspects of the proposed development that particularly connect with country and acknowledge Indigenous Traditional influence are outlined in **Section 4.8**. The final design was presented to the elders who were engaged in the Walk on Country and design input session and has been endorsed.

6.1.3 Engagement Activities and Communication Tools

As detailed in the Community Engagement Report (**Appendix E**), a variety of engagement activities (refer to **Table 11**) were conducted and communication tools (refer to **Table 12**) utilised in the engagement process.

Engagement activities for this proposal were conducted concurrently to the Proposal for another SSDA (Aqualand Prestige 1 Pty Ltd) at 2 & 4 Larkin Street and 1, 3 & 5 Pockley Avenue (SSD-77829461).

Table 11 Engagement Activities (Notting Hill Advisory)

Activity	Description	Purpose	Level of Engagement
Public Sentiment Research	8-10 minute live telephone interviews with n=200 residents near the proposed development.	Quantitative research provides an accurate sample of community attitudes towards the Proposal.	Consult and Inform (Note: survey questionnaire provides respondents with a succinct brief about the proposal, hence Inform)
Community Drop-In Session	Two (2) community drop-in sessions at local community centres were held on Thursday 20 February 2025 and Saturday 22 February 2025.	To engage directly with neighbouring residents, ensuring they were informed and had the opportunity to discuss the Proposal with the project team.	Consult and Inform
Drop-In Session Feedback Form	Hard copy feedback forms were distributed at the community drop-in sessions, providing attendees with the opportunity to record their feedback in-person.	Provide attendees to the drop-in session with a mechanism to record feedback in real-time.	Consult

Feedback Mechanism via Online Engagement Portal	An online feedback form was set up on the engagement portal, allowing community members to submit their comments directly to the project team for review and response.	To facilitate two-way communication between the community and the project team, enabling timely responses and fostering transparent communication.	Consult
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Table 12 Communication Tools (Notting Hill Advisory)

Activity	Description	Purpose	Level of Engagement
Information Flyer	Flyer distributed via letterbox drop to 1,283 residences to inform the community about the Proposal, share the Online Portal URL and drop-in session details.	Ensure local residents are aware of the project and have the opportunity to access information, provide feedback and attend the drop-in sessions.	Inform
Online Engagement Portal	A central forum for project information to ensure clear communication with the community. The portal outlines how and when the community can get involved, making it easy to access information provide feedback and ask questions.	Provides key project information, FAQs and a mechanism for community members to submit their feedback.	Inform and Consult
FAQs	FAQs were published to the online portal and addressed some of the key questions relating to the proposal, providing information on key questions in plain English.	Ensures accurate, relevant and consistent information is communicated to the community.	Inform
Project Display Boards	Display boards were designed and printed for use at the drop-in session to facilitate active participation between attendees and the project team.	Key themes identified through early consultation guided the topics covered in the display boards, including feedback received the	Inform and Consult

6.2 Community Views

Key issues raised by the community over the course of engagement activities are outlined in **Table 13**.

Table 13 Community views summarised

Issue/ Matter	Comment/ Sentiment
Affordability/ Housing affordability	- Majority rated housing affordability in their local area as poor (50%). - Majority (61%) were favourable towards the inclusion of 15% affordable housing as part of the Proposal. - Clarity sought in relation to the affordability component and how it would contribute to addressing local housing needs.
Traffic & on-street parking	- Multiple attendees from the drop-in session noted existing difficulties with respect to accessing the Pacific Highway particularly during peak hours. There is limited right-turn access from Maclaurin Parade onto the Pacific Highway, which creates congestion by preventing left-turning vehicles from proceeding. - Concerns were highlighting existing challenges with on-street parking and sought assurances on parking provisions within the development. - Concerns in relation to adding new dwellings son an already congested access point to the Pacific Highway, particularly in light of another development under construction at the corner of Pacific Highway and Maclaurin Parade.
Building height and density	- Majority (55%) prefer two 9-storey buildings over a single 18-storey building (5%), suggesting a preference for medium-density development over high-density - Questions regarding how increased housing density will impact local character and infrastructure capacity.
Natural hazards and risks	Concerns raised about potential bushfire risk.

	• Inquiry into flood mitigation measures, particularly how stormwater would be managed to prevent localised flooding.
TOD/ Proximity to public transport	• Majority (72%) of respondents were favourable towards the project's location, being close to Roseville train station.
Impact on neighbouring residential amenity	• Concern about potential overshadowing impacts on neighbouring properties and public spaces. • Questions regarding noise during construction.
Landscaping	• Note preservation of the tree canopy along The Rifleway.

6.3 Engagement to be carried out

As the Proposal evolves, Aqualand Prestige will continue to engage local residents, landowners, businesses and key agencies, ensuring that community input remains an essential part of the development process. This includes during public exhibition, assessment, and following determination phases of the SSD.

7.0 Assessment of Impacts

This section assesses and provides responses to potential environmental impacts of the proposal. It addresses matters set out in the SEARs, dated 15 November 2024. Refer to the SEARs Compliance Table at **Appendix A** for details on the address of each SEARs requirement in this EIS and also supporting technical documentation.

7.1 Design Quality

The proposal was subject to a SDRP meeting, held on 19 February 2025. Initial designs, concepts and development metrics were presented and was overall, well received. SDRP feedback was received 3 March 2025 where the following elements of the proposal were supported:

- The rigorous testing of massing options to determine the preferred approach.
- The concept of a series of buildings grounded in the landscape.
- The simple approach to the siting of the buildings, which is a logical response to a steeply sloping site.
The open circulation spaces between the buildings which provide an opportunity for the development to connect with nature.
- The diagonal pedestrian approach from Maclaurin Parade to the building entries, allowing glimpses between the buildings upon entering the site.
- The generous apartment and balcony sizes.
- The logical approach to the typical apartment plans, subject to the advice below regarding an east-west connection.
- The distribution of affordable apartments throughout the development, subject to the advice below.
- The proposal for carpark walls to be clad in sandstone.

The Design Report prepared by Woods Bagot and attached at **Appendix D** provides a design consideration response to the SDRP feedback that was received.

Additional assessment requirements were given by DPHI in the SEARs cover letter as below:

Provide a table which demonstrates how each apartment, including affordable apartments, addresses the key Apartment Design Guide design criteria to inform the assessment of the development, against the Design Quality Principles within State Environmental Planning Policy (Housing) 2021 and the Apartment Design Guide.

Accordingly, an Apartment Compliance Schedule has been prepared included in **Appendix D** for each apartment, including affordable apartments, which addresses the key ADG design criteria. Further, the proposed development has been assessed against the Design Quality Principles of the Housing SEPP and ADG in the Design Verification Statement, prepared by Woods Bagot, attached at **Appendix S**.

7.2 Built Form and Urban Design

The proposed built form is a residential flat building development containing 3 building pavilions of up to 9 storeys within an area that accommodates a range of densities from low scale to higher density residential buildings. Key built form impacts are described and assessed in this section and should be read concurrently with the Design Report prepared by Woods Bagot and is attached at **Appendix D**.

7.2.1 Building Height

The maximum height of building applicable to the site is 22m under section 155, Chapter 5 of the Housing SEPP plus the additional height bonus of up to 30% for the provision of up to 15% affordable housing GFA, permissible under section 16 of the Housing SEPP. The proposal is providing 13.4% of the total GFA as infill affordable housing which allows the proposal to achieve an additional 26.8% increase in height which equates to a maximum permissible building height of 27.9m. The proposed development has a maximum building height of 27.9m which exceeds the permissible building height control by a maximum of 4.31m (15.45%). This due to the sloping nature of the site which results in the proposal subtly varying the height plane in a few instances. However, Woods Bagot

have quantified that when assessing the encroachment on average, the amount of building that is not utilising the envelope under the building height plane is greater than volume which is over.

A Clause 4.6 Variation to a Development Standard for Building Height has been prepared by Planning & Co and attached as **Appendix M**. It seeks to vary section 16 of the Housing SEPP, which currently allows for a maximum building height of 27.9m on the site. The report demonstrates consistency with the aims of Chapter 5 *Transport Oriented Development* of the Housing SEPP and the objects of the EP&A Act.

The proposed development is of an appropriate scale, notwithstanding the proposed height exceedance, and is compatible with the future desired character of Roseville as established by the Housing SEPP. The Roseville TOD area is a precinct undergoing change aligned to relevant strategic frameworks and government directives, and the recent amendments to the Housing SEPP to deliver housing in well located areas.

In *Big Property Group Pty Ltd v Randwick City Council* [2021] NSWLEC 1161, Commission O'Neill established that desired future character is not determined only by the development standards that control building envelopes for an area, and "[cannot] account for provisions under other EPIs that incentivise particular development with GFA bonuses or other mechanisms that intensify development."

The proposed bulk and scale of the building including the proposed height is appropriate mindful of this context and is compatible with the future desired character of the area. We note that the maximum height permitted under the infill affordable housing provisions in the TOD area is 28.6m, for the delivery of 15% of the total GFA as infill affordable housing. The proposed development seeks a maximum building height of 32.31m only as a result of a 26.8% height bonus for the delivery of 13.4% affordable housing under Chapter 2 of the Housing SEPP. This will result in the delivery of a total of 15.4% affordable housing including the 2% requirement under section 156 of the Housing SEPP provisions.

The proposed development has been designed with consideration of the existing and future streetscape in terms of building articulation, use of materials and landscaping in setbacks and on structure.

In summary, the proposed building envelope is consistent with the scale of development anticipated under the Housing SEPP, does not result in any undesirable impacts in terms of shadows or view loss and is as a result of the steeply sloping terrain. Being in an area that is already transitioning to higher residential densities, the proposed height is compatible with the emerging built form character of the surrounding area. As such, a variation to the development standard for height of building should be supported.

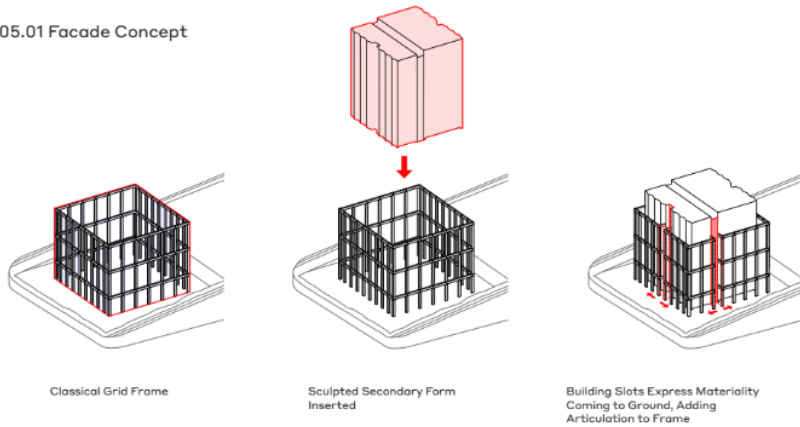
7.2.2 Bulk, Scale and Articulation

The maximum permissible FSR is 3.25:1 in accordance with the provisions of section 155 and section 16 of the Housing SEPP subject to the proposed development providing 15% of the total GFA as infill affordable housing. The proposal is providing 13.4% of the total GFA as infill affordable housing GFA which enables a maximum permissible FSR of 3.17:1. The proposed development has an FSR of 3.17:1 and is therefore compliant with the anticipated density for an infill affordable housing development within a TOD precinct.

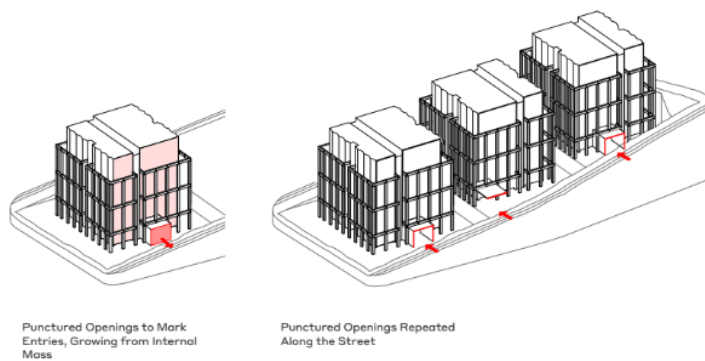
The bulk and scale of the proposed development has been influenced by the very steep 21 metre sloping topography of the site. In response, the mass is split into three pavilions set within the landscape and transitioned across the site. The strong triple height horizontal and vertical rectilinear framing of the typical façade levels breaks down the perceived bulk of the pavilions which is further reduced by the relief created by the glazing and balcony composition. The upper levels are set back to reduce the sense of bulk from the street level, provide relief and outlook, and maximise compliance with the height plane. The darker materiality and subtle architecture of the upper levels increases the recessive qualities of the building when viewed from the public domain.

