RESPONSE TO SUBMISSIONS

16-24 Lord Street & 21-27
Roseville Avenue, Roseville

SSD-78996460

Prepared for
HYECORP PROPERTY GROUP
10 December 2025

URBIS

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Project Code	P0054878
Report Number	FINAL

Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

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

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

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EXECUTIVE SUMMARY

This Submissions Report has been prepared on behalf of Hyecorp Property Group (**the Applicant**) to address the matters raised by government agencies, local Council, the community and relevant stakeholder groups during public exhibition of the proposed development at 16-24 Lord Street and 21-27 Roseville Avenue, Roseville (**the site**).

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

Overview of Submissions

The SSDA was publicly exhibited between 1 May 2025 and 28 May 2025. Gyde have analysed the submissions (**Appendix F**) in an Engagement Report Addendum (**ER Addendum**). Gyde's analysis has confirmed that 389 unique public submissions were received over the public exhibition period, including:

- 386 submissions from members of the public.
- 3 submissions from community interest groups.

Additionally, submissions were received from the following nine government agencies, alongside a 'Key Issues' letter from DPHI.

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

Gyde found that of the public submissions, 10 submissions were received in support (3%), 367 submissions objected (94%), and 12 submissions provided general comments (3%).

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

- Traffic and parking (289)
- Surrounding context/character (230)
- Planning (227)
- Community engagement (218)
- Heritage (215)
- Height, scale and form of buildings (160)
- Tree removal (137)
- Infrastructure (128)
- Overshadowing/solar access (127)
- Issues beyond the scope of the project. (104)

- Privacy/overlooking (84)
- Visual impact (68)
- Construction impacts (67)
- Biodiversity and wildlife (64)
- Metro Tunnel (56)
- Flooding (23)
- Noise impacts (14)
- Landscaping (7)
- CPTED and Social Impact Assessment (7)
- Waste management (5)
- Sustainability (4)
- Wind impact (1)

Section 4 of this submissions Report provides a response to each agency submission, as well as a response to the key issues raised in the public submissions based on the above categories.

Actions Taken Since Exhibition

Since the SSDA was publicly exhibited, the Applicant has undertaken further consultation with agencies including the NSW State Design Review Panel (**SDRP**), DPHI and Sydney Metro.

State Design Review Panel

The submitted design was reviewed by the SDRP in June 2025, with the Panel recognising several positive elements of the submitted design, including the strong landscape-led approach, retention of mature trees, generous communal spaces, and direct amenity for affordable housing.

The SDRP also provided detailed recommendations to further enhance the design, including:

- **Connecting with Country**: refine massing to respond to topography and local context.
- **Site Strategy and Landscape**: refine and vary building massing to provide a transition in scale and improve relationship with the surrounding area, rationalise entries and access for clarity and wayfinding, and maximise passive surveillance and tree retention.
- **Architecture**: test massing options and review internal layouts to optimise sunlight and ventilation and mitigate privacy and shadow impacts.
- **Materials and Detailing**: incorporate darker podium tones and varied building forms and massing to reflect local character.
- **Sustainability**: develop sustainability initiatives to exceed baseline requirements, incorporate salvaged materials, and demonstrate alignment with NSW's Net Zero emissions target.

Sydney Metro

Hyecorp were already aware of the need to liaise with Sydnye Metro and commenced this consultation prior to the request from DPHI. A suitably qualified consultant has been engaged to complete an assessment against Sydney Metro requirements as specified in the '*Sydney Metro Underground Corridor Protection Guidelines*'. Engagement has been undertaken with Sydney Metro to obtain as-built drawings and other key documents. These have informed the preparation of the Metro Impact Assessment package for Sydney Metro's review which is included at **Appendix N**.

Response to Submissions

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

The key changes are summarised as follows:

- A 1.1m reduction of the proposed maximum building height from 31.2m to 30.1m, to generally comply with the maximum permissible building height. Minor exceedances to this maximum permissible building height are still required for building elements including architectural roof features and rooftop plant and equipment.
- A one storey reduction to the podium of Building A (Roseville Avenue / Martin Lane north eastern corner) from five to four storeys.
- A reduction in the total number of apartments from 259 to 252 dwellings
- An increase to the number of affordable housing units from 48 to 55 (the affordable housing gross floor area remains generally the same, falling slightly from 5,191.8m^2 in the original SSDA scheme, to 5,191.6m^2 in this revised proposal).
- Increased vertical articulation to break down the Lord Street façade through the introduction of additional vertical recesses and landscaping.
- A darker material palette has been selected for the base of the building to add definition to the building's base and upper forms. Balcony materials have also been reviewed and now include brick elements, and textured sandstone elements have been introduced to penthouses.
- The previously proposed flood wall to the eastern site boundary has been removed and all residential apartments have been raised to achieve the flood planning level plus freeboard. This has resulted in the deletion of dwellings fronting Roseville Avenue positioned below footpath level.
- Increase setback to balconies at Level 4 and 8 to 9m and 12m from the western site boundary respectively.
- The Roseville Avenue entry has been redesigned to allow for improved amenity including opportunities for seating and additional planting.
- Introduce direct street access to the ground floor townhouses along Roseville Avenue to provide a greater sense of street address and activation
- Updates to apartment designs to increase overall amenity relating to daylight and natural ventilation and improve overall internal layouts.
- Conversion of previously proposed private open space to communal open space at Level 8.
- Increase the overall deep soil area provision from 23% to 30% of the site area, including providing additional soft landscaping around the central courtyard tree.

Additional and updated assessments have also been prepared to respond to the issues raised within the submissions. Key matters that have been raised through the community consultation that have been addressed within the Response to Submissions include:

- Further assessment of the compatibility of the proposal with the desired future character for the Roseville area. This assessment has been expanded to include Ku-ring-gai Council's (**Council**) alternative Transport Oriented Development (**TOD**) scheme (**Council's alternative**) noting that, at the time of lodgement of the EIS (16 April 2025), Council's alternative was not a relevant environmental planning instrument or a 'proposed instrument' under section 4.15(1)(a)(ii) of the EP&A Act. It was endorsed by Council on 5 June 2025 and submitted to DPHI on 10 June 2025, both dates after lodgement. Accordingly, it was not required to be considered in the EIS and its omission at that stage was consistent with statutory requirements which included the TOD precinct controls under the Housing SEPP. Council's alternative was finalised on 14 November 2025 as such the RTS now considers the final gazetted changes to the Ku-ring-gai LEP 2015 and Housing SEPP made by *State Environmental Planning Policy (Ku-ring-gai Station Precincts) 2025*.

- The assessment of the proposal's compatibility with the area's future character includes consideration of the range of State and local planning policies that apply to the surrounding area. The relevant policies include the TOD, Infill Affordable Housing (**IAH**) and Low and Mid Rise Housing (**LMR**) provisions of the *State Environmental Planning Policy (Housing) 2021* (**Housing SEPP**) and the finalised amendments to the *Kur-ring-gai Local Environmental Plan 2015* that reflects Council's alternative scheme.
- Application of the LMR Exclusion Map to areas within the Ku-ring-gai Station Precinct means that land within the Sydney Metro protection reserves has not been considered for future development. A key principle of the proposed revised design has been to better respond to surrounding sites should they remain low density residential dwellings.
- Alongside a reduction in the height and bulk of the proposed development, an updated visual impact assessment (**VIA**) and heritage impact assessment (HIA) have been undertaken. These updated assessments include evaluation of visual and heritage impacts from 10 additional viewpoints within the local area, including locally listed buildings within the Clanville Heritage Conservation Area (**HCA**) identified in DPHI's key issues letter. The updated HIS considers the potential impacts of the revised design in relation to the significance and setting of the HCA and surrounding locally listed buildings. The VIA and HIS have been updated to refer to the revised proposal, as presented in the architectural plans at **Appendix B** of this report.
- The revised building height generally complies with the maximum permissible building height applicable to the site of 28.6m. Elements of the proposal remain above the permissible height control by up to approximately 1m, however, these exceedances mainly relate to roof features such as lift overruns and parapets. These exceedances are not anticipated to be perceivable from the public domain, and will not have material visual, heritage or amenity impacts. An updated Clause 4.6 Variation Request provides further information to support the minor exceedances to the maximum permissible building height.
- An assessment of all community and community group submissions has been undertaken as part of this RTS. As part of this assessment, the issues raised by the community have been categorised and summarised in accordance with the DPHI '*State significant development guidelines – preparing a submissions report*'. The Response to Submissions provides a response to the various categories of issues identified and, where required, specific changes have been made to the proposed development to respond to these issues.

Updated Justification and Evaluation

Since the public exhibition of the EIS, the Applicant has refined the proposal to address matters raised in submissions and feedback from the Department and other agencies including the SDRP. The refinements represent a series of significant design improvements that both enhance the proposal's contextual fit and reduce potential environmental impacts, without altering the overall intent or strategic consistency of the development.

The design of the building has been carefully considered to ensure any potential impacts are mitigated or minimised. Whilst it is acknowledged that the proposed development will result in significant change to its immediate vicinity, this change is considered acceptable in the wider context of the emerging planning landscape in proximity to Roseville Station which, despite protecting a greater portion of the surrounding heritage conservation area than anticipated by the original TOD provisions, will still include a range of low, medium and high density development under a combination of applicable planning controls, which includes Council's finalised alternative.

Importantly, the proposed development will deliver a high-amenity well-designed residential development in an accessible area that will help address the housing demand in Ku-ring-gai, including demand for affordable housing. The project is a positive development outcome for the site and surrounding area for the reasons outlined in **Table 1**.

Table 1 Summary of Development Outcomes

Matter	Response
Connecting with Country (**CWC**)	The project has been designed with a deep understanding of the system of Country, embedding cultural knowledge into its planning and design. Engagement with the Aboriginal Heritage Office and a Cultural Awareness Workshop, including a Walk on Gamaragal Country, informed the design. The revised design enhances the project's connection with Country through an improved response to the site's topography as recommended by the **SDRP**. The revised design also increases the quantum of deep soil area provided on the site, to maximise planting of native species. Retaining existing significant native trees is a key element of the CWC Strategy. As such the revised landscape design increases the soft landscaped area around the retained tree within the central courtyard tree. The development continues to respect and reflect the cultural significance of the land noting that whilst it has been modified, it remains connected to Gamaragal Country through its ecological setting, proximity to waterways, and place in the cultural landscape. The recommendations of the CWC Strategy focus on respecting and reflecting these connections in design, landscaping, and interpretation ensuring that the development contributes to a healthy Country and community.
Design Excellence / Better Placed	The project aligns with the Better Placed design policy by considering the local context and enhancing the quality of life through good design. The design has been updated to respond to the advice and recommendations of the SDRP, including enhancing the landscape design, communal open spaces and the amenity of proposed dwellings. The revised design responds to the existing and future local character through significant amendments to the massing, setbacks and articulation of the built form and refining the material palette to reflect the heritage conservation area. The project continues to exhibit a high-quality design, with a variety of amenities and provides a considered design response to the existing context whilst also recognising the controls available to this development and the transition likely to occur through the implementation of various planning controls including existing TOD sites, LMR sites and Council's alternative.
The project is consistent with strategic planning policies	▪ **National Housing Accord**: In October 2022 the Commonwealth Government announced the National Housing Accord to build 1.2 million new homes to 2029 and the creation of 20,000 new social and affordable homes. In accordance with the Accord, the project will deliver high, quality new homes and affordable rental housing in a mix of unit sizes to contribute towards the required housing target for NSW. ▪ **Housing 2041**: The development includes the provision of 53 high quality affordable homes, with high amenity in an accessible location. Affordable homes are provided tenure blind and have full access to all the site's residential amenities. ▪ **Greater Sydney Region Plan – A Metropolis of Three Cities**: The project contributes to increasing housing supply, providing diverse and affordable rental housing, creating great places that bring people together, integrating land use and transport to create walkable cities, and contributing to a low-carbon city by promoting public transport use. ▪ **North District Plan**: The development supports priorities such as planning for a city supported by infrastructure, providing housing supply, choice, and affordability, creating and renewing great places, and reducing carbon emissions. It also aims to grow investment, business opportunities, and jobs in strategic centres. ▪ **Ku-ring-gai Local Strategic Planning Statement**: The project addresses housing supply, diversity, and affordability, supports integrated land use and transport planning, and enhances the natural environment and urban

Matter	Response
	canopy. It promotes sustainability and climate resilience through reduced carbon emissions and sustainable design principles. ▪ **Ku-ring-gai Housing Strategy**: The development delivers diverse and affordable housing options close to public transport and essential services, enhancing accessibility and reducing reliance on private vehicles. It also contributes to the preservation of the natural environment and urban canopy. ▪ **Future Transport Strategy**: The project ensures easy access to public transport, supports local businesses and services, and promotes the use of public transport, reducing traffic congestion and enhancing the efficiency of the transport system.
The project is consistent with State and local development controls	The development is permissible with consent under the Housing SEPP and meets the relevant statutory requirements of the relevant environmental planning instruments, including; ▪ *State Environmental Planning Policy (Planning Systems) 2021* ▪ *State Environmental Planning Policy (Resilience and Hazards) 2021* ▪ *State Environmental Planning Policy (Housing) 2021* ▪ *State Environmental Planning Policy (Transport and Infrastructure) 2021* ▪ *State Environmental Planning Policy (Sustainable Buildings) 2022* ▪ *State Environmental Planning Policy (Biodiversity and Conservation) 2021* ▪ *Ku-ring-gai Local Environmental Plan 2015* (**KLEP 2015**). In response to submissions relating to strategic and statutory planning consistency, the site remains mapped TOD site under the Housing SEPP, and as such the application has been assessed in accordance with the controls in force at lodgement. Notwithstanding, the revised design has been tested against the finalised TOD Alternative and LMR Exclusion Map, with height, setbacks, and massing refined to ensure compatibility with the mixed future character envisaged under both State and local frameworks.
The project minimises impacts on the natural environment	The proposed development addresses the principles of Ecologically Sustainable Development (**ESD**) as required by Section 193 of the *Environmental Planning and Assessment Regulation 2021*. It incorporates various measures to ensure environmental sustainability, conservation, and efficiency: ▪ **Precautionary Principle:** The development includes environmental assessments and mitigation measures to prevent serious or irreversible damage. Features like courtyard design for runoff management and tree protection measures are included. The project aims to achieve the NSW EPA's 80% recycling target for demolition waste. ▪ **Intergenerational Equity:** The development considers the needs of future generations by providing high-quality dwellings including 55 affordable rental housing dwellings near Roseville train station, reducing reliance on private vehicles and lowering carbon emissions. Energy and water efficiency measures are also incorporated. ▪ **Conservation of Biological Diversity and Ecological Integrity:** A Biodiversity Development Assessment Report (**BDAR**) Waiver has been granted for the proposal. An Arboricultural Impact Assessment has been undertaken and the project includes mitigation measures to minimise impacts on biological diversity and ecological integrity. As part of the Connecting with Country and ESD strategy, native planting is proposed to contribute to ecological values. ▪ **Improved Valuation, Pricing, and Incentive Mechanisms:** The project values environmental factors through various ESD initiatives. A Construction Management Plan will minimize pollution and waste, and establish recycling and landfill waste streams. Environmental ratings like BASIX and NaTHERS will promote resource efficiency, reducing running costs and increasing the development's value. Overall, the proposed development will not have any unacceptable impacts on the natural environment

Matter	Response
The project minimise**s** impact**s** on the built environment	Whilst it is well acknowledged that the local character is subject to transition, the design of the development has been updated in response to the submissions and SDRP feedback. The design changes have considered impacts to the surrounding environment and HCA, including the reduction of the building massing, increased setbacks, improved articulation of the built form, increased landscaping and a refined materials palette. The proposed building massing has been updated to better respond to surrounding properties, its setting within the HCA and adjacent locally listed heritage building (Roseville Scout Group Hall). The design of the proposal seeks to minimise impacts to neighbouring properties and includes landscaped site setbacks with deep soil tree planting. The design of the façade and materials palette have been carefully selected to complement the qualities of the surrounding area and to ensure a high quality proposal within its setting.
The project has positive social impacts	A Social Impact Assessment (**SIA**) was prepared by Gyde Consulting in accordance with the DPHI guidelines. The SIA evaluates the potential social impacts of the proposed development on various aspects of community life: ▪ **Increased Housing Supply:** The development will provide more market and affordable rental housing, addressing local needs. ▪ **Affordable Housing for Aging Population:** The project includes affordable rental housing options suitable for an aging population in the area. ▪ **Impact on Built Form and Character:** There will be changes to the existing built form and character of the locality. ▪ **Proximity to Services:** The site is conveniently located near Roseville Town Centre and other nearby centres, providing easy access to services and infrastructure. ▪ **Residential Amenity:** The demolition of dwellings within a Heritage Conservation Area and the removal of 90 trees may impact residential amenity. ▪ **Construction Impacts:** Noise and dust from construction activities may affect residential amenity. Overall, the project is expected to benefit the community. Negative impacts can be effectively managed through adopting a range of mitigation strategies outlined in the SIA into the proposed development.
The project has positive economic impacts	The proposed development will have positive economic impacts that will benefit both the local community and the broader region. During the construction phase, the project will create 640 direct jobs and 865 indirect jobs, providing significant employment opportunities. Once operational, the development will generate three ongoing jobs, contributing to sustained economic activity. The increased population and activity resulting from the development will support existing and future businesses in the area in addition to supporting the State Government's investment in transport infrastructure which will foster economic growth.
The site is suitable for the project	The site is suitable for the proposed development for these reasons. • The site is subject to the provisions of the Housing SEPP which permit high density residential development within 400m of Roseville Train Station in addition to bonus height and floor space for the provision of 15% affordable rental housing within the development. • There are no significant constraints on the site or adjacent sites (heritage, Metro and flooding) that cannot be addressed by appropriate design and mitigation measures. • The site is highly accessible to high frequency public transport, services and social infrastructure (community facilities, childcare, schools and open space), supporting the '30-minute city' vision.

Matter	Response
The project is in the public interest	Whilst the concerns and objections to the project raised in the submissions are acknowledged the proposed development remains in the public interest for these reasons: ▪ The development supports the Federal Governments National Housing Accord and the NSW Government priority to provide well designed market and affordable rental housing in a convenient and highly accessible location to meet the needs of all residents. ▪ Whilst the originally submitted SSDA included 48 affordable rental dwellings the proposed development has increased this number to 55 affordable rental dwellings that will be managed by a Community Housing Provider (Link Wentworth) ensuring the needs of essential workers and vulnerable members of the community are provided for in Ku-ring-gai. ▪ All submissions have been considered on their merits in accordance with the EP&A Act and relevant guidelines. The RTS provides detailed responses to each matter raised, amended the design where required and is supported by updated technical assessments, ensuring that the proposal can be assessed and determined transparently and on its planning and environmental merits. ▪ The development will create 640 direct and 865 indirect jobs during construction and three ongoing jobs once completed, boosting the local economy. Overall, the proposed development is in the public interest, and approval is recommended with the necessary conditions and mitigation measures.

The Applicant has made significant changes to the project in response to advice received from the SDRP, DPHI, Council, authorities and submissions made by the community.

These updates have refined the design of the proposal to ensure the project is of the highest standard of design is maintained and results in acceptable environmental impacts whilst delivering much needed additional housing with high amenity in the form of 252 market and 55 affordable rental dwellings to be managed by a Community Housing Provider

The proposal exceeds guidance requirements for deep soil areas and canopy tree planting, delivering a net increase in tree coverage. It aligns with the provisions of the Housing SEPP and will help address both affordable and market housing needs in Sydney. The revised design remains broadly compatible with Roseville's future character being a mix low- to mid-rise higher density residential development amongst retained lower density residential dwellings and heritage items within a large HCA and as such is appropriate for the site.

1. INTRODUCTION

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

The State Significant Development Application (**SSDA**) was submitted to the Department of Planning, Housing and Infrastructure (**DPHI**) on 16 April 2025 (SSD-78996460). The SSDA was placed on public exhibition for 28 days between Thursday 1 May 2025 until Wednesday 28 May 2025.

During this period, a total of 389 submissions were received from members of the public and special interest groups. In addition, agency referrals were provided along with a 'Key Issues' letter from DPIE.

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

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

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

Figure 1 Site Location

Source: Urbis

1.1. EXHIBITED PROJECT

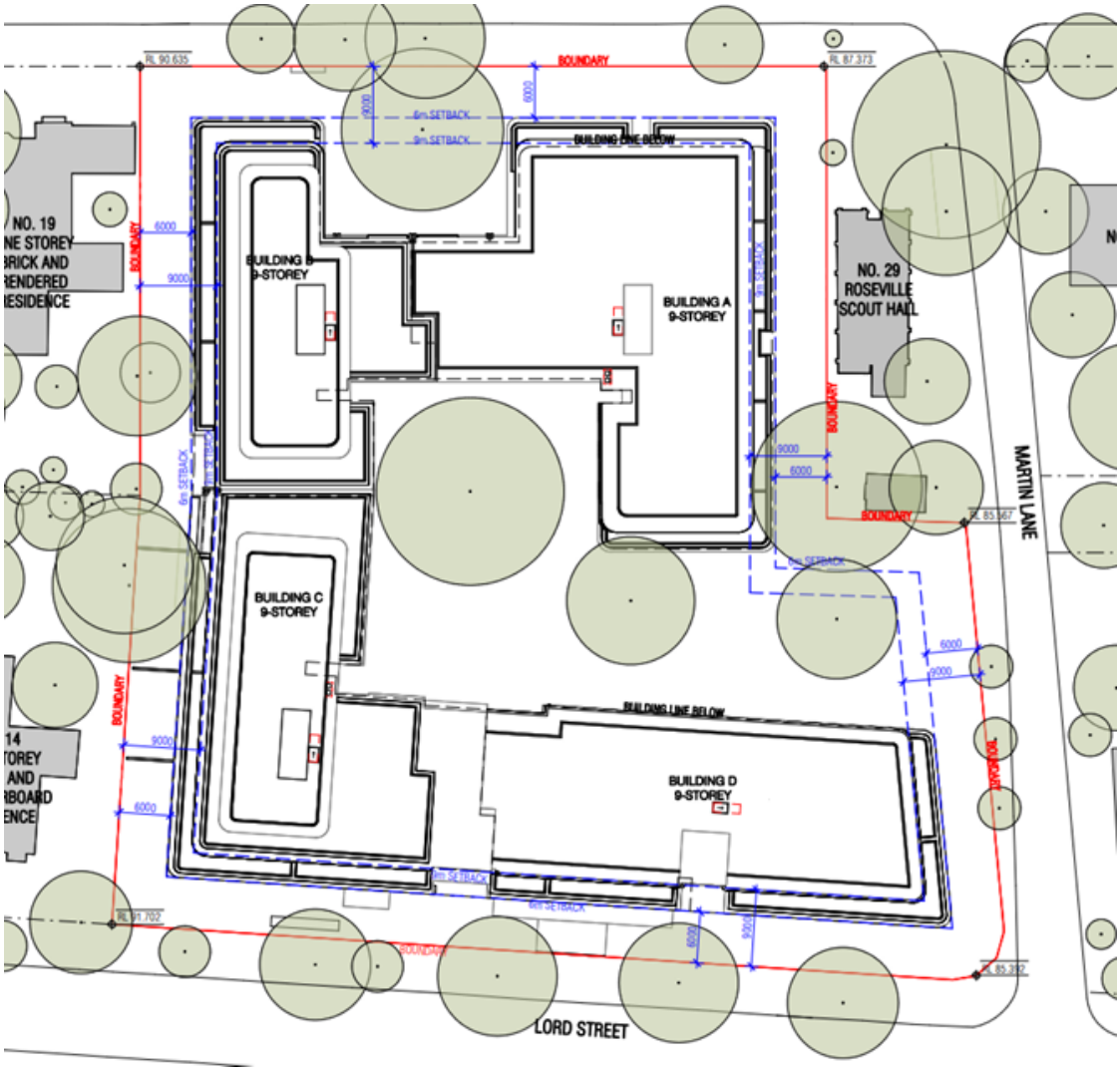
The SSDA, as exhibited, sought approval for an in-fill affordable housing development within the Roseville Transport Oriented Development (TOD) Area under Part 5 of the State Environmental Planning Policy (Housing) 2021, located about 200 metres from Roseville Station.

- Four residential buildings up to 9 storeys, containing 259 apartments: 28 one-bed, 117 two-bed, 104 three-bed, and 10 four-bed.
- 48 affordable rental housing units (17% of GFA) in Building D, totalling 5,192 m².
- Total gross floor area of 30,391.5 m².
- 344 basement car spaces and bicycle parking.
- On-site resident amenities including a pool, gym, media/games rooms, and a kids' club.
- A central landscaped courtyard, retention of significant trees, and new planting.

This description reflects the project as publicly exhibited. The design has since been refined through this Response to Submissions (**RTS**) to address matters raised by the community, Council, and government agencies.

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

Figure 2 Exhibited Proposed Site Plan



Source: FKA

1.2. SUPPORTING DOCUMENTATION

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

Table 2 Supporting Documentation

Appendix	Report	Abbreviation	Prepared By
Appendix A	Updated Mitigation Measures		Urbis
Appendix B	Updated Architectural Plans		FKA
Appendix C	Design Report Addendum		FKA
Appendix D	Updated Landscape Report & Plans		Land + Form
Appendix E	Updated Clause 4.6 Variation Request		Urbis
Appendix F	Engagement Report Addendum	ER Addendum	Gyde
Appendix G	Updated BCA Report		SWP
Appendix H	Updated Accessibility Report		ABS
Appendix I	Updated Visual Impact Assessment	VIA	Urbaine
Appendix J	Updated Transport Impact Assessment	TIA	Anson
Appendix K	Noise and Vibration Impact Assessment Addendum	NVIA	Acoustic Logic
Appendix L	Updated Integrated Water Management Report	IWMP	Ptc
Appendix M	Updated Flood Impact Risk Assessment	FIRA	Ptc
Appendix N	Metro Impact Assessment		Meinhardt
Appendix O	Preliminary Site Investigation Addendum	PSI	Douglas Partners
Appendix P	Updated Arboricultural Impact Assessment	AIA	CPS
Appendix Q	Updated Ecological Sustainability Development Report	ESD	Credwell
Appendix R	Updated BASIX & NaTHERS Certificates		Credwell
Appendix S	Updated Waste Management Plan	WMP	Salt3
Appendix T	Heritage Impact Statement Addendum & Updated Heritage Impact Statement	HIS	Urbis
Appendix U	Updated Historical Archaeological Assessment	HAA	Artefact
Appendix V	Updated Community Housing Provider Letter	CHP	Link Wentworth
Appendix W	Draft Aboriginal Heritage Interpretation Strategy		Artefact
Appendix X	Updated Statutory Compliance Table		Urbis
Appendix Y	State Design Review Panel Advice	SDRP	
Appendix Z	Updated Site Survey		LTS
Appendix AA	Wind Impact Assessment Addendum		SLR

Appendix BB	Updated Biodiversity Development Assessment Report Waiver	BDAR

2. ANALYSIS OF SUBMISSIONS

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

The SSDA was publicly exhibited for 28 days (1 May 2025 to 28 May 2025). A total of 389 unique public submissions and nine government agency submissions were received.

Public Submissions

- 386 from individual community members
- 3 from special interest groups:
    - Eastside Roseville Action Group
    - Friends of Ku-ring-gai Environment
    - Sydney YIMBY.

Government

Nine submissions were received from agencies:

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

DPHI's 'Key Issues' letter was also received, dated 15 July 2025.

2.1. BREAKDOWN OF PUBLIC SUBMISSIONS

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

Gyde's analysis has confirmed that of the 389 unique public submissions (including special interest groups), 367 submissions objected to the proposal (94%), 12 submissions provide general comments on the proposal (3%) and 10 submissions were in support (3%). **Table 2** breaks these down in a quantitative format.

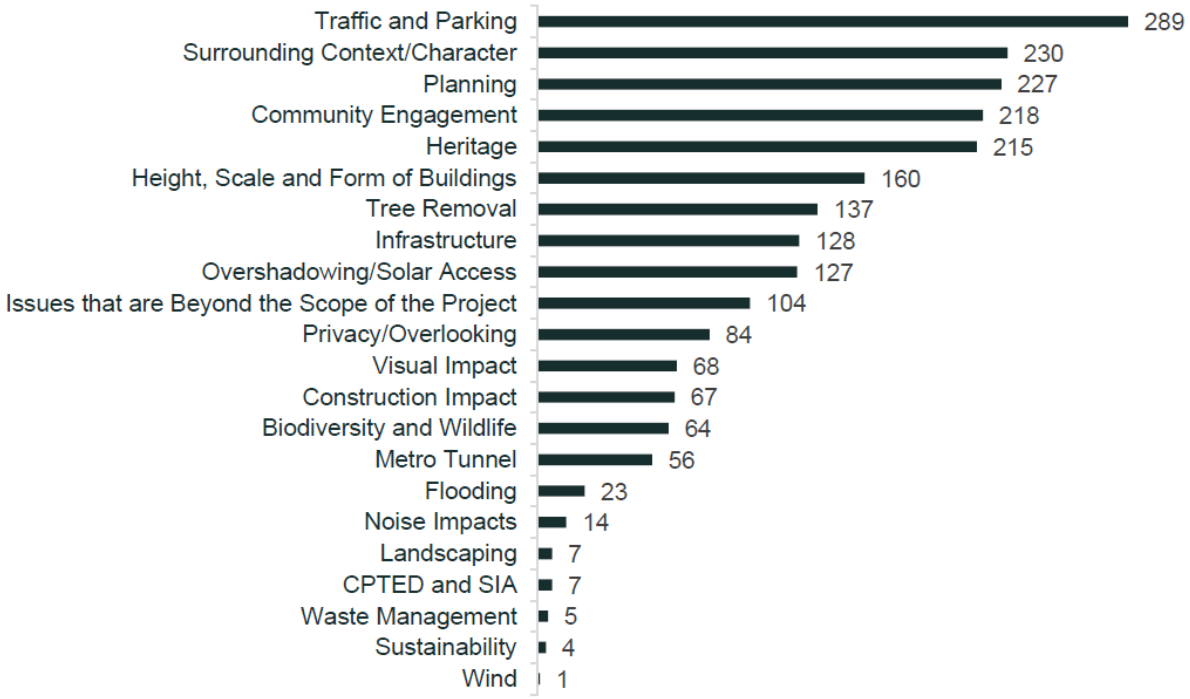
Table 3 Quantitative breakdown of public submissions

Submitter type	Support	Object	Comment/Neutral	Total
General Public	10	367	12	389
Special interest groups	1	2	0	3

2.1.1. General Public

Gyde has provided a thematic breakdown of the public submissions at section 3.2 of their ER Addendum (**Appendix F**). This breakdown is provided below in **Figure 3** below. For each key issue, the number of times that this has been mentioned across all public submissions has been recorded. A response to all key issues raised is provided in **Section 4**.