The proponent considered several massing alternatives (refer to **Section 3.7.3**). The design concept for the built form, illustrated and explained in **Figure 32**, was informed by the site-specific opportunities and constraints of the site.

05.01 Facade Concept



05.01 Facade Concept



05.02 Materiality

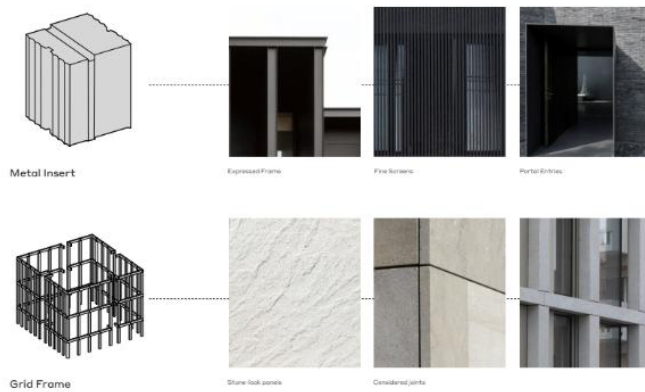


Figure 32 Facade design concept (Woods Bagot)

7.2.3 Setbacks and Separation

The pavilions are proposed to setback 10.5 metres to the north western Pockley Avenue street boundary, a minimum of 4.4 metres to Larkin Street which increases to greater than 6 metres; a minimum of 4.6 metres to Maclaurin Parade which increases to greater than 10 metres; and a minimum of 7.5 metres to the Pockley Avenue south western street boundary.

The proposed street setbacks are reasonable and will result in a development that is situated within a landscaped setting. Whereby the landscape softens the appearance of the built form and provides significant deep soil opportunities.

The site does not have any immediate adjoining lots. The provided setbacks allow for reasonable building separation to neighbouring sites, across the street on all sides, both as current low density dwelling houses and future envisioned apartments. Adequate separation allows residents to enjoy visual and acoustic privacy, solar

access and natural ventilation. The proposed development setbacks achieve a high-quality public domain outcome that balances the realisation of the permissible density, residential amenity, visual bulk, and interface with the streetscape.

7.2.4 Desired Future Character

The design requirements of Part 2, Division 1 In-fill Affordable Housing requires the consideration of the desirable elements of the character of the local area, and the desired future character for precincts undergoing transition.

The proposed development is not identified in any specific character areas of Ku-ring-gai that have been planned within Council's development control plan. However, **Section 3.0** of this EIS explains how the proposal is aligned to the strategic context and framework that is relevant to the site.

As a TOD site, the aims of Chapter 5 of the Housing SEPP for Transport Oriented Development provide an indication of the desired future character of the TOD areas. These are:

- (a) to increase housing density within 400m of existing and planned public transport,*
- (b) to deliver mid-rise residential flat buildings, seniors housing in the form of independent living units and shop top housing around rail and metro stations that—*
 - (i) are well designed, and*
 - (ii) are of appropriate bulk and scale, and*
 - (iii) provide amenity and liveability,*
- (c) to encourage the development of affordable housing to meet the needs of essential workers and vulnerable members of the community.*

The proposal is consistent with the above aims in that:

- It is located within 400m of Roseville train station.
- It delivers mid residential flat buildings around rail.
- It has undergone an SDRP process and implemented feedback received.
- It is a site-specific design response to the existing and future development context for bulk, scale, amenity and liveability. The proposed FSR complies with the maximum permissible and the proposed variation to the maximum permissible height is due to the site's very steep natural topography. It has been demonstrated in this EIS that the proposal will maintain reasonable solar access and visual privacy to the surrounding neighbourhood while sitting comfortably within the Roseville town centre.
- It is aligned to the ADG design criteria and otherwise, design guidance in the ADG.
- It is delivering 39 affordable housing dwellings.

Further, the future character of the area consists of the potential development enabled by the provisions of the TOD and Low-Mid Rise Housing chapters within the Housing SEPP, which the applicable areas are identified in **Section 2.2.9** of this EIS. The Design Report prepared by Woods Bagot and attached as **Appendix D** demonstrates how the proposal is a site-specific design that is consistent with and considers this potential future development context.

7.2.5 Accessibility

An Accessibility Report has been prepared by Jensen Hughes and is attached as **Appendix JJ**. It has assessed general areas of the proposed development including but not limited to items as noted below:

- Accessways (continuous accessible path of travel) from the allotment boundary and any accessible parking bay within the allotment associated with the building.
- Building entrances.
- Provision of vertical transport (where relevant)
- Doors (hinged/sliding) and doorway circulation space.

- Stairs, ramps, and walkway /pathway requirements.
- Car parking.
- Sanitary facilities
- Landscaping
- Adaptable housing provisions AS 4299

Subject to addressing the actions identified as necessary within the future design stages of the project, Jensen Hughes confirm that the project documentation provides accessibility capable of complying with the relevant requirements.

There are currently 43 units that are designed to meet the silver level requirements of LHA (36 are needed to achieve 20% of 178). Based on the current level of detail all access requirements appear capable of achieving compliance subject to those adjustments noted in the report.

7.2.6 Building Code of Australia Compliance

A Building Code of Australia Report has been prepared by Jensen Hughes and is attached as **Appendix II**. It has assessed architectural drawings against the Deemed-to-Satisfy provisions of the Building Code of Australia (BCA) 2022. Part 3 'Matters for Further Consideration' outlines the identified BCA compliance issues that require further information and/or assessment as Performance Solutions which will be addressed at subsequent design stages.

7.3 Residential Amenity

As per Chapter 4 of the Housing SEPP, the design of the proposed development is accordance with the requirements of the ADG in order to achieve a high level of amenity for all residents.

Additionally, to meet the 'Additional assessment requirements' stated in the Cover Letter for the SEARs, the Unit Compliance Breakdown Schedule in the Design Report prepared by Woods Bagot at **Appendix D** outlines how each apartment, including affordable apartments addresses the key ADG design criteria in order to inform the assessment of the development against the Design Quality Principles within the Housing SEPP and the ADG.

The Design Report prepared by Woods Bagot and attached as **Appendix D** confirms that the proposed development generally complies with the design criteria in Part 3 and 4 of the ADG. Any inconsistencies with key ADG design criteria are assessed and discussed below.

7.3.1 Part 3F – Visual Privacy

The proposed development is located on an island site bounded by Larkin Street, Pockley Avenue, and Maclaurin Parade; it will not share common boundaries with any neighbouring residential lots.

The separation between Pavilion C and Pavilion B, and Pavilion B and Pavilion A are 9 metres. From Level 04, the separation between Pavilion C and Pavilion B is 11 metres. From Level 06, the separation between Pavilion B and Pavilion A is 11 metres. Visual privacy is maintained through the provision of angled screening which prevents overlooking between apartments from windows and balconies. All apartments with privacy screening have dual outlooks from the living areas and private open space ensuring they have an unobstructed outlook from these areas while maintain external and internal privacy.

Internal visual privacy between the three buildings has been managed by offsetting windows where possible.

7.3.2 Part 4A – Solar and Daylight Access

The proposal achieves a minimum of 2 hours solar access to living areas and private open space for 105 apartments in mid-winter (59%) between 9am – 3pm. This increases to 123 apartments (69%) between 8am – 4pm in mid-winter. The are largely attributed to the orientation of the site where significant views to the city are oriented south, away from the aspect for optimal direct sunlight. Therefore, the proposed solar non-compliance is reasonable in the circumstances as apartments that don't achieve the minimum 2 hours on the upper levels enjoy high quality southern views and satisfy the majority of the key amenity requirements in the ADG.

7.3.3 Part 4D – Apartment Size Layout

Certain apartments accommodate open plan room depths that seek to vary the ADG numeric criteria. Deeper open plan rooms allow larger and more functional living spaces. The majority of apartments that provide deeper open plans also offer a double orientation which enables good light and air into the apartment. The apartments that have deeper open plan living areas satisfy the relevant design guidance.

7.3.4 Part 4E – Private Open Space and Balconies

Certain balconies are proposed that vary the minimum area required by the design criteria, these are predominantly facing east and west. Appropriate depth has been provided to these balconies to ensure functional layout. The balconies under the minimum area are accessible from three aspects of the apartments. Additionally,

- The internal apartment area is 84sqm which is greater than the minimum requirement and the layout provides functional internal spaces and organization.
- Access to the balcony is provided from the three main rooms.
- Large operable windows are centred with the open plan to provide views and ventilation. These windows are located on the external face of the building.

7.3.5 Environmental Amenity

Overshadowing

Shadow diagrams and sun-eye diagrams have been prepared by Woods Bagot and are provided within the Architectural Plans as **Appendix B**. In summary, the diagrams demonstrate that overshadowing caused by the proposed development is minor, notwithstanding the height exceedance, as:

- Neighbouring dwellings to the north, east and west of the site are not overshadowed by the proposed development between 9am and 3pm on 21 June.
- Neighbouring dwellings to the south will receive at least 2 hours of solar access between 9am and 3pm on 21 June. The impact of the additional proposed height over the maximum permitted height is minor and does not result in additional overshadowing.
- The site is located in a dense urban centre undergoing renewal. The proposed development reflects the anticipated future character of the area and the minor exceedance does not create any unreasonable additional impact in terms of overshadowing compared to a compliant TOD and Infill Affordable Housing envelope.

7.4 Pedestrian Wind Impact

A Pedestrian Wind Environment Assessment has been prepared by Windtech and attached as **Appendix X**. Wind activity has been examined for the three predominant wind directions for the region, namely the north-easterly, southerly, and westerly winds. The wind assessment considered the context of the local wind climate, building morphology and land topography.

The wind assessment for pedestrian comfort was assessed for the following areas of the proposed development:

- The pedestrian footpaths along Pockley Avenue and Maclaurin Parade.
- The ground level communal areas within the through site links.
- Through site links (co through site links will be partially shielded from the north-easterly winds.
- Communal space located on the western site of Pavilion C.
- Communal space located on the south-western corner.
- Lobby entrances to Pavilion A and pavilion C located on Maclaurin Parade.

The assessment concludes that the proposed architecture and landscaping will mitigate wind impacts, resulting in the areas listed above experiencing wind conditions appropriate to their intended use.

7.5 Visual and View Impact

A Visual Impact Assessment (VIA) has been prepared by Planning & Co with views prepared by Virtual Ideas and attached as **Appendix Y**. The VIA concludes that the proposed development has acceptable visual and view impacts and can be supported.

The visual analysis confirmed that the site is not subject to any notable significant public domain views identified in the any environmental planning instruments or Council plans.

7.5.1 Potential Impacts

The following viewpoints have been identified to illustrate the change in views which are likely to be experienced by a range of different viewers across the study area. Viewpoints are either representative (represent the experience of different types of visual receptors) or specific (key viewpoints from important locations). The location of the viewpoints is shown on **Figure 33**.



Figure 33 Assessed viewpoints (Virtual Ideas)

The visual impact assessment has analysed whether the visual impact resulting from the proposed project is reasonable, considering the relevant planning and strategic context of the Roseville TOD and LMR areas. It has been determined that the visual impact is reasonable on the following grounds:

- Strategic and statutory plans are clear in their intent to guide the transition of the precinct in line with the transport-oriented development principles as enforced by the Housing SEPP as well as the Low and Mid-rise Housing provisions of that same plan. The delivery of new housing in line with the objectives of these plans will make a significant contribution towards housing delivery, including the delivery of much needed affordable housing.
- Consistent with this, recent mid and higher-rise development has occurred which has fundamentally changed the visual context of the subject site.
- The proposal is a proportionately scaled and skilfully designed scheme, which positively responds to the current planning policy context as well as the steeply sloping site – with height exceedances only at points where the slope falls away from the consistent floorplate. The proposal sits broadly within the applicable envelope.
- From mid-to-long distance views, the proposal would sit within a highly vegetated context, that over time, will be punctuated with higher forms of housing. Few long distance views are impacted as a result of the street pattern and existing treed nature of the site and its context.