Figure 3 Breakdown of Key Issues Raised by General Public



Source: Gyde

2.1.2. Special Interest Groups

Table 4 summarises the key issues and themes raised by special interest groups.

Table 4 Summary of issues raised by Special Interest Groups

Group	Position
Friends of Ku-ring-gai Environment (**FOKE**)	FOKE objects to the proposal, citing the following key concerns: • **Statutory compliance** – Inconsistent with Ku-ring-gai LEP 2015, DCP, Apartment Design Guide, Housing SEPP 2021, and objects of the EP&A Act; inadequate independent environmental and infrastructure studies. • **Built form and design** – Excessive height and bulk (four buildings up to 9 storeys) out of scale with surrounding 1–2 storey dwellings; adverse impacts on streetscape, solar access, privacy, and amenity; incompatible with Council's "Preferred Scenario"; isolation due to Metro tunnel constraints. • **Heritage** – Adverse impacts on three Heritage Conservation Areas and multiple heritage-listed items; demolition of nine heritage-listed houses.

	• **Traffic and parking** – Increased congestion, parking shortages, and safety risks for pedestrians and emergency access; concerns about rat-running and school traffic. • **Environment and biodiversity** – Removal of 91 trees, including Critically Endangered Ecological Communities (Blue Gum High Forest, Sydney Turpentine Ironbark Forest); loss of canopy, habitat, and biodiversity corridors; climate resilience impacts. • **Social impacts** – Loss of neighbourhood character and amenity; emotional distress from environmental change; no meaningful community benefits; increased pressure on infrastructure. • **Affordable housing** – Provision limited to 15 years, not in perpetuity. FOKE requests refusal of the SSD due to cumulative adverse impacts on heritage, environment, traffic, urban design, neighbourhood character, and community wellbeing.
Eastside Roseville Action Group (**ERAG**)	ERAG objects to the proposal, citing concerns supported by reports it has commissioned from: • **SJB Planning** (Planning Report) • **Lisa Trueman** (Heritage Report) • **Mitch Ayres Surveying** (Survey Plan) • **PlanCom** (Community Engagement Report) • Legal correspondence from **Storey & Gough** **Key issues raised (including supported reports):** • **Community engagement –** Engagement process did not meet SEARs or NSW Government guidelines; disputed flyer distribution; low participation; lack of engagement with non-English speaking residents; questions over validity of the Engagement Outcomes Report and Social Impact Assessment. • **Built form and planning controls –** Excessive height, bulk and scale on a large consolidated site; inconsistent with Ku-ring-gai Council's TOD Preferred Alternative Scenario (proposal would be prohibited under draft controls); unjustified Clause 4.6 height variation using flawed methodology; isolation as an "island" high-rise due to Metro tunnel constraints. • **Future character and cumulative impacts –** EIS misrepresents likely future development; ignores TOD Alternate Preferred Scenario and Sydney Metro excavation limits; overestimates surrounding redevelopment potential; nine houses on site are contributory to the Clanville HCA. • **Heritage –** Urbis Heritage Impact Statement considered flawed; inadequate analysis of conservation area and subdivision/street pattern; omission of affected heritage items; significant adverse impacts on HCA and nearby heritage items (including Roseville Scout Hall, St Luke's Hall, 19 Lord Street, 22 Roseville Avenue, 16 Roseville Avenue, 31 Roseville Avenue); loss of nine contributory dwellings and gardens.

	• **Visual impact assessment –** VIA omits or misrepresents key viewpoints; fails to assess views from within heritage curtilages and private dwellings; avoids most significant impacts on the Clanville HCA; additional viewpoints identified by SJB as necessary. • **Social impacts –** SIA based on inadequate engagement; affordability claims questioned; market pricing likely to exclude target groups; limited genuine affordable housing benefit. • **Traffic and parking –** TIA does not reflect actual conditions; high traffic volumes on Martin Lane; existing congestion and parking shortages; safety risks for pedestrians; concerns over heavy vehicle access during construction. • **Process and documentation deficiencies –** Late publication of key survey plan; factual errors and inconsistencies in EIS and related documents; difficulty accessing SEARs plans due to IT issues; inconsistencies in GFA and deep soil calculations; concerns about practicality of retaining significant Sydney Blue Gum (Tree 93) without detailed root mapping and construction management. ERAG requests refusal of the SSD due to cumulative adverse impacts on heritage, environment, traffic, urban design, neighbourhood character, and community wellbeing, and procedural/documentation deficiencies in the assessment process.
Sydney YIMBY	Sydney YIMBY supports the proposal, citing the following key reasons: ▪ **Housing supply and affordability** – Sydney faces a housing affordability crisis; more housing is needed, particularly in well-located areas. This development is an example of the type of housing required. ▪ **Location** – Site is approximately 4 minutes' walk from Roseville station and shops, making it an ideal location for higher density housing; preferable to some sites in Ku-ring-gai Council's preferred scenario that are further from transport. ▪ **Land use efficiency** – Current dwellings occupy large blocks (most over 1,000 m²) near a train station, which is considered a poor use of valuable land. ▪ **Neighbourhood amenity** – Increased population would support more shops, restaurants, and entertainment, improving local vibrancy. ▪ **Demand** – Strong market demand to live near Roseville station; most recent planning applications in Ku-ring-gai seek the maximum 9 storeys allowed under TOD controls. ▪ **Heritage and aesthetics** – While some existing houses have gardens, similar properties are common in Roseville; site is not considered to contain unusually attractive or significant heritage buildings. ▪ **Opposition views** – Opposition is seen as primarily aesthetic and unrepresentative; majority of Ku-ring-gai residents supported development options that include this site. ▪ **Policy context** – If local opposition prevents well-located housing, State Government intervention to override local controls is considered justified.

	Sydney YIMBY concludes that the proposal will deliver needed housing in an appropriate location, improve local amenity, and make better use of land near transport.

2.2. BREAKDOWN OF COUNCIL AND AGENCY SUBMISSIONS

A total of nine submissions were received from government agencies (including Council) during the public exhibition of the SSDA. A summary of these submissions is provided in the **Table 4** below. All agency submissions referenced in this RTS were received after lodgement of the EIS on 16 April 2025. They were therefore not part of the EIS preparation process but are addressed here to inform the post-exhibition assessment.

Table 5 Summary of Council and agency submissions

Authority	Position
Ku-ring-gai Council	**Planning** **Demolition:** ▪ The proposed demolition of all dwellings at Nos. 16-24 Lord Street and 21-27 Roseville Ave, Roseville, will result in the loss of buildings that contribute significantly to the character and significance of the Clanville HCA. These buildings, built in the Federation (1890-1915) and Inter-war (1915-1945) years, are important for their historical and architectural value. The demolition does not satisfy the objectives of the KLEP2015 to conserve the heritage significance of the conservation area. **Setting and View Impacts:** ▪ The proposed 9-storey residential flat building will drastically and adversely change the setting of the Clanville HCA and surrounding heritage items. The bulk and scale of the building will visually dominate and detract from the area, which is characterized by single-storey Federation and Interwar housing with large gardens. ▪ The development will also negatively impact the setting of the Scout Hall and the Lord Street/Bancroft Avenue Conservation Area (C36), changing views from low-rise to high-rise and resulting in the loss of trees and a towering built form. **Setbacks:** ▪ The proposed building does not respect the established pattern of built elements in the streetscape, with insufficient setbacks between the built form and inadequate setbacks on the upper levels. The minimal setbacks to the side boundaries will increase the bulk of the building and have an obtrusive impact. ▪ The proposed setback from the Scout Hall will be 10m from a 5-storey high sheer wall, which is notably different in scale and contrast to the single-storey heritage buildings. **Impacts on Character:** ▪ The proposed development will be located in the centre of the Clanville HCA and in the vicinity of several heritage items and another HCA. It does not harmonize with or enhance the area's distinctive identity and will be very dominant in the streetscape, visible from all surrounding sides.

Bulk, Massing, Scale, and Form:

- The proposed massing of the residential flat building will adversely affect views from HCAs and heritage items, including views to the sky, tree canopies, and terracotta rooftops. The 9-storey development does not relate to the predominant scale of the setting and will have an adverse impact on the Clanville HCA and surrounding heritage items.
- The increased density will irreversibly degrade the heritage significance of the area due to its inconsistency with the existing low-scale historic built form.

Landscape

- The proposed tree plantings within the site frontages are limited to small and medium-sized trees, failing to consider the established landscape context where tall trees contribute to the streetscape. The lack of tall trees does not effectively contribute to the streetscape and amenity.
- The extent of proposed hard surface treatment within the Lord Street site frontage is uncharacteristic of the existing streetscape context and will result in unacceptable tree impacts. Further root mapping is required to determine the outcomes for existing trees.

Form, Details, Materials, and Colours:

- The materials and finishes, consisting of light colours, will be visually dominating and obtrusive in the streetscape. It is recommended that the external materials and finishes be amended to comprise darker, earthy tones to present a more recessive building that responds more appropriately to the aesthetic of surrounding heritage items and conservation areas.
- The overall scale and form of the proposed development will be obtrusive and dominant, having an adverse impact on the HCA and surrounding heritage items.

Residential Amenity:

- **Privacy:** Internal corners have windows and balconies with direct lines of sight, impacting visual privacy between dwellings, not meeting ADG 3F-1 1 and ADG 3F-1 6.
- **Overshadowing:** The proposal will overshadow properties to the west and south, with no analysis provided for future development impacts. Solar access should not be on a 'first-in best-dressed' basis, and adequate solar access for future developments must be ensured.
- **Sunlight to Apartments:** 70% of units are stated to receive 2 hours of direct sunlight, but independent calculations suggest only 66% meet this requirement. Additionally, 22% of units receive no direct sunlight, exceeding the maximum allowed.
- **Clothes Drying Facilities:** Locations must be detailed on plans and appropriately screened if on balconies.
- **Cross Ventilation:** 60% of units are stated to be naturally cross-ventilated, but independent calculations suggest only 53% meet this requirement.
- **Internalised Living Rooms:** Several apartments have internalised living rooms, not meeting ADG 4D-1 2 requirements.

- **Snorkel Bedroom Windows:** Several apartments have 'snorkel' bedroom windows, not meeting ADG 4D-1 4 requirements.
- **Circulation Core**: Buildings A, C, and D exceed the maximum of 8 units off a circulation core, not meeting ADG 4F-1 1 requirements.
- **Inequitable Natural Cross Ventilation to Affordable Housing:** Only 38% of affordable units are naturally cross-ventilated, not meeting ADG 4B-3 1 requirements.

Site Coverage:

- The proposed site coverage of approximately 46% exceeds the maximum 30% specified in control 1 in Part 7A.5 of KDCP. Viable deep soil landscaping, including tree canopy, must be provided.

Affordable Housing:

- Affordable housing units should be provided in perpetuity beyond the 15-year minimum to prevent displacement and social issues.

Insufficient Information:

- A full survey, existing ground RLs, roof plan with spot heights, and labelled use of all areas are required for assessment.

Landscaping

- A full Planting Plan and Plant Schedule, root mapping for specific trees, and BASIX compliance plan are required.
- Deep soil zone calculations and compliance plan must be provided. The proposed deep soil zone is inadequate, and a minimum of 15% deep soil should be provided.
- The landscape design should reflect the established character with a mix of native and exotic species.

Tree Removal and Impacts:

- Root mapping for specific trees is required to assess impacts. Design modifications may be needed to ensure tree retention and protection.

Landscape Design and Character:

- A full Planting Plan and Plant Schedule, soil depths in planters, and a revised planting palette are required.
- Tree plantings should be set back from buildings to ensure protection and viability.
- The extent of decking and hard surface treatments should be reduced to protect significant trees.

Health:

- The acoustic report should be updated to reflect the most recent plans and assess noise emissions from rooftop condenser units.
- Further consideration of the recommendations in the Preliminary Site Investigation report is required.

Development Engineering:

Stormwater

- Supporting hydraulic calculations, stormwater plans, and details of the pump-out pit and rising main are required.
- The flood mitigation strategy should provide at least 500mm freeboard above the Design Flood Standard.

	Vehicle Access and Parking: ▪ Visitor parking and car share space requirements must be met. Minimum sight lines for pedestrian safety should be demonstrated. **Waste Management:** ▪ A longitudinal section through the driveway and basement carpark is required to demonstrate clear headroom for waste collection vehicles. **Ecology:** ▪ The impacts on Tree 93, a mature Sydney Blue Gum, are significant and require a Biodiversity Development Assessment Report (BDAR). **Heritage:** ▪ The proposal must address the heritage significance of the area and ensure that the heritage conservation area is not adversely affected. ▪ Roseville Scout Hall (29 Roseville Ave): High historic, aesthetic, and social significance as a local scout hall from the 1920s-30s. ▪ 16 Roseville Avenue: Demonstrates early residential development with a rare roof form and largely intact original fabric. ▪ 22 Roseville Avenue: Historic significance from the 1930s with original inter-war Mediterranean stylistic detailing. ▪ 31 Roseville Avenue: Historic and social significance from the second decade of the twentieth century, retaining original form and massing. ▪ 32 Roseville Avenue: Part of the initial residential development with original form, massing, and detail. ▪ 19 Lord Street: Significant for early residential development in the 1920s, retaining aesthetic significance as an inter-war Bungalow. ▪ 28 Lord Street: Historic significance as part of the inter-war period development, representing the local Presbyterian community.
Department of Climate Change, Energy, the Environment and Water (**DCCEW**)	Provides a recommendation regarding water supply, take and licensing. Recommends that the proponent ensure a water access license (**WAL**) is obtained to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the *Water Management (General) Regulation 2018*.
Conservation Programs Heritage and Regulation (**CPHR**) Group	Objects and raised the following concerns: **Flood Behaviour:** ▪ The Flood Impact and Risk Assessment does not comply with the Flood Risk Management Guideline LU01, as it fails to provide the required level of information and outputs. ▪ The proposal to set habitable floor levels below the 1% AEP plus freeboard standard is unacceptable. Flood planning levels are fixed development standards and cannot be reduced through mitigation measures such as a barrier wall. **Flood Impacts:** ▪ The Flood Report only assesses the 1% AEP event and does not evaluate the full range of flooding scenarios, contrary to best practice requirements. ▪ The development would increase flood depth on the public footpath (Roseville Avenue and Martin Lane) to 0.53 m, well above Council's DCP

	limit of 50 mm. This impact is unacceptable due to increased risk to public safety. ▪ The conclusion that there is no change to flood hazard categorisation is disputed. The combination of increased depth and velocity (up to 0.7 m/s) is likely to alter hazard classification. **Flood Emergency:** ▪ Site accessibility during floods is compromised by depths up to 1.8 m, including at the Building A entrance. ▪ The proposed emergency response strategies (shelter in place and evacuation) are inadequately detailed and do not demonstrate safe evacuation or flood resilience. **Recommends the following:** The Flood Report should be updated to: ▪ Provide information on flood behaviour, flood constraints and flood risk for the full range of flooding for both existing and post developed conditions ▪ Set the habitable floor level at not less than the 1% AEP plus freeboard. ▪ Provide information on the impacts of the development on flooding and on the community for the full range of flooding. ▪ Demonstrate that evacuation can be undertaken consistent with the Local Flood Plan or State Emergency Service (SES) flood emergency strategy for the area. ▪ If evacuation is not feasible, the Flood Report should refer to the Shelter in place guideline for flash flooding (DPHI, January 2025). These guidelines provide ten shelters in place considerations which should be addressed in the Flood Report to assess if shelter in place is an appropriate emergency management strategy for the site. ▪ The afflux should be reduced to an acceptable level (50mm) as required by Council's DCP. Mitigation measures should be proposed to ensure that the impact of the development is acceptable and does not increase the risk to the community.
Heritage NSW	Heritage NSW reviewed the application and provided the following comments: ▪ Requests clarity on the history of the site and its usage, particularly associated with its use from 1814-1890s. ▪ Questions the conclusion that development on the site from the 1920s to present would have removed any archaeology on the site from earlier periods. ▪ If considerably intact and in situ archaeological resources are identified on the site, particularly from the years 1814-1850s, this would be of State heritage significance, not local. ▪ Additional mitigation measures should be incorporated, including an archaeological monitoring, possible test excavation and/or appropriate salvage excavation methodology.
Ausgrid	Ausgrid raised no objection to the proposed development, subject to conditions: ▪ Liaise directly with Ausgrid regarding new connections and load requirements and submit a formal connection application.

	▪ Ensure compliance with Ausgrid Network Standards (NS156 – underground cables; NS220 – overhead powerlines) and relevant SafeWork Codes of Practice. ▪ Ensure construction works, including driveways and excavations, do not interfere with existing underground cables or overhead mains and maintain prescribed clearances. ▪ Maintain a minimum clearance of 1.5 m between new driveways and Ausgrid poles, unless otherwise agreed. ▪ Fund any required relocation of Ausgrid assets where minimum clearances cannot be achieved.
Sydney Metro	Sydney Metro advises that it is not in a position to make a decision until the additional information outlined below is provided for Sydney Metro's further review: ▪ A detailed survey plan defining the boundaries between the development, the rail corridor, rail infrastructure, and any Sydney Metro substratum land, verified by a registered surveyor. ▪ Plan and cross-sectional drawings showing the rail corridor, subsoil profile, proposed basement/foundation excavation, and structural design, verified by a registered surveyor. ▪ An engineering impact assessment demonstrating no adverse impacts on the Sydney Metro Northwest rail corridor, in accordance with the Sydney Metro Underground Corridor Protection Technical Guidelines. ▪ Structural foundation layout and design documentation showing that the foundation design ensures no adverse impacts on the rail corridor, rail infrastructure, or rail easements, and that any deformation induced by bulk excavation will not have adverse impacts. ▪ A risk assessment report in accordance with Section 7.3 of the Sydney Metro Underground Corridor Protection Technical Guidelines. ▪ An electrolysis report on the electrolysis risk to the development from stray current and measures to control that risk, prepared by a suitably qualified consultant. ▪ An acoustic assessment report confirming compliance with the State Environmental Planning Policy (Transport & Infrastructure) 2021 and the NSW Department of Planning & Environment's "Development Near Rail Corridors and Busy Roads – Interim Guideline" (2008) and the Sydney Metro Underground Corridor Protection Guidelines. The report should ensure the proposal avoids damage or interference from noise and vibration effects from the rail corridor and does not impact the rail corridor or infrastructure. ▪ Confirmation of the groundwater level to be adopted for design, as specified in the Geotechnical Investigation report. ▪ A desktop impact assessment on Sydney Metro assets, as referenced in the Geotechnical Investigation Report and Environmental Impact Statement.
TfNSW	Confirms no comments regarding the proposed development as it is unlikely to have a significant impact on the classified road network.

NSW SES	Raised the following: **Concerns:** ▪ The site experiences overland flooding along its eastern edge as frequently as the 20% AEP event. ▪ Flooding exceeds 1 metre during the Probable Maximum Flood (**PMF**) event. ▪ The current design increases footpath flood depth from 340mm to 530mm, posing safety risks. ▪ The 1 in 100 AEP event probability is now approximately 1 in 44 AEP for 2024, leading to more frequent inundation/isolation. ▪ Basement openings below the PMF level pose risks to life and property. **Recommends the following:** ▪ Consider redesigning the proposed flood wall to minimise afflux on pedestrian footpaths. ▪ Seek advice from the Department of Climate Change, Energy, the Environment and Water. ▪ Ensure any emergency management strategy aligns with existing emergency management arrangements. ▪ Follow the Shelter-in-place Guideline for Flash Flooding where applicable. ▪ Recognise that the actual probability of a 1 in 100 AEP event is higher than previously modelled, leading to more frequent inundation and/or isolation. ▪ Ensure all openings to the basement (ramp, vents, etc.) are situated above the PMF. ▪ If this is not feasible, reconsider basement car parking to reduce risk to life and property.
Sydney Water	Sydney Water reviewed the application and provided comments below: ▪ Sydney Water would require the following conditions be included in the development consent. Section 73 Compliance Certificate Building Plan Approval. ▪ Given the scale and location of the proposed development within a TOD precinct, further investigations will be required to determine the servicing requirements for this site. It is recommended that a Water Servicing Coordinator is engaged as soon as possible, and an Anticipated Section 73 application is submitted with Sydney Water. Anticipated Section 73 applications can be registered with Sydney Water.

Further information required to address comments from agency submissions are provided in **Section 4** of this report.

3. ACTIONS TAKEN SINCE EXHIBITION

Following the public exhibition of the SSDA between 1 May and 28 May 2025, the Department received submissions from government agencies, Council, special interest groups, and members of the community. These submissions raised a range of matters relating to statutory compliance, built form and design, heritage, traffic and parking, environmental impacts, and community engagement.

In response, the proponent has:

- Undertaken further consultation with relevant agencies and stakeholders;
- Commissioned additional technical studies and updated existing assessments; and
- Refined the design to address key issues raised.

This section summarises the actions taken since exhibition, including:

- **Engagement** with the State Design Review Panel (**SDRP**) and Sydney Metro.
- **Design refinements** to directly respond to matters raised in the submissions, reduce impacts and improve alignment with planning controls and design guidance; and
- **Additional and updated assessments** to respond to specific technical and policy matters.

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

3.1. ENGAGEMENT

3.1.1. State Design Review Panel

The proposed development was presented to the SDRP on 11 June 2025. The SDRP provided written advice of their review of the proposal on 20 June 2025 (refer **Appendix Y**). The SDRP identified the following elements of the proposal are positive and should be retained:

- The focus on landscape as a key element of the Connecting with Country strategy.
- The retention of significant mature trees, which reinforces the site's natural character.
- The inclusion of consolidated deep soil zones co-located with communal spaces, and not limited to the perimeter.
- The generous interior amenity provided to common areas around the central courtyard.
- The provision of through-lobbies that connect both sides of the site via the central courtyard.
- Direct access to common amenities for the affordable housing units.
- The inclusion of a playground.

The SDRP also provided advice and recommendations, a summary of which is provided in the table below.

Table 6 Summary of SDRP Advice

Element	Recommendation
Connecting with Country:	▪ Vary massing to address site topography. ▪ Use the nearby ridge as a reference. ▪ Refer to the Connecting with Country Framework for guidance.
Site Strategy and Landscape:	▪ Provide greater variation in building massing. ▪ Split the building length along Lord Street to improve apartment amenity and break down the façade. ▪ Adjust rooflines and podium heights to reflect topography and provide a transition in scale.

Element	Recommendation
	▪ Develop the Roseville Avenue entry for seating or informal gathering. ▪ Provide direct street access to ground floor dwellings. ▪ Avoid ground floor apartments lower than the adjoining footpath; balance privacy and surveillance. ▪ Lower the podium at the junction of Roseville Avenue and Martin Lane to improve the relationship with the scout hall. ▪ Rationalise entries, access, and wayfinding for clarity. ▪ Maximise passive surveillance of public areas. ▪ Introduce landscape buffers near ground level bedrooms. ▪ Plan to maximise retention of existing trees.
Architecture:	▪ Test massing options to optimise sunlight penetration into the central courtyard. ▪ Rationalise internal circulation to avoid dogleg corridors. ▪ Review apartment layouts to optimise daylight, ventilation, and cross-ventilation. ▪ Mitigate shadow impacts on surrounding properties. ▪ Ensure 3- and 4-bedroom units are family-friendly with adequate storage. ▪ Avoid bathrooms opening directly onto kitchens or central living areas. ▪ Reduce inboard kitchens to improve natural ventilation and daylight. ▪ Refine apartments at internal corners to mitigate privacy impacts.
Materials and Detailing:	▪ Incorporate darker tones at the podium to reflect the Federation-era context. ▪ Differentiate buildings to provide greater variation and break down massing.
Sustainability and Climate Change:	▪ Develop sustainability initiatives to exceed baseline requirements. ▪ Undertake detailed sun-shading analysis for energy efficiency. ▪ Incorporate salvaged materials. ▪ Balance views, daylight, and thermal performance in façade composition. ▪ Illustrate how the project will contribute to NSW's Net Zero emissions goal by 2050.

3.1.2. Sydney Metro

As requested by the DPHI RFI, further engagement has been undertaken with Sydney Metro in the preparation of additional information requested by Sydney Metro in their referral response. This is summarised in the table below.

Table 7 Further engagement with Sydney Metro

Engagement	Matter
Email correspondence, Peter Bourke (Senior Manager), Joshua Murray (Planner), Jennifer Nguyen (Senior Planner), Prisha Singh (Planner), Abhishek Sengupta (Planner) (Sydney Metro, Corridor Protection), 08 May – 17 July 2025	Consultation with Sydney Metro commenced prior to the receipt of the DPHI Key Issues letter. The Applicant engaged a consultant team to commence preparation of the relevant information to address Sydney Metro's assessment requirements for the project. Consultation to obtain relevant information has been ongoing, with the last communication occurring in July by e-mail, in which Sydney Metro provided key documents, including as-built drawings, to assist the Applicant and the project team in the preparation of additional reports and drawings for the preparation of the Metro Impact Assessment for Sydney Metro's review.

3.2. REFINEMENTS TO THE PROJECT

The following table summarises the refinements and clarifications proposed since public exhibition and in response to submissions made, the recommendations of the SDRP, and as a result of further engagement with DPHI.

Importantly, these refinements are changes that fit within the limits set by the project description. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposal is not required. The proposed design refinements are described thematically below, with a summary provided in the table below.

Table 8 Summary of design refinements

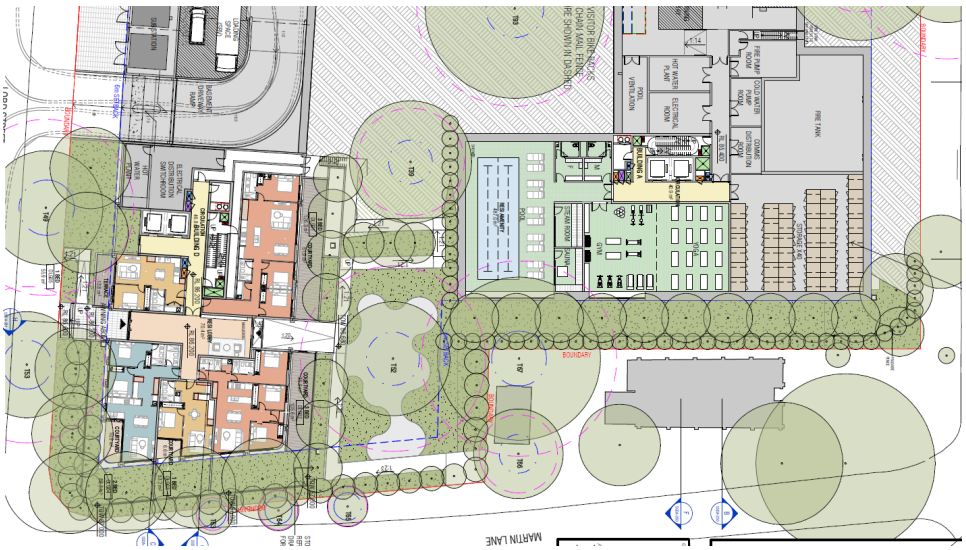
Project Element	Summary of Changes
Building height	The proposed building height has been reduced with all of the primary built form elements lowered to comply the maximum permissible building height of 28.6m. Minor exceedances remain for architectural roof features and rooftop plant and equipment. Overall, the maximum building height will decrease by 1.1m from 31.2m to 30.1m above existing ground level. The maximum exceedance of the height control is now 1.07m for the eastern corner of the central roof parapet on the rooftop of Building C. This measurement has been taken from the existing ground level directly below the highest point (**response to DPHI key issue**).
Dwellings (total)	The proposed number of dwellings has been reduced from 259 to 252.
Dwellings (affordable rental housing)	The number of affordable rental units has been increased from 48 to 55 (the affordable housing GFA remains generally consistent with the original SSDA scheme, falling slightly from 5,191.8m^2 to 5,191.6m^2 in this revised proposal). 5,191.6m^2 of affordable housing GFA is proposed, equivalent to 17.2% of total GFA.
Podium	The proposed height of the Building A podium at the Roseville Avenue / Martin Lane north east corner has been reduced from five to four storeys.
Articulation	The Lord street façade has been broken down through the introduction of vertical recesses, vertical articulation and additional landscaping.
Materials and finishes	A darker palette has been selected for the base of the building to add definition to the building's base and upper forms. Balcony materials have also been reviewed and now include brick elements, and textured sandstone elements have been introduced to penthouses (**response to DPHI key issue**).
Changes by building level	
Basement	▪ Provision of further detail on the architectural plans to confirm that the basement storage spaces provided are larger enough to accommodate bicycle parking in addition to the minimum storage area recommend by the ADG (**response to DPHI key issue**). Bicycle parking is provided within resident storage cages with minimum dimensions of 1.3m (wide) x 2m (long) x 2.4m (high). ▪ Reconfiguration of waste holding room, carpark ventilation room and swimming pool plant to respond to changes to communal swimming pool.
Lower Ground	▪ All residential apartments raised above footpath level within Building A (**response to DPHI key issue**).