- Whilst there will be a change in the overall building mass experienced at street level, this is anticipated in the precinct as a result of the Housing SEPP TOD provisions.

On this basis, it is the conclusion of the visual impact assessment that the impact is insufficient in its own right to warrant redesign or refusal of the proposal on merit grounds. The proposal is supported in terms of its visual impact.

7.6 Crime Prevention Through Environmental Design

A Crime Prevention Through Environmental Design (CPTED) report has been prepared by Planning & Co and attached as **Appendix Z** to consider potential opportunities for crime and fear of crime by recommending design and management principles. The assessment has been informed by a review of LGA-specific data and a review of local and state policies and prepared in accordance with the *Crime Prevention and the Assessment of Development Applications Guidelines*.

7.6.1 Current Conditions

The assessment found that the overall Crime Risk of the site is considered to be 'low'. The key elements of the site which have contributed to this rating are identified below.

- The site is located within an existing urban area that experiences high levels of vehicular and pedestrian traffic due to its location close to Roseville Station and main street, and is proximate high capacity road and pedestrian networks. The site and surrounding location is frequented by a number of residents, visitors and workers.
- The site is near many multi-storey, predominately residential and commercial buildings with a mix of activate and passive uses at street level which provide day and night activity.
- The site demonstrates no evidence of graffiti, neglect, litter or dumping contained on site.
- Two-year crime trends have generally remained stable in the Ku-ring-gai LGA. An increase in malicious damage to property can be adequately managed and addressed through CPTED principles and design interventions.

7.6.2 Potential Impacts

A potential perpetrator can take advantage of the environment, with access and the opportunity for concealment significantly affecting the safety and perceived safety of an environment. Given the site's enhancing urban context and its position in proximity to potentially high-risk areas, including public transport nodes, local centres, and rear lanes that are somewhat concealed from mainstream activity, the proposed development may be at potential risk to opportunities for crimes including malicious damage to property and stealing from dwelling. However, as noted above, the overall Crime Risk was evaluated as low.

7.6.3 Mitigation Measures

To minimise potential crime opportunities and increase safety and perceived safety, the following key recommendations are made. Refer to **Appendix Z** for the extensive list of mitigation measures.

- Maintain sightlines to entry lobbies, basement entrances and throughout the communal open space.
- Ensure public domain and external circulation spaces are unobstructed by structures to remove opportunities for concealment and ensure that residents and pedestrians can move freely with clear sightlines of their surrounds.
- Ensure glazed elements to the ground floor are clearly visible from the external environment to assist in maximising surveillance.
- All lighting provided within and around the development, including pedestrian accessways and near building entrances should ideally exceed the minimum Australian Lighting Standard AS/NZ 1158.
- Consistent and uniform lighting is recommended throughout all public and ground level areas (where appropriate) within the proposed development.

- A CCTV network.
- Ensure that the main pathway into the entry lobby remains unobstructed at all times to avoid blind spots.
- Provide wayfinding signage and building / business identification signage.
- Ensure mechanisms are in place to facilitate the on-going maintenance of the buildings, including private areas and external boundary treatments.
- Ensure future building and wayfinding signage is appropriate to deter access to private spaces and direct pedestrian movements to desired locations.
- Provide access controls for residents to control access to the entry lobby, lifts, communal open space and basement parking.
- Ensure potential security risks and threats are considered and managed appropriately in the design.
- Clear wayfinding signage should be provided to the car park, loading dock to prevent unauthorised individuals from inadvertently or intentionally accessing these spaces.

7.7 Trees and Landscaping

An Arboricultural Impact Assessment (AIA) has been prepared by Naturally Trees and is attached as **Appendix J**. The AIA evaluates the potential impact on trees and makes recommendations on tree retention.

The Landscape Plan have been prepared by Ground Ink and is attached as **Appendix H** and sets out landscape design for the proposed development supporting the Architectural Plans (**Appendix B**).

7.7.1 Current Conditions

There are currently 36 trees relevant to the site. The following trees (Trees 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 16, 17, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 35, 36) are legally protected under Ku-ring-gai Council's Tree Preservation Order.

7.7.2 Potential Impacts

Impact to Trees

The AIA assessed the impact of the proposal on trees by the extent of disturbance in Tree Protection Zones (TPZs) and the encroachment of structures into the Structural Root Zones (SRZs). The following table provides a summary of trees that may be affected by the development. The AIA stipulates that the works specified are necessary for reasonable management and should be acceptable to Council.

Table 14 Summary of existing trees and trees that may be affected by development (Naturally Trees)

Impact	Reason	Important trees		Unimportant trees	
		AA	A	Z	ZZ
Retained trees that may be affected through disturbance to TPZs	Removal of existing surfacing/ structures/ landscaping and/or installation of new surfacing/structures/ landscaping		1, 2	5, 8, 9, 10, 19, 23, 29, 30, 31, 32, 33, 35	
Tree to be removed	Civil and construction and/or level variations within TPZ	3	4, 7, 20, 21, 26	6, 11, 12, 13, 14, 16, 17, 18, 22, 24, 25, 27, 28	15, 34, 36

- 16 trees with low to very low retention value are proposed for removal. None of these are considered significant or worthy of special measures to ensure their preservation. It should be noted that Trees 14, 15, 18, and 34 are exempt from Ku-ring-gai Council's Tree Preservation Order.
- The proposal necessitates the removal of 6 Category AA and A trees are considered moderate to high significance and display good health and condition. In order to compensate for the loss of amenity, consideration should be given to replacement planting within the site.

- 2 Category A trees can be successfully retained without any adverse effects subject to appropriate protective measures which can be detailed in an arboricultural method statement.

Landscaping

The Landscape Plan will create an overall positive environmental and amenity outcome which includes a meaningful celebration of Country. Further, the Landscape Plans have incorporated SDRP feedback where relevant to ensure the achievement of quality design and amenity outcomes for residents as well as create an appropriate interface between the proposed development and the public domain.

A significant amount of new planting is proposed including the following (refer to **Appendix H**):

- Blue Gum High Forest (*Angophora costata*, *Eucalyptus pilularis*, *Elaeocarpus reticulatus*, *Eucalyptus saligna*, *Pittosporum undulatum*)
- Sydney Turpentine Ironbark Forest (*Syncarpia glomulifera*)
- Various (*Backhousia citriodora*, *Cyathea australis*, *Elaeocarpus eumundi*, *Homalanthus populifolius*, *Flindersia Australia*, *Livistonia Australia*, *Tristanopsis laurina*)

7.7.3 Mitigation Measures

Impact to Trees

Mitigation measures for impact to trees are summarised below and are further detailed in the AIA.

- **Protection of retained trees:** Quality protection and administrative procedures to ensure protective measures remain in place throughout the development. An arboricultural method statement is included in Section 4 of the AIA.
- **New planting:** New trees should have the potential to reach a significant height without excessive inconvenience and be sustainable into the long term to contribute to local amenity.
- **Minimising impact to local amenity or character:** If adequate precautions to protect the retained trees are specified and implemented through the arboricultural method statement, the proposed development is expected to have a low to moderate impact on the contribution of trees to local amenity or character.
- **Adhere to programme of tree protection and supervision:** It is the developer's responsibility to ensure that the details of the arboricultural method statement and any agreed amendments are known and understood by all site personnel.

7.8 Ecologically Sustainable Development

The Ecologically Sustainable Development (ESD) Report has been prepared by Stantec is attached as **Appendix I**. The report discusses the sustainability principles as they have been incorporated into the design and ongoing operation of the proposed development. It also outlines the energy efficiency measures that will be implemented to reduce greenhouse gas emissions and footprint of the project.

The BASIX Certificate prepared by Stantec is attached as **Appendix T** and certifies that the development will meet the relevant industry recognised building sustainability and environmental performance standards.

7.8.1 Potential Impacts

An assessment of the proposal against the principles of ecologically sustainable development outlined at section 193 of the EP&A Regs are provided in **Appendix I** and summarised in **Table 15**:

Table 15 Assessment against ESD principles

ESD Principle	Proposal Response
Precautionary principle	The development will be designed to improve above business-as-usual and minimum compliance obligations to avoid, where practicable, damage to the environment and achieve broad sustainability outcomes. In particular: • By ensuring compliance through various environmental studies. • Targets and supporting design principles for project design support:

	– Reducing energy and water consumption – Minimising upfront and operational carbon emissions – Promoting the use of sustainable materials and reducing waste – Limiting site emissions, including light pollution – Provide net positive biodiversity outcomes better than the pre-development condition
Intergenerational equity	The project aims to provide benefits for both present and future generations. The project design response includes: • Avoiding materials that could pose a hazard to the environment and future generations. • Improved well-being via active transport-friendly urban design. • Creation of an inclusive space accessible to people of all ages, cultures, and abilities. • Efficient use of water through the use of WELS rated low-flow fittings, and reuse of potable water. • Consideration for low embodied energy products, recycled or green rated products, such as GECA or 'Global Green Tag'. • Inter-generational equity is realised in the use of energy and water efficiency measures which aim to reduce the consumption of limited resources, preserving these for future generations. • The design principles outlined in the ESD report are for buildings which will be occupied by the next generation. The healthy interior environments which they create will benefit occupants for up to 60 years from today.
Conservation of biological diversity and ecological integrity	There is limited biological diversity on the current site due to the site being previously developed and occupied. The development will have limited, if any, impact on the current level of biological diversity and ecological integrity as there is limited green landscaping on the current site that will be replaced by built development in this project. The BDAR Waiver and Landscape Plans have considered the conservation of biodiversity and maintaining ecological integrity. The protection of local flora and fauna has been ensured through identification that the proposed development will have no significant impact on biodiversity on the site and the grant of the BDAR Waiver for this SSDA.
Improved valuation, pricing and incentive mechanisms	This project will integrate several initiatives which aim to internalise pollution and other undesirable environmental outcomes. Contractors will be requested to provide and abide by an Environmental Management Plan and Environmental Management System which are in accordance with NSW Environmental Management Systems Guidelines or a similar standard.

In addition, the proposal minimises greenhouse gas emissions (reflecting the Government's goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources including:

- BASIX (Building Sustainability Index) compliance for energy efficiency, water efficiency and thermal comfort:
 - BASIX Energy score: 60% reduction in Greenhouse Gas (GHG) emissions.
 - BASIX Water score: 40% saving in potable water consumption.
 - BASIX Thermal Comfort: 7-Star average NatHERS star rating across the project.
- Water-sensitive urban design measures proposed incorporate water efficiency strategies, on-site rainwater capture and reuse, as well as rain gardens and water treatment systems as integral components of comprehensive stormwater management approach.
- Strategy to reduce Materials to assist the project to avoid unnecessary use of materials and give preference to those with high recycled content, low embodied carbon and ability to be removed and reused / recycled in the future.
- Exceeds NCC Section J compliance requirements for energy efficiency.

7.8.2 Mitigation Measures

The project team has assessed the energy use profile of the development and will implement a number of energy efficiency measures that will significantly reduce the greenhouse gas emissions and footprint of the project. A series of best practice sustainability initiatives are listed in ESD report that will be investigated so that potential environmental impacts are mitigated substantially. Targets or initiatives for each design theme are listed below (further details are in the ESD report):

Design themes	Targets and Initiatives
Energy efficiency and greenhouse gas emissions	• BASIX energy strategies • High performance glazing • Efficient lighting systems • Lighting controls • Solar gain reduction through passive design • Efficient HVAC system • Shading devices • Transport
Thermal comfort and indoor air quality	• BASIX thermal comfort • Materials with low emission • Daylight • Occupant thermal comfort • Natural ventilation
Renewable energy opportunity	• Roof with on-site renewable energy production
Water conservation	• BASIX Water strategies • Water efficient fixtures and fittings • Rainwater tanks for rainwater reuse • Efficient irrigation systems
Waste avoidance and resource recovering	• Reducing materials used • Construction waste management plans • Waste separation
Embodied carbon	• Reduce embodied energy • Concrete mixes • Responsible steel products • Selection of certified timbers • Best practice certified PVC products • Environmentally friendly materials • Material reduction
Responsible construction practices	• Environmental management system • Best practice procedures and operational guidelines

7.9 Traffic, Transport and Accessibility

A Transport and Accessibility Impact Assessment (TAIA), Green Travel Plan and preliminary Construction Traffic Management Plan (CTMP) have been prepared by Varga Traffic Planning attached as **Appendix N**, **Appendix AA** and **Appendix BB** respectively. These reports have assessed the impact of the proposed development on traffic during operation and during construction.