Project Element	Summary of Changes

- The previously proposed flood wall to the eastern site boundary has been removed and all residential apartments have been raised to achieve the flood planning level plus freeboard. Lower ground floor town houses have been redesigned as single level apartments with the area below, situated below the FPL, being converted to non-habitable floorspace (refer **Figure 4** below).
- Expansion of residential gym and reconfiguration of amenities to replace the removed apartments.
- Delineation of bike storage areas to include a 30 space visitor storage cage, a 54 space resident bicycle store and 40 individual resident storage cages.
- Reconfiguration of service areas and car parking.

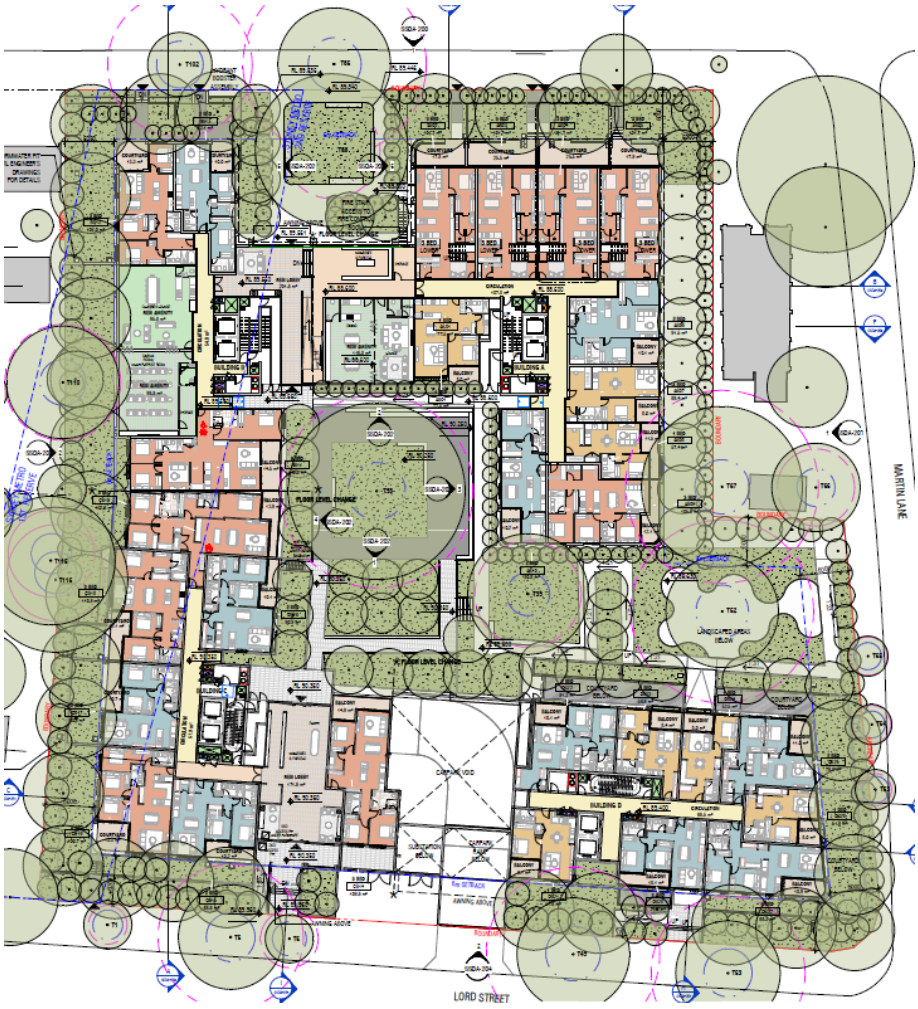
Figure 4 Revised lower ground floor plan

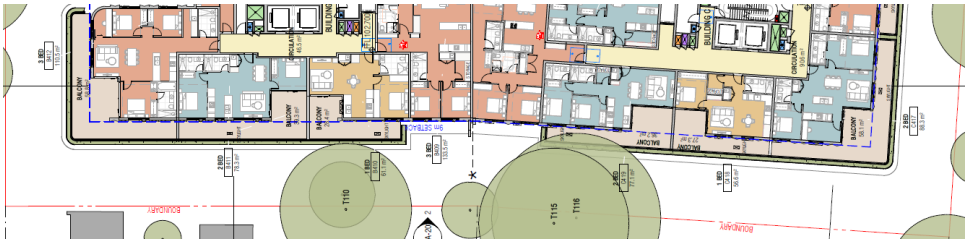
SSDA lodgement scheme

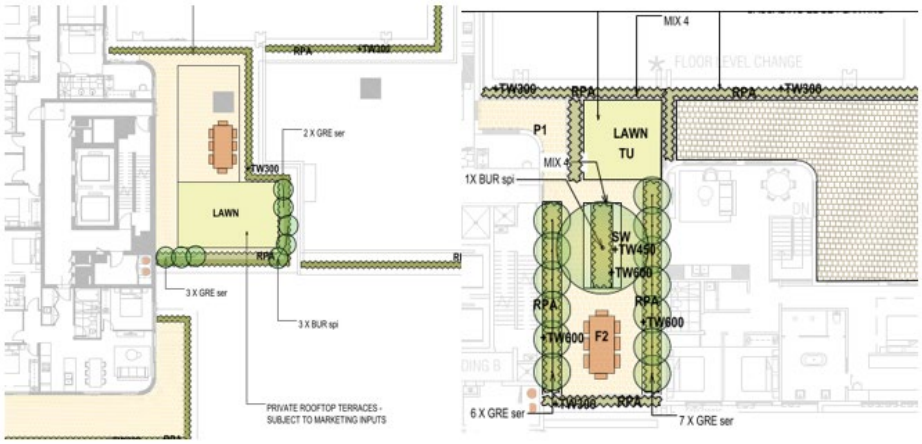
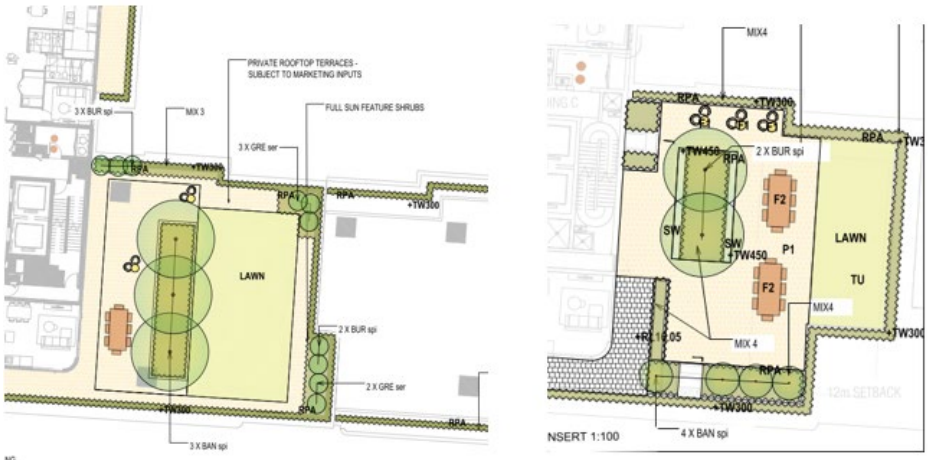


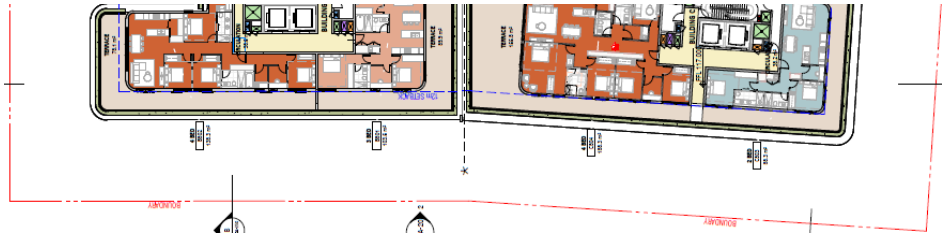
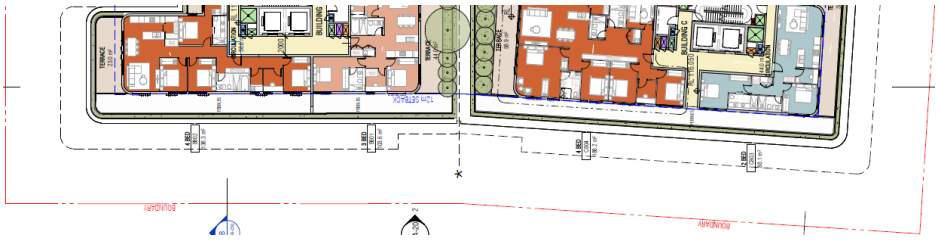
Response to Submissions scheme

Source: FKA

Project Element	Summary of Changes
Ground Floor	▪ The ground floor townhouses have been amended to include direct street access from Roseville Avenue. ▪ The Roseville Avenue entry has been redesigned to allow for improved amenity and to minimise impacts on trees including opportunities for seating and additional planting (**response to DPHI key issue**). ▪ The ground floor apartments within Building A on the northern elevation have been raised to achieve greater amenity relating to daylight and natural ventilation (**response to DPHI key issue**). ▪ Removal of the dogleg corridors in the North and South wings of Building B (**response to DPHI key issue**). Figure 5 Updated ground floor plan  *Source: FKA*
Level 01	▪ Changes to apartments within Building A to achieve greater amenity relating to daylight and natural ventilation (**response to DPHI key issue**). ▪ Removal of the dogleg corridors in the North and South wings of Building B (**response to DPHI key issue**).
Level 02	▪ Changes to apartments within Building A to achieve greater amenity relating to daylight and natural ventilation (**response to DPHI key issue**).

Project Element	Summary of Changes
	▪ Removal of the dogleg corridors in the North and South wings of Building B (**response to DPHI key issue**).
Level 03	▪ Changes to apartments within Building A to achieve greater amenity relating to daylight and natural ventilation (**response to DPHI key issue**). ▪ Removal of the dogleg corridors in the North and South wings of Building B (**response to DPHI key issue**).
Level 04	▪ Western balconies for apartments in Building B and Building C have been reduced to be compliant with the 9m ADG setback. Refer to **Figure 6** below (**response to DPHI key issue**). ▪ Changes to apartments within Building A to achieve greater amenity relating to daylight and natural ventilation ▪ Removal of the dogleg corridors in the North and South wings of Building B (**response to DPHI key issue**). Changes to the private open space areas for apartments along the western elevation in response to pulling back of balconies Figure 6 Extract of Level 4 balcony changes  SSDA Lodgement scheme  Response to Submissions scheme *Source: FKA*
Level 05	▪ Changes to apartments within Building A to achieve greater amenity relating to daylight and natural ventilation (**response to DPHI key issue**). ▪ Removal of the dogleg corridors in the North and South wings of Building B (**response to DPHI key issue**).
Level 06	▪ Changes to apartments within Building A to achieve greater amenity relating to daylight and natural ventilation (**response to DPHI key issue**). ▪ Removal of the dogleg corridors in the North and South wings of Building B (**response to DPHI key issue**).
Level 07	▪ Changes to apartments within Building A to achieve greater amenity relating to daylight and natural ventilation (**response to DPHI key issue**).

Project Element	Summary of Changes
	▪ Removal of the dogleg corridors in the North and South wings of Building B (**response to DPHI key issue**).
Level 08	▪ Western balconies have been pulled back to comply with ADG setback requirements (**response to DPHI key issue**). ▪ Changes to numerous apartments to achieve greater amenity relating to daylight and natural ventilation (**response to DPHI key issue**). ▪ Updated apartment layouts to remove any dogleg corridors (**response to DPHI key issue**). ▪ Conversion of previous private open space to communal open space. See **Figure 7** below. ▪ An additional three-bedroom apartment on the northern elevation. Figure 7 Conversion of Level 08 Private Open Space to Communal Open Space  SSDA Lodgement scheme  Response to Submissions scheme *Source: FKA* ▪
Roof Level	▪ Additional roof plant on Building B and Building C
North and South Elevations	▪ Façade material changes to include darker brick detailing and textured sandstone elements have been introduced to the penthouses (**response to DPHI key issue**).

Project Element	Summary of Changes
East and West Elevations	▪ West facing balconies on levels 4 and 8 have been amended so that they do not encroach into the ADG minimum setbacks to the western site boundary. Balconies previously extended over the roof slab below, this former balcony zone has been converted to non-trafficable roof area and will be treated with a pebble finish. See **Figure 8** below (**response to DPHI key issue**). ▪ Façade material changes to include darker brick detailing and textured sandstone elements have been introduced to the penthouses Figure 8 Level 8 balcony reduction  SSDA Lodgement scheme  Response to Submissions scheme *Source: FKA*
Landscaping	▪ Increase in deep soil area from 2,160.3m^2 (23% of site area) to 2,773.3m^2 (33% of site area). ▪ Increase in soft landscaping around tree 93 (**response to DPHI key issue**). ▪ Two Council street trees (tree 86 and tree 20) are required to be removed and replaced — one on Roseville Avenue and one on Lord Street. Tree root mapping identified that the Roseville Avenue tree is in poor health and will not survive. The Lord Street tree must be removed to allow access to the Ausgrid substation.

Refer to the updated Architectural Plans (**Appendix B**) for further details on the design refinements made since public exhibition.

On the basis of the above project refinements, the revised description of the proposed development is as follows:

Table 9 Updated Project Description

Project Element	Summary
Project Summary	The project includes demolition of existing buildings and structures on the site and construction of 252 residential apartments with affordable housing and basement parking. Specifically, the SSDA seeks development consent for: ▪ Demolition of existing buildings and structures and removal of selected trees. ▪ Partial excavation of the site to a depth of RL76m and construction of a 3-level basement.

Project Element	Summary
	▪ Construction of a residential flat building up to 9-storeys in height (RL120.45m) to provide 252 apartments including affordable rental housing, residential amenities and services. ▪ Provision of car parking spaces at basement level and bicycle parking. ▪ Provision of hard and soft landscaping. ▪ Associated works for the provision of infrastructure and servicing.
Site/Project Area	The site has a total area of 9,370.9m^2. The majority of the site will be physically disturbed by the project.
Proposed uses	Residential flat building
Apartments and Mix	The proposal will deliver 252 dwellings in the following mix: ▪ 1 bedroom: 29 (12%) ▪ 2 bedrooms: 112 (44%) ▪ 3 bedrooms: 101 (40%) ▪ 4 bedrooms: 10 (4%) 197 of these apartments will be market housing and 55 apartments will be affordable rental housing (17% of overall GFA). All affordable housing units will be located in Building D.
Gross Floor Area (GFA)	30,247.6m^2
Floor Space Ratio (FSR)	3.23:1
Maximum height	30.1m above existing ground level (RL 120.45) 9 storeys
Parking	344 car parking spaces: ▪ 267 residential including 35 platinum standard accessible spaces. ▪ 32 visitor spaces including 3 accessible spaces and 3 car share spaces. ▪ 8 motorcycle parking spaces ▪ 4 car wash bays ▪ 1 SRV loading bay
Bicycle Parking	312 spaces including 30 visitor spaces
Communal Open Space	2,353.8m^2 (25.12% of site area)
Deep Soil Area	2,773.3m^2 (30% of site area)

3.3. ADDITIONAL IMPACT ASSESSMENT

Additional and updated assessments have been prepared to respond to the issues raised within the submissions. These are:

- Metro Impact Assessment
- Draft Aboriginal Heritage Interpretation & Art Strategy
- Updated BCA Report

- Updated Accessibility Report
- Updated Visual Impact Assessment
- Updated Transport Impact Assessment
- Noise and Vibration Impact Assessment Addendum
- Updated Integrated Water Management Report
- Updated Flood Impact Risk Assessment
- Updated Preliminary Site Investigation
- Updated Arboricultural Impact Assessment
- Updated Ecological Sustainability Development Report
- Updated BASIX & NaTHERS Certificates
- Updated Waste Management Plan
- Heritage Impact Statement Addendum
- Updated Heritage Impact Statement
- Updated Historical Archaeological Assessment
- Natural Ventilation Assessment
- Engagement Report Addendum
- Wind Impact Assessment Addendum.

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

4. DETAILED RESPONSE TO SUBMISSIONS

All submissions were received and management by DPHI, including registration and publication on the Major Projects website (SSD-78996460). This section provides a detailed summary of the Applicant's response to the issues raised in submissions, together with the additional information and clarifications requested by DPHI. A full package of information as submitted to DPHI to address their requirements has been submitted to Ku-ring-gai Council for their information prior to formal exhibition of this material.

4.1. RESPONSE TO DPHI, SDRP AND COUNCIL

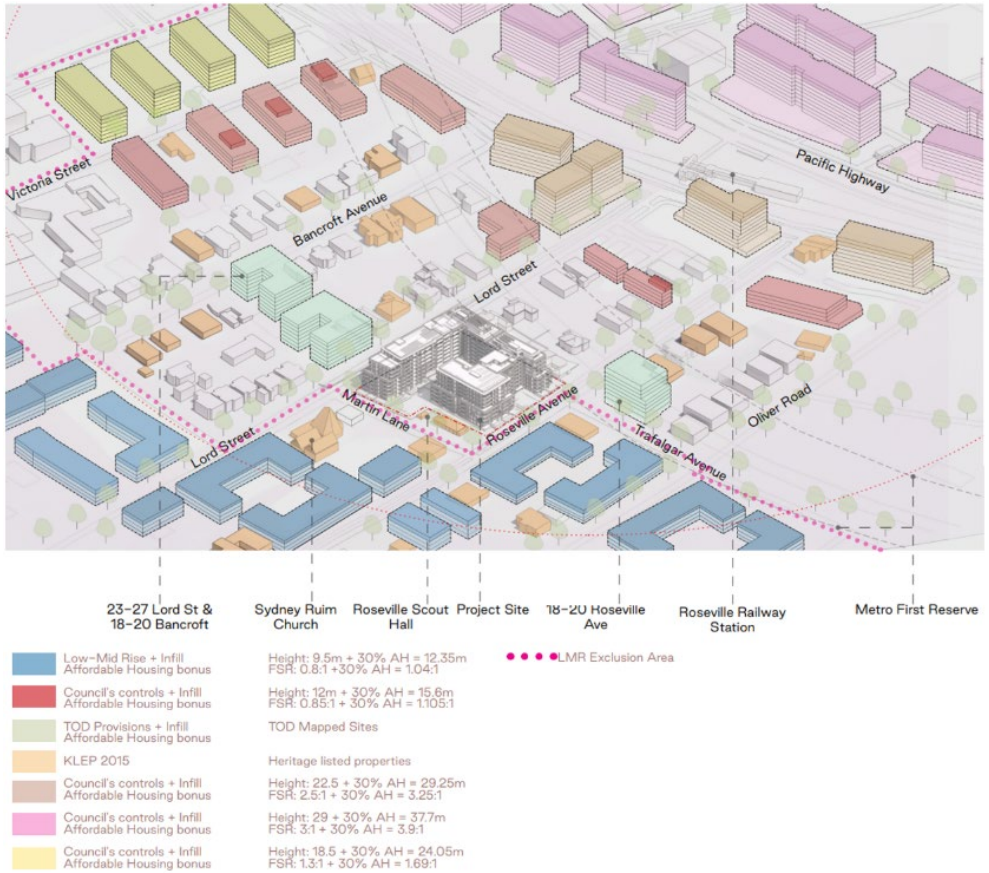
Table 10 Response to issues raised by DPHI, SDRP and Council

Summary of Issue Raised	Response	Refer to
NSW DEPARTMENT OF PLANNING, INDUSTRY AND ENVIRONMENT		
Desired future character		
Demonstrate how the proposal is consistent with the desired future character of the area, including alignment with State and local plans and strategies as well as further analysis and design response to the specific local character of the area.	At the time of lodgement of the EIS (16 April 2025), Ku-ring-gai Council's Alternative Planning Scenario was not a relevant environmental planning instrument or a "proposed instrument" under section 4.15(1)(a)(ii) of the EP&A Act. It was endorsed by Council on 5 June 2025 and submitted to DPHI on 10 June 2025, both dates after lodgement. Accordingly, it was not required to be considered in the EIS to assess future character and its omission at that stage was consistent with statutory requirements. As the Housing SEPP Transit-Oriented Development (**TOD**) provisions applied in Roseville, the initial future character assessment was therefore based on the TOD provisions that applied at the time of lodgement. Council's alternative was finalised on 14 November 2025, as such the RTS now considers the final gazetted changes to the Ku-ring-gai LEP 2015 and the Housing SEPP, made by *State Environmental Planning Policy (Ku-ring-gai Station Precincts) 2025*. As shown in **Figure 9** the future character assessment and sensitivity testing considers the following scenario: ▪ Council's finalised alternative controls around Roseville Station ▪ Areas excluded from the LMR provisions under the Housing SEPP, as shown on the Low and Mid Rise Housing Exclusion Map (**LMR exclusion map** – **Figure 10**) that	**Design Report Addendum Appendix C**
Demonstrate that the proposal would be compatible with the desired future character of the area. The desired future character of the area should have regard to, where relevant: ▪ The updated Transport Orientated Development (**TOD**) provisions applicable to the Ku-ring-gai Council (**Council**) local government area under Chapter 5 of the *State Environmental Planning Policy (Housing) 2021* (**Housing SEPP**) ▪ Council's final scheme formally submitted to the Department on 10 June 2025 (or final controls once adopted)		

Summary of Issue Raised	Response	Refer to
▪ The low and mid-rise housing provisions under Chapter 6 of the Housing SEPP ▪ The protection reserves around the Sydney Metro underground infrastructure.	will remain low density (including areas within the Sydney Metro reserves) and where the existing Ku-ring-gai LEP height limits will apply. Immediately to the west of the site height limits will be maintained at 9.5m. The LMR exclusion area does not apply to the whole of Roseville, some areas continue to benefit from the LMR controls. ▪ Adjacent mapped TOD sites (including 18-20 Roseville Avenue and 18-20 Bancroft Avenue & 23-27 Lord Street) ▪ Potential LMR development outside the LMR exclusion areas to the north and east of the site, within 800m walking distance of Roseville Station (refer **Figure 10** below). Pursuant to section 174 of the Housing SEPP, residential flat buildings are permitted within the R2 zone. A 9.5m height control applies. Bonus floorspace may also be achieved pursuant to the Housing SEPP infill affordable housing provisions. Buildings up to 12.35m are therefore permissible.	

Summary of Issue Raised	Response	Refer to

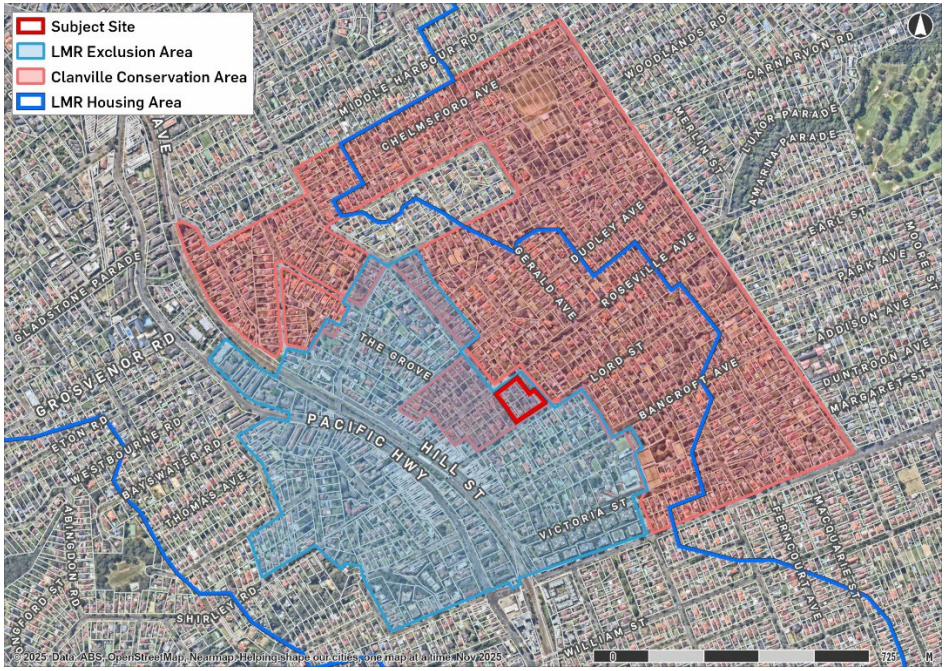
Figure 9 Desired future character



Source: FKA

Summary of Issue Raised	Response	Refer to

Figure 10 LMR Exclusion Area



Source: Urbis

Planning Principle – Compatibility in the Urban Environment

The Planning Principle defines compatibility in an urban design context as the ability of buildings to exist together in harmony, which is different from sameness. Compatibility is assessed through two key questions:

1. Are the proposal's physical impacts on surrounding development acceptable?
2. Is the proposal's appearance in harmony with nearby buildings and the street's character?

Physical impacts include noise, overlooking, overshadowing, and any constraints on neighbouring development potential. Visual compatibility is determined by how well a

Summary of Issue Raised	Response	Refer to
	proposal responds to the essential elements of local character, such as building height, setbacks, and landscaping. In conservation areas, architectural style and materials are also important. The principle recognises that buildings do not need to be the same height to be compatible. Instead, they should reflect key urban design elements — such as the rhythm created by front and side setbacks, opportunities for canopy tree planting, and architectural features like roof form, fenestration, and materials — even if not replicating them exactly. Applying this principle, the future character is established first, followed by an assessment of the proposal against that character. **Noise** ▪ *Future Character*: o Residential area with low ambient noise. o Increased density will slightly raise noise levels from traffic, plant, and activity. o Sensitive receivers will be closer to apartment buildings up to 11 storeys. ▪ *Proposal Response*: o NVIA (EIS Appendix R) and NVIA Addendum (**Appendix K**) assess construction and operational noise. o Rooftop plant noise mitigated by parapets. o Impacts acceptable and compatible with desired future character. **Overlooking** ▪ *Future Character*: o Higher density and taller buildings (up to 11 storeys) increase overlooking potential to adjacent low density dwellings. o Minimum ADG setbacks expected to be applied to all residential apartment developments.	

Summary of Issue Raised	Response	Refer to
	▪ *Proposal Response*: o Western façade designed with solid upstands, translucent balustrades, recessed balconies, and deep reveals. o Balcony space removed from western setback increasing setbacks to ADG minimums at the upper levels. o Landscape setback planted with canopy trees for screening. o Privacy impacts acceptable and compatible. **Overshadowing** ▪ *Future Character*: o Taller buildings may increase overshadowing. o ADG solar access requirements apply. ▪ *Proposal Response*: o Shadow diagrams (**Appendix B**) show >3 hours solar access to neighbours between 11am–3pm mid-winter. o Worst-case modelled; other days have greater access. o Impacts acceptable and compatible. **Constraining Development Potential** • *Future Character*: o Lot amalgamation for 4–11 storey developments. o Designs must avoid constraining adjoining sites. • *Proposal Response*: o 6m setbacks allow for future RFBs on adjoining sites. o Solar access study (Design Report Addendum Fig 1.9) confirms future development can meet ADG solar access. o No undue constraint.	

Summary of Issue Raised	Response	Refer to
	Building Height ▪ *Future Character*: o Range from 1–11 storeys. o 9 storey cluster near site; 4-storey LMR areas to north and east; 1-2 storeys maintained to the west. o 11 storeys around Roseville Station. ▪ *Proposal Response*: o 9 storeys aligns with clusters to north/south; steps down to 4 storeys to north/east. o Four-storey podium with upper levels set back 9–12m. o Podium base design and materiality responds to existing dwellings to west. o Podium height reduced near Scout Hall to respect heritage and topography. o Compatible with the scale of the broader precinct around Roseville Station to the west and LMR areas to the east and north. **Front Setbacks** ▪ *Future Character*: o Generally 6m; larger for heritage/community sites. ▪ *Proposal Response*: o 6m setbacks to all frontages; aligns with prevailing pattern. o Scout Hall's 16.5m setback acknowledged as unique to community use. **Side Setbacks** ▪ *Future Character*: o Up to 6m; larger for heritage/community sites. ▪ *Proposal Response*: o 6m side setbacks to west; consistent with ADG and local pattern.	

Summary of Issue Raised	Response	Refer to
	Landscaping ▪ *Future Character*: o Large street trees, landscaped setbacks, deep soil zones. ▪ *Proposal Response*: o 34% landscaped area; retention of mature Chinese Elm. o Deep soil areas exceed ADG minimum requirements (30%). o Integrated planter boxes soften built form. o Planting mix reflects local character and biodiversity. **Architectural Style** ▪ *Future Character*: o Federation-period references; contemporary apartment forms. ▪ *Proposal Response*: o Brick, stone, bronze palette; articulation and detailing draw from Federation cues. o Podium expressed as three forms along Lord Street; separation between buildings enhances openness. **Roof Form** ▪ *Future Character*: o Mix of pitched and flat roofs. ▪ *Proposal Response*: o Flat roof minimises bulk; setbacks, curved corners, and perimeter landscaping soften appearance. **Fenestration** ▪ *Future Character*: o Larger windows/balconies in modern apartments; smaller openings in Federation buildings.	

Summary of Issue Raised	Response	Refer to
	▪ *Proposal Response*: o Articulated fenestration; dark bronze frames reference HCA palette; high amenity provided. **Materials** ▪ *Future Character*: o Federation palette (sandstone, brick, timber) with modern additions. ▪ *Proposal Response*: o Light/dark brickwork, stone cladding, bronze/timber fencing; darker tones refined in RTS to better respond to Roseville character. The proposal has been assessed for compatibility with the desired future character of the area in accordance with **Sections 20(3) and 147 of the Housing SEPP**. Section 20(3) requires consideration of whether the design is compatible with either the desirable elements of the local area's character or, for precincts in transition, its desired future character. The assessment finds the proposal to be compatible with the mixed future character of the area. The precinct is transitioning from predominantly **Federation-period single dwellings** to a **mixed character** of single dwellings, low to mid rise apartment buildings set in a large HCA and retained locally listed heritage items. The future character will feature a **range of building heights** from single/two storey dwellings, to 4 storeys under the LMR provisions plus IAH bonus, and larger apartment buildings up to 11 storeys in heigh (retained TOD sites and Council's alternative). The proposal responds to this context by: ▪ Aligning with 9-storey clusters to the north and south, and stepping down to 4 storeys to the east. ▪ Incorporating a **four-storey podium** to match the lower-scale context, with upper levels set back to reinforce the street wall height. ▪ Designing the base of the podium and materiality to respond to existing dwellings to the west.	