7.9.1 Current Conditions

The existing traffic generation potential of the site consisting of 8 dwellings, vehicles per hour (vph) is 5.4 vph (AM) and 6.2 vph (PM).

The site is well serviced by public transport, located approximately 390m walking distance from Roseville rail station and 210m walk (3 minutes) walking distance from the nearest bus stop along the Pacific Highway. Refer to **Section 2.2.7** for further details regarding public transport.

7.9.2 Potential Impacts

Access

A single vehicle access will be provided via Maclaurin Parade at the centre of the site (refer to **Figure 30**) that will be utilised by residents, visitors and service vehicles to a part 3-, part 4- and part 5-level combined basement parking. Access to residence is available from basement levels.

Parking Provision

The TAIA has calculated the parking requirements for the proposed development under sections 19 (Chapter 2) and 157 (Chapter 5) of the Housing SEPP, providing minimum rates as well as Ku-ring-gai DCP 2024 which provide minimum and maximum rates.

The proposed development makes provision for a total of 285 off-street car parking spaces comprising:

- 252 residential spaces (including 3 disabled spaces),
- 31 visitor spaces,
- 2 car share space.

Additionally, the proposed development makes provisions for the following:

- 1 car wash bay,
- Dedicated loading dock,
- 11 motorcycle spaces,
- 18 off-street visitor bicycle parking spaces,
- A private storage cages which have capacity for approximately 210 bicycles.

Servicing and Loading Arrangements

The service vehicle access to the development is the same as residential and visitor vehicle entry and exit on Maclaurin Parade. A dedicated loading dock is provided in the Basement 03, adjacent to the waste collection room.

The geometric design layout of the proposed loading facilities has been designed to comply with the relevant Australian standards in respect of loading dock dimensions, overhead clearances and service area requirements.

The manoeuvring area has been designed to accommodate the swept turning path requirements of Council's 5.1m long waste truck, allowing them to enter and exit the site in a forward direction at all times. Swept turning path diagrams have been provided in the using a 6.4m long SRV truck.

Construction Traffic Management

Loading and unloading activities will occur entirely within the front setback areas of the site, fronting the Pockley Avenue site frontage and therefore a work zone is not considered necessary.

Construction truck routes will approach and depart the site via the Pacific Highway, Maclaurin Parade, Larkin Street and Pockley Avenue.

Operational Traffic Management

The forecasted nett increase in traffic generation potential for the proposed development is:

- **AM:** 28.4 vph
- **PM:** 20.5 vph

The TAlA concludes that the projected change in the traffic generation from the site as a consequence of the development will not have any unacceptable traffic implications in terms of road network capacity.

Green Travel Plan

The Green Travel Plan (GTP) prepared by Varga Traffic Planning attached at **Appendix AA**, sets site-specific actions to influence travel behaviour and manage travel demands. The objectives of the plan are:

- Reducing dependence on private cars;
- Improving pedestrian and cycling facilities;
- Promoting public transport and car sharing; and
- Reducing congestion in the local area.

The GTP envisages a modal shift ranging between 15% to 25% towards sustainable or active transport, with a reduction in private vehicle trips, and provides methods of encouraging sustainable transport.

7.9.3 Mitigation Measures

Construction Traffic Management

The CTMP outlines mitigation measures for the following elements during the demolition & site establishment, excavation, and construction stages of the proposal:

- Truck loading/unloading, routes, movement and management at different stages;
- Proposed work zones;
- Hoarding;
- Sediment control;
- Tree protection devices;
- Maintaining access for neighbouring properties;
- Traffic control plans;
- Permits; and
- Tradesmen/contractor parking and public transport.

7.10 Biodiversity

Clause 7.9 of the Biodiversity Conservation Act 2016 (BC Act) requires an SSDA to be accompanied by a BDAR unless a BDAR Waiver is approved for a proposal that has been assessed as not likely to have any significant impact on biodiversity values.

ACS Environmental undertook an assessment of biodiversity values on the site. The prepared Biodiversity Development Assessment Waiver Report is included in **Appendix F**. The findings of the report concluded the following:

- No elements of biodiversity value will be impacted by the proposed TOD, with mostly only exotic, ornamental plants, trees, shrubs, and ground cover plants, with few local and non-locally occurring native species being impacted.
- No definitive Plant Community Type (PCT) occurs throughout the subject properties which have been historically landscaped for over a period of 80 years.
- A small patch of Blue Gum High Forest (BGHF) occurs outside the development area, at the rear of No.7 Pockley Avenue. This patch will not be impacted by the development, but any landscape plan should use up to 80% of species drawn from this assemblage, including large trees, small trees, shrubs, ground cover plants and twiners.
- It is considered that no threatened species, either flora or fauna, will be impacted by the proposed development, either in relation to foraging, breeding or habitat suitability.

Accordingly, a BDAR Waiver request was submitted to DPHI for the requirement to submit a full BDAR to be waived under clause 7.9(2) of the BC Act. The BDAR Waiver provided by the Department of Climate Change, Energy, the Environment and Water is included in **Appendix F**. Thus, no further assessment of biodiversity impacts is required.

7.11 Noise and Vibration

A Noise and Vibration Impact Assessment (NVIA) has been prepared by Stantec and is attached as **Appendix CC** to assess the potential effects of external noise and vibration intrusion to the proposed development as well as the assessment of construction and operational noise and vibrations from the proposed development.

7.11.1 Current Conditions

The NVIA identified three Noise Catchment Areas (NCAs) as potential nearby sensitive noise receivers (shown in **Figure 34**). Attended and unattended noise surveys were conducted in the locations shown in Table 3 to Table 5 of the NVIA report to establish the ambient and background noise levels of the site and surrounds. The predominant noise sources noted at the attended noise surveys were construction noise including heavy machinery and vehicles, and noise generated by flora and fauna.



Figure 34 Overview of site and measurement locations identifying NCAs (Stantec)

7.11.2 Potential Impacts

Relevant noise and vibration criteria were identified for the following aspects which identify appropriate levels to minimise potential detrimental impact to sensitive receivers:

External Noise

The following noise sources are considered the most likely to cause an adverse noise impact to noise sensitive receivers if not acoustically treated effectively:

- External condenser units located on the rooftop of the proposed development.

In order to assess the worst-case scenario, it is assumed that the air conditioning units associated with the proposed development are running at any time throughout a 24hr period. With all, night time is the most stringent period for the noise generated by the operation of the mechanical plant, therefore this criterion was used as the noise target at the boundary of the nearest sensitive receivers for the project.

However, due to the early stage of works, the final mechanical plant for the project haven't been selected. Further assessment will be conducted at the later stage once specific units have been selected prior to Construction Certificate to ensure no adverse noise impacts from external mechanical plant in accordance with the criteria outlined.

Internal Noise

The results of the acoustic façade modelling, assessing internal noise levels in habitable spaces, indicate that some apartments shown in Appendix B may require an alternative means of ventilation to meet the aforementioned requirements. Further coordination during the design stage will be required to resolve noise affected apartments.

Construction Noise and Vibration Assessment

Predicted noise levels have been assessed for the following construction stages:

- Early works and demolition
- Structural works

- Fit-out

A Detailed Construction Noise and Vibration Management Plan (CNVMP) is recommended to be carried out once a construction program and methodology are known. This preliminary advice provided in the NVIA shall form the basis for the Contractor's detailed CNVMP which shall identify any noise criteria exceedances and relevant mitigation measures once construction methods and stages are known.

7.11.3 Mitigation Measures

External Noise Impact

- **Mechanical noise emissions:** Noise generation by external mechanical plant associated with the proposed development is to be managed to ensure external noise emissions are not intrusive and do not impact the amenity of the nearest sensitive receivers.
 - Where possible, locate plant as far away from possible noise sensitive receivers as practical to minimise the aggregate noise level.
 - Select low noise mechanical equipment.
 - Acoustic louvres or solid barriers may be required, surrounding plant items on the rooftop. This mitigation will likely be driven by internal noise criteria within the residential spaces of the proposed development.
 - Where possible, locate noisy plant within an enclosed plant space.
 - Carpark exhaust is to be included in the mechanical assessment. Carpark exhaust fans are typically located in a plant room in a basement allowing for sufficient ductwork to allow for acoustic internal lining or an attenuator for supply and exhaust to meet environmental noise criteria.
 - A detailed acoustic assessment of the mechanical plant noise is recommended prior to Construction Certificate.

Internal Noise Impact

- **Glazing performance:** Appendix C of the NVIA indicates glazing performance required out of min. RW 32 windows or min. RW 35 windows for each apartment to ensure adequate internal noise levels.
- **Open windows for natural ventilation:** If there is an exceedance of the internal noise level criteria with the windows open, alternative means of ventilation is required in accordance with the requirements of the NCC to the noise-affected spaces. Acoustic façade modelling indicates that some apartments shown in Appendix B may require an alternative means of ventilation. Further coordination will be required to resolve noise affected apartments.

All relevant criteria relating to the development are able to be satisfied, including the internal noise levels within each space and external noise emissions at the most affected receivers. Further assessments will be conducted to provide acoustic mitigation measures such as to comply with the relevant requirements as part of the Detailed Design Phase when all plant selections and locations have been detailed.

Construction Noise and Vibration

Reasonable and feasible mitigation methods have been provided to limit the noise and vibration impacts on the nearest sensitive receivers during the construction, including:

- Noise distancing and barriers:
 - Increasing the distance between noise sources and sensitive receivers.
 - Reducing the line-of-sight noise transmission to residences or other sensitive land uses using temporary barriers (stockpiles, shipping containers and site office transportable can be effective barriers).
 - Constructing barriers that are part of the project design early in the project to introduce the mitigation of site noise.
 - Installing purpose-built noise barriers, acoustic sheds and enclosures.
- Screening:

- Situate structures such as stores, site offices and other temporary buildings between the noisiest part of the site and the nearest dwellings.
- A hoarding that includes a site office on an elevated structure offers superior noise reduction when compared with a standard (simple) hoarding. The acoustic performance is further enhanced when the hoarding is a continuous barrier.
- Storage of building materials or the placement of shipping containers between the noise source and any noise-sensitive area.
- Siting the plant behind and as close as possible to mounds of earth, which may effectively screen any noise-sensitive areas from the plan. These can often be designed into the construction schedule or site arrangement for future landscaping.
- Water pumps, fans and other plant equipment that operate on a 24-hour basis effectively screened by either situating them behind a noise barrier or by being positioned in a trench or hollow in the ground provided this does not generate reverberant noise.
- Crane (diesel operated):
 - An appropriate silencer on the muffler and acoustic screen around the engine bay are recommended to attenuate the noise emission.
- Reversing and warning alarm alternatives:
 - Broadband audible alarms incorporating a wide range of sound frequencies.
 - Variable-level alarms.
 - Non-audible warning systems (e.g. flashing lights, reversing cameras) provided safety consideration are not compromised.
 - Proximity alarms that use sensors to determine the distance from objects.
 - Spotters or observers.

The above mentioned should be combined, where appropriate.