Summary of Issue Raised	Response	Refer to
	▪ Designing front and side setbacks, architectural style, and landscaping to reflect key elements of the surrounding Heritage Conservation Area (**HCA**). ▪ Selecting materials and planting that respond to the established local palette and garden character. Under **Section 147 of the Housing SEPP**, the proposal has also been evaluated against the **design principles within Schedule 9** and the **ADG**. This evaluation confirms that the design quality, amenity, and contextual response meet the required standards, further supporting its compatibility with the desired future character. **1. Context and Neighbourhood Character** ▪ Responds sensitively to Roseville's natural, built, social, and environmental context whilst utilising the controls available as a retained TOD site. ▪ Building massing steps with the west–east slope to integrate with terrain. ▪ Reflects desirable aspects of the existing character, including the garden suburb identity and heritage significance of the adjacent Scout Hall. ▪ Uses sympathetic materials (brick, sandstone) and reduced building heights to enhance the streetscape and reinforce heritage prominence. ▪ Compatible with the LMR and TOD planning frameworks and Council's controls. **2. Built Form and Scale** ▪ Scale, bulk, and height calibrated to suit existing and future street character. ▪ Building A lowered by 1.7m to improve relationship with Scout Hall and neighbours. ▪ Lord Street podium articulated into three volumes following natural slope, reducing perceived bulk and reinforcing human scale. ▪ Active frontages, clear entries, and visual permeability enhance public domain. **3. Density** ▪ Delivers high amenity while aligning with LMR and TOD controls. ▪ FSR ranges from 0.8:1 to 2.5:1, with IAH bonus increasing to 1.04:1 and 2.86:1. ▪ Strategic location near Roseville Station supports density.	

Summary of Issue Raised	Response	Refer to
	▪ Affordable housing component addresses social needs while maintaining liveability. **4. Sustainability** ▪ Passive solar design with operable skylights and cross-ventilation reduces reliance on mechanical systems. ▪ 70% of apartments receive at least 2 hours of sunlight on 21 June. ▪ Deep soil zones and retained vegetation support biodiversity and microclimate regulation. ▪ Sustainable materials and construction methods enhance long-term performance. **5. Landscape** ▪ Integrates architecture and landscape into a cohesive, sustainable system. ▪ Retains mature trees and reinforces neighbourhood identity. ▪ Landscaped setbacks soften built form and create green buffers. ▪ Layered planting improves privacy, usability, and social interaction. **6. Amenity – Apartment Amenity** ▪ Generous, well-proportioned rooms maximise comfort and usability. ▪ Layouts optimise solar access, ventilation, and views. ▪ Privacy supported through setbacks, landscaping, and screening. ▪ Ground-floor townhouses have direct street access; balconies and courtyards provide high-quality private open space. ▪ Affordable dwellings integrated with equal access to amenities. **7. Amenity – Communal Amenity** ▪ Shared facilities include lounge, co-working area, entertainment room, communal kitchen, children’s lounge, and cinema. ▪ Health and recreation supported by fitness centre, pool deck, and sauna. ▪ Mature tree canopies create a calm, retreat-like atmosphere.	

Summary of Issue Raised	Response	Refer to
	▪ Landmark Chinese Elm at entrance forms an informal pocket park and activates the street. **8. Safety** ▪ Designed in accordance with Crime Prevention Through Environmental Design (**CPTED**) principles (see EIS Section 1.1.5 and Appendix II). **9. Housing Diversity and Social Interaction** ▪ Mix of apartment sizes and layouts to meet varied household needs. ▪ Family-friendly 3- and 4-bedroom units designed to Healthy Higher Density Living guidelines. ▪ Communal areas encourage resident interaction. ▪ Affordable rental housing integrated to support inclusivity. **10. Aesthetics** ▪ Balanced composition of elements reflecting internal layout and structure. ▪ Refined material palette references Federation-era character. ▪ Darker brick and sandstone at podium level ground the building; lighter tones above reduce visual mass. ▪ Façade articulation through planter boxes, vertical breaks, and material variation creates a contextually responsive design. A comprehensive assessment against the Apartment Design Guide (**ADG**) is provided in the Design Report Addendum (**Appendix C**). The proposal is generally consistent with ADG objectives and delivers a high-quality residential outcome. Both deep soil provision and communal open space exceed ADG requirements, reflecting the established garden character of the local area. The only variation is a minor non-compliance with the ADG's solar and daylight access criterion, which requires that at least 70% of apartments receive a minimum of two hours of direct sunlight to living rooms and private open space between 9am and 3pm at mid-winter. The proposal achieves 69%, with the shortfall limited to private open space on the upper levels of Building A's south-east corner. These apartments still receive	

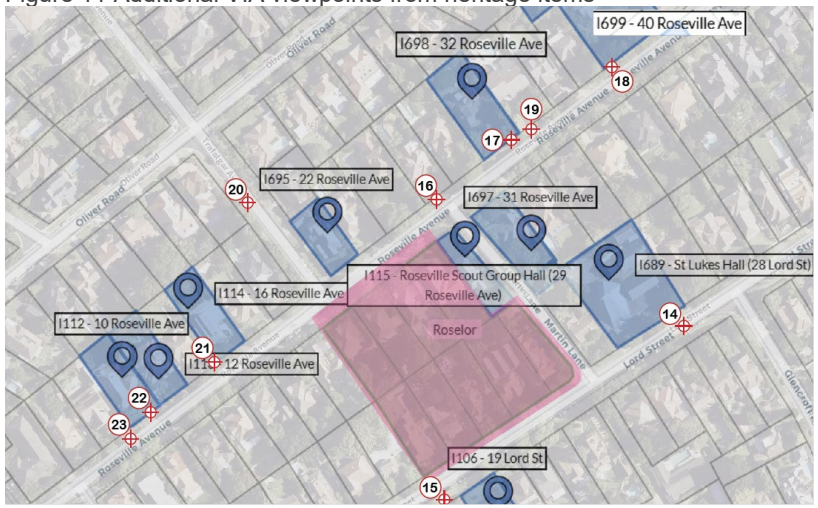
Summary of Issue Raised	Response	Refer to
	approximately four hours of direct sunlight to living rooms daily and enjoy a strong visual connection to the prominent Eucalyptus tree (T93) from their balconies. This variation is considered acceptable as the design meets the ADG objective of providing high-amenity apartments, and living spaces receive double the required solar access at mid-winter. All other aspects of the development comply with or exceed the relevant ADG criteria. **Summary** State and local planning policy identify the site as being within a precinct undergoing significant transition. The future character is expected to comprise a mix of low-rise single dwellings and medium-density apartment buildings, as assessed above. The apartment design is expected to respond sensitively to the HCA, incorporating Federation-period materials and substantial tree planting. The proposal has been assessed against this future character using the relevant Planning Principle, which requires developments to respond to the essential elements of their urban context. While the proposal differs from the existing low-rise character, it reflects and is compatible with the future mixed character by: ▪ Aligning setbacks with the prevailing development pattern. ▪ Using materials and finishes drawn from the local heritage palette. ▪ Incorporating landscaping that reinforces the garden suburb identity. ▪ Responding to the mixed future scale and density envisaged under the planning framework that has been finalised for the area. The assessment confirms the proposal contains, and is compatible with, the key elements that will define the desired future character including setbacks, landscaping, materiality, scale, and density. Any short-term change to the area's character will be mitigated over time as the precinct transitions to a mixed character area under the finalised planning framework.	
Based on the analysis above, amend the Design Verification Statement by re-assessing the proposal	The Design Verification Statement has been amended by FKA and is provided in the Design Report Addendum at **Appendix C**.	**Design Report**

Summary of Issue Raised	Response	Refer to
against the Design Quality Principles in Schedule 9 of the Housing SEPP, and justify in particular: ▪ The proposal's consistency with the desired future character of the locality ▪ How the proposal has been designed/refined in response to State Design Review Panel (**SDRP**) feedback.	As summarised below, the proposal has been reassessed against the **Design Quality Principles in Schedule 9 of the Housing SEPP** to demonstrate its consistency with the desired future character and the refinements made following SDRP and DPHI feedback. Refer to sections 1.3 and 2 of the Design Report Addendum for further details. **Consistency with Desired Future Character** ▪ **Context & Neighbourhood Character** – responds to Roseville's natural, built, social, and environmental context. The stepped building form follows the site's west–east slope, integrating with the terrain. The design reflects the garden suburb identity and respects the heritage significance of the adjacent Scout Hall. ▪ **Built Form & Scale –** Scale, bulk, and height calibrated to suit both existing and future character. The podium and upper levels are designed to reinforce human scale and street wall height, with setbacks that align with the prevailing pattern. ▪ **Density** – Aligns with LMR, TOD and Council's controls (FSR 0.3:1–3:1 – including IAH bonus), supported by proximity to Roseville Station and local services. Affordable rental housing is integrated to meet social needs while maintaining liveability. ▪ **Sustainability** – Incorporates passive solar design, operable skylights, and cross ventilation. Nearly 70% of apartments receive at least two hours of sunlight on 21 June. Deep soil zones and retained vegetation support biodiversity and microclimate regulation. ▪ **Landscap**e – Fully integrated with the built form, retaining significant vegetation including a mature Eucalyptus tree in the central courtyard and providing landscape buffers that enhance privacy, support passive surveillance, and reinforce the green character of Roseville. ▪ **Amenity** – Well-proportioned apartments with good solar access, ventilation, and outlook. Privacy is supported through setbacks, landscaping, and screening. Generous communal facilities and direct street access for ground floor townhouses improve activation and convenience.	**Addendum Appendix C** **Updated Statutory Compliance Table Appendix X**

Summary of Issue Raised	Response	Refer to
	▪ **Safety** – Clear delineation of public and private spaces, secure access points, and well lit communal areas. Passive surveillance maximised through sightlines from podium and ground level apartments. ▪ **Housing Diversity & Social Interaction** – Mix of apartment sizes and layouts, including family friendly 3 and 4 bedroom units designed to Healthy Higher Density Living guidelines. Affordable rental housing integrated with equal access to amenities. ▪ **Aesthetics** – Refined material palette referencing Federation era character. Darker brick and sandstone at podium level ground the building; lighter tones above reduce visual mass. Façade articulation through planter boxes, vertical breaks, and varied materials responds to local context. **Refinements in Response to SDRP Feedback** ▪ **Height reduction**: Building A lowered by 1.7m to improve its relationship with the Scout Hall and neighbouring properties. ▪ **Podium articulation**: Lord Street frontage broken into three volumes following the slope, reducing perceived bulk and reinforcing human scale. ▪ **Material palette refinement**: Darker brick and sandstone at podium level to ground the building; lighter tones above to reduce visual mass. ▪ **Improved permeability and safety**: Removal of flood wall and introduction of palisade fencing near the Scout Hall; enhanced passive surveillance through sightlines from podium and ground-level apartments. ▪ **Amenity upgrades**: Expanded communal facilities (gym, indoor pool, cinema, dining and lounge) and improved private open space for ground-floor townhouses. ▪ **Landscape integration**: Retention of mature trees, increased canopy cover, and planting to enhance privacy, biodiversity, and visual softness. **Conclusion** The reassessment confirms the proposal is **consistent with the desired future character** under both State and local planning frameworks and has been **refined to address SDRP and DPHI feedback**. The design incorporates essential elements of local character — including scale, setbacks, landscaping, and materiality — while	

Summary of Issue Raised	Response	Refer to
	delivering a high-quality, well-proportioned apartment development that supports the precinct's planned transition	
Heritage Impacts		
Provide an updated heritage impact statement and visual impact assessment which includes an overlay of the Ku-ring-gai Local Environmental Plan 2015 heritage map with the visual impact assessment locations to ensure that the visual and heritage impacts of the proposal are identified and assessed from nearby heritage items. This should include additional imagery and analysis of the visual impact from, but not limited to, the following locations: ▪ I115 (Roseville Scout Group Hall), I697 (31 Roseville Avenue), I695 (22 Roseville Avenue), I112 (10 Roseville Avenue), I113 (12 Roseville Avenue), I114 (16 Roseville Avenue), I106 (19 Roseville Avenue), I698 (32 Roseville Avenue), I699 (40 Roseville Avenue) and 1689 (St Luke's Hall 28 Lord Street).	An updated Heritage Impact Statement (**Appendix T**) and Visual Impact Assessment (**Appendix I**) have been prepared in response to the RFI. These include: ▪ An overlay of the *Ku-ring-gai Local Environmental Plan 2015* heritage map with all VIA viewpoint locations. ▪ Additional imagery and analysis from the heritage items specified by DPHI. The additional viewpoints relating to local heritage items assessed in the updated VIA are shown below. As shown in **Figure 11** below, the results of the VIA from the additional viewpoints align with the findings of the previous version of the VIA; that severe visual impacts are experienced in the immediate vicinity of the site, with nil/negligible and minor/moderate impacts at locations from surrounding streets and from longer range views within the local area. The VIA and HIS have been updated to respond to the revised design as shown in the architectural drawings at **Appendix B** of this report.	**Heritage Impact Statement Appendix T** **Visual Impact Assessment Appendix I**

Figure 11 Additional VIA viewpoints from heritage items



Source: Urbaine

The assessment confirms that:

- The proposal will be visible from several nearby heritage items, most notably the **Roseville Scout Group Hall (I115)**, with lesser visibility from other items including 31 Roseville Avenue (I697), 22 Roseville Avenue (I695), 10–16 Roseville Avenue (I112–I114), 19 Lord Street (I106), 32–40 Roseville Avenue (I698–I699) and St Luke's Hall (I689).
- Of the ten additional viewpoints assessed, only one — *Viewpoint 16 at 31 Roseville Avenue, adjacent to the Scout Hall* — experiences a **severe** visual impact. Two viewpoints (*19 Lord Street* and *22 Roseville Avenue*) experience **moderate–severe** impacts, with the remainder rated **moderate** or **negligible**.
- The revised scheme reduces height, bulk and massing, increases upper-level setbacks, lowers the podium height, and applies a material palette informed by the surrounding Clanville HCA (refer figures below). These changes lessen visual prominence and improve the interface with heritage items.

Summary of Issue Raised	Response	Refer to
	▪ For the Scout Hall, impacts are most apparent in views from the western end of Roseville Avenue. These are moderated by: o A four-storey human-scale podium adjoining the Hall. o Retention and augmentation of mature vegetation. o Introduction of an activated green space to the south, enhancing its setting and interface. ▪ Views from other heritage items are generally filtered or screened by existing vegetation, topography, and intervening development, resulting in minor or negligible change. ▪ No changes are proposed to the setting or curtilage of any heritage item. ▪ While some visual impact will occur due to the proposal's increased scale, these impacts are consistent with the anticipated change in character under the TOD SEPP, Housing SEPP and Council's alternative controls, with varying height and scale across the precinct. These impacts are mitigated through: o Considered architectural resolution, including undulating façade projections to break up bulk and improve sightlines. o Landscaping that retains and supplements significant plantings to soften and obscure the building form. o Material selection that references the surrounding HCA while differentiating podium and tower elements to emphasise human scale.	

Figure 12 Summary of View Impact Assessment

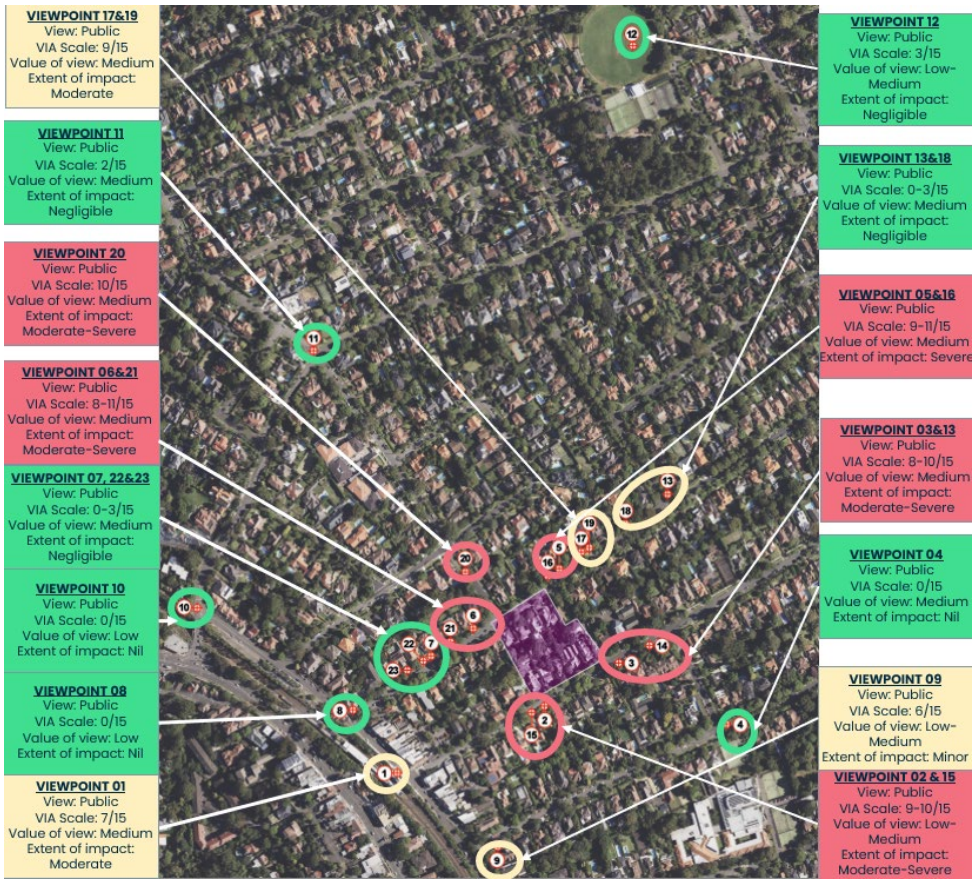


Figure 13 Comparison of prior and proposed view impacts from viewpoint 3

SSDA Lodgement scheme

Revised Response to Submissions scheme

Source: Urbaine

Summary of Issue Raised	Response	Refer to

Figure 14 Comparison of prior and proposed view of Roseville Scout Hall

SSDA Lodgement scheme

Revised Response to Submissions scheme

Source: Urbaine

Summary of Issue Raised	Response	Refer to

Figure 15 VIA Viewpoint 15

Existing view

Photomontage of proposal

Source: Urbaine

Summary of Issue Raised	Response	Refer to
	Figure 16 VIA Viewpoint 20  Existing view  Photomontage of proposal *Source: Urbaine*	

Summary of Issue Raised	Response	Refer to
Demonstrate how the proposal responds to the recommendations and mitigation measures of the Heritage Impact Statement and the feedback received from the SDRP in relation to the interface from heritage items, particularly the Scout Hall.	The proposal has responded to the recommendations and mitigation measures of the updated HIS (set out below) as follows: **Response to HIS Mitigation Measures** ▪ **Street setbacks and podium design** - setbacks from the street which relate to the prevailing building line and the use of a podium to give less prominence to the highest part of the development. ▪ **Landscaping to street setbacks** - continuation of substantial landscaping along the street fronts to both Lord Street and Roseville Avenue continues the established character of street planting in the HCA and softens the visual bulk of the development in the streetscape. ▪ **Built form setbacks** - incorporation of staggered setbacks which increase at the tower height plane, to further reduce the appearance of the development in the streetscape. ▪ **Architectural treatment** – use of a cohesive architectural treatment which is simple, elegant and not visually dominant in the context of locally heritage listed items within the vicinity. ▪ **Articulation of built form & façade** - incorporation of chamfered corners, horizontal articulation of floor slabs and undulating façade projection along Roseville Avenue to soften the presentation of the development's overall visual impact when read within the context of adjacent heritage items and the surrounding Clanville HCA. ▪ **Relationship to Scout Hall** - incorporation of a human-scale four-storey podium element at the development's north-eastern corner to establish a cohesive relationship to the adjacent Roseville Scout Hall item. ▪ **Interface with Scout Hall** - incorporation of an architecturally resolved green space to be located south of the adjacent Roseville Scout Hall which serve to activate the item and improve its interface with the proposed development. ▪ **Materials palette** - the materials palette has been informed by the material treatment of the surrounding Clanville HCA. Darker earthier tones are incorporated to the	**Updated Heritage Impact Statement Appendix T** **Design Report Addendum Appendix C**

Summary of Issue Raised	Response	Refer to
	podium to be read at streetscape level, while the tower component incorporates lighter neutral tones differentiating between the podium and tower masses and emphasises the human-scale resolution of the podium form. ▪ **Lightweight boundary treatment** – incorporation of a lightweight composition and materiality fence to the street frontages establishes a non-dominating boundary to the proposed development. **Response to SDRP Feedback** In relation to the interface from heritage items, particularly the Scout Hall: ▪ The height of Building A has been lowered by 1.7 metres, which also reduces the podium height accordingly. This adjustment aligns the podium more closely with the surrounding context including the adjacent Scout Hall and satisfies the ADG requirements with regards to building separation. ▪ The four-storey podium element at the north-eastern corner provides a respectful scale transition to the adjacent heritage item. ▪ The architectural language draws subtle references from the Scout Hall, incorporating materials such as brick and sandstone that are used consistently across the site. ▪ Chamfered corners, articulated floor slabs, and an undulating façade soften the building's presentation within the HCA ▪ A restrained and elegant architectural treatment is proposed to ensure the development remains visually recessive in relation to nearby heritage-listed items. ▪ The previously proposed flood wall has been replaced with a low palisade fence and landscaping. This not only softens the interface with the Scout Hall. The revised treatment enhances visual permeability towards Roseville Avenue and reinforces the Scout Hall's connection to its broader context. ▪ The material palette references the surrounding context, with darker, earthy tones applied to the podium to enhance the streetscape, and lighter, neutral tones used on the tower to distinguish the two built forms and reinforce a human-scale podium.	

Summary of Issue Raised	Response	Refer to
	▪ A landscaped green space south of the Roseville Scout Hall improves the setting and interface of the heritage item. A lightweight, visually recessive fence along the street frontages ensures a non-dominant boundary treatment.	
Building height		
The Department raises concerns with the proposed building height exceeding the maximum permissible building height of 28.6m, particularly noting that portions of the building above 28.6m would be visible from the public domain and neighbouring properties. The proposal should be refined as necessary to be compliant with the maximum permissible building height of 28.6m.	The building massing has been reduced in height to generally sit below the maximum height limit. The building exceeds the maximum permissible building height of 28.6m are limited to roof elements such as lift overruns. A revised clause 4.6 variation request is provide at **Appendix E** which provides a detailed justification as to why: ▪ Compliance with the standard is unreasonable and unnecessary in the circumstances; and ▪ There are sufficient environmental planning grounds to justify the contravention.	**Updated Clause 4.6 Request Appendix E**
Provide further detail to confirm the building height: ▪ An overlay of the roof plan over the survey plan, with existing ground level and the uppermost point of the roof clearly notated ▪ Updated section plans dimensioning the uppermost point of the building with the existing ground level directly underneath.	▪ An overlay of the roof plan over the survey plan has been included in the updated Architectural Plans. ▪ Updated section plans are provided in the Architectural Plans and Design Report Addendum. The sections clearly outline the extent and dimension of the height breaches, measuring a maximum of 1.07m for the eastern corner of the central roof parapet on the rooftop of Building C. This measurement has been taken from the existing ground level directly below the highest point.	**Updated Architectural Plans Appendix B** **Design Report Addendum Appendix C**
Should any variation in the building height development standard be proposed, provide an updated clause 4.6 variation report which: ▪ Identifies that the proposal seeks to vary the maximum building height development standard in section 16(3) of the Housing SEPP rather than section 155) ▪ Provides unique site-specific and contextual planning justification to establish that there are	▪ The clause 4.6 variation request identifies the proposal seeks to vary the maximum building height in section 18(2) of the Housing SEPP. It does not seek to vary the development standards outlined in section 16(3) of the Housing SEPP given this development standard relates to floor space ratio and not building height. ▪ A detailed overshadowing analysis of the revised design is provided at Appendix A of the updated clause 4.6 variation Request. This analysis assesses the shadows cast by the proposed development on the worst affected properties to the west and south of the site. A comparison with the shadow cast by the previously proposed SSDA scheme and a compliant building height is provided. The analysis shows that,	**Updated Clause 4.6 Variation Request** **Appendix E** **Updated View Impact**

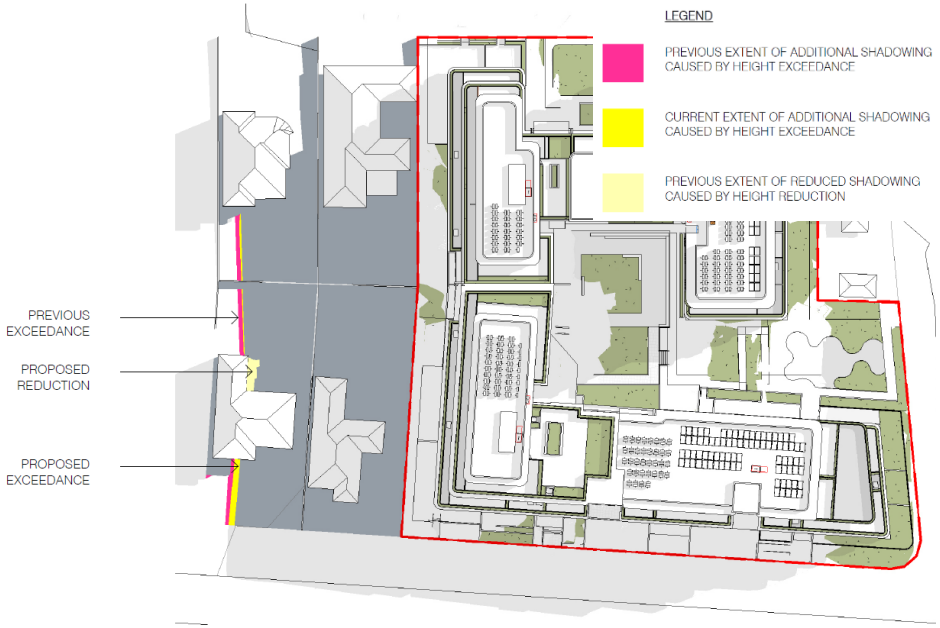
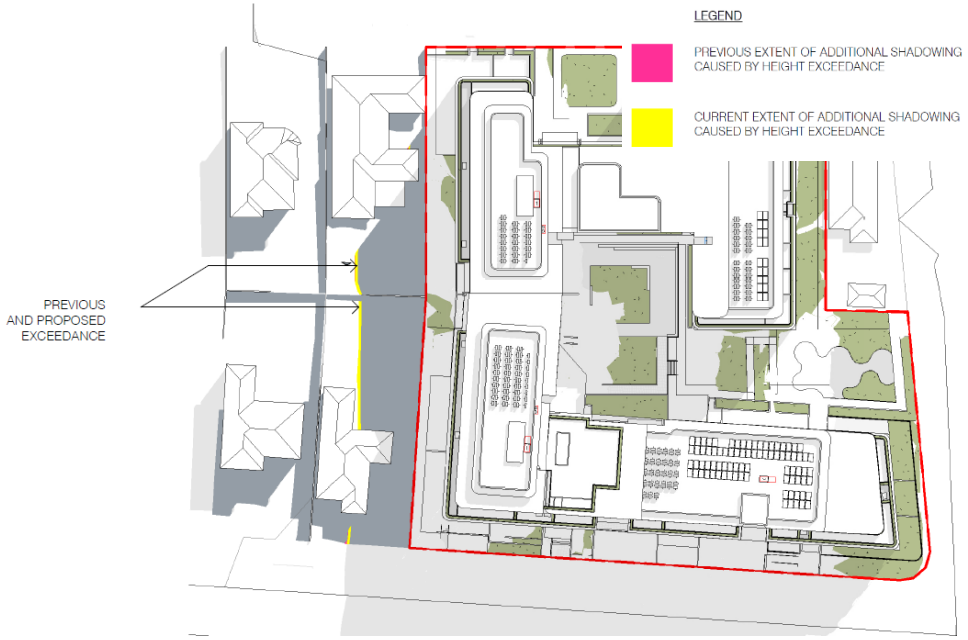
Summary of Issue Raised	Response	Refer to
sufficient environmental planning grounds for the height to exceed beyond the maximum ▪ Demonstrates that the variation would not result in additional amenity impacts on the neighbouring properties in terms of visual and overshadowing impacts etc, compared to a compliant building height ▪ Demonstrates that the proposed bulk and scale is appropriate and responds to the desired future character of the area despite the building height exceedance ▪ Follows similar structure as provided in Department's Guide to Varying Development Standards 2023	between 9am and 3pm, the proposal would result in greater overshadowing than a compliant building height to 12 Lord Street at 10am and 11am on mid-winter, and 14 Lord Street at 12pm and 1pm on mid-winter. The quantum of this additional overshadowing ranges from 23.1m^2 to 16.4m^2. The revised building height demonstrably reduces the shadow cast to these neighbouring properties, as shown in **Figure 17** below. The proposed building height will have a minimal overshadowing impact, particularly to the rear garden of these properties, in comparison with a compliant building height (refer **Figure 18** below). All properties will continue to receive greater than 3 hours of sunlight at mid-winter in accordance with requirements. Figure 17 Reduced shadow impacts to 12 Lord Street at 10am, 21 June  *Source: FKA*	**Assessment Appendix I**

Figure 18 Shadow impacts to 12 Lord Street at 12pm, 21 June



Source: FKA

- The extent of the exceedance is limited to the rooftop plants and lift overruns. It will not have a perceivable impact on surrounding views when compared to a compliant scheme. The Figures below show the viewpoints assessed within the updated VIA, looking towards the greatest proposed exceedance of the height control which relates to a portion of the Building C roof parapet, located within the eastern portion of the roof. The Figures show that the height exceedances will not have a perceptible view impact, including in views from the surrounding HCA.

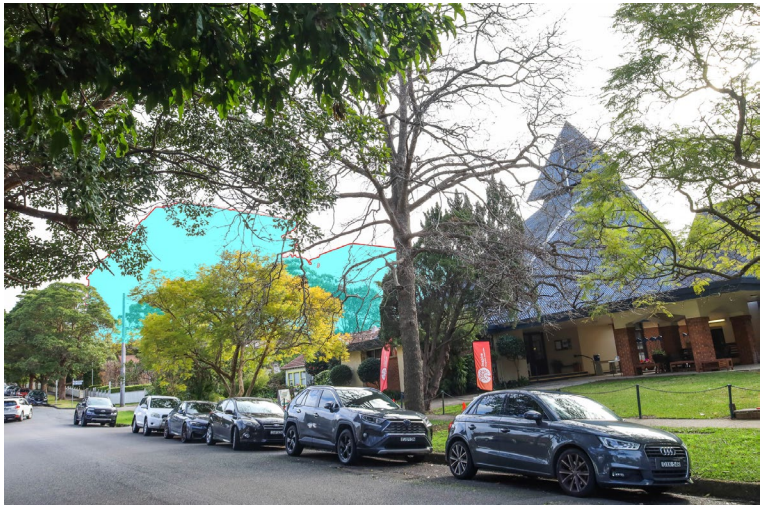
Figure 19 VIA Viewpoint 3

Visual Impact in cyan with red outline

Photomontage of proposal

Source: Urbaine

Figure 20 VIA Viewpoint 14



Visual Impact in cyan with red outline

Photomontage of proposal

Source: Urbaine

Summary of Issue Raised	Response	Refer to
	▪ The site slopes 7.5 metres from west to east and as such, results in a height control plane that is inconsistent across the site area. In response to this, the design of the built form has been stepped at roof level. In addition, the revised scheme has reconfigured and removed apartments within the development in order to reduce the extent of the building height exceedance on the Lord Street and Martin Lane corner, providing a more appropriate response to the sloping nature of the site. ▪ As discussed earlier in **Table 9**, the scale of the proposed building is consistent with State planning policy for the provision of residential apartment buildings in the Roseville area and the desired future character scenarios that have been modelled and assessed. The proposed variation does not substantially alter this scale noting that the building generally complies with the maximum permissible building height and the proposed exceedances relate to the rooftop plants and lift overruns. ▪ The clause 4.6 Variation Request has been updated to adopt the approach in *Merman Investments Pty Ltd v Woollahra Municipal Council [2021] NSWLEC 1582* for determining "ground level (existing)" on sites that are not fully built over. Consistent with *Merman*, the prevailing existing ground level across the site has been used as the reference point, rather than public domain levels as in *Tony Legge*. This ensures that localised excavations, such as swimming pool basins, do not artificially lower the height plane and create a technical exceedance unrelated to the actual relationship between the built form and the surrounding natural or established ground level. This approach aligns with the intent of the LEP definitions and provides a more accurate and equitable assessment of compliance with the 28.6 m height control under the Housing SEPP. ▪ The clause 4.6 variation request follows the structure as provided in the DPHI *'Guide to Varying Development Standards 2023'*. The template has been based off DPHI's template variation request.	

Summary of Issue Raised	Response	Refer to
Balcony setbacks		
The ADG recommends minimum setbacks to boundaries in order to protect visual privacy. The west facing balconies/terraces on level 4 and 8 encroach into the 9m and 12m setbacks respectively. These balconies should be reduced in size/relocated to meet the ADG recommended setbacks	The western balconies have been reduced in depth to sit wholly within the 9 m and 12 m setbacks required by the ADG. In addition, the design has been amended to incorporate non-accessible landscaped zones in these setback areas, further reducing balcony size and protecting visual privacy by limiting direct sightlines to adjoining properties. These changes also respond to concerns about bulk, scale, and direct transition impacts along the western elevation. By pulling back the upper-level built form and introducing layered landscaping, the interface with the neighbouring low-density dwellings is softened, reducing the perception of a continuous vertical wall. The combination of increased setbacks, recessed balcony edges, and planting breaks up the horizontal massing, provides visual relief, and creates a more graduated transition in scale between the proposal and the adjoining properties. An extract of the amended balcony setbacks and landscaped interface is provided in the figure below, illustrating how these refinements improve privacy outcomes while mitigating bulk and scale impacts on the western boundary. Figure 21 level 4 amended balcony setbacks  *Source: FKA*	**Updated Architectural Plans** **Appendix B**

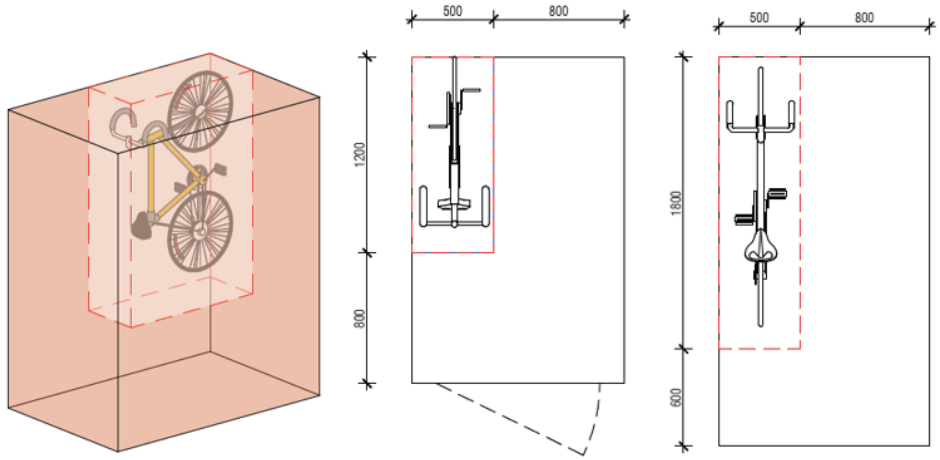
Summary of Issue Raised	Response	Refer to
Solar access		
Provide an updated solar access study with hourly shadow diagrams and views from the sun to demonstrate the impacts of the proposal on the potential future development of surrounding properties, utilising the development controls within Council's finalised scenario (or final adopted controls), would be capable of achieving a minimum of two hours of solar access to 70% of apartments between 9am-3pm on 21 June	An updated solar access analysis has been undertaken in line with the assess development scenarios which included existing TOD sites, sites subject to the LMR provisions and Councils alternative controls. These controls allow for a varied built form, including 9-storey buildings (existing TOD sites), 4-storey buildings (LMR controls), and single-storey dwellings (Council's alternative). The study assesses the potential impacts of the proposed development on future surrounding developments, including their ability to achieve the required solar access standard. **Key Points:** ▪ Shadow impacts are localised and primarily affect immediately adjacent buildings to the west and south. ▪ **Western impacts:** o Shadows extend over the building to the west during the morning mid-winter period. o By midday, overshadowing is limited to the setback zone. ▪ **Southern impacts:** o Properties opposite on Lord Street are unaffected in the morning. o Partial shading occurs from 1pm, affecting building fronts only. o Rear gardens are already shaded by the buildings themselves in the afternoon. ▪ Discrete rooftop elements above the permissible height plane do not cause additional overshadowing due to their setbacks. ▪ Solar modelling confirms that future developments on surrounding sites can achieve **minimum two hours of solar access to 70% of apartments between 9am–3pm on 21 June**. ▪ Only around 10% of apartments in neighbouring developments would be affected by overshadowing from the proposal.	**Design Report Addendum** **Appendix C**

Summary of Issue Raised	Response	Refer to
	Conclusion: The solar access study demonstrates that overshadowing impacts are limited, localised, and within acceptable parameters. Under future development scenarios, the proposed development will not prevent future development on adjacent sites from achieving the required solar access under the ADG, or existing dwellings maintaining over 3 hours of solar access.	
If any variations are proposed to the height control, this analysis must demonstrate that these elements do not have any overshadowing impacts on surrounding properties, beyond that of a complying building height.	As detailed in the clause 4.6 variation request and supporting shadowing diagrams, between 9am and 3pm, the proposal would result in greater overshadowing than a compliant building height to 12 Lord Street at 10am and 11am on mid-winter, and 14 Lord Street at 12pm and 1pm on mid-winter. The quantum of this additional overshadowing ranges from 23.1m2 to 16.4m2. The revised building height demonstrably reduces the shadow cast to these neighbouring properties. The proposed building height will have a minimal overshadowing impact, particularly to the rear garden of these properties, in comparison with a compliant building height. All properties will continue to receive greater than 3 hours of sunlight at mid-winter in accordance with requirements.	**Updated Architectural Plans** **Appendix B** **Updated Clause 4.6 Variation Request** **Appendix E**
State Design Review Panel response		
Provide a detailed response, showing how the proposal has been amended and refined in response to the matters raised by SDRP in the meeting held on 11 June 2025.	The design has been amended to reflect the matters raised by SDRP. Please refer to section 2 of the Design Report Addendum. A detailed response is provided later in this table.	**Design Report Addendum** **Appendix C**
Residential amenity		
Communal Open Space (COS) Recalculate the area of COS considering the useable and functional parts, as recommended by the ADG. Walkways, entry points and buffer zones with landscaping should not be included in the calculation of the principal COS area.	The COS area has been calculated in accordance with the ADG. The calculation includes the zones designed specifically as amenity space; these spaces are the dedicated rooftop spaces, the central courtyard and play space and the Roseville Avenue courtyard (refer to **Figure 22** below). As clearly illustrated in **Figure 22**, the calculation does not include landscaped setback zones. The development provides 2353.8m^2 of COS, equating to	**Updated Landscape Report** **Appendix D**

Summary of Issue Raised	Response	Refer to
	25.12% of the site area. Please refer to page 25 of the updated Landscape Report and **Figure 22** for further details. Figure 22 Calculation of Communal Open Space  *Source: Land + Form*	
Solar access Confirm that the calculation of direct sunlight to apartments is correct, noting the concerns raised in Council's submission.	The ADG requires at least 70% of apartments to receive a minimum of 2 hours direct sunlight between 9am–3pm at mid-winter. The solar access assessment, undertaken using the ADG criteria and verified through "sun eye" views in the architectural drawings, confirms that 174 of 252 dwellings (69%) achieve 2hrs sunlight to both living rooms and private open space which is marginally below the ADG requirement. The shortfall is limited and supported by strong amenity outcomes and design considerations as outlined below:	**Updated Architectural Plans** **Appendix B Design Report**

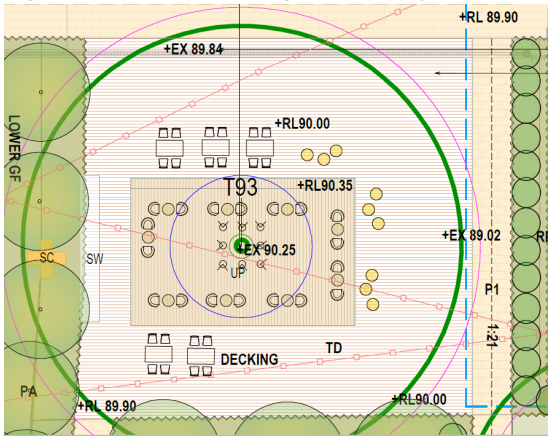
Summary of Issue Raised	Response	Refer to
	▪ All north-facing apartments in Buildings C and D meet the requirement for private open space. ▪ Non-compliance is limited to upper-level apartments at Building A's southeast corner, where balconies do not receive winter solstice sunlight. ▪ Living rooms in these apartments receive approximately 4 hours of direct sunlight daily. ▪ Balconies have a strong visual connection to a significant Eucalyptus tree (Tree 93), enhancing outlook and amenity. ▪ Relocating balconies to achieve winter compliance would reduce living room amenity and increase setback, compromising design intent. ▪ Balconies receive ample sunlight in warmer months, supporting year-round liveability. The minor shortfall is considered acceptable given the high levels of sunlight to living rooms, strong visual connections to landscape features, and the availability of ample sunlight in warmer months.	**Addendum Appendix C**
Cross ventilation Certain single aspect apartments rely on operable skylights to achieve cross ventilation. Provide information on how these skylights operate and a natural ventilation statement from a suitably qualified person to demonstrate that these apartments achieve natural cross ventilation in line with Objective 4B-3 of the ADG.	The design of apartments has been refined to enhance cross ventilation. A Natural Ventilation Assessment of the project design has been undertaken (appended to the Design Report Addendum). This confirms that compliance with the ADG criteria can be achieved. The Natural Ventilation Assessment undertakes detailed Computational Fluid Dynamics (**CFD**) modelling to verify natural ventilation performance, with a focus on apartments utilising skylights as part of the cross ventilation strategy. The CFD modelling incorporated skylights, recesses, and façade articulations, which create pressure differences that facilitate airflow through apartments. Skylight openings in the tested units were increased during design to 870mm x 1,275mm to enhance performance. The results confirmed the following: ▪ 12 of 13 Level 3 apartments tested achieved natural cross ventilation ▪ All Level 7 apartments tested achieved natural cross ventilation ▪ Given that actual wind speeds at the site exceed 2m/s approximately 74% of the time, real-world performance is expected to be higher than modelled.	**Design Report Addendum Appendix C**

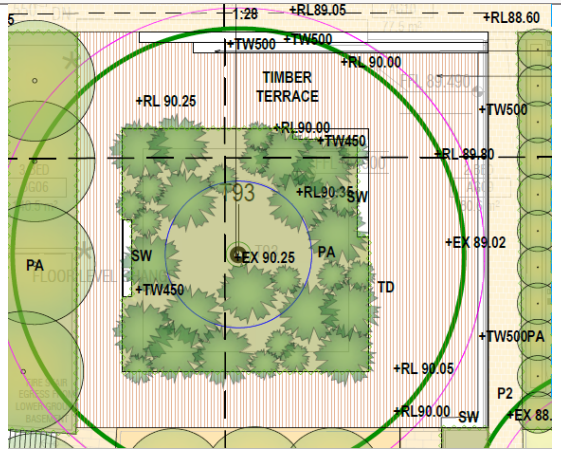
Summary of Issue Raised	Response	Refer to
	Skylights have been designed to ensure that overlooking does not arise. As illustrated on the architectural plans. the skylights are to comprise translucent glass. Potential overlooking from the taller building forms adjacent is further managed by the inclusion of parapet walls which prevent access to the edge of the building.	
Circulation Core More than eight apartments are proposed off a circulation core. Demonstrate how the proposal provides amenity to apartments by limiting the number of apartments within each circulation core in line with Objective 4F-1 of the ADG.	Objective 4F-1 of the Apartment Design Guide seeks to limit the number of apartments accessed from a single circulation core to support amenity, privacy, and efficient movement. While the proposal includes more than eight apartments off a single core on Levels 01–03 of Buildings C and D, the maximum number is twelve, which is consistent with the ADG's acceptable solution. The design incorporates measures to ensure high amenity for all dwellings served by each core as outlined below. ▪ Maximum of twelve apartments per core on Levels 01–03 of Buildings C and D, in line with ADG acceptable solution. ▪ Corridors designed with natural daylight and ventilation to improve comfort and orientation. ▪ Enlarged lift lobbies to enhance legibility, reduce congestion, and provide a welcoming arrival space. ▪ Acoustic and visual privacy measures at apartment entries to minimise disturbance. ▪ Lift capacity and performance designed to ensure reasonable waiting times. ▪ Separate service areas provided to avoid disruption to residential circulation. ▪ Corridor widths and lengths optimised for ease of movement and amenity. It is considered that the proposal meets the intent of Objective 4F-1 by limiting apartments per core to within ADG parameters and incorporating design features that maintain privacy, comfort, and efficient circulation for residents.	**Design Report Addendum Appendix C**
Storage The EIS states that residents are expected to park their bicycles within their basement storage space. Demonstrate that the storage spaces provided are large	The ADG requires minimum storage volumes of 4 m³ (studio), 6 m³ (1-bed), 8 m³ (2-bed) and 10 m³ (3+ bed), with at least 50% located within the apartment. The proposal meets this requirement by providing secure, accessible basement storage cages designed to fit a bicycle alongside the ADG-compliant storage allocation.	**Updated Architectural Plans Appendix B**

Summary of Issue Raised	Response	Refer to
enough to accommodate bicycle parking in addition to the minimum storage area recommended by the ADG.	▪ All apartments meet the ADG minimum storage volumes, with at least 50% located internally. ▪ Additional secure, individually-allocated basement storage cages are provided for larger or infrequently used items. ▪ Cages are dimensioned to allow bicycle storage in addition to the minimum required volume. ▪ Typical cage layout (Design Report Addendum Figure 1.16 and **Figure 23** below) demonstrates a side-mounted bicycle can be accommodated while retaining required storage capacity. ▪ Basement storage is lockable, weather-protected, and located for easy access without crossing vehicle aisles. ▪ Two central bike storage areas also provided — one for residents and one for visitors — at lower ground level. Figure 23 Proposed bike storage  Source: FKA	**Updated Transport Impact Assessment Appendix J**

Summary of Issue Raised	Response	Refer to
Lower ground floor apartments The submitted plans show that some ground floor apartments and the courtyards would be sub-terranean (as shown in Sections D, E, J and K). Concerns are raised regarding the amenity of the future occupants in these apartments due to lack of outlook, effective wind flow and overshadowing. In this regard, you must: ▪ Amend the architectural plans to include updated finished floor levels for the courtyards and the top of the retaining walls ▪ Update sun access diagrams to show the impact of overshadowing caused by the retaining walls on the living areas and courtyards of affected apartments ▪ Clarify how an adequate level of amenity would be provided to the occupants in terms of outlook and privacy ▪ Consider providing double storey apartments on the lower levels	The design has been amended to remove all previously proposed subterranean apartments in Building A facing Roseville Avenue. The ground floor level has been raised to RL 88.6 to meet the Probable Maximum Flood (**PMF**) level, ensuring all apartments are now at or above footpath level. ▪ **Updated levels:** Architectural plans revised to show new finished floor levels for apartments and courtyards, with retaining wall heights adjusted accordingly. ▪ **Amenity improvement:** Raising the ground floor eliminates sub-terranean conditions, providing improved outlook, natural light, and ventilation. ▪ **Overshadowing:** Courtyards and living areas now receive direct sunlight without obstruction from retaining walls; updated sun access diagrams reflect this change. ▪ **Privacy and surveillance:** Ground floor courtyard planting enhances privacy while maintaining passive surveillance of communal and street spaces. ▪ **Connectivity:** Street-level access points introduced to improve pedestrian permeability, wayfinding, and activation. ▪ **Double-storey apartments** were considered; however, raising the ground floor level achieved the desired amenity outcomes without requiring split-level units. It is considered that the redesign resolves DPHI's concerns.	**Updated Architectural Plans** **Appendix B**
Trees and landscaping		
Provide tree root mapping as recommended by the Arboricultural Assessment Report and demonstrate how the investigations have informed any necessary design changes or construction methods to ensure the trees retention and protection.	Project arborists CPS undertook root mapping for Trees 20, 67, 85, 86 and 102 within the Notional Root Zones (**NRZs**) of proposed works to assess potential construction impacts and determine retention viability. ▪ **Tree 20 – *Lophostemon confertus***: 58 roots (10–90 mm diameter), 27% NRZ encroachment; removal recommended due to likely health decline and reduced Useful Life Expectancy (**ULE**). ▪ **Tree 67 – *Quercus robur***: 9 roots (10–50 mm diameter), 18% NRZ encroachment; retention viable with root-sensitive construction and arborist supervision.	**Updated Arboricultural Impact Assessment** **Appendix P**

Summary of Issue Raised	Response	Refer to
	▪ **Tree 85 – *Lophostemon confertus***: 12 roots (20–40 mm diameter), 28% NRZ encroachment; retention viable with mitigation measures. ▪ **Tree 86 – *Schinus molle var. areira***: 16 roots (10–60 mm diameter), 25% NRZ encroachment; removal recommended due to reduced ULE. ▪ **Tree 102 – *Melaleuca salicina***: 16 roots (10–25 mm diameter), 24% NRZ encroachment; retention viable with mitigation measures. Canopy encroachment to T67 and T116 will necessitate pruning. The extent of pruning required is acceptable and will not threaten the long term viability of these trees as specified in Section 5.3 of the Updated Arboricultural Impact Assessment (**AIA**): "*Provided the pruning works are carried out in accordance with AS4373-2007 Pruning of amenity trees, it is considered that Trees 39, 67, 93, 110, 115 & 116 will be capable of tolerating the required level of pruning. Further, it is generally not expected that the works will result in a significant impact to crown balance or trigger any associated instability issues".* The canopy of T5 is not impacted by the proposed development as illustrated in Figure 23 of the Updated AIA. Tree 93, initially identified as Sydney Blue Gum, was confirmed by the Project Ecologist as **Flooded Gum** (*Eucalyptus grandis*) based on diagnostic fruit features (4–5 incurved valves, exserted or at rim level) (Appendix 7 of Updated Aboricultural Impact Assessment at Appendix P) . The following mitigation measures are recommended for retained trees with moderate/major NRZ encroachment: ▪ Raised, lightweight decking and pathways above existing ground with minimal excavation. ▪ Test excavation for footings/piers to 600 mm under arborist supervision, using non-destructive methods. ▪ Relocation/redesign of footings where significant roots (>25 mm) are found. ▪ Root-sensitive installation of seating walls/play areas with arborist oversight. ▪ Use of contiguous deep soil zones to offset NRZ encroachment and support root growth.	

Summary of Issue Raised	Response	Refer to
	Trees recommended for removal due to unsustainable root loss (20 and 86) will be replaced with species in accordance with Council requirements. Council has been advised of the proposed removal of these street trees in conjunction with notification of the issue of the RtS to DPHI.	
Provide a response to Council's concerns about the proposed works within the TPZ and SRZ of Tree 93, including updated landscaped plans as necessary to ensure the long-term retention value of this ecologically significant Sydney Blue Gum tree.	As part of the updated Landscape Plans, the extent of decking surrounding tree 93 has been reduced. Please refer to the figure below which shows the increased soft landscape area now proposed surrounding tree 93. The updated AIA identifies that Tree 93 is recommended for retention and protection despite a 'major' (21% NRZ) encroachment from proposed seating walls, retaining walls, pathways and building/basement footprint. This level of encroachment, as well as the modification of surrounding site conditions may alter ground water movement and availability of nutrients and has the potential to result in a reduction to the assigned Useful Life Expectancy (**ULE**) rating and health/condition of this tree. The AIA proposes mitigation measures for root-sensitive design and construction of decking, pathways and seating walls, and project arborist supervision and tree protection measures throughout construction, to ensure the long-term retention of the tree. Figure 24 Landscape design – tree 93 (Flooded Gum)  SSDA Lodgement Landscape Design	**Updated Landscape Plans** **Appendix D** **Updated Arboricultural Impact Assessment** **Appendix P**

Summary of Issue Raised	Response	Refer to
	 Revised RtS Landscape Design *Source: Land + Form*	
Provide updated landscape plans which demonstrate how the proposed landscape strategy is compatible with the landscaped 'garden' character of Lindfield. In addition, the landscape plan must address the following: ▪ clarify the number of trees to be retained and removed within the site. The Arboricultural Assessment Report outlines that 26 trees are to be retained on the site, however the Department notes that the majority of these trees are located outside of the site boundary. ▪ incorporate additional tree planting to demonstrate no net loss in trees on the site (excluding trees outside of the site boundary)	**Garden Character** The landscape design has been updated to align with Ku-ring-gai Council's 'garden' character, defined by large private gardens, significant public green spaces, and a high tree canopy created by a mix of native and exotic species. The proposal reflects this character through: ▪ Townhouse formats with direct street access, contributing to a landscaped streetscape. ▪ Formal garden spaces using recycled brick paving, native and exotic plantings, and high-canopy trees. ▪ A proposed tree canopy coverage of 39% of the site, exceeding the Government Architect's *Greener Places Design Guide* benchmark of 25%. **Clarification of tree retention and removal** ▪ Existing trees on site: 96. ▪ Trees to be retained: 6 (located within the site boundary). ▪ Trees to be removed: 90.	**Updated Landscape Plans** **Appendix D**

Summary of Issue Raised	Response	Refer to
▪ provide an updated plant schedule and plan which includes location, quantity and pot size. ▪ all proposed trees are annotated with species name, including the 1430.4m^2 of indigenous, low water use planting in common areas referenced in the BASIX certificate.	▪ Proposed new trees: 105. ▪ Outcome: No net loss of trees on site. **Additional tree planting** ▪ 105 new trees proposed, ensuring replacement of all removed trees and achieving a net gain in canopy coverage. **Updated plant schedule and plan** ▪ Provided in the Landscape Report (**Appendix D**), showing location, quantity, and pot size for all proposed plantings (refer to LD-DA0001). **Species annotation and indigenous planting** ▪ All proposed trees annotated with species name on updated landscape plans (refer to LD-DA0001). ▪ Total landscaped area: 3,222 m² (34% of site area). ▪ Approximately 70% of plantings are native species, meeting ESD and BASIX low-water-use commitments, including 1,430.4 m² of indigenous, low-water-use planting in common areas.	
Traffic and transport		
Confirm the location of the proposed 339 bicycle parking spaces.	The architectural drawings have been updated to clearly identify the location of the proposed bicycle parking. Resident bicycle parking is to be provided in storage cages within the basement levels adjacent to resident car parking, as well as in a resident bicycle storage room. Visitor spaces are provided at the lower ground level within an accessible central bike storage area. A total of 312 bicycle parking spaces are provided: 282 resident bicycle parking spaces and 30 visitor bicycle parking spaces. The proposed bicycle parking provision reflects the revised design and reduced number of apartments now proposed. The KDCP requires 1 space per dwelling + 1 per 10 dwellings for visitors. This equates to 252 resident spaces + 26 visitor spaces, a total 278 bike spaces. The proposal exceeds this requirement by 34 spaces (comprising an overprovision of 4 visitor spaces and 30 resident spaces).	**Updated Architectural Drawings Appendix B** **Updated Transport Impact Assessment Appendix J**

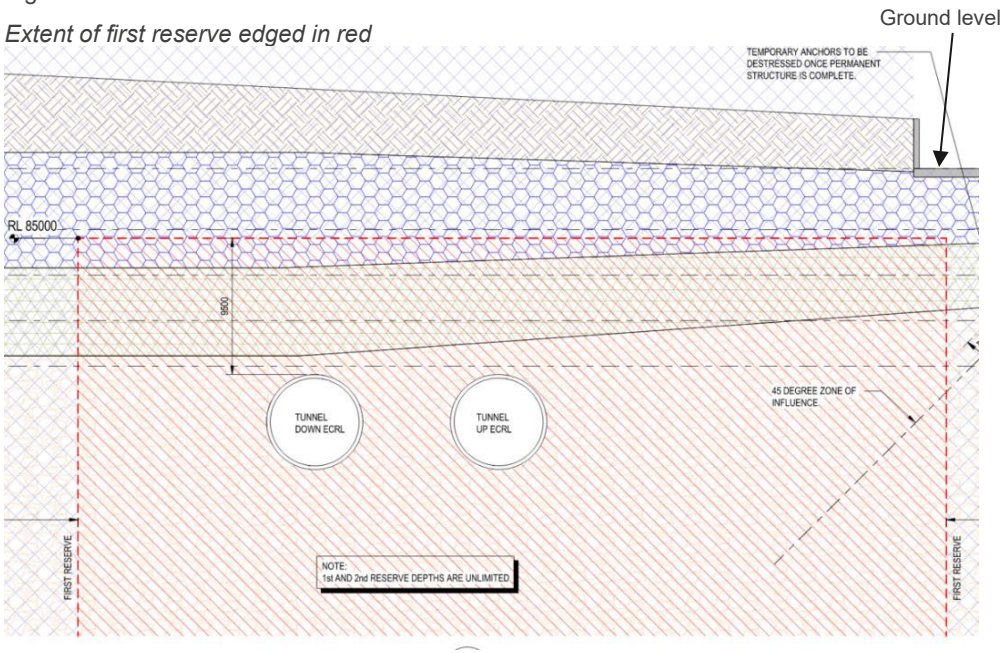
Summary of Issue Raised	Response	Refer to

The proposal provides 344 car parking spaces which is 62 spaces more than the minimum rate the Housing SEPP (282 spaces). As the site is located within walking distance of Roseville station, the number of car parking spaces should be reduced to comply with the minimum rates within the Housing SEPP. A reduction in parking should occur in conjunction with amendments to improve bin storage and waste collection arrangements.	**Car Parking**
	▪ Proposal includes 344 spaces broken down as follows:
	  ▪ 267 residential spaces (including 35 platinum standard accessible spaces)
	  ▪ 32 spaces for the affordable housing component (including 3 accessible spaces)
	  ▪ 42 visitor spaces including 3 accessible spaces
	  ▪ 3 car share spaces.
	▪ The Housing SEPP outlines a minimum parking provision for the development of 272 spaces. However, this applies to resident parking spaces only and excludes visitor and car share spaces. The proposed development includes 299 residential spaces which is 27 spaces more than the Housing SEPP minimum and 15 spaces more than the Ku-ring-gai DCP minimum (which is 284 spaces excluding visitor parking).
	▪ Whilst this parking provision exceeds Housing SEPP and DCP minimums, it remains below the maximum DCP requirement of 391 (or 433 including visitor parking requirements). The proposed parking provision is also consistent with the TfNSW Guide to Traffic Impact Assessments 2024 which sets a minimum parking requirement for the site of 273 residential spaces (or 323 spaces including visitor parking).
	▪ 42 visitor parking spaces are provided in accordance with the Ku-ring-gai DCP.
	▪ While the site is close to Roseville Station, the area retains a suburban, family-oriented character where private vehicles are commonly used for weekend and non-work trips.
	▪ Providing additional spaces is intended to meet anticipated resident demand and avoid increased reliance on on-street parking, which was raised as a concern in public submissions.
	▪ Updated Traffic Impact Assessment confirms the proposed parking can be accommodated without adverse traffic or parking impacts.
		Updated Transport Impact Assessment Appendix J
		Updated Waste Management Report Appendix S