- Noise and Vibration Monitoring:
 - The following monitoring program is proposed for this project. Refer to Figure 4 of the NVIA for the approximate monitoring locations:
 1. Unattended noise monitor installed at L1 and L2 during the demolition and construction stages, at least for a time period representing the average works. To be determined upon consultation with the appointed contractor.
 2. Attended noise and vibration monitoring at the start of new work phases likely to result in an adverse change in the noise emissions, and in the case of complaints.
 - The monitoring programme as shown above is to be carried out during the likely noisiest stages as agreed with the Acoustic engineer and Contractor. The final monitoring locations are subject to agreement with the relevant stakeholders associated with the surrounding receivers

7.12 Ground and Water Conditions

El Australia have prepared the following technical documentation in relation to ground and water conditions:

- Geotechnical Assessment, attached as **Appendix W**,
- Surface and Groundwater Impact Assessment (SGIA), attached as **Appendix DD**.

7.12.1 Current Conditions

Potential Contamination Sources

The PSI (**Appendix K**), discussed in **Section 7.15**, identified potential contamination sources. The SGIA report states that it is unlikely that any contamination plume (if present) would be drawn towards the dewatered site. Further, the lack of active groundwater supply bores within the area suggests that there are no local groundwater users at risk of suffering adverse impact to groundwater quality.

Potential Environmental Receptors

The discharge waters anticipated point of entry is upstream of the tidally influenced section of Blue Gum Creek, which is therefore deemed to be a freshwater aquatic ecosystem. As a result, freshwater discharge water quality criteria have been selected.

Groundwater Dependent Ecosystems

No listed high priority groundwater dependent ecosystems are in the vicinity of the site.

Soil Salinity

The potential for saline soils is low, and further assessment of saline soils is considered unwarranted for the subject site.

Acid Sulfate Soils

There is a low risk of acid sulfate soils (ASS). Given the land's elevation, the map information and the proposed development, further assessment of ASS is considered unwarranted for the subject site.

Soil Erosion

Erosive dispersion is not a significant risk for the proposed development.

Groundwater Conditions

The sub-soil profile comprises:

- Fill generally comprised sandy CLAY, silty CLAY, sandy SILT or gravelly CLAY (occurring from 0 -1.5m BGL);
- Residual clay described as 'firm to very stiff silty Clay' grading into extremely weathered shale (0.5 – 1.5 m BGL in thickness); and
- Bedrock (shale and sandstone) starting at depth ranging between 1.5 and 3.20 mBGL to the maximum investigation depth of 30.05 mBGL.

Groundwater is under pressure and moves through the fractured bedrock layer, which has been tested with characteristically low hydraulic conductivities ranging between 5.0×10^{-8} m/s and 1.6×10^{-7} m/s.

Groundwater levels ranging between 3.17 and 13.75 mBGL, have been observed in monitoring wells located inside and outside of the proposed basement excavation footprint area.

Groundwater flow direction in the vicinity of the site is inferred (based on monitoring data) to be south-westerly towards Blue Gum Creek.

Water Treatment

The baseline groundwater quality data indicates water treatment is required in relation to:

- The physical parameters: pH and turbidity
- Metals: nickel, zinc, aluminium, and
- The nutrient parameters: total phosphorus and total nitrogen.

7.12.2 Potential Impacts

The NSW 2012 Aquifer Interference Policy (the NSW AIP) provides guidance for the assessment of potential impacts of dewatering on water uses and groundwater dependent ecosystems. The NSW AIP assessment process was performed with due regard for all hydrogeological information collected for the site.

Hydrogeological Model Summary

Lower seepage flow volumes may be expected during depressed groundwater levels in dry periods, with higher seepage flow after high rainfall events, which would be expected to cause temporary, elevated groundwater levels.

Groundwater Source Category

Modelled inflow to the basement will be 13.52m³/day (i.e. 0.14L/sec) for both the construction and operational phases of the development.

Minimal Impact Conclusions

The proposed dewatering for the construction and operational phases of the project are considered to be compliant with the NSW AIP minimal impact criteria for the following reasons:

- The estimated maximum cumulative pressure head decline in respect to drawdown will occur in competent bedrock. Drawdown-induced ground settlement would therefore have negligible impact on neighbouring properties, beyond the site boundary.
- There are indications that there are no beneficial users of the groundwater resource within the zone of drawdown influence that would be adversely affected by the drop in groundwater levels.
- Since groundwater is not being utilised within 500m of the site (noting the nearby petrol station as a potential source of groundwater contamination), any water quality impacts are unlikely to adversely impact the beneficial use category of the groundwater source. The AIP Level 1 Water Quality condition would therefore be maintained.
- There are no documented high priority, groundwater dependent ecosystems within the 40m of the site.

7.12.3 Mitigation Measures

Soil Erosion

Measures for minimising erosion in proposed landscaped areas with vegetation:

- Areas of established vegetation should be maintained (where possible)
- In areas of deep soil, mulch should be used, or salt tolerant plants should be planted to use the groundwater source and reduce infiltration.
- In certain landscaping situations, infiltration measures to be incorporated may include a sub-surface drain and liner when rapid infiltration to groundwater is likely to occur.
- Irrigation systems to be properly installed to avoid leakage and smart sprinkler systems should be considered.

Water Treatment

A potentially suitable water treatment option may involve pumping tail waters through a sediment settlement (baffle) tank, where the following could be implemented:

- pH correction via the addition of sodium hydroxide solution;

- Addition of flocculent/coagulant for settlement of suspended particles, which would lower turbidity and assist in the control of metals; and
- Adjustment of the flow rate to allow sufficient residence time for flocculation / coagulation and settlement to take place.

Dewatering Management

The report includes requirements for a dewatering management plan (DMP) to ensure that the proposed dewatering operations do not impact on the quality of the receiving surface waters. The objective on implementing a DMP is for groundwater to be treated to achieve an acceptable water quality prior to discharge.

7.13 Water Management

The Water Management Plan (WMP) has been prepared by Stantec and is attached at **Appendix O**.

This WMP outlines the conceptual stormwater design and demonstrates the proposal's compliance with provisions set by Ku-ring-gai Council, Australian Rainfall and Runoff, Australian Standards. The quantity and quality of stormwater associated with the proposed development plan is evaluated and addresses the following:

- Stormwater runoff volumes;
- Stormwater quality treatment measures;
- Water Sensitive Urban Design (WSUD) measures
- Erosion Sedimentation Control
- Stormwater Network Maintenance during Operation

7.13.1 Current Conditions

Existing Stormwater Infrastructure

There is no evidence that the site contains any council authority drainage infrastructure within the site boundary extents. Review of the topographical survey plan prepared by Rygate Surveyors identifies unspecified pit locations and gutter systems which surround the existing dwellings. It is assumed and expected that stormwater runoff follows the natural topography of the site and utilises both the network spanning Pockley Avenue to the north, and Maclaurin Parade to the south.

Existing Stormwater Discharge

The existing residential frontages bordering Pockley Avenue drain via overland flow to pits along the southern side of Pockley Avenue. Whereas the roof areas and driveways along Maclaurin Parade drain to the kerb. It is assumed that all flows upstream of the western end of Maclaurin Parade and are to discharge into the existing stormwater pit. Upstream culverts and overland flow management is located behind 12 Pockley Avenue on Maclaurin Parade. All stormwater runoff to this pit is directed to an open channel reserve located west of Maclaurin Parade.

WSUD

There were no major constraints within or neighbouring the site such as flood plains, watercourses or sensitive environments that are required to be preserved or remediated as part of the proposed works.

7.13.2 Potential Impacts

Stormwater Conveyance

The development area is proposed to have a singular discharge located at the Southwest boundary of the site, connecting into the existing stormwater network on Maclaurin Parade. This single point of discharge will also encompass discharge from the OSD tank, and major overland flows in the 1% AEP storm events will be conveyed towards the Southwestern corner of the site, towards Maclaurin Parade/Pockley Avenue. It is assumed the existing downstream stormwater network has adequate capacity to accommodate this flow.

Stormwater Attenuation

One OSD tank has been proposed for the site. The tank incorporates an orifice plate leading into a discharge control pit to control the minor rainfall events (5% AEP).

Water Quality Treatment

The WMP identifies potential stormwater pollutant sources (typical urban pollutants and specific pollutants in urban stormwater) which can be managed through appropriate stormwater quality treatment.

7.13.3 Mitigation Measures

Stormwater Conveyance

Further consultation with Ku-ring-gai Council is noted to confirm the legal point(s) of stormwater discharge.

Stormwater Attenuation

A DRAINS model has been prepared to confirm that the proposed stormwater pit and pipe network is adequately sized to capture and convey the 5% AEP storm. Overland flow paths have been adequately sized to convey the 1% AEP storm flows safely across the site.

Water Quality Treatment and WSUD Targets

Stormwater Quality Improvement Devices (SQIDs) are proposed to assist in reducing a wide range of pollutants and minimising the development impact on the natural water cycle. A pollutant reduction system is proposed as a series of treatment devices within the stormwater network which forms a treatment train.

Quantitative water treatment modelling using the Model for Urban Stormwater Improvement Conceptualisation (MUSIC) software program demonstrates the effectiveness of the treatment system of the proposed development in achieving the reduction targets, for pollutant loading of stormwater into Council's drainage system, set by Council. The MUSIC results presented into WMP are recreated in **Table 16**.

Table 16 Assessment of proposed design against Council's reduction target (Stantec)

Pollutant / Issue	Target	Reduction	Target Achieved
TSS	85%	87.0%	YES
Phosphorus	65%	71.7%	YES
Nitrogen	45%	47.6%	YES
Gross Pollutants	70%	100%	YES

Other SQIDs proposed in the WMP include Ocean Protect StormFilter Cartridges, and OceanGuard Pit Baskets.

Water Conservation

The proposed development will include a rainwater storage tank that can provide water to be reused for non-potable uses such as toilet flushing and landscape watering.

Erosion and Sedimentation Control

A Soil and Water Management Plan has been prepared by Stantec and is included as Appendix A of the WMP.

7.14 Flooding Risk

A Flood Impact Assessment Report has been prepared by Kozarovski and Partners and is attached at **Appendix U**. The report identifies and assesses any potential flood risk in relation to the site and proposed development.

7.14.1 Current Conditions

The development site is slightly affected by the 1% AEP flood, however the footprint of the development is not affected at all.

7.14.2 Potential Impacts

Most of the development is not affected by floods with some minor areas at the north-western corner located in a Medium Flood Risk Precinct. It would be necessary to physically protect the north-western corner of the site from the PMF plus say 200 mm freeboard to eliminate any risk of flooding during the maximum possible flood.

The proposed development can be considered safe during all possible floods and evacuation from the building is not required.

7.14.3 Mitigation Measures

The following mitigation measures are provided:

- The lower ground floor and the basements' floor levels are lower than the 1%AEP flood levels in the streets, however, they are protected by the existing ground levels. The existing ground levels and all accesses to the building must be checked to be 500 mm above the 1% AEP levels.
- The part of the site where the proposed driveway crossing is located is not affected by flooding. The driveway hump should be higher than the kerb level.
- The proposed development must be constructed from flood compatible materials for the components exposed to flood waters.
- All electrical connections must be physically protected 500 mm above the 1% AEP flood levels. Construct the proposed development from flood compatible materials for the components exposed to flood waters.
- The building structure is not exposed to floods, however any flood protection walls must be designed to withstand the forces of buoyancy, flowing water and debris during the PMF. The depth and the velocity of flow during the PMF event in contact with the flood protection wall are low and will be able to withstand the forces of water flow, debris and buoyancy, subject to a structural engineer's design and report at the CC stage.
- The floods in this area would be of a short nature and it is recommended that the occupants remain within the site during the periods of extremely heavy rain.
- Regardless of the above, a Flood Emergency Response Plan has been prepared by Kozarovski and Partners and is attached as Appendix A to the Flood Impact Assessment Report. This plan is to be used in the event of a 'flash flood' and floodwaters.

7.15 Contamination and Remediation

A Preliminary Site Investigation (PSI) has been prepared by EI Australia, attached at **Appendix K** and appraises the potential for contamination on the site.

A Hazards Materials Survey (HMS) has been prepared by EI Australia and is attached as **Appendix V**. This report presents the findings of a qualitative risk assessment of hazardous materials detected within the buildings.