Summary of Issue Raised	Response	Refer to
	Waste management ▪ Updated Waste Management Report prepared. ▪ Confirms adequate bin storage within the development. ▪ Demonstrates safe and efficient waste transfer and collection arrangements. ▪ Details provided in **Appendix S**. A plan showing the measures to be implemented to manage potential conflicts between cars and waste vehicles (convex mirrors, signage, and flashing lights) is included on the swept path diagrams included at Appendix D of the updated TIA (**Appendix J**). It is considered that the proposed parking provision balances proximity to public transport with local travel behaviours and community concerns about on-street parking. Waste management arrangements have been updated to ensure bin storage and collection are safe, efficient, and integrated into the design.	
Confirm the number of car parking spaces that will be allocated to the affordable housing units.	A total of 32 spaces will be allocated to the affordable housing units in accordance with the parking rates specified in the Housing SEPP and based on the proposed mix of apartments.	**Updated Architectural Plans** **Appendix B** **Updated Transport Impact Assessment** **Appendix J**
Provide a revised traffic impact assessment which incorporates the following: ▪ Existing and proposed levels of service. ▪ Clarify how the net increase in vehicle trips was calculated ▪ Confirm how the conflict of swept paths crossing over in the basement would be managed	A revised Traffic Impact Assessment (**TIA**) has been prepared by Ason Group and is attached at **Appendix J**. DPHI's comments are addressed as follows: ▪ **Existing and proposed levels of service** – the revised TIA has undertaken SIDRA modelling to assess the impact of the proposed development on the surrounding road network, including the existing and proposed levels of service for nearby intersections. Section 7.3 of the TIA confirms that the proposed development is not anticipated to	**Updated Transport Impact Assessment** **Appendix J**

Summary of Issue Raised	Response	Refer to
▪ Provide the estimated number of construction vehicle movements (light and heavy vehicles) anticipated for each stage of construction, provide swept path analysis demonstrating construction vehicles can enter/exit and manoeuvre on the site and assess the impact of construction vehicles on the surrounding road network. ▪ Provide an updated Table 5 which sets out the minimum car parking requirements under the Housing SEPP. Table 5 has used different figures to calculate car parking (for example, 45 instead of 48 affordable units).	have any material impact on the level of service/operation of key surrounding intersections. ▪ **Net increase in vehicle trips** – vehicle trip rates for the existing and proposed development were calculated based on the traffic generation rates stipulated in Chapter 5 of the *TfNSW Guide to Transport Impact Assessment 2024*, as outlined in Section 7.1 of the TIA. The traffic generation rates selected were for low density residential dwellings in Sydney (for the existing scenario) and high-density residential development with high public transport accessibility in Sydney (for the proposed scenario). These traffic generation rates were in the form of vehicle trips/dwelling/hour and were multiplied by the number of existing or proposed dwellings as relevant to determine the number of existing and proposed vehicle trips per hour, which was then used to calculate the net increase in vehicle trips. ▪ **Swept paths** – the basement layout provides sufficient passing opportunities throughout, including along circulation aisles, ramps and at the site access. All aisle widths are compliant with the relevant Australian Standards. Additionally, the TIA notes that, considering the anticipated moderate traffic volumes, the possibility of two vehicles passing one another within the basement is low. Notwithstanding, the basement layout provides sufficient passing opportunities throughout including along circulation aisles, ramps and at the site access. A swept path plan is included at Appendix D of the updated TIA (**Appendix J**). This plan includes proposed mitigation measures (convex mirrors, flashing lights and signage) to address the minor risk of conflicts between waste management vehicles and cars. ▪ **Construction vehicles** – based on Ason Group's knowledge of comparable projects, the development is expected to produce up to approximately 20 vehicles per hour depending on activities, which are notably lower than operational volumes (which SIDRA modelling indicates would have minimal impact on the operation of the surrounding road network). The exact numbers are currently unknown at this stage however will be confirmed once a contractor is appointed. Notwithstanding, construction vehicle movements during the road network peak hours would be minimised, where practical through the implementation of a Construction Pedestrian	

Summary of Issue Raised	Response	Refer to
	Traffic Management Plan (CPTMP) to reduce impacts to traffic in the local area. Therefore, the impact of construction vehicles on the surrounding road network are acceptable. ▪ Furthermore, since the construction vehicle access strategy, staging, vehicle sizes and other construction elements, are currently unknown, targeted swept paths would also be completed as part of the future detailed CPTMP. ▪ **Housing SEPP car parking requirement** the table has been updated (updated TIA Table 10) to ensure that accurate dwelling mix and affordable housing unit numbers are used. This table now confirms that the Housing SEPP minimum parking requirements for the proposed development (as amended), are 240 spaces for non-affordable units and 32 spaces for affordable units.	
Sydney Metro corridor protection		
Provide detailed survey plan, cross-sectional drawings, engineering impact statement, risk assessment report, electrotysis report, acoustic assessment report, desktop impact assessment and structural foundation layout and design documentation to Sydney Metro in accordance with the Sydney Metro Underground Corridor Protection Technical Guidelines. Consult with Sydney Metro in preparation of this aspect to the submissions report.	Consultation has been undertaken with Sydney Metro as detailed at **Section 3.1** of this Report This consultation has informed the Sydney Metro Impact Assessment which provides the requested documentation in accordance with the Sydney Metro Underground Corridor Protection Technical Guidelines (**Appendix N**).	**Metro Impact Assessment Appendix N**
Provide information on how tree removal and stormwater pits installation within the first reserve will be managed in line with the Sydney Metro Underground Corridor Protection Technical Guidelines.	Additional information has been obtained from Sydney Metro confirming the stratum location of the tunnel protection reserves. The first reserve is located below ground and is limited in height and depth. No works, including demolition, tree removal or stormwater pit installation, are proposed within the Sydney Metro First Reserve (refer to EIS Figure 36). Excavation work on land positioned directly above the first reserve is shallow in depth and does not protrude into the first reserve zone, as demonstrated in the documentation provided in **Appendix N**. The Sydney Metro Underground Corridor Protection Technical Guidelines specify the documents required to accompany a DA. All required documentation has been provided at **Appendix N** for referral to Sydney Metro.	**Metro Impact Assessment Appendix N**

Summary of Issue Raised	Response	Refer to
	Figure 25 Extent of first reserve *Extent of first reserve edged in red*  *Source: Meinhardt*	
Additional information		
Provide an updated letter from the Applicant's nominated community housing provider (**CHP**) confirming that: ▪ The in-fill affordable housing apartments will be managed as affordable housing for at least 15 years, and the TOD affordable housing apartments will be managed as affordable housing in perpetuity.	An updated letter from Link Wentworth as the Applicant's nominated CHP is provided at **Appendix V**. This confirms that the in-fill affordable rental housing apartments will be managed as affordable housing for at least 15 years. The letter also confirms that the TOD affordable housing apartments will be managed as affordable housing in perpetuity. The letter confirms that the proposed allocation of affordable rental apartments is acceptable. Section 156(2)(b) of the Housing SEPP requires the consent authority to be satisfied that the 2% TOD affordable housing component will be managed by a registered community housing provider in perpetuity. This will be managed through the application of an 88E	**Updated CHP Letter** **Appendix V**

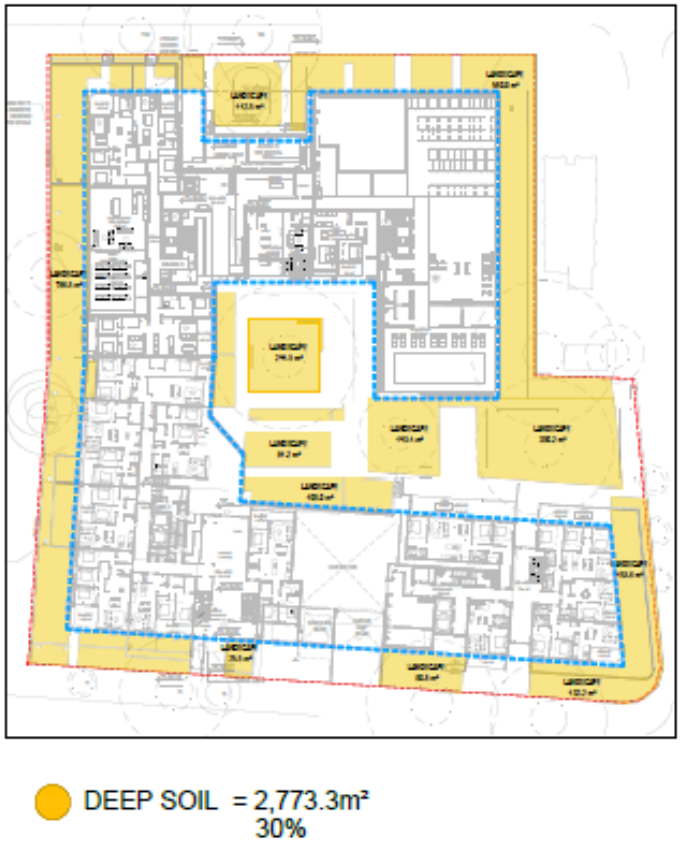
Summary of Issue Raised	Response	Refer to
▪ The proposed allocation of affordable apartments is acceptable.	restriction to be registered on the title of the applicable apartments. It is anticipated that a condition would be applied to any future consent to this effect.	

Demonstrate that the affordable housing apartments will have good level of amenity in terms of key ADG criteria and the “Residential amenity of affordable housing” section (p15) of the In- fill Affordable Housing Practice Note.	▪ All **affordable housing apartments** are located within **Building D** fronting Lord Street and Martin Lane.
	▪ Each affordable housing apartment complies with **ADG requirements** for:
	  ▪ Minimum internal areas
	  ▪ Ceiling heights
	  ▪ Natural ventilation
	  ▪ Daylight access
	  ▪ Private open space
	▪ **All affordable housing residents** have universal accessibility via lift access to ground floor communal open space.
	▪ **All affordable housing apartments** have direct access to communal facilities in Buildings A and B, including:
	  ▪ Landscaped resident lounges
	  ▪ Cinema
	  ▪ Open spaces and seating
	  ▪ Pool and gym amenities
	  ▪ Rooftop communal terraces.
	▪ **Affordable housing apartments** are oriented to maximise **outlook, sunlight, and cross-ventilation**.
	▪ Courtyard planting and landscaping around **affordable housing apartments** enhance **privacy and visual amenity**.
	▪ Circulation spaces serving **affordable housing apartments** are **well-lit** and visually connected to communal areas, supporting legibility and safety.
	▪ The design of **affordable housing apartments** meets **best practice guidance** in the *In-Fill Affordable Housing Practice Note* (p.15) and aligns with ADG objectives.
		Design Report Addendum Appendix C

Summary of Issue Raised	Response	Refer to
Confirm the proposed gross floor area has been calculated in line with the definition under the *Ku-ring-gai Local Environmental Plan 2015*.	The floor space for the proposed development has been calculated in accordance the KLEP 2015. Refer to updated GFA plans at **Appendix B**.	**Updated Architectural Plans Appendix B**
The following additional information is required to be submitted with the submissions report:		
An Aboriginal heritage interpretation and art strategy as set out in Appendix C and recommended in Appendix F and EE	A draft Stage 1 Aboriginal Heritage Interpretation Strategy (**AHIS**) has been prepared by Artefact and is provided at **Appendix W**. The draft AHIS outlines a broad strategy for communicating messages about Aboriginal cultural heritage values of a place to users and other audiences. The draft AHIS will inform and guide planning for heritage interpretation by identifying relevant themes and outlining strategies for presenting these through a variety of interpretive media. The draft AHIS makes recommendations for possible locations and content of interpretive elements and will be finalised post-determination of the SSDA.	**Draft Aboriginal Heritage Interpretation Strategy Appendix W**
A hazardous building materials survey as recommended in Appendix Y	The updated PSI (**Appendix O**) confirms that the hazardous buildings materials survey can be undertaken post-determination of the SSDA and before the commencement of any demolition works on site. Should the SSDA be approved, it is anticipated that this would be conditioned as part of the consent.	**Preliminary Site Investigation Addendum Appendix O**
Further groundwater testing as set out in Appendix Y	Further groundwater testing is provided in the Preliminary Site Investigation (**PSI**) Addendum at **Appendix O**. The supplementary ground water testing has been undertaken in response to recommendations outlined in the original PSI, which identified the presence of shallow groundwater requiring further investigation. The findings of the further ground testing concluded that the shallow groundwater at the site does not present a human health or environmental risk and support the conclusion of the PSI that the site can be made suitable for the proposed development subject to completion of the remaining recommendations listed in the PSI.	**Preliminary Site Investigation Addendum Appendix O**

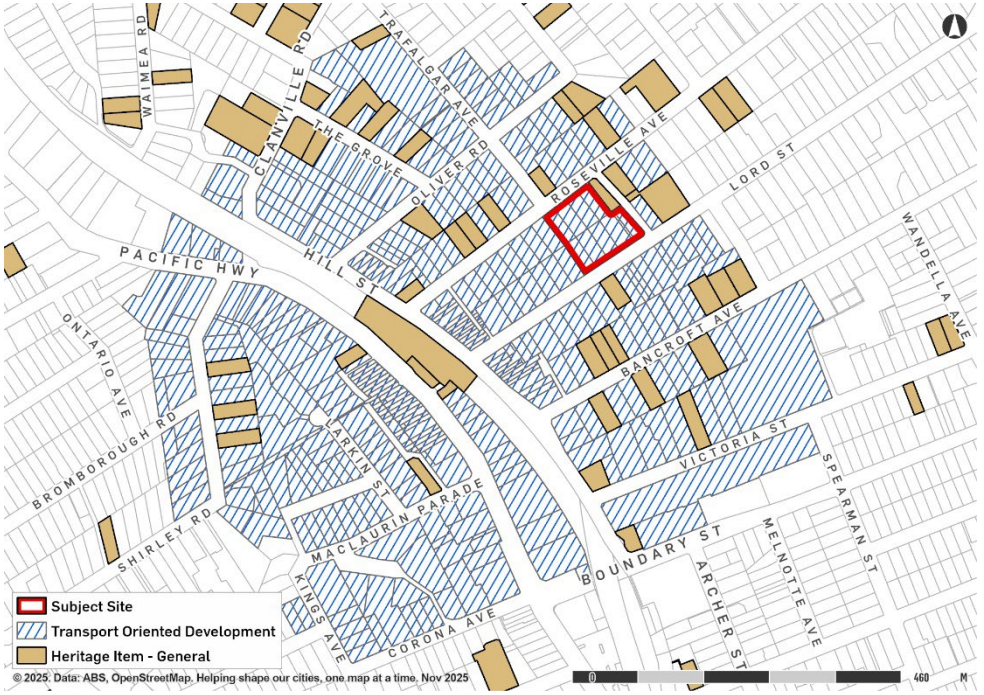
Summary of Issue Raised	Response	Refer to
A revised waste management plan which clearly sets out how waste collection would work noting the multiple waste rooms. Confirm the route in which the bins would be pulled from the bin room to the loadings space aligns with Council's requirements. Clarify how the waste collection would not conflict with the cars entering the basement.	A revised Waste Management Plan has been prepared by Salt3, including waste transfer diagrams to demonstrate how bins will be transported from the waste holding rooms to the loading dock. A bin tug will be used to assist with the transfer of full garbage bins from the chute rooms to the main bin room. Bin transfers will be undertaken during off peak hours to minimise potential conflict with cars. Alternatively, and if preferred, bins can be transported between levels via the lifts to avoid the use of the car park ramps and further mitigate any potential conflict with vehicles. Waste collection will be conducted within the dedicated loading bay and will not create conflict with cars entering the basement. Council's DCP does not include any specific requirements for bin transfers within the building. A swept path plan is provided within the updated TIA at **Appendix J**, and includes the proposed mitigation measures to address the minor potential conflict between waste management vehicles and cars. Refer to **Appendix S** for further information, including bin transfer diagrams demonstrating how waste collection will be managed from the multiple waste rooms.	**Updated Waste Management Plan** **Appendix S**
A revised ESD report which considers the current scheme (specifically green spaces and biodiversity) with updated mitigation measures	The revised Ecological Sustainability Development (**ESD**) report prepared by Credwell outlines compliance with objectives of the SEARs, Ku-ring-gai's LEP and DCP, Section 193 of the EP&A Regulation, and the relevant SEPPs. The report provides details of updated design features, sustainability initiatives, and measures for renewable energy integration, advanced stormwater treatment, low-embodied carbon materials, and construction-phase environmental management. The report concludes the development is suitable and warrants approval, subject to mitigation measures addressing energy efficiency; water conservation and stormwater management; sustainable materials and waste management; passive design and climate adaptation; green spaces and biodiversity; sustainable transport; and environmental compliance.	**Updated ESD Report** **Appendix Q**
A draft flood emergency management plan setting out evacuation strategies	A draft flood emergency management plan setting out evacuation strategies is provided at Section 8 of the updated Flood Impact Risk Assessment Report (**FIRA**). The FIRA identifies that evacuation of the site should occur in events rarer than the 0.2% AEP	**Updated Flood Impact Risk**

Summary of Issue Raised	Response	Refer to
	flood event. Should evacuation of the site be required, it is possible for vehicles (including emergency vehicles) to evacuate via the basement driveway (which is protected from flooding in all storm events up to and including the PMF) Lord Street to Hill Street and then towards the Pacific Highway. Pedestrian evacuation is possible via this route as well as there are shallow flood depths and is categorised as H1 Low Hazard area.	**Assessment Appendix M**
A revised noise and vibration impact assessment to address the following: - consider noise from the proposed rooftop mechanical plant - clarify whether doors, windows and skylights must be closed to maintain internal acoustic amenity of apartments facing Lord Street or Roseville Avenue.	A Noise Vibration Impact Assessment (**NVIA**) Addendum is provided at **Appendix K**. This assesses potential noise impacts of the proposed rooftop mechanical plant on nearby sensitive receivers. The NVIA Addendum finds that the attenuation provided by the proposed parapets around the edge of each rooftop is predicted to sufficiently mitigate noise from the rooftop plant units to nearby sensitive receivers. No additional acoustic treatment is required to achieve compliance with the established project noise emission objectives. Section 3.4 of the NVIA Addendum confirms that the doors, windows and skylights are not required to be closed to maintain the acoustic amenity of apartments facing Lord Street or Roseville Avenue.	**Noise and Vibration Impact Assessment Addendum Appendix K**
Revised architectural plans which include a scalebar, RLs and existing ground levels	Revised architectural plans including a scalebar, RLs and existing ground levels are provided at **Appendix B**.	**Updated Architectural Plans Appendix B**
A revised demolition plan (SSDA-004) which shows the full extent of what is proposed to be demolished including all existing trees to be removed	A revised demolition plan (SSDA-004) which shows the full extent of all buildings and structures to be demolished, including all existing trees to be removed, is provided at **Appendix B**.	**Updated Architectural Plans Appendix B**
A plan which shows the location of the OSD tank identified in Appendix S	The location of the OSD tank is shown on Lower Ground drawing SSDA-099 with additional detail provided within the updated Integrated Water Management Report.	**Updated Architectural Plans Appendix B**

Summary of Issue Raised	Response	Refer to
A revised plan which clearly sets out how the deep soil zones have been calculated, ensuring hardstand areas and structures are not included and it reflects the current landscape plans	A revised deep soil plan is provided within the Landscape Report at **Appendix D**, ensuring hardstand areas are removed. The proposed dep soil zones exceed the ADG guidelines (being 15% of the site is pervious, and a minimum dimension of 6m). As shown in **Figure 26**, the proposal achieves 30% deep soil area on the ground floor and co-locates deep soil with COS in accordance with the ADG guidelines. Figure 26 Deep soil area  *Source: Land + Form*	**Updated Landscape Report Appendix D**

Summary of Issue Raised	Response	Refer to
Revised plans which detail all wind mitigation measures recommended	The proposed wind mitigation measures comprise of frameless glass screens. The screens are shown on the updated Architectural Plans, with further detail provided in Section 1 of the Design Report Addendum. An addendum to the wind report has also been provided, confirming that the findings of the original wind report and the proposed mitigation measures remain relevant to the revised design (refer to **Appendix AA**).	**Updated Architectural Plans Appendix B** **Design Report Addendum Appendix C**
Revised plans which detail the proposed flood mitigation wall.	The flood mitigation wall has been deleted as part of the revised proposal.	**N/A**
Due to the amended LEP controls provide a response considering the potential for site isolation impacts to the scout hall. Having regard to the LEC planning principle for redevelopment expressed in Karavellas v Sutherland Shire Council [2004] NSWLEC 251	The Land and Environment Court planning principle in *Karavellas v Sutherland Shire Council* addresses situations where redevelopment of a site would leave adjoining land isolated and incapable of reasonable or economic redevelopment under applicable planning controls. This matter has arisen following Council's finalisation of alternative controls, which included concurrent amendments to the Housing SEPP mapping to identify the adjacent Scout Hall site (29 Roseville Avenue) as a Transport Oriented Development (**TOD**) site. Prior to 14 November, a principle of the TOD provisions was that they applied to heritage conservation areas, but did not apply to heritage listed properties. This can be seen through the exclusion of all heritage listed properties within the Clanville HCA from the TOD provisions as originally implemented through the Housing SEPP in **Figure 27**. DPHI's '*Guidance to Transport Oriented Development (May 2024)*' specifically states *"While the TOD planning controls do apply in heritage conservation areas (HCAs**), they do not apply** to land that:* ▪ *contains a State Heritage Register listed item (which will continue to be protected under the Heritage Act 1977), or* ▪ *contains a local heritage item, or* ▪ *contains an Aboriginal object, or*	

Summary of Issue Raised	Response	Refer to
	▪ *is within an Aboriginal place of heritage significance, or* ▪ *archaeological sites.* The Guidance also states: "*the Heritage Council of NSW* ***support the exclusion of state and locally listed heritage items*** *from the TOD planning controls*". Heritage-listed items were excluded from TOD controls because their intrinsic heritage value means they were not expected to be demolished or redeveloped. Only in rare and exceptional circumstances would development consent be granted for the demolition of a listed heritage item to enable residential flat building development. Under the first *Karavellas* principle, the threshold question is whether the adjoining site (the Scout Hall) can be developed in a manner consistent with applicable planning controls. Given that demolition of the Scout Hall would have an unacceptable impact on its heritage significance under clause 5.10 of the KLEP, the site has no realistic development potential for a residential flat building under TOD controls, despite the recent mapping amendment. As the first principle cannot be satisfied, there is no need to consider the second principle. The site isolation principle in *Karavellas* is therefore not applicable in this case. Notwithstanding the above conclusion that the *Karavellas* site isolation principle does not apply, the Applicant asked shortlisted design teams in an informal design competition to explore options that incorporated the Scout Hall. The development has been designed to provide an appropriate relationship to the Scout Hall site, including setbacks, landscape screening, and a reduction in the massing of Building A as part of this Response to Submissions. The Applicant has engaged with NSW Scouts during preparation of the SSDA to ensure their ongoing operational requirements are considered, noting that the building is currently used as offices rather than as a base for a local Scout group.	

Summary of Issue Raised	Response	Refer to
	Figure 27 TOD mapping excluding listed heritage items  *Source: Urbis*	
STATE DESIGN REVIEW PANEL		
Connecting with Country		
An understanding of Country offers the potential to inform richer and more place-responsive design solutions. As the scheme is developed, identify areas of the proposal that are most able to achieve positive outcomes for Country.	The revised design responds to the site's natural topography and surrounding landscape features, creating a stronger relationship between the built form, the land, and the broader setting. ▪ Buildings A, B and C have been lowered to follow the slope from west to east, reducing podium heights and allowing ground and lower ground levels to connect directly to the terrain.	**Updated Architectural Plans** **Appendix B** **Design Report**

Summary of Issue Raised	Response	Refer to
▪ Consider opportunities to vary the massing to address the site's topography, refer recommendations below. ▪ The nearby ridge, which is an important pathway, might offer a reference. ▪ Refer to the Connecting with Country Framework and case studies on the GANSW website for more information and guidance.	▪ The nearby ridge, recognised as an important pathway, has influenced the stepped massing and articulation, creating visual and spatial links to the wider landscape. ▪ Removal of Building A subterranean units improves access to natural light, ventilation, and views, while landscaped courtyards provide privacy, amenity, and habitat. ▪ Clear articulation at building connection points creates transitional spaces between buildings and open space, supporting movement and connection. These changes are consistent with recognised *Designing with Country* principles, including working with natural landform, connecting to broader landscape systems, supporting living environments, and creating spaces that foster connection and transition. The design refinements address the SDRP's recommendations by varying massing to suit topography, referencing local landforms, and integrating landscape and built form in a way that strengthens connection to place.	**Addendum Appendix C**
Site strategy and landscape		
The intention to create a 'family of massing blocks' is supported, but does not yet appear to have been achieved, and the bulk might create adverse visual impacts from the public domain. Look at opportunities to provide greater variation. ▪ Consider splitting the building length along Lord Street to improve the apartment amenity and break down the long length of façade. ▪ Adjust rooflines and podium heights to reflect the topography, and to provide a transition in scale to the adjoining context.	In response to the SDRP's recommendations, and addressing feedback in the submissions regarding bulk, scale, and transition impacts, the Lord Street façade and overall massing have been further refined to break down the building form and mitigate perceived bulk from both the public domain and adjoining low-density properties. The Lord Street podium is now expressed as three distinct elements that follow the natural topography, with vertical articulation and recessed sections reducing the apparent width and depth of Buildings C and D. Additional articulation has been introduced along extended elevations to avoid the perception of a continuous wall, particularly at interfaces where the proposal directly adjoins lower-scale dwellings to the west. This includes varied setbacks, recessed upper levels, and landscaped buffers that soften the transition in scale and provide visual relief. These measures respond directly to concerns about "direct transition" impacts by creating a more graduated interface between the nine-storey elements and the neighbouring one- to two-storey future context to the west.	**Updated Architectural Plans Appendix B** **Design Report Addendum Appendix C**

Summary of Issue Raised	Response	Refer to
	Landscaping layers including retained mature trees and new planted zones between entries enhance the rhythm of the street frontage, reinforce a human-scale streetscape, and visually break up the massing. The rooflines and podium heights have been adjusted to better reflect the site's slope and surrounding context, with the height of Building A lowered by 1.7 m to improve its relationship with the Scout Hall and adjacent properties. The podium along Lord Street is articulated into three distinct volumes that step with the terrain, reducing perceived bulk and reinforcing a human-scale frontage. Together, the updates to building height, massing, podium design, and façade articulation enhance the appearance of the development as a cohesive "family" of smaller massing blocks, provide variation in the streetscape, and deliver a more sensitive transition to the surrounding heritage and low-density residential context.	
Public interfaces on all sides of the site can be further improved and developed: ▪ Develop the Roseville Avenue entry to provide spaces for seating or informal gathering. ▪ Provide direct street access to ground floor dwellings to support activation and convenience. ▪ Where possible, avoid apartments with ground floor levels lower than the adjoining footpath. Where these cannot be avoided, continue to develop the interface to balance privacy and passive surveillance. ▪ The proximity of the five-storey podium will overwhelm the adjacent scout hall. Consider lowering the podium at the junction of Roseville Avenue and Martin Lane to improve the relationship with the scout hall and adjoining streets.	The following updates have been made in response to the SDRP's recommendations to enhance the public interfaces of the development: ▪ The Roseville Avenue entry provides a generous entry space with an existing Chinese elm tree to be transplanted. The landscape area has been increased to provide 125m^2 of deep soil planted area and entry seating provided to encourage informal gathering. ▪ Ground floor access is now provided to townhouses through the introduction of gates and pathways to their respective courtyards along Roseville Avenue. ▪ Previous subterranean apartments have been repositioned ensuring that they are positioned above the adjoining street level. Building A's lowest level has been raised to achieve the flood planning level plus freeboard, being RL 88.6. ▪ The height of the Building A podium adjacent to the Scout Hall has been reduced from 5 to 4 storeys. This provides an appropriate scale and enhances the relationship with the Scout Hall and Martin Lane. ▪ Three clearly defined access points are provided within the development, each featuring a distinctive and legible entry to assist with goods delivery and ensure practical, user-friendly access for residents and visitors. A single access point to the	**Updated Architectural Plans Appendix B** **Design Report Addendum Appendix C** **Updated Landscape Plans Appendix D**

Summary of Issue Raised	Response	Refer to
▪ Rationalise entries, access and wayfinding to ensure this is clear for users and visitors. Suggest reviewing through the lens of the "pizza delivery test" to assess practical access, particularly for buildings along Lord Street. ▪ Ensure passive surveillance of public areas is maximised for safety and amenity.	car parking and loading dock is provided from Lord Street. Signage and wayfinding will be installed to ensure clear and efficient navigation for users. ▪ Ground level and podium apartments typically have line of site to public areas and streetscapes, providing security by way of passive surveillance. All raised edges and planter walls are at seating height or lower, allowing clear sight-lines and visibility throughout the ground plane. Trees are used to frame spaces and ensure clear visibility to and from the streetscape at all times. Regular congregation spaces enable passive surveillance to all areas, discouraging undesired behaviour and possible blind spots.	
Continue to refine and develop the landscape: ▪ Where ramps and common areas are located near ground level bedrooms, introduce landscape buffers to protect privacy and amenity. ▪ Consider the potential construction impacts on existing trees and plan accordingly to maximise retention of existing trees.	In accordance with the SDRP's recommendations, the following refinements have been made to the landscape design: ▪ To protect residential amenity, privacy measures have been introduced in the form of landscaping, planter boxes, and privacy screens. Landscape buffers of a minimum of 1.5m deep are provided adjacent to dwellings and courtyards. Buffers are also provided for ramps. ▪ Tree root mapping has been undertaken as part of the updated AIA. The AIA provides an assessment of the potential impacts of the development on trees proposed to be retained. It is noted that as part of the updated Landscape Plans, the soft landscaped area around tree 93 within the central courtyard has been significantly increased to ensure the long-term retention of this tree.	**Design Report Addendum Appendix C** **Updated Landscape Plans Appendix D** **Updated Arboricultural Impact Assessment Appendix P**
Architecture		
Amenity ▪ Test massing options to improve and optimise sunlight penetration into the central courtyard. Demonstrate that the solar access to communal open spaces has been optimised in accordance	▪ As set out at section 1.5 of the Design Report Addendum, a number of revised massing options were tested. The proposed height and massing reductions of Buildings A, B and C improve and optimise sunlight penetration to the central courtyard. In accordance with the ADG, the communal open space achieves more than 2 hours of direct sunlight for over 50% of the primary usable area during midwinter.	**Updated Architectural Plans Appendix B** **Design Report**

Summary of Issue Raised	Response	Refer to
with the ADG, and that landscape species will thrive in the solar and wind conditions. ▪ Rationalise internal circulation to avoid dogleg corridors. ▪ Rationalise layouts and views apartment depth to optimise access to daylight and ventilation and ensure that the objectives of the ADG are achieved. ▪ Review apartment design and layouts to improve and optimise cross ventilation. The proposed skylights positioned near external walls are not likely to provide sufficient cross ventilation. ▪ Demonstrate that shadow impacts to surrounding properties have been mitigated. Provide overshadowing diagrams that include proposals under assessment to assess impacts accurately. ▪ Demonstrate that 3- and 4-bedroom units are family-friendly, with adequate storage and functionality. As a helpful guide, refer to the Healthy Higher Density Living for Families with Children design guide by the Western Sydney Local Health District. ▪ Continue to refine the apartment design as follows: - Review apartment design to avoid bathrooms that open directly onto kitchens or central living areas. - Reduce the number of inboard kitchens to improve natural ventilation and daylight.	▪ Unit layouts have been refined to reduce the number of turns within unit corridors, creating a clear connection from the entry to living areas and improving movement and privacy. Notably, the dogleg corridors in the north and south wings of Building B have been redesigned to provide more efficient and intuitive circulation, improving both functionality and resident experience. Refer to section 2.15 of the Design Report Addendum for further detail. ▪ As part of the revised design, the layout of apartments has been reviewed to optimise access to daylight and ventilation and ensure that the objectives of the ADG are achieved. Figure 2.16 in the Design Report Addendum provides an example of the rationalisation of apartment layouts for 3-bed apartments in Building A, improving the residential amenity and the relationship of internal spaces to daylight and ventilation. ▪ Cross ventilation has been reviewed and refined in the updated architectural design. A Natural Ventilation Assessment (appended to the Design Report Addendum) has been prepared by SLR to verify the proposed cross ventilation strategy is suitable, including an assessment of skylights where proposed. The Design Report Addendum (**Appendix C**) confirms that 60% of apartments achieve natural cross ventilation, with this being achieved with the use of operable skylights in some cases. Refer to the cross-ventilation diagrams provided within the updated architectural plans at **Appendix B**. ▪ The shadow diagrams provided include an assessment of impacts to existing surrounding properties, as well as impacts on the potential future residential flat building development of neighbouring sites. The design of the building form has been specifically developed to ensure a minimum of 3 hours of solar access to existing neighbouring properties is retained. The proposed development will also allow a future apartment development on the neighbouring sites to achieve the ADG 70% solar access criteria. As shown in the shadow diagrams at Appendix A of the Clause 4.6 Variation Request, the reduced building height	**Addendum Appendix C** **Updated Clause 4.6 Variation Request Appendix E**

Summary of Issue Raised	Response	Refer to
- Refine apartments located at the internal corners of the proposal to mitigate visual and acoustic privacy impacts.	and massing makes a demonstrable improvement to the solar access to the existing neighbouring properties to the west. ▪ Figure 2.19 of the Design Report Addendum provides an analysis of a typical proposed 3-bedroom townhouse against family-friendly design criteria. Key living spaces, such as kitchens and living rooms, are arranged to facilitate easy supervision of children, supporting a safe and connected family environment. Bedrooms and study areas are designed with flexibility to allow them to adapt to the evolving lifestyles and changing needs of growing children. ▪ As detailed in section 2.21 of the Design Report Addendum, apartment layouts have been refined to position bathroom entries away from main living areas and kitchens to enhance privacy and improve spatial comfort for residents. The revised design enhances privacy, establishes a clearer functional separation between living and utility spaces, and positions bathrooms more conveniently near the bedrooms. Consequently, bathrooms are no longer visible from the kitchen or living areas, resulting in improved spatial planning and a more comfortable living environment. ▪ As detailed at section 2.22 of the Design Report Addendum, apartment layouts have been revised to reduce the number of inboard kitchens and improve natural ventilation and daylight. Design Report Addendum Figure 2.22 details examples of improved kitchen layouts to a 2-bedroom apartment within Building D and a 3-bedroom apartment within Building A. ▪ The design of apartments located at internal comers of the development have been carefully refined to mitigate visual and acoustic privacy impacts. As detailed in Figure 2.23 of the Design Report Addendum, privacy screens and measures such as double-glazed windows are proposed to mitigate privacy impacts and enhance residential amenity.	

Summary of Issue Raised	Response	Refer to
	Figure 28 Rationalisation of Internal Corridors Before = SSDA Lodgement scheme After = Revised Response to Submissions scheme  *Source: FKA*	
Materials and detailing ▪ The use of sandstone references is appropriate and the lighter materials at upper levels are supported. However, consider opportunities to incorporate darker tones at the podium to reflect	– In accordance with the recommendation of the SDRP, a darker tone of sandstone is now proposed for the podium façades across the building. The darker tone of the podium façades now better reflects the surrounding Federation-era context, and grounds the building within its setting. To introduce more depth and shadow to the façade, a darker tone of brick is proposed for planter boxes within the	**Design Report Addendum Appendix C**

Summary of Issue Raised	Response	Refer to
the Federation-era context and introduce more depth and shadow to the façade. ▪ Consider how detailing and façade composition might further differentiate the buildings to provide greater variation and break down the building massing.	podium façades. The updated materials have been specifically selected through taking reference from the character and materiality of the surrounding area. The updated materials palette complements the building design but does not overpower the podium. – Numerous refinements have been made to the detailing and façade composition to assist in differentiating the buildings and creating variation in their bulk and scale, as outlined in the Design Report Addendum (**Appendix C**). These refinements include updates to materiality and colour throughout, including changing the materiality of the planter boxes along the Lord Street podium, as described above, using darker sandstone tones for the podium against the lighter brickwork above, along with articulated façade panelling to create greater façade articulation. Vertical separation and articulation has been provided along the Lord Street frontage through setting back the Building D lift core and Building C apartments, separating the building form into three separate massings. This is further expressed by the stepping of the building massing in accordance with site levels. Courtyards and landscaping are used to separate Buildings A, B and D, whilst building height, level differences and a double column articulate the difference between Buildings C and D. The reduction in overall building height had a positive impact on reducing perceived bulk and scale of the building.	
Sustainability and climate change		
Continue to develop sustainability initiatives and consider opportunities to exceed baseline requirements.	The façade design has been refined to optimise energy efficiency and solar performance. Vertical louvred screens have been introduced to provide targeted shading, while high-performance glazing has been specified to reduce heat gain. Careful material selection, including lighter and more reflective finishes on sun-exposed façades, further enhances thermal performance and occupant comfort.	**Design Report Addendum Appendix C**
Review elevations and undertake detailed sun-shading analysis of each façade to demonstrate that energy efficiency and performance is optimised for each solar orientation	Elevations have been reviewed to ensure each façade is optimised for its solar orientation. Vertical louvred screens are used on east and west façades to reduce low-angle sun exposure, while horizontal shading elements on north façades block high summer sun and allow winter solar access. High-performance, energy-efficient double-glazed windows, in	

Summary of Issue Raised	Response	Refer to
	line with BASIX (**Appendix R**) requirements, minimise heat gain and loss, supported by high insulation in walls, exposed ceilings, and suspended floors. Awning windows promote natural ventilation, and all openings are properly sealed to prevent drafts and air leakage.	
Pursue opportunities to incorporate salvaged materials into the proposal.	As set out in the updated Landscape Report (page 29), the proposed materiality complements the natural setting of the site with the use of natural materials such as stone and timber, and recycled materials such as the existing brick paving, building elements and trees to be removed.	**Updated Landscape Report Appendix D**
As the design is developed, review the façade composition to balance views, daylight, and thermal performance.	The façade design has been refined to optimise energy efficiency and solar performance. Vertical louvred screens have been introduced to provide targeted shading, while high-performance glazing has been specified to reduce heat gain. Careful material selection, including lighter and more reflective finishes on sun-exposed façades, further enhances thermal performance and occupant comfort.	**Design Report Addendum Appendix C**
Illustrate how the project will contribute to NSW's Net Zero emissions goal by 2050. Refer to 'NSW, DPIE, Net Zero Plan, Stage 1: 2020-2030' for further information.	The development supports the NSW Government's Net Zero Plan, Stage 1: 2020–2030, by reducing operational and embodied emissions through building electrification, rooftop solar, high-performance insulation and glazing, energy-efficient appliances, LED lighting, and smart meters. Passive design features maximise natural light and ventilation, while low-carbon, recycled, and locally sourced materials with Environmental Product Declarations, plus low-VOC finishes, cut embodied carbon. Resource efficiency is enhanced via a 10kL rainwater tank, water-efficient fixtures, and waste separation facilities, with extensive landscaping and tree preservation supporting biodiversity. These measures align with the Plan's priorities and contribute to achieving net zero emissions by 2050.	**Updated ESD Report Appendix Q**

Summary of Issue Raised	Response	Refer to
KU-RING-GAI COUNCIL		
Urban Design & Planning		
Inconsistent with Aims		
The objectives of Chapter 5 of the Housing SEPP are not met due to significant heritage and biodiversity impacts, non-compliance with gross floor area and building height, poor solar access, inadequate natural cross ventilation, internalised living rooms, 'snorkel' bedrooms, excessive units per core per floor, and insufficient deep soil landscaping and tree canopy.	An assessment of the proposal against the aims of Chapter 5 of the Housing SEPP is provided below. Responses in relation to specific design elements are provided elsewhere within this Table. *(a) to increase housing density within 400m of existing and planned public transport* The proposed development increases housing density within approximately 200m of Roseville station. *(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* The proposed development is considered to have been well designed for these reasons: ▪ The proposal has been designed by FK Architects who are experienced, award-winning architects. FK are supported by an experienced team including Land and Form Landscape Architects, Urbaine, Urbis Heritage and Planning. ▪ The proposal was reviewed by the State Design Review Panel (**SDRP**) post lodgement. As set out in this Response to Submissions, all comments provided by the SDRP have been responded to in full and the design amended accordingly where feasible and practicable. ▪ The revised design has responded to the comments raised by DPHI, SDRP, Council and the public by amending the overall building massing to respond to the existing and future character of the area whilst still achieving the intent of the TOD provisions and Infill Affordable Housing height and FSR standards. ▪ The revised design has improved the overall amenity of the apartments including increased access to daylight and ventilation, rationalised layouts, improved privacy and access to communal open space at Level 8. Further information on the	**Design Report Addendum Appendix C**

Summary of Issue Raised	Response	Refer to
	refinements made to the design to respond DPHI and SDRP feedback and the ADG is provided within Section 3.2 of this RTS and the Design Report Addendum. ▪ The design of the development has been evaluated against the design quality principles for residential apartment development set out in Schedule 9 of the Housing SEPP (as set out in this Report and the Design Report Addendum). This evaluation confirms that the design appropriately responds to Country, context and future character, through both architecture and landscape, as well as providing high levels of sustainability and amenity. ▪ The design has been assessed against the ADG. Overall, the proposal complies with the objectives of the ADG. Two minor non-compliances with ADG criteria exist with respect to 3B Orientation and 4A Solar and Daylight Access, however, the proposal nevertheless achieves the relevant ADG objectives with respect to the siting and layout of the development. The proposal exceeds the requirements of several ADG criteria including in relation to the provision of deep soil and communal open space. ▪ The design has been developed in accordance with the NSW Government Architect's policies '*Better Placed*' and the '*Connecting with Country Framework*'. The design response to these policies has ensured that the proposal has been developed to respond to the specific site context, particularly the identified elements of Country, landscape and heritage features. *(ii) are of appropriate bulk and scale, and* The proposed development is of an appropriate bulk and scale for these reasons: ▪ The proposal is compliant with the maximum FSR control noting that is below the maximum achievable FSR for the site. ▪ The overall height of the building has been reduced to generally comply with the maximum permissible height. It is noted that minor exceedances to the maximum permissible are required for two lift overruns and three portions of the parapet. These exceedances are up to a maximum of 1.07m. Whilst there will be some minor	

Summary of Issue Raised	Response	Refer to
	additional overshadowing impacts, these have been assessed as minor and acceptable in the circumstances. ▪ The design of the western façade has been amended to ensure all balconies achieve the required ADG setbacks. ▪ The bulk and scale of the development have been amended in response to SDRP comments, notably the reduced podium height to the north-east corner of the site and the introduction of articulation to the Lord Street façade. The articulation of the building form, including incorporating curved corner balconies and edge planting, help to reduce visual bulk. ▪ The updated VIA has provided an additional 10 viewpoints relating to locally listed heritage items within the vicinity of the site to be assessed in an updated HIS. The HIS notes that whilst there will be a degree of visual impact to the setting of the HCA and heritage items, the revised design has incorporated mitigation measures to provide a sensitive resolution and interface to the existing conservation area. This approach maintains the significance of the heritage items within the vicinity. Noting that the future character of the surrounding area is anticipated to evolve in line with the future development scenarios identified and assessed this this RTS , the proposal is on balance considered as acceptable for the subject site from a heritage perspective. The VIA and HIS have been updated to respond to the revised design. *(iii) provide amenity and liveability,* The proposed design provides significant amenity and liability for these reasons. ▪ The design of the proposal achieves the relevant ADG objectives in relation to the quality and amenity of apartments proposed. ▪ Whilst there is a minor non-compliance (1%) with the ADG criteria relating to solar access to private open space, the living rooms of these apartments receive 4 hours sunlight, and have a strong visual connection to the central courtyard tree. ▪ The design concept seeks to retain mature trees to maximise the amenity of the development. A BDAR Waiver has been assessed and granted by Department of	

Summary of Issue Raised	Response	Refer to
	Climate Change, Energy, the Environment and Water, confirming that the proposed development does not have significant biodiversity impacts. ▪ Native trees of high value are to be retained and a tree planting ratio of 1.2:1 is proposed. The proposal provides deep soil landscaping (30%) in excess of the ADG criteria and communal open space (25.12%), enhancing the amenity and liveability of the development. ▪ A range of residential amenities are proposed as part of the development including 2353.8m^2 communal open space, play space, pool, gym, cinema room and kids lounge. ▪ Apartment sizes have been designed to meet or exceed ADG requirements, and all apartments have access to high quality private open space in accordance with the ADG. The removal of the lower ground floor apartments as part of the Response to Submissions has enabled the provision of increased communal amenity space in this location. *(c) to encourage the development of affordable housing to meet the needs of essential workers and vulnerable members of the community.* The development proposes 17% affordable rental housing with a mix of 1-, 2- and 3-bedroom apartments. As identified in the SIA (EIS Appendix EE), families with children are expected to make up a high proportion of households within Ku-ring-ai, as well as couples without children and lone person households increasing. The proposed development in this location, approximately 200m from Roseville station, provides affordable rental housing in a highly accessible location, meeting the needs of the community. The development provides 55 affordable rental housing apartments, which includes 8 dwellings in perpetuity. The development includes a commitment for ongoing management from a CHP (Link Wentworth) as confirmed in their letter at **Appendix V**. The proposed affordable rental housing will meet the needs of the community, for single person households, couples and families in a high amenity area.	

Summary of Issue Raised	Response	Refer to
Failure to meet Design Principles in Schedule 9 of the SEPP		
The proposal fails to meet the following design principles as detailed in Schedule 9 of the Housing SEPP: ▪ Design Principle 1: Context and neighbourhood character ▪ Design Principle 2: Built form and scale ▪ Design Principle 5: Landscape ▪ Design Principle 6: Amenity ▪ Design Principle 9: Aesthetics	The quality of the design of the development has been re-evaluated against the design principles for residential apartment development set out in Schedule 9 of the Housing SEPP (Response to Submissions Report, Design Report Addendum and updated Statutory Compliance Table). This evaluation finds that the proposal exhibits high quality design, with scheme that appropriately responds to its context, through both architecture and landscape.	**Design Report Addendum Appendix C** **Updated Statutory Compliance Table** **Appendix X**
Desired future character		
The proposal is inconsistent with the planning principle established in *Seaside Properties v Wyong Council* (2002) LGERA 111 at [25] (**Seaside Planning Principle**). ▪ The Seaside Planning Principle provides (emphasis added): "[A]t a zone interface… any development proposal in one zone needs to recognise and take into account the form of existing development and/or development likely to occur in an adjoining different zone… [R]esidents living in [a smaller density zone]… must accept that a higher density and larger scale residential development can happen in the adjoining… [higher density] zones and whilst impacts must be within reason they can nevertheless occur… Conversely any development… must take into account its relationship to the [adjoining] zoned	While Council has referenced the *Seaside Planning Principle*, this principle is most relevant to communal open space location. The more applicable test for this proposal is the *Project Venture* planning principle, which assesses compatibility with surrounding development and the desired future character. We acknowledge Council's concern that, at a zone interface, some sites may not achieve the full potential under applicable development standards. This has been considered from the outset, with the proposal assessed against mixed future character of the area, that takes into account: ▪ The updated **Transport Oriented Development (TOD)** provisions under the Housing SEPP. ▪ The **Low and Mid-Rise Housing (LMR)** provisions. ▪ **Council's alternative controls**, implemented 14 November, including the **LMR Exclusion Area**. The exclusion area does not apply to the whole of Roseville, some areas in the vicinity of the site continue to benefit from the LMR controls. ▪ The **Infill Affordable Housing bonus** under the Housing SEPP.	**Design Report Addendum Appendix C** **Updated Heritage Impact Statement Appendix T**

Summary of Issue Raised	Response	Refer to
lands… and the likely future character of those lands must be taken into account. **Also in considering the likely future character of development on the other side of the interface it may be that the development of sites such as this may not be able to achieve the full potential otherwise indicated by applicable development standards and the like."** ▪ The site and its surrounds are currently zoned R2 low density and are within and surrounded by a heritage conservation area. Under the proposed TOD Alternative Scheme the Site and the adjoining sites are zoned R2 and will retain its low density scale which is primarily single and two storey dwellings. As such, the site is at a zone interface on all sides. ▪ The Clanville HCA includes dwellings which were built in the Federation (1890-1915) and Inter-war (1915-1945) years. These buildings make an important contribution to the character and significance of the HCA as they have a key historical layer, most are true to an architectural type, style or period and some are substantially intact including their garden setting. ▪ While a higher-density and larger-scale development is permitted on the Site via the TOD, due to its interface with the adjoining HCA zoned R2 Low Density Residential and the alternate TOD scheme, the maximum potential indicated by	The proposal has been designed to respond to the future mixed character by: ▪ Retaining over 3 hours solar access to surrounding properties. ▪ Providing 6m landscaped side setbacks with canopy tree planting. ▪ Incorporating a four-storey podium with upper levels set back 9m, and 12m at Level 8, to create a transition in scale to existing dwellings and the HCA. ▪ Reducing the podium height at the north-east corner to better relate to the adjacent Scout Hall. ▪ Amending the podium brickwork to a darker tone to complement the surrounding heritage character. The site sits between other TOD-mapped sites to the north and south where 9-storey buildings are permissible. If these proceed, the proposal will form part of a cluster of medium-density buildings, consistent with the planned transition in Roseville under the TOD and LMR provisions, while also respecting the lower-scale character envisaged in Council's alternative for adjoining R2 land to the west, which maintains a height limit of 9.5m. Design responses to the HCA and heritage context include: ▪ Substantial landscaping along Lord Street and Roseville Avenue to soften visual bulk. ▪ Setbacks aligned with the prevailing building line. ▪ Staggered upper-level setbacks to reduce perceived mass. ▪ Chamfered corners, horizontal slab articulation, and undulating façades to break down bulk. ▪ A material palette informed by the HCA, with darker tones at podium level and lighter tones above to reinforce human scale. ▪ An architecturally resolved green space adjoining the Scout Hall to enhance its setting. ▪ Lightweight, recessive fencing to maintain visual permeability.	

Summary of Issue Raised	Response	Refer to
the applicable development standards may not be able to be achieved. ▪ The proposed 9 storey residential flat building, which has insufficient landscaping and setbacks and non compliant building height and floor space ratio would be juxtaposed with the existing low density residential character and the future desired character as espoused by the TOD Alternative Scheme. The scale of the building is further exacerbated by the light coloured brick work. ▪ The massing of the built form is exacerbated by the lack of transition between the low density residential dwelling character (single and two storey heritage buildings) and the proposed high density residential flat building (9 storeys). ▪ The proposal has not adequately considered the Site's relationship with the adjoining HCA, heritage item and R2-zoned lands, and results in an abrupt and unsympathetic transition.	The proposal complies with the maximum FSR control and generally complies with the height control, with only minor exceedances for discrete roof features that are not visible from the public domain. Setbacks meet ADG requirements, and whilst Council requires a setback within its DCP of 10m, the street setbacks align with the prevailing 6m street setback in the locality which is consistent with ADG guidance. These measures ensure the proposal responds sensitively to the HCA's character and heritage interface, while aligning with the desired future character under both the State-led TOD/LMR framework and Council's alternative controls.	
Deep soil landscaping is significantly less than the character of existing and future development in the locality with limited landscaping and insufficient space for canopy tree planting in scale with the development. The extent of private open space encroachment within the street frontages significantly limits the ability of the proposal to provide viable tree planting within the common and public domain. The proposed setback of 6m to Lord Street and Roseville Avenue do not comply with the minimum street setbacks of 10m, although a	As illustrated in the Landscape Design Report and Plans, the revised proposal incorporates substantial changes to exceed design standards, improve landscape quality, and ensure compatibility with both the existing and desired future character of the locality. ▪ **Exceeds ADG deep soil requirements** – proposal provides 30% deep soil area on the ground floor (ADG minimum is 15% with 6m minimum dimension). ▪ **Tree canopy coverage well above benchmark** – 39% canopy cover proposed, exceeding the Government Architect's Greener Places benchmark of 25%.	**Updated Landscape Design Report & Plans Appendix D**

Summary of Issue Raised	Response	Refer to
greater setback of 12-14m is desirable having regard to the drastic difference in scale between the proposed 9 storey RFB and the existing and desired future character of 1 to 2 storey dwellings houses within a heritage conservation area.	▪ **Significant new planting** – 105 additional trees proposed, including large native and evergreen species with mature heights of 15–20m and canopy spreads of 10m, supporting local character and biodiversity. ▪ **Improved deep soil in setbacks** – removal of lower ground floor apartments allowed rationalisation of deep soil areas in front setbacks, better responding to site slope and enabling direct street access for ground floor townhouses along Roseville Avenue. ▪ **Reduction in hard surfaces** – Lord Street frontage redesigned to reduce hardscape and increase deep soil planting area, improving viability for canopy trees. ▪ **Setbacks consistent with prevailing pattern** – 6m front setbacks to Lord Street and Roseville Avenue align with the predominant local setback; endorsed by the State Design Review Panel (**SDRP**) as appropriate for the future character context. ▪ **Landscape character response** – planting strategy reflects Roseville's garden character, with substantial street planting to soften visual bulk and integrate with the Heritage Conservation Area (**HCA**). ▪ **Retention and enhancement of significant trees** – mature high-value trees retained where viable, with root-sensitive construction methods applied; additional canopy planting in setbacks to reinforce streetscape. ▪ **Future character alignment** – setbacks and landscaping designed to transition between existing 1–2 storey dwellings and future medium-density apartment buildings envisaged under TOD/LMR provisions and Council's controls. ▪ **Amenity outcomes** – landscaped setbacks and canopy planting contribute to privacy, shade, and visual relief for both residents and neighbours.	

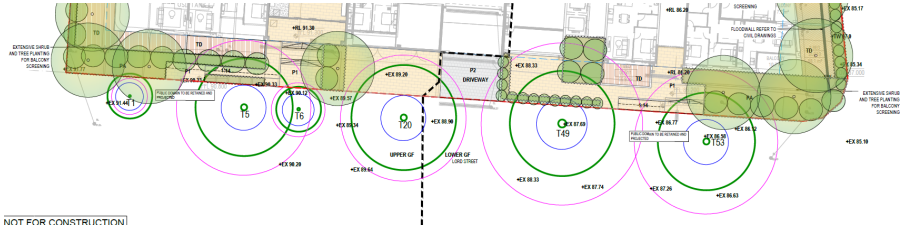
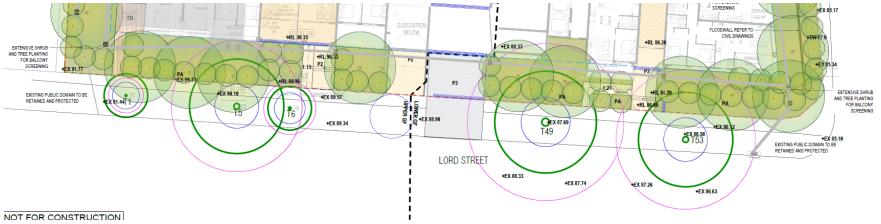
Summary of Issue Raised	Response	Refer to
	Figure 29 Lord Street setback – deep soil landscape  SSDA Lodgement Landscape Design  Revised RtS Landscape Design *Source: Land + Form*	
The street setback is irregular and is typically between 6.5m and 15m along Roseville Avenue and 7m – 17m along Lord Street. The proposed development does not respond to the street setback of neighbouring buildings noting the difference in scale and is inconsistent with the pattern of development which exacerbates the prominence of the built form.	A review of all front setbacks surrounding the site has identified that these generally range from 6m to 10m (refer figure below). The locally listed building at 29 Roseville Avenue (Scout Hall) has a front setback of 16.5m. Side setbacks have been assessed as generally ranging from less than 1m to 6m. The locally listed building at 19 Bancroft Avenue (dwelling house) has a side setback of 18.5m.	

Figure 30 Prevailing front setbacks

The proposed setbacks are considered to respond to the prevailing setback pattern for these reasons.

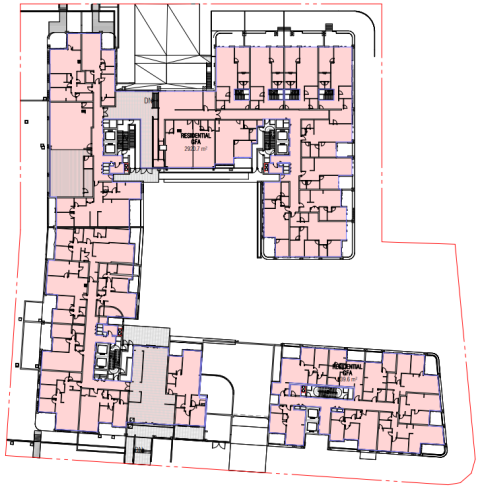
- The proposed development is setback 6m from Roseville Avenue, Lord Street and Martin Lane. This setback generally aligns with the prevailing 6m front setback within the surrounding area.
- It is noted that the adjacent Scout Hall on Roseville Avenue has a front setback of 16.5m. This setback is over twice the depth of the prevailing setback and relates to the non-residential use of the site. The larger front setback differentiates the site from the surrounding dwellings as a community use.

Summary of Issue Raised	Response	Refer to
	▪ The proposed setbacks are compatible with surrounding residential uses and consistent with ADG guidance that is expected to inform future apartment development in the area under the TOD/LMR and Council's alternative. ▪ The proposed development is setback 6m from the neighbouring properties to the west. This is consistent with the prevailing side setbacks of up to 6m and consistent with the ADG. The proposed side setback allows for sufficient separation to existing and future residential development on immediately adjacent sites. ▪ The proposed street setbacks have been reviewed and supported by the SDRP.	
Floor space ratio		
Allowable FSR A survey has not been provided which identifies the total 'Site Area'. The statutory compliance table prepared by Urbis specifies an approximate site area as 9,370.9sqm. An accurate assessment of the allowable GFA/FSR cannot be determined.	The site survey has been updated to confirm the site area of 9370.9m^2 this survey has informed an accurate assessment of the permissible GFA/FSR.	**Updated Site Survey Appendix Z**
Proposed GFA The stated gross floor area (GFA) is 30,391.5sqm, equating to a floor space ratio (FSR) of 3.243:1, which complies with the maximum FSR of 3.25:1. However, compliance with the GFA definition is unclear due to potential discrepancies in wall thicknesses, circulation areas, and contour levels. An independent calculation suggests the proposal exceeds the maximum FSR by approximately 500sqm. Without a Clause 4.6 request to vary the development standard, consent cannot be granted. Affordable housing calculations should be adjusted to reflect the revised GFA.	As shown on the GFA Plans (**Appendix B**), the proposed GFA has been measured in accordance with the KLEP 2015 definition. The proposed GFA is 30,247.6m^2, resulting in an FSR of 3.23:1, compliant with the FSR control. In accordance with the KLEP 2015 definition, the following areas have been excluded from the GFA measurement: ▪ areas for common vertical circulation, such as lifts and stairs ▪ basement storage, vehicular access, loading areas, garbage and services ▪ plant rooms, lift towers and other areas used exclusively for mechanical services or ducting ▪ car parking and access to that car parking) ▪ space used for the loading or unloading of goods (including access to it) ▪ terraces and balconies with outer walls less than 1.4 metres high.	**Updated Architectural Plans Appendix B**

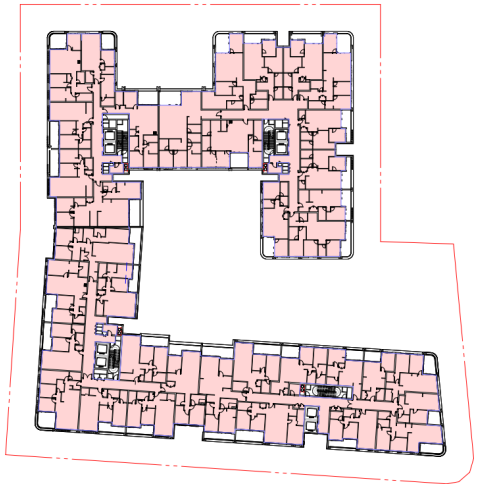
Summary of Issue Raised	Response	Refer to

Figure 31 GFA plans extract

Lower ground floor level

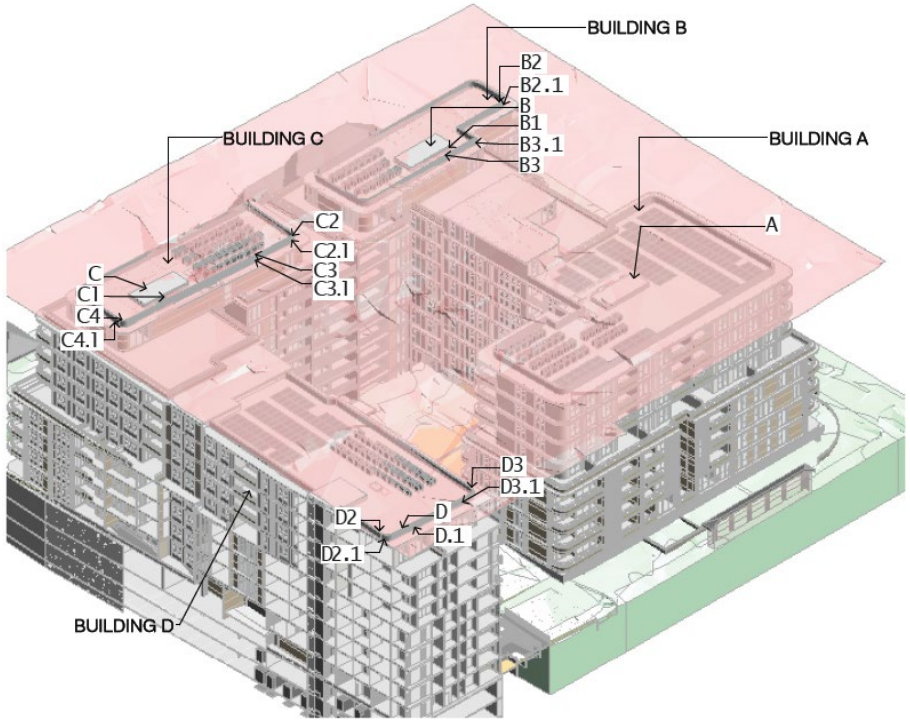


Ground floor level



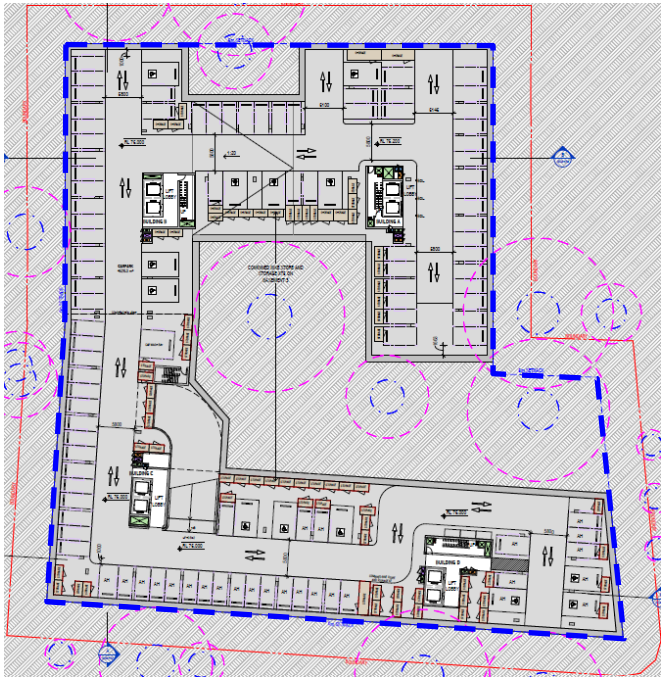
Level 2

Source: FKA

Summary of Issue Raised	Response	Refer to
Building height		
The height of the proposed building is difficult to verify due to missing information on existing ground levels. The documentation includes varying maximum building height figures, and clarification is needed. The Clause 4.6 variation request is not well-founded as it does not address specific objectives related to building height in SEPP (Housing) 2021. The proposal includes 17% of the total gross floor area as affordable housing, equating to 48 dwellings, and argues that the height exceedance is minimal with minimal environmental impact. However, the applicant has not sufficiently demonstrated that compliance with the height standard is unreasonable or unnecessary. The bulk and scale of the development are inappropriate, with insufficient setbacks and inadequate deep soil and tree canopy planting. The proposal is inconsistent with SEPPH Aim 150(b)(ii) and (iii) regarding appropriate bulk, scale, amenity, and liveability. The environmental planning grounds provided by the applicant are insufficient to justify the height breach, and greater consideration of the unique site circumstances is needed. The consent authority must ensure the Clause 4.6 variation is well-founded before granting development consent.	The architectural plans have been updated to include existing ground level RLs and building height RLs. The design has been revised as part of the Response to Submissions to generally comply with the maximum permissible building height. As noted, there are minor exceedances proposed to the maximum permissible height, being three lift overruns and three portions of roof parapet. The maximum extent of this exceedance is 1.07m. Figure 32 Height limit exceedances  *Source: FKA*	**Updated Architectural Plans Appendix B** **Updated Clause 4.6 Variation Request Appendix E**

Summary of Issue Raised	Response	Refer to
	An updated Clause 4.6 Variation Request (**Appendix E**) has been provided as part of the Response to Submissions. Whilst there will be some additional shadow impact, in comparison to a compliant building height, to the properties at 12 and 14 Lord Street and 17 and 19 Roseville Avenue, the minor variations to the height control will not be apparent in views from the public domain and will not have impacts on the significance of the Clanville HCA. The proposed development generally complies with the ADG amenity for residential apartments and provides communal open space and deep soil landscaping in excess of ADG requirements. In addition, high quality residential amenities are provided as part of the proposal including a play space, pool, gym, cinema room and kids lounge. Noting the above, the Clause 4.6 Variation is considered to be well founded and demonstrates that strict compliance is unreasonable and unnecessary and that there are sufficient environmental planning grounds to justify this variation as outlined below: ▪ **Overshadowing:** The proposed development will not result in unacceptable shadow impacts, with neighbouring properties retaining over 3 hours of solar access at mid-winter. ▪ **Views:** The height exceedances will not be perceivable from the public domain or impact on views from with the winder area. ▪ **Amenity:** The proposed exceedances allow for the provision of rooftop plant and lift overruns, required for the liveability of the development for future residents. ▪ **Architectural integration:** The height exceedances are generally centrally located to the roof area and seek to sensitively blend into the built form and aesthetic of the design. ▪ **Heritage:** The proposed exceedances will not impact on the setting of the HCA or significance of surrounding locally listed heritage items. ▪ **Intensity of use:** The proposed height variation does not increase the intensity of the uses on the site with a compliant FSR being maintained.	

Summary of Issue Raised	Response	Refer to
Building setbacks		
Front setback The KDCP requires a 10-metre minimum setback for residential flat buildings, while the ADG specifies setbacks should match existing patterns or future character. The proposed 6-metre setback to Lord Street and Roseville Avenue is insufficient and objected to by the Council. A 10-metre setback is required, with 12-14 metres being preferable due to the scale difference between the proposed 9-storey building and existing 1 to 2-storey houses in the heritage area. The non-compliant setback, lack of deep soil areas for tall trees, and privatisation of landscape setbacks do not enhance the streetscape or amenity. The landscape design should remain communal to maintain integrity. The site is zoned R2 Low Density Residential, and the proposed building will adjoin low-density development, making it an interface zone. The proposed setbacks do not comply with KDCP and ADG requirements, failing to ensure a proper scale transition. Compliance with these requirements is necessary.	Refer to response above in relation to setbacks.	
Basement encroachments The basement is consolidated under the building and encroaches setback areas which is non-compliant with control 11 in Part 7A.3 of KDCP.	The development has a proposed setback of 6m on all frontages. The basement is contained entirely within this 6m setback and does not encroach on the proposed setback area at any point. Refer to the below extract of the basement plan, with the 6m setback shown as a blue dashed line. Additionally, a 'horseshoe' design has been adopted to ensure that significant trees within the site can be retained.	**Updated Architectural Plans** **Appendix B**

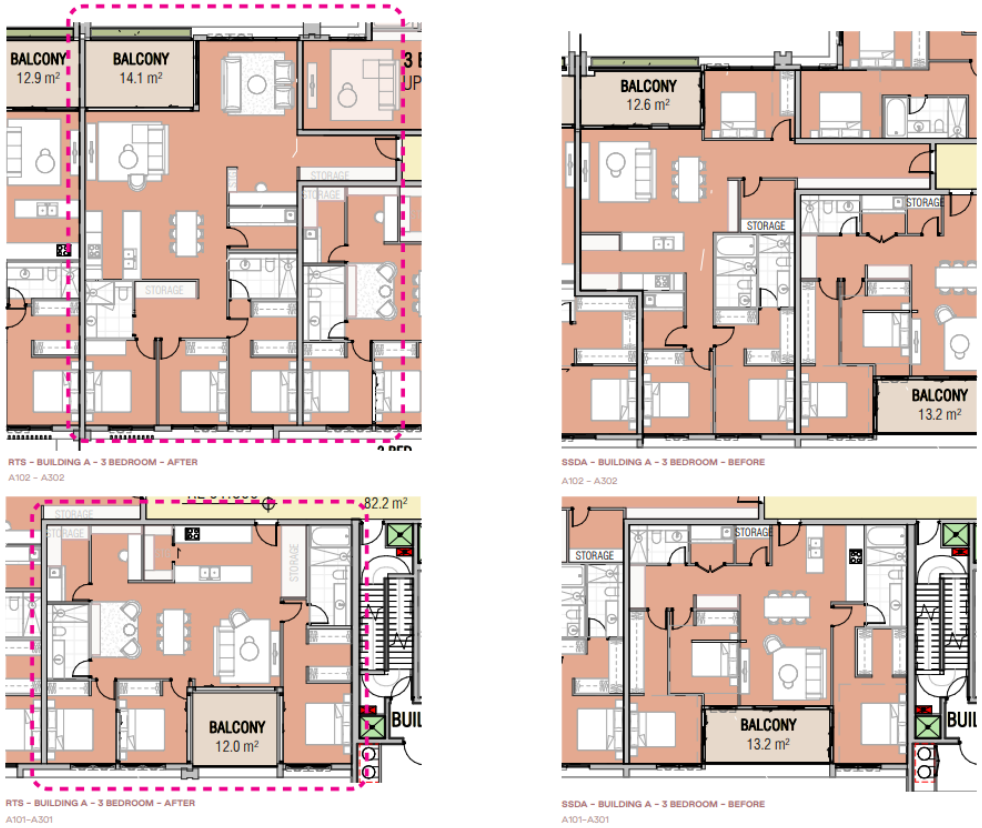
Summary of Issue Raised	Response	Refer to
The setback encroachment compromises deep soil plantings and the growth of tall trees and is not acceptable (refer to Deep Soil Zones below).	Figure 33 Proposed Basement 01 Plan  *Source: FKA*	
Residential amenity		
Privacy Every internal corner of the proposal has windows to habitable rooms and balconies with direct lines of sight across between neighbouring units which will significantly impact visual privacy between dwellings. This does not meet the requirements of ADG 3F-1 1 and ADG 3F-1 6.	Apartments located at internal corners of the development have been carefully designed to mitigate visual and acoustic privacy impacts. Privacy screens and measures such as double-glazed windows have been implemented to enhance resident comfort. Refer to Section 2 of the Design Report Addendum for further details.	**Design Report Addendum Appendix C**

Summary of Issue Raised	Response	Refer to
	Figure 34 Privacy mitigation measures Buildings A and C  *Source: FKA*	
Overshadowing The 'Sun-eye Views' indicate the proposal will overshadow properties to the west and south across Lord Street, except for the heritage-listed 19 Lord Street. There is no analysis of the overshadowing impact on future development of these sites. Solar access planning should ensure future developments receive adequate sunlight and are not constrained, which may not meet several ADG requirements. SEARs 7(dp1) requires assessing solar access impacts to ensure high environmental amenity for surrounding areas. 'Sun-eye Views' should include neighbouring site envelopes to show potential overshadowing impacts and compare the proposed development with one without bonuses. The In-fill Affordable Housing	An updated solar access analysis has been undertaken in line with the assess development scenarios which included existing TOD sites, sites subject to the LMR provisions and Councils preferred alternative. These controls allow for a varied built form, including 9-storey buildings (existing TOD sites), 4-storey buildings (LMR controls), and single-storey dwellings, including heritage listed properties (Council's alternative). The study assesses the potential impacts of the proposed development on future surrounding developments, including their ability to achieve the required solar access standard. **Key Points:** ▪ Shadow impacts are localised and primarily affect immediately adjacent buildings to the west and south. ▪ **Western impacts:** ○ Shadows extend over the building to the west during the morning mid-winter period.	**Design Report Addendum Appendix C**

Summary of Issue Raised	Response	Refer to
Practice Note advises that bonuses may not be fully achievable on all sites due to constraints and local impacts. The consent authority must consider relevant EPIs and likely impacts, including solar access, when assessing the proposal.	○ By midday, overshadowing is limited to the setback zone. ▪ **Southern impacts:** ○ Properties opposite on Lord Street are unaffected in the morning. ○ Partial shading occurs from 1pm, affecting building fronts only. ○ Rear gardens are already shaded by the buildings themselves in the afternoon. ▪ Discrete rooftop elements above the permissible height plane do not cause additional overshadowing due to their setbacks. ▪ Solar modelling confirms that future developments on surrounding sites can achieve **minimum two hours of solar access to 70% of apartments between 9am–3pm on 21 June**. ▪ Only around 10% of apartments in neighbouring developments would be affected by overshadowing from the proposal. The solar access study demonstrates that overshadowing impacts are limited, localised, and within acceptable parameters. Under future development scenarios, the proposed development will not prevent future development on adjacent sites from achieving the required solar access under the ADG.	
Sunlight to apartments The proposal states that 181 of 259 units (70%) receive a minimum of 2 hours of direct sunlight in mid-winter, meeting ADG 4A-1 1 requirements. However, the solar access calculation appears incorrect. Independent analysis suggests only 171 units (66%) meet this requirement, falling short by 10 units. These needs addressing. Additionally, 'Sun-eye Views' do not consider potential overshadowing from future developments on neighbouring sites, which may impact solar access.	The ADG requires at least 70% of apartments to receive a minimum of 2 hours direct sunlight between 9am–3pm at mid-winter. The solar access assessment, undertaken using the ADG criteria and verified through “sun eye” views in the architectural drawings, confirms that 174 of 252 dwellings (69%) achieve 2hrs sunlight to both living rooms and private open space which is marginally below the ADG requirement. The shortfall is limited and supported by strong amenity outcomes and design considerations as outlined below: ▪ All north-facing apartments in Buildings C and D meet the requirement for private open space. ▪ Non-compliance is limited to upper-level apartments at Building A’s southeast corner, where balconies do not receive winter solstice sunlight.	**Design Report Addendum Appendix C**

Summary of Issue Raised	Response	Refer to
This should be verified to ensure future developments are not constrained. The proposal also states that 37 units (14%) receive no direct sunlight, meeting ADG 4A-1 3 requirements. However, independent analysis suggests 57 units (22%) receive no direct sunlight, exceeding the maximum by 18 units. This discrepancy should be addressed. Furthermore, some upper-level apartments rely on skylights located in the private open space of units above, which is unacceptable.	▪ Living rooms in these apartments receive approximately 4 hours of direct sunlight daily. ▪ Balconies have a strong visual connection to a significant Eucalyptus tree (Tree 93), enhancing outlook and amenity. ▪ Relocating balconies to achieve winter compliance would reduce living room amenity and increase setback, compromising design intent. ▪ Balconies receive ample sunlight in warmer months, supporting year-round liveability. The minor shortfall is considered acceptable given the high levels of sunlight to living rooms, strong visual connections to landscape features, and the availability of ample sunlight in warmer months.	
Clothes drying facilities The location of the external clothes drying areas for the apartments must be detailed on the plans. If these areas are located on the balconies, they are to be appropriately screened and excluded from private open space calculations.	All apartments are provided with clothes dryers. It is not intended that external clothes drying areas be proposed on balconies.	
Cross ventilation The proposal states that 156 of 259 units (60%) are naturally cross-ventilated, meeting ADG 4B-3 1 requirements. However, the calculation appears incorrect. Areas to check include single aspect units on the eastern face of Building C, the southern face of Building D, and units relying on skylights not shown in drawings or located in the private open space of units above. Independent analysis suggests only 136 units (53%) are naturally cross-ventilated, falling short by 20 units. These needs addressing. It is recommended that any openable skylight intended for natural cross	A Natural Ventilation Assessment was undertaken to test the adequacy of the openable skylights (and is appended to the Design Report Addendum). Detailed Computational Fluid Dynamics (**CFD**) modelling was undertaken by SLR to verify natural ventilation performance, with a focus on apartments utilising skylights as part of the cross-ventilation strategy. The modelling used ANSYS-FLUENT software and a high-resolution polyhedral mesh (over 32 million nodes) to simulate airflow both internally and externally. The CFD modelling incorporated skylights, recesses, and façade articulations, which create pressure differences that facilitate airflow through apartments. Skylight openings in the tested units were increased during design to 870mm x 1,275mm to enhance performance. The results confirmed the following:	**Updated Architectural Plans Appendix B** **Design Report Addendum Appendix C**

Summary of Issue Raised	Response	Refer to
ventilation be replaced by a clerestory window, oriented at least 90 degrees to the windows it serves, and have an adequate openable area for effective ventilation.	▪ 12 of 13 Level 3 apartments tested achieved natural cross-ventilation ▪ All Level 7 apartments tested achieved natural cross-ventilation ▪ Given that actual wind speeds at the site exceed 2m/s approximately 74% of the time, real-world performance is expected to be higher than modelled. Therefore, the openable skylights have not been removed in lieu of a clerestory window considering the required ADG criteria can been met via this alternate solution. Potential overlooking into the skylights from taller building elements is mitigated through the use of translucent glazing. Inset parapets are strategically located to prevent access to building edges further eliminating potential overlooking into the skylights from above.	
Internalised living rooms Several proposed apartments have internalised living rooms. This does not meet the requirements of ADG 4D-1 2 for every habitable room to have a window in an external wall and to not borrow daylight and air from other rooms. Areas to check include upper floor of 2-storey units in Building A; and western cross through apartments in Building B.	Changes have been made to a number of apartments to achieve greater amenity relating to daylight. Apartment layouts have been refined to position bathroom entries away from main living areas and kitchens to enhance privacy and improve spatial comfort for residents. This design solution enhances privacy, establishes a clearer functional separation between living and utility spaces, and positions bathrooms more conveniently near the bedrooms. Consequently, bathrooms are no longer visible from the kitchen or living areas, resulting in improved spatial planning and a more comfortable living environment. Apartment layouts have been refined to relocate a number of kitchens within the development to allow for better access to daylight.	**Updated Architectural Plans Appendix B** **Design Report Addendum Appendix C**

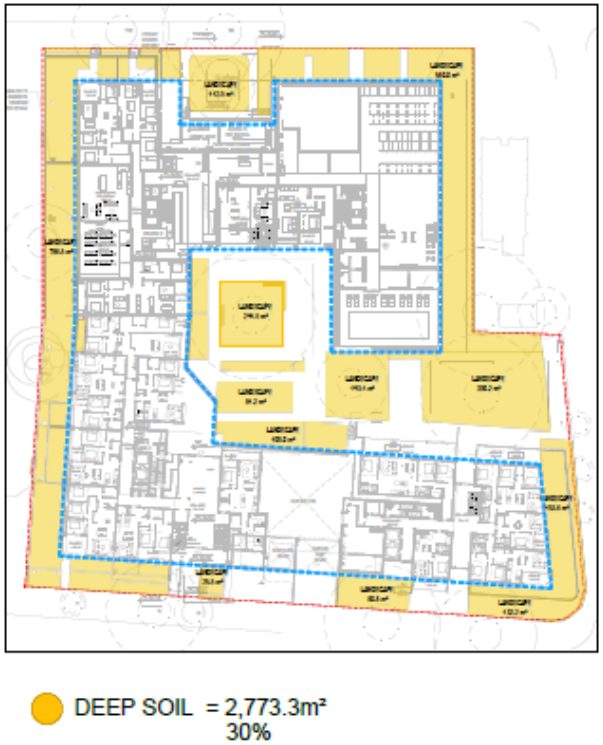
Summary of Issue Raised	Response	Refer to
	Figure 35 Improved apartments layouts Building A  *Source: FKA*	
Snorkel bedrooms Several proposed apartments have 'snorkel' bedroom windows. This does not meet the requirements of ADG 4D-1 4 for a window to be visible from every point of a habitable room. Areas to check include central east-	Unit layouts have been refined to reduce the number of turns within unit corridors, creating a clear connection from the entry to living areas and improving movement and privacy. Notably, the dogleg corridors in the north and south wings of Building B have been redesigned to provide more efficient and intuitive circulation, improving both functionality and resident experience. Refer to section 2.15 of the Design Report addendum for further detail.	**Updated Architectural Plans Appendix B** **Design Report**

Summary of Issue Raised	Response	Refer to
facing bedrooms in Building A; and central north-facing bedrooms in building A		**Addendum Appendix C**
Circulation core Building A has 11 units, Building C has nine units, and Building D has 10 units off a circulation core at lower levels, exceeding the ADG 4F-1 1 maximum of 8 units per core. ADG 4F-1 8 allows for exceptions if a high level of amenity is demonstrated, but the proposal lacks adequate sunlight and natural cross ventilation. An additional core is recommended to meet the requirements.	While the proposal includes more than eight apartments off a single core on Levels 01–03 of Buildings C and D, the maximum number is twelve, which is consistent with the ADG's acceptable solution. The design incorporates measures to ensure high amenity for all dwellings served by each core as outlined below. ▪ Maximum of twelve apartments per core on Levels 01–03 of Buildings C and D, in line with ADG acceptable solution. ▪ Corridors designed with natural daylight and ventilation to improve comfort and orientation. ▪ Enlarged lift lobbies to enhance legibility, reduce congestion, and provide a welcoming arrival space. ▪ Acoustic and visual privacy measures at apartment entries to minimise disturbance. ▪ Lift capacity and performance designed to ensure reasonable waiting times. ▪ Separate service areas provided to avoid disruption to residential circulation. ▪ Corridor widths and lengths optimised for ease of movement and amenity. It is considered that the proposal meets the intent of Objective 4F-1 by limiting apartments per core to within ADG parameters and incorporating design features that maintain privacy, comfort, and efficient circulation for residents.	**Design Report Addendum Appendix C**
Inequitable natural cross ventilation to affordable housing 48 of 259 units are designated as affordable, but only 18 of these (38%) have natural cross ventilation, which is below the ADG 4B-3 1 requirement. The amenity of the affordable units is significantly lower than the rest	The design of apartments has been refined to enhance cross ventilation. A Natural Ventilation Assessment of the project design has been undertaken (appended to the Design Report Addendum). This confirms that the development achieves compliance with the ADG. The proposed affordable housing apartments are accommodated within Building D. The affordable housing apartments have been designed to provide a high standard of	**Design Report Addendum Appendix C**

Summary of Issue Raised	Response	Refer to
of the building, making it inequitable. This issue needs addressing. SEARs 6(dp2) requires a table showing how each dwelling, including affordable ones, meets ADG Design Criteria. The In-fill Affordable Housing Practice Note emphasises that affordable dwellings should not have a lower standard of amenity, including natural ventilation. This advice should be considered in the assessment.	residential amenity in accordance with the key ADG criteria and the guidance in the DPHI 'In-Fill Affordable Housing Practice Note' (p.15). All apartments are provided with minimum internal areas, ceiling heights, natural ventilation, daylight access, and private open space consistent with ADG requirements. Of the 55 affordable dwellings, 24 achieve the ADG cross ventilation criteria (43.6%) and 45 achieve the ADG solar access criteria (81%). Access and communal amenity Affordable housing residents benefit from lift access to ground floor communal open space, ensuring universal accessibility. They also have direct access to residential communal facilities located on the lower ground and ground floors of Buildings A and B, including landscaped resident lounges, cinema, open spaces, seating, and pool and gym amenities, promoting social interaction, recreation, and passive surveillance and roof top communal terraces. Design measures supporting amenity: Apartments are oriented to maximise outlook, sunlight, and cross-ventilation, with courtyard planting and landscape features providing privacy and visual amenity. Circulation spaces are well-lit and visually connected to communal areas, supporting legibility and a sense of safety. Together, these measures ensure that the affordable housing apartments achieve a comfortable, functional, and high-quality living environment, consistent with ADG objectives and best practice guidance for infill affordable housing. Refer to Design Report Addendum section 1.28 for further details.	
Site coverage Site coverage plans have not been provided. The proposed site coverage appears to be approximately 46% and exceeds the maximum 30% specified in control 1 in Part 7A.5 of KDCP. The SSD application must demonstrate that viable deep soil landscaping, including tree canopy is provided across the site to	Section 2.10 of the Planning Systems SEPP specifically states that Development Control Plans do not apply to SSD and as such the site coverage requirement does not apply. The proposed landscape area is 3,222m^2 (approximately 34% of the total site area). The proposal achieves 30% deep soil area on the ground floor. The proposed tree canopy coverage is 39.7% of the site.	**Updated Landscape Design Report Appendix D**

Summary of Issue Raised	Response	Refer to
maintain the landscape character of the locality (refer to Deep Soil Zones below).		
Affordable housing Provision of affordable housing units, operated by a Community Housing Provider, should be provided in perpetuity (beyond the 15-year minimum requirements), otherwise the population will once again be displaced in 15 years and lose established networks and area connections leading to social issues.	Whilst Council's concerns are acknowledged, the development proposes 15% of the affordable in accordance with the requirements of section 21 of the Housing SEPP, being that it be managed by a CHP for a minimum of a 15-year period. In addition, 2% of the affordable housing proposed on site is proposed to be provided in perpetuity in accordance with section 156 of the Housing SEPP. A restriction on the title of the affordable housing apartments will be managed through a section 88E instrument. It is anticipated that a condition to this effect will be included in any future consent for the project.	**Updated CHP Letter Appendix V**
Insufficient information to undertake an assessment ▪ A full survey has not been provided demonstrating the Site area and spot levels and contour levels across the Site. ▪ The elevations and sections do not sufficiently identify existing ground RL's. ▪ The roof plan should include the survey spot height and contours to demonstrate maximum building height. ▪ The use of all areas should be labelled.	▪ An updated survey plan identifying the site area is provided at **Appendix Z**. ▪ The existing ground RLs are identified on the elevations and sections, and the maximum building height RLs are identified on the updated Architectural Plans, including the roof plan, at **Appendix B**. ▪ Proposed uses are labelled on the Architectural Plans provided at **Appendix B**.	**Updated Site Survey Appendix Z** **Updated Architectural Plans Appendix B**
Landscape Comments		
SEARS A full Planting Plan and Plant Schedule indicating location, quantity and pot size of proposed planting has not been provided which is contrary to the SEAR's, ADG and KDCP requirements. Refer to comments below under 'LANDSCAPE DESIGN and CHARACTER'. A Planting Plan and full	A detailed Planting Plan and Plant Schedule, showing the location, quantity, and pot size of all proposed plantings, is included in the updated Landscape Plans at **Appendix D**. The project arborist has completed root mapping for Trees 20, 67, 85, 86, and 102 to assess potential impacts from the proposed works. This investigation confirmed that Trees 67, 85, and 102 can be retained with appropriate mitigation measures, while Trees 20 and 86 require removal. The findings have informed root-sensitive design solutions,	**Updated Landscape Plans Appendix D** **Updated Arboricultural Impact**

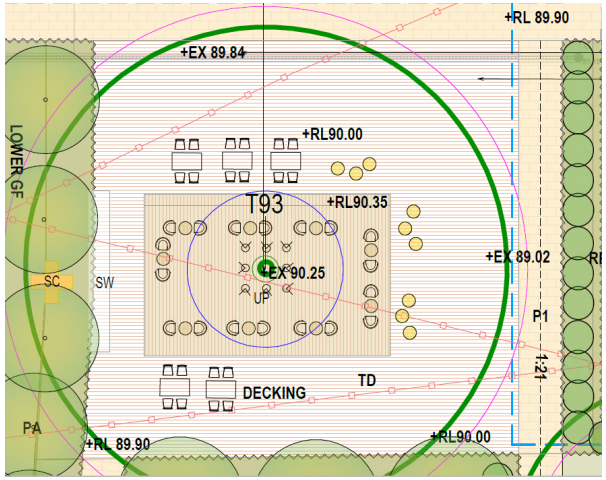