7.15.1 Current Conditions

The findings of the PSI concluded the following:

- The site had continuously been used for residential purposes since at least 1916.
- A large scale cut and fill operation was not expected to have occurred on the land.
- The site was free of statutory notices and licensing agreements.
- Neither the site, nor any surrounding area within a kilometre radius of it, were subject to any government per- and poly- fluoroalkyl substance (PFAS) investigation / management program.
- There was no evidence that an underground storage tank had been installed on any part of the site. No aboveground storage tank was present.
- Acid sulfate and saline soils were unlikely to be present on-site.

- The Conceptual Site Model established there was low potential for contamination to be present within the site area and that the risks to human and environmental receptors posed by the identified contaminant sources were such that further investigation was unwarranted.

The HMS summarised the findings of the presence/absence of hazardous materials on the site, this has been replicated in **Table 17**.

Table 17 Presence/absence of identified hazardous materials (EI Australia)

Property Address	Asbestos-containing material (friable)	Asbestos-containing material (non-friable)	Lead containing dust	Lead-based paint	Synthetic mineral fibre	Polychlorinated biphenyl
2 Pockley Avenue	No	Yes	No	Yes	Yes	Yes
4 Pockley Avenue	No*	Yes	No	Yes	Yes	Yes
6 Pockley Avenue	No	Yes	No	No	Yes	No
8 Pockley Avenue	No	Yes	No	Yes	Yes	Yes
10 Pockley Avenue	No	Yes	No	Yes	Yes	No
12 Pockley Avenue	No	Yes	No	Yes	Yes	Yes
14 Pockley Avenue	No	Yes	No	No	Yes	Yes
16 Pockley Avenue	No	Yes	No	Yes	Yes	Yes

* = Asbestos-containing putty may be considered friable

7.15.2 Potential Impacts

The PSI concludes that in accordance with *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP), the site was deemed suitable for the proposed (medium-high density, residential apartment) development.

All identified hazardous building materials identified in the HMS were ranked **Priority 3 or Priority 4** (i.e. stable and posing low to negligible health risk under present conditions). No immediate remedial action is considered necessary. Adopting the precautionary principle, and in the absence of a more comprehensive sampling and analytical program, EI recommends that where there is doubt over the type of any building material, it should be assumed as containing a hazardous substance.

7.15.3 Mitigation Measures

The following recommendations from the PSI are summarised below. Refer to **Appendix K** for details.

- During the demolition stage, all identified hazardous materials must be appropriately managed, to maintain worker health and safety and prevent the spread of hazardous substances. The HMS details the handling and management process and procedures for asbestos (removal, waste management and clearance inspection), lead paint, lead in dust, synthetic mineral fibres and polychlorinated biphenyl capacitors.
- All soil materials designated for off-site disposal resulting from excavation of soils, including any virgin excavated natural material, must be managed in accordance with an appropriate waste management plan.
- Once appropriately classified, all waste materials are to be transported to EPA-licensed waste facilities by the appointed waste contractors. All tipping dockets supplied by the landfill companies are to be retained, to confirm the appropriate (lawful) disposal of waste.
- Any material being imported to the site should be validated as suitable for the intended land use, in accordance with EPA guidelines.
- During groundwater treatment and monitoring as part of excavation and construction phases, the analytical program should include the parameters recommended under relevant policy and requirements documents.

EI emphasises that these recommendations can be managed post demolition and through the development approval process, as conditions of consent, in accordance with the Resilience and Hazards SEPP.

The HMS made recommendation in relation to the safe and secure removal of asbestos, lead, synthetic mineral fibres, polychlorinated biphenyl capacitors, and demolition and waste disposal. Refer to **Appendix V** for details.

7.16 Waste Management

Elephants Foot have prepared a Construction Waste Management Plan (CWMP), and an Operation Waste Management Plan (OWMP) attached as **Appendix EE** and **Appendix FF** respectively. These identify potential waste generation and the plan of management, processing and disposal of waste.

An HMS has been prepared by EI Australia and is attached as **Appendix V**. Contents of the report are discussed in **Section 7.15**.

7.16.1 Construction Waste Management

Waste Generation

The CWMP details the anticipated volumes of the different waste materials resulting from demolition and construction works.

The HMS identified hazardous materials detected within the existing buildings, outlined in **Section 7.15**.

Waste Management

The HMS details the waste management process and procedures for asbestos (removal, waste management and clearance inspection), lead, synthetic mineral fibres and polychlorinated biphenyl capacitors. It also makes recommendation in relation to the proposed building demolition and clean-up program to provide the basis for a demolition works plan.

A demolition contractor will be engaged during the demolition phase of the project, who will be responsible for ensuring all activities are undertaken in accordance with relevant waste minimisation policies and requirements.

Waste generated during the construction stage of the development will be managed by the principal contractor and sub-contractors. Where neither reuse nor recycling of materials are possible, waste will be disposed of as general waste at a licensed landfill site.

Site-specific operational measures are detailed and include:

- Training/ site inductions;
- Materials selection and ordering;
- Waste avoidance opportunities; and
- Site procedures

7.16.2 Operational Waste Management

Waste Generation

The Ku-ring-gai Development Control Plan 2024 has been referenced to calculate the total number of bins required for the residential units. Calculations are based on generic general waste, recycling and Food Organics and Garden Organics (FOGO) rates.

Based on the estimated volumes of general waste, recycling and FOGO generated by the residential component of this development, the recommended bin quantities and collection frequencies are as follows:

- **General waste:** 33 x 660L bins collected 1 x weekly
- **Paper / Cardboard recycling:** 17 x 660L bins collected 1 x weekly
- **Comingled recycling:** 17 x 660L bins collected 1 x weekly
- **FOGO:** 9 x 240L bins collected 1 x weekly
- **Service bins:** 3 x 660L bin

Waste Management

The OWMP details residential waste disposal procedures which include storage within residential units and at allocated disposal points on each residential level with access to a general waste chute and larger recycling compartments. Communal FOGO bin rooms will be provided for each building core.

Council will be engaged for residential bin collection in accordance with Council's collection schedule. The report assumes that each waste type (general waste, recycling, and FOGO) will be collected weekly.

Additional residential waste management procedures for residential common areas, landscaped areas and garden organics, and residential bulky waste procedures are outlined.

Primary roles and responsibilities for operational waste management are identified in the OWMP.

7.17 Heritage

7.17.1 Aboriginal Cultural Heritage

Artefact have prepared an Archaeological Assessment, attached as **Appendix GG** and ACHAR, attached as **Appendix G**.

The Archaeological Assessment found that site is unlikely to contain Aboriginal objects therefore the proposed development has no potential impacts.

The ACHAR states that the site has been subject to significant levels of disturbance through residential development and associated services. It is unlikely to contain any Aboriginal objects and therefore the proposal will not result in impacts to Aboriginal objects. No cultural values specific to the study area have been identified, however significance of the surrounding landscape for Aboriginal people is acknowledged.

Recommendations provided by both documents include:

- Preparing an Unexpected Finds Procedure (UFP) ahead of the proposed works commencing and implementing the throughout the project with procedures in place for notification of relevant authoritative parties where unexpected finds are identified.
- Consultation with registered Aboriginal parties to be maintained with gaps in communication of no more than six months until approval for the proposed works has been received

7.17.2 Environmental Heritage

The site does not accommodate any heritage items nor is located within a heritage conservation area identified in the Heritage Map and listed in Schedule 5 of the *Ku-ring-gai Local Environmental Plan 2015* (KLEP). There are also no heritage items in the immediate vicinity of the site which would be impacted by the proposal. Therefore, the proposed development has no potential impacts.

7.18 Social Impact

Forward Thinking has prepared a Social Impact Assessment (SIA) attached as **Appendix HH**.

7.18.1 Current Conditions

The SIA defined the social locality as being bounded by Grosvenor and Clanville Roads in the North, Lady Game Drive in the West, the A38 and Victoria Avenue in the South and Archbold Road and Penshurst in the East (**Figure 35**). The area comprises 10,000 homes and 2,878 registered businesses. The social locality includes the immediate area and examines the wider social locality including the regional centre of Chatswood, which provides a myriad of transport, economic, health, education and social services, and substantial private sector investment, of benefit to the future residents of the proposals.

The SIA identified the current circumstances whereby housing stress and affordability is a significant issue in NSW. The NSW government have responded to housing stress with two key policies: the TOD Program and Affordable Housing Initiatives under the Housing SEPP. Roseville is one of the most expensive rental markets in Australia. Providing at least 15.32% of GFA for Affordable Housing is a highly positive outcome in Ku-ring-gai. The Affordable Housing component will enable professionals, such as nurses, teachers and police, to live in the area.

The design of the Roseville proposal is intended to ensure that good quality design and amenity are available for all residents, regardless of their ownership status. The design will provide a range of housing sizes, suitable for a diverse community. Embedded in the design will be areas of communal and open space to promote social cohesion.

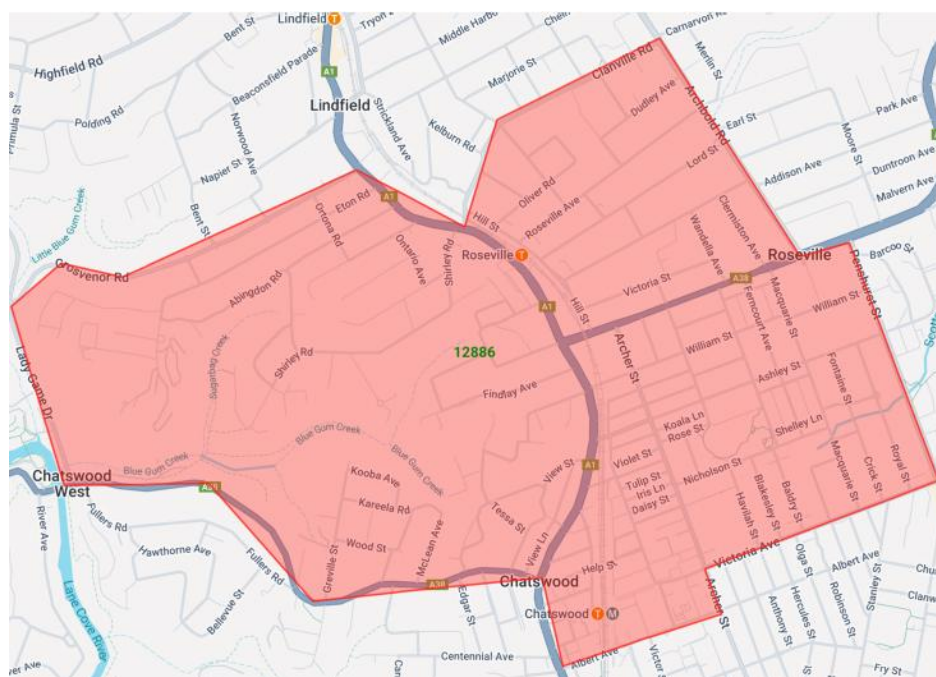


Figure 35 Social locality (Forward Thinking)

7.18.2 Potential Impacts

While Affordable Housing development proposals can raise concerns from the local community, research shows that these concerns are usually not substantiated once developments are built and this appears not to be a major issue in the immediate locality. Research suggests that many of the perceived negative impacts of affordable housing are most likely where design and management are poor, where it is located in a rundown and disadvantaged area, and where affordable housing residents are clustered. Impacts include antisocial behaviour, parking, privacy, overlooking, visual effects, and noise. These potential impacts can be mitigated, outlined in **Section 7.18.3**.

The SIA Guidelines identify several principles that underpin the preparation of a SIA. The SIA outlines the proposal's alignment with these principles and how they have been addressed, which are been further summarised below.

- **Action oriented:** The objective of the proposal is to deliver diverse housing types that are practical and achievable, where people in Sydney need it most.
- **Adaptive:** Bridge Housing will manage the project and support affordable housing residents once the project is built, involving ongoing engagement with residents and the local community.
- **Culturally responsive:** Aqualand Prestige has partnered with JMP Aboriginal Consultancy to lead engagement with Traditional Owners. The objective is to ensure that cultural knowledge, values and histories are respectfully integrated with both projects and connection to Country is embedded into the design.
- **Distributive equity:** This principle underpins the purpose of the project including Affordable Housing and the TOD.
- **Impartial:** The SIA has been prepared by suitably qualified professionals in accordance with industry standards.
- **Inclusive:** Engagement supports the proposal.
- **Integrated:** The SIA has drawn on findings of the EIS, architectural drawings, reports of traffic, construction and environmental impacts.

- **Life-cycle focus:** The proposal has considered impacts of social and environmental factors from construction to project completion.
- **Material:** The SIA discusses scoping of the potential social impacts and benefits and mitigation and enhancements.
- **Precautionary:** The proposal has taken a precautionary approach to environmental risks, drawing on technical studies.
- **Proportionate:** The proposal has assessed potential social impacts proportionate to the level of anticipated social impacts.
- **Rigorous:** The SIA has been conducted in line with the methodology and requirements outlined in the Social Impact Assessment Guidelines for State Significant projects.
- **Transparent:** This SIA uses a strong evidence base to analyse potential impacts on the social environment, using DPHI's SIA guideline assessment framework. The engagement with the community was undertaken by Notting Hill Advisory and is detailed in the SIA and in **Section 5.2** of this EIS.

7.18.3 Mitigation Measures

A social impact and assessment analysis is presented in the SIA in alignment with the categories outlined in the Guidelines and includes mitigation measures under these categories. These are summarised in **Table 18**.

Table 18 Social impact and assessment analysis (Forward Thinking)

Social Impact	Likelihood and Magnitude of Impact	Assessed Impact Significance Local in Project Phase	Response Mitigation
Way of life and surroundings			
Densification of the area	Certain	Moderate (post construction)	• The Roseville projects will comply with the TOD SEPP and the Affordable Housing SEPP. • The local area has already commenced changing character following the underlying zoning established by Ku-ring-gai Council. Both sites are surrounded by existing and incoming mid-rise residential housing. As a result of this development, the projects are compatible with the existing built form in the locality.
Affordable housing	Certain	Moderate (post construction)	• This development will provide at least 15.32% of GFA for Affordable Housing which is a highly positive outcome for the area of Ku-ring-gai which has a higher level of unaffordability compared to other areas of Greater Sydney. The proposals will provide quality design and equitable amenity outcomes equally for the affordable housing stock and the market apartments.
Natural environment, including trees, flora and fauna	Likely	Moderate (during and post construction)	• Implement mitigation measures from BDAR Waiver report and AIA report.
Bushfire risk	Unlikely	Minor	• Compliance with Australian standards and National Construction Code Requirements.
Capacity of local infrastructure	Likely	Moderate (post construction)	• The proposal is subject to government contributions.
Run-off from the site	Very unlikely	Minimal	• On-site detention will be provided and designed for storm events up to and including the 1% Annual Exceedance Probability (AEP) event. Additional post development discharge shall not exceed predevelopment discharge. Stormwater quality control will be in accordance with the Ku-ring-gai Council (2024) 24C.6 Stormwater Quality Control

Targets. This will be achieved through a series of pollutant reduction treatment devices.

Health and well-being			
Commitment to active transport	Certain	Major	- TOD projects encourage active transport, cycling and walking due to proximity to transport, convenience shopping and other services. - Proposed development will include bike storage and car share spaces.
Community			
Community engagement	Likely	Moderate	- Community engagement has underpinned the SIA and provided evidence for the SIA. - Ongoing community engagement through the planning assessment process aimed at explaining how community issues are being managed and being open to further concerns being raised and dealt with.
Economic			
Proposal will create an economic	Likely	Moderate (post construction)	There is capacity in the businesses in Roseville Village and the activation from the proposal will create a new market for the Village.
Access			
Public transport	Moderate	Moderate (post construction)	- The site is a walkable distance from Roseville Station - Rail and bus services are readily available close to the site.
Traffic	Moderate	Moderate (post construction)	Traffic generation impact will not have any unacceptable traffic implications in terms of road network capacity.
Parking	Likely – medium impact	Moderate (during and post construction)	- Parking will be provided within the development to take parking off the street and reduce pressure during peak hours. - All car parking spaces are designed to be EV ready, to enable installation of electric vehicle charging points for each individual dwelling electricity meter.
Construction impacts	Certain	Major (during construction)	- The CTMP aims to minimise disruption to the community and neighbourhood during construction. - TPZs will be created to protect tree in line with the Tree Retention and Removal Plan.
Decision-making systems			
Planning process	Very unlikely	Minimal	- The proposals will be assessed as State Significant Development (SSD), as they reach the cost threshold for SSD assessment. - This is a stringent process requiring a suite of highly technical reports, as laid out in the SEARS, from experts as part of the EIS.

7.19 Infrastructure, Requirements and Utilities

Neuron has prepared an Infrastructure Delivery, Management and Staging Plan attached as **Appendix Q**. The report assesses the existing and required services infrastructure to facilitate the development.

7.19.1 Current Conditions

- **Electrical infrastructure:** There are existing utilities infrastructure within the site that will be removed prior to construction. There are no existing substations on the site though a proposed power connection strategy is identified along Maclaurin Parade.
- **Communications infrastructure:** There are no carrier mobile base station on the site. There are currently existing NBN and Telstra carrier service infrastructures to the current individual lots which will need to be removed prior to excavation. Proposed fibre connections for both are identified along Pockley Avenue.
- **Gas infrastructure:** There is Medium Pressure (210kPA) gas mains running along Larkin Street, Pockley Avenue and Maclaurin Parade. The existing gas mains along Larkin Street may be sufficient to support this development. We recommend a new gas connection, including a gas meter and regulator. The site currently has multiple existing connection points to the gas main which will require removal.
- **Water infrastructure:** The site has existing 100mm water mains running along Larkin Street and Pockley Avenue, and a 150mm water main on Maclaurin Parade. Two connection strategy options have been proposed and early discussions with Sydney Water are recommended.
- **Sewer infrastructure:** The dial before you dig investigation reveals there is an existing 225mm sewer main next to the site along Pockley Avenue and running into the site. Based on the preliminary calculations, the proposed development is likely to require a new 300mm or multiple 225mm sewer mains connection. The connection strategy illustrated in the adjacent image involves connections to the 225mm mains on Pockley Avenue and Nola Road. Consultation with Sydney Water will be required for a preferred connection strategy.

7.19.2 Potential Impacts

The site has two proposed stages, with stage 1 consisting of the construction of all basement carpark levels and Pavilion A and B, and stage 2 consisting of the construction of Pavilion C from ground level up. Further information is detailed in **Section 4.12**. The infrastructure utility works for the proposal is proposed to be delivered in three stages:

1. Decommissioning utilities: Decommission of existing services to buildings and then buildings are demolished. Clean site for excavation.
2. Early works utility modifications: To allow the early works of shoring and excavation the following scope is to be considered.
3. Utility works for the proposed development.

Further consultation is identified for proposed services at the next stage of the project:

- **Proposed electrical infrastructure:** An ASP Level 03 will be engaged to begin the detailed design of the substation including consultation with Ausgrid.
- **Proposed communication infrastructure:** Consultation with NBN and Telstra to coordinate required works.
- **Proposed gas infrastructure:** Consultation with Jemena to coordinate the required connection works.
- **Proposed water and sewer infrastructure:** A Sydney Water Coordinator will be engaged during the next stage of the project to begin consultation with Sydney Water and ascertain their preferred connection strategy out of the two options proposed.

7.20 Bushfire Risk

The site is not identified as being bushfire prone land. Being located in an urbanised and well established residential suburb, there is a low risk of bushfire. Therefore, a Bushfire Impact Assessment has not been prepared for this SSDA. All fire safety building compliance have been adhered to, refer to the BCA Report prepared by Jensen Hughes and attached at **Appendix II**.

7.21 Aviation

The proposed development does not propose a helicopter landing site (HLS), nor does the site contain nor is adjacent to an HLS. Further, the site is not located in an area that may impact aviation activity. Therefore, an Aviation Report is not required as part of this SSDA.

8.0 Justification

This section provides an overall justification of the project holistically. It evaluates the potential benefits and impacts of the proposal considering the findings of the detailed assessment and the compliance of the proposal with relevant controls having regard to the economic, environmental and social impact of the project and the principles of ecologically sustainable development.

8.1 Design of the Proposed Development

The design of the proposed development has been carefully considered to ensure that potential impacts are suitably mitigated or minimised. The proposed development responds to its proximity to Roseville Station within the TOD catchment, which allows greater height and density on the site. Importantly, the proposal allows for much needed supply of both market and affordable housing in New South Wales.

The additional 26.6% building height and FSR permissible under the Housing SEPP has been utilised to provide a thoughtful design and incorporate feedback from the SDRP. The height exceedance beyond the additional height is supported by a Clause 4.6 Variation Request for building height (**Appendix M**). This additional height accommodates the lift overrun.

8.2 Consistency with the Strategic Context

The strategic context for the proposal has been addressed at **Section 3.0** which demonstrates that the development is consistent with the strategic context.

8.3 Compliance with the Statutory Requirements

The relevant State and local environmental planning instruments are addressed in **Section 5.0** and further detailed in the Statutory Compliance Table in **Appendix R**. in summary:

- The proposed development has been designed in respect to the relevant objects under clause 1.3 of the EP&A Act as addressed in **Section 5.0**.
- This EIS has been prepared in accordance with the issued SEARs as required by Schedule 2 of the EP&A Regulations.
- The proposed development has addressed relevant matters for consideration under the Biodiversity Conservation Act, supported by the BDAR Waiver attached as **Appendix F**.
- The proposed development has been assessed and has addressed relevant clauses under the Resilience and Hazard SEPP.
- The proposed development will require an approval for vehicle connection and access to a Council owned road under the Roads Act 1993.
- This SSD is qualified and in accordance with the requirements of 26A In-fill Affordable Housing under Schedule 1 of the Planning SEPP.
- The proposed development is made permissible with consent under Chapter 5 of the Housing SEPP as a relevant residential zone, R2 under the KLEP.
- The proposed development is compliant with the relevant provisions under the KLEP and Chapters 5,2, and 4 of the Housing SEPP including consistency with the aims of Chapter 5 Transport Oriented Development.

8.4 Community Views

Community and stakeholder engagement has been undertaken by the Applicant and Notting Hill Advisory in process of this SSDA. Key matters raised by the community over the course of engagement activities are outlined in **Section 6.0** further detailed in the Community Engagement Report attached as **Appendix E**.

8.5 Likely Impacts of Development

The proposed development has been assessed considering the potential environmental, economic and social impacts.

8.5.1 Natural Environment Impacts

- **Biodiversity:** A BDAR Waiver and BDAR Waiver Report supports this SSDA, confirming that the development is unlikely to have significant impact on biodiversity values on the site.
- **Trees:** 22 trees are proposed to be removed within the site. Replacement trees are proposed throughout the proposed development. An AIA Report prepared by Naturally Trees, attached as **Appendix J** supports the proposal.
- **Landscaping:** Additional landscaping has been proposed to support the built form and are demonstrated in the Landscape Plan prepared by Ground Ink, attached as **Appendix H**. Key elements of the landscaping strategy that support environmental outcomes include:
 - A perched site overlooking the canopy of Blue Gum Creek and Lane Cove National Park
 - The site as a mediator between the Blue Gum Creek Gully and the commercial hub around Roseville Station.
 - Extending and blending of surrounding Ecological Biodiversity.
- **Ecologically Sustainable Development:** The ESD principles are addressed in the ESD Report attached at **Appendix I** in accordance with the requirements under Clause 191 of the Regulations.
- **Flood risk:** Flood risk has been investigated for the site and a Flood Risk Impact Assessment has been prepared by Kozarovski and Partners, attached as **Appendix U**. Overall, most of the development is not affected by floods with some minor areas at the north-western corner located in a Medium Flood Risk Precinct.

8.5.2 Built Environment Impacts

- **Built Form and Urban Design:**
 - The Proposal has gone through an SDRP meeting prior to the lodgement of the SSDA and have implemented feedback received, which is addressed in the Design Report prepared Woods Bagot, attached as **Appendix D**.
 - Alternatives for the massing of the built form were considered, and the proposal demonstrates the most suitable according site-specific and environmental constraints.
 - Site specific design outcomes have incorporated outcomes influenced by a Walk on Country and Design Input Session with Traditional Owners.
 - Affordable housing dwellings have been designed to provide equitable outcomes in relation to market dwellings. These dwellings will meet the expected needs of potential affordable housing tenants including housing typology as notified by the registered CHP, Bridge Housing who will manage this component of the proposed development.
 - The façade design is sensitive of the surrounding natural and built context and produces a design that will integrate well through material selection.
 - The maximum building height of 32.31m exceeds the maximum permissible building height control of 27.9m by 4.31 (15.45%). A Clause 4.6 Variation Request has been prepared by Planning & Co, attached as **Appendix M**. The report concludes that the height exceedance from the maximum permitted height is acceptable.
- **Residential Amenity:** The built form has been assessed against environmental issues which may affect residential amenity. The potential impacts of the proposed development are supportable considering the site-specific circumstances and are detailed in **Section 7.3**. All other amenity considerations are satisfactory as ADG compliance is met.

- **Pedestrian Wind Impact:** The proposed development has incorporated an extensive landscape strategy with a mixture of soft and hard landscaping through the western and northern communal areas which are expected to result in wind conditions that are suited for the intended activities across the ground plane.
- **Visual and View Impact:** The Visual and View impact of the proposed development has been undertaken and conclude that the visual impact is deemed reasonable on balance of considering the implications of State government strategic policy and provisions.
- **Crime Prevention Through Environmental Design:** Considers how to minimise potential crime opportunities and increase safety and perceived safety and recommends design and management principles to increase actual and perceived safety within the proposed development and notable surrounding areas.
- **Traffic, Transport and Accessibility:**
 - **Traffic Generation:** The TAIA confirms that the projected change in the traffic generation as a consequence of the development is minimal and will not have any unacceptable traffic implications in terms of road network capacity.
 - **Servicing and loading arrangements:** A dedicated loading dock is provided in Basement 03, adjacent to the waste collection room. The manoeuvring area has been designed to accommodate the swept turning path requirements of Council's 5.1m long waste truck, allowing them to enter and exit the site in a forward direction at all times.
 - **Construction traffic management:** Construction truck routes will approach and depart the site via the Pacific Highway, MacLaurin Parade, Larkin Street and Pockley Avenue. Loading and unloading activities will occur entirely within the front setback areas of the site, fronting the Pockley Avenue site frontage and therefore a work zone is not considered necessary.
- **Noise and Vibration:**
 - **External noise** impacting noise sensitive receivers from the proposed development is likely to be external condenser units located on the rooftop of the proposed development. Mitigation measures are recommended for when the final mechanical plant has been selected at a later stage.
 - **Internal noise** was assessed and apartments identified as potentially requiring an alternative means of ventilation to be determined at a late design stage.
 - The preliminary advice provided within the NVIA shall form the basis for the Contractor's detailed Construction Noise and Vibration Management Plan (CNVMP) which shall identify any noise criteria exceedances and relevant mitigation measures once construction methods and stages are finalised. Noise and vibration techniques that may be implemented include noise barriers, screening, crane mufflers, alarm alternatives and monitoring.
- **Ground and Water Condition:** Assessment states that it is unlikely that any contamination plume (if present) would be drawn towards the dewatered site. The lack of active groundwater supply bores within the area suggests that there are no local groundwater users at risk of suffering adverse impact to groundwater quality. No listed high priority groundwater dependent ecosystems are in the vicinity of the site. The potential for saline soils is low, and further assessment of saline soils is considered unwarranted for the subject site. There is a low risk of acid sulfate soils (ASS). Given the land's elevation, the map information and the proposed development, further assessment of ASS is considered unwarranted for the subject site. Erosive dispersion is not a significant risk for the proposed development.

The proposed dewatering for the construction and operational phases of the project are considered to be compliant with the NSW AIP minimal impact criteria. Mitigation measures for soil erosion, water treatment and dewatering management are provided.
- **Water Management:** The proposed stormwater management system complies with provisions set by Ku-ring-gai Council, Australian Rainfall and Runoff, Australian Standards. The development area is proposed to have a singular discharge located at the Northwest boundary of the site, connecting into the existing stormwater network in The Rifleyway and assumed to have adequate capacity. A soil and water management plan has been prepared.
- **Contamination and Remediation:** The PSI concludes that the proposed use of the site as a residential flat building development is suitable for the site subject to the implementation of the recommendations as mitigation measures. All identified hazardous building materials identified in the HMS were ranked Priority 3

or Priority 4 (i.e. stable and posing low to negligible health risk under present conditions). Recommendations for the safe and secure removal of materials are outlined. No immediate remedial action is considered necessary. Recommendations for the safe and secure removal of materials are outlined. EI emphasises that these recommendations can be managed post demolition and through the development approval process, as conditions of consent, in accordance with the Resilience and Hazards SEPP.

- **Waste Management:**

- **Construction Waste:** A demolition contractor will be engaged during the demolition phase of the project. Recommendations are provided in relation to the proposed building demolition and clean-up program to provide the basis for a demolition works plan. Waste generated during the construction stage of the development will be managed by the principal contractor and sub-contractors. Where neither reuse nor recycling of materials are possible, waste will be disposed of as general waste at a licensed landfill site.
- **Operational waste:** The OWMP details residential waste disposal procedures which include storage within residential units and at allocated disposal points on each residential level with access to a general waste chute and larger recycling compartments. Communal FOGO bin rooms will be provided for each building core. Council will be engaged for residential bin collection in accordance with Council's collection schedule, assuming weekly collections for each waste type.

- **Heritage (Aboriginal Cultural and Environmental), Bushfire and Aviation:** The proposed development will not have any impacts to the above matters.

8.5.3 Social

The proposal will deliver positive social outcomes for both the wider and local communities. Future residents of the development will benefit from the proximity to existing transport, services and shops and a well-designed built form that provides adequate residential amenity. The wider community will benefit from development that does not increase Sydney's sprawl. It is emphasised that the local area is one that had already commenced a changing character prior to the implementation of the TOD Program, following the underlying zoning established by Ku-ring-gai Council.

Social impact mitigations will be implemented, and ongoing community engagement will be addressed as part of the public exhibition process to continue addressing community concerns.

A Social Impact Assessment has been prepared and supports this proposal at **Appendix HH**.

8.5.4 Economic

The proposal will have a positive economic impact through the delivery both 139 market dwellings and 39 affordable dwelling in close proximity to public transport and existing services and shops. This will allow for more efficient use of existing transport infrastructure for work and education travel. Further, the construction phase for this development will generate approximately 250 jobs in the near term.

8.5.5 Cumulative Impacts

The site is located in an evolving Roseville area which is anticipated for increased density. This is mainly catalysed by the TOD provisions for the Roseville TOD catchment which is defined as a 400m walking distance from the rail station. Further, 400-800m from Roseville rail station is identified as a 'low and mid-rise housing outer area' where the low and mid-rise housing provisions under the Housing SEPP apply. Due to the recency of these provisions being introduced in 2024 and 2025 respectively, it is understandable that there are not yet any developments that have been approved in the area under these provisions. However, future development in these area catchments is a sensible consideration for cumulative impacts. Whilst it is acknowledged that the Housing SEPP maximum 30% height and FSR bonuses facilitates greater density on the site, this EIS demonstrates that the environmental impacts of this additional density are reasonable and can also be reduced where appropriate through the mitigation measures proposed in **Section 7.0** of this EIS. Furthermore, the continued issues relating to the housing shortage that is currently facing wider Sydney should also be considered as a factor of this assessment. The proposed development responds directly to the State Government's objective to provide more housing in well located areas. Specifically, the integration of affordable and market dwellings in an area that is highly accessible via public and active transport options will actively work towards addressing the housing crisis.

8.6 Suitability of the Site

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

- The proposal is consistent with the aims of the chapter for Chapter 5 Transport Oriented Development and is permitted with consent under the Housing SEPP.
- A PSI (**Appendix K**) conducted for the site concluded that the proposed use of the site as residential is appropriate for the site.
- The site is currently underutilised in its existing condition and does not align to the density and height envisioned for the site by State government policy.
- The site is not affected by natural hazard risk nor does it significantly impact biodiversity values.
- The proposal is largely compliant with statutory provisions including FSR (inclusive of additional 26.8% bonus under Housing SEPP). A variation is sought for the maximum building height development standard, through the Clause 4.6 Variation Request (**Appendix M**).
- The character and scale of the development is compatible with the existing and envisioned future surrounding context.
- The proposal will provide the maximum GFA over the site for increased housing supply in an accessible area as envisioned by State Government.

8.7 Public Interest

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

- The proposal delivers 39 affordable housing dwellings in an accessible location which consists of the State government's mandated 2% of GFA for affordable housing in the TOD catchment, in perpetuity, as well as an additional 13.4% of GFA as affordable housing as part of in-fill affordable housing delivered under the provisions of the Housing SEPP.
- Considerable effort has been made to ensure equitable residential amenity outcomes for affordable housing dwellings in comparison to market dwellings.
- The proposal is consistent with the state and local strategic framework and largely complies with the relevant statutory controls. Importantly, the proposal provides an outcome that is consistent with the outcomes envisioned by recent State government's TOD program.
- Subject to the implementation of the mitigation measures identified for the proposed development, potential social and environmental impacts resulting from the proposal will be eliminated or at an appropriate extent.
- The proposal will allow key workers to be located closer to their place of work through affordable housing tenancy.
- The proposal will deliver 250 jobs in the near term through construction works, providing benefits to the local economy.
- The site will facilitate the orderly and economic redevelopment of the site through the intensification of the existing residential use of the land.

We conclude that the approval of this SSDA, subject to appropriate conditions of consent, is recommended for the proposed development as it has considered all relevant matters, has demonstrated significant merit and is appropriate for the site.

9.0 Conclusion

The Environmental Impact Statement (EIS) has been prepared to consider the environmental, social, and economic impacts of the proposed Infill Affordable Housing development. The EIS has addressed the issues outlined in the SEARs (Appendix A) and accords with Part 8 of the EP&A Regulation with regards to consideration of the relevant environmental planning instruments, built form, social and environmental impacts resulting from the proposed development.

Appropriate mitigation measures have been identified to manage the impacts of the development through the construction and operational phases of the project, noting that some impacts are inevitable for any construction project as it involves the demolition of existing developments, excavation and redevelopment of the site.

The proposed development is identified as having strong strategic merit, by delivering a contemporary and high-quality affordable and market housing development, comprising a total of 178 dwellings including 39 affordable housing dwellings. The proposal is consistent with the various strategic planning initiatives encouraged by federal, state and local government, principally, in relation to the delivery of additional housing supply in key locations across Greater Sydney relative to existing transport options under the TOD program. Having regard to the biophysical, economic, and social considerations, including the principles of ecological sustainable development, the carrying out of the project is justified for the following reasons:

- The proposal will facilitate the redevelopment of the site for the purposes of infill affordable housing, which will deliver important social and economic benefits to the community by contributing to housing diversity in a highly accessible location proximate to heavy rail infrastructure in line with the NSW Government's TOD program.
- The proposed development is a direct response to the strategic vision and objectives for the delivery of additional housing supply, stated in such documents as the National Housing Accord 2022, as well as the Greater Sydney Region Plan and North District Plan.
- The proposal has been carefully designed to provide a contextual response to its setting and to create a contemporary and high-quality infill affordable housing development.
- The proposal is a high-quality architectural building and represents a significant improvement that will set a high standard of architecture in an evolving precinct, that has already seen an increased level of densification over the years.
- The proposed development will facilitate the delivery of a high level of amenity for residents.
- The proposal is supported by a clause 4.6 variation request to support a minor (15.44% at its worst point) height variation that has demonstrated that compliance with the standard is unreasonable in the case of the steeply sloping site, with the environmental grounds to support it based on negligible to no impact in terms of solar impact, views or amenity.

The assessment of the proposal has demonstrated that the development will not result in any unreasonable environmental impacts that cannot be appropriately managed consistent with the relevant planning controls for the site. The proposal is consistent with the principles of ecological sustainable development as defined by Section 190 of the *Environmental Planning and Assessment Regulation 2021*.

Based on the detailed assessment undertaken in this EIS, we conclude that it is in the public interest that consent be granted to the proposal, subject to the implementation of suitable conditions of consent reflecting the recommended mitigation measures.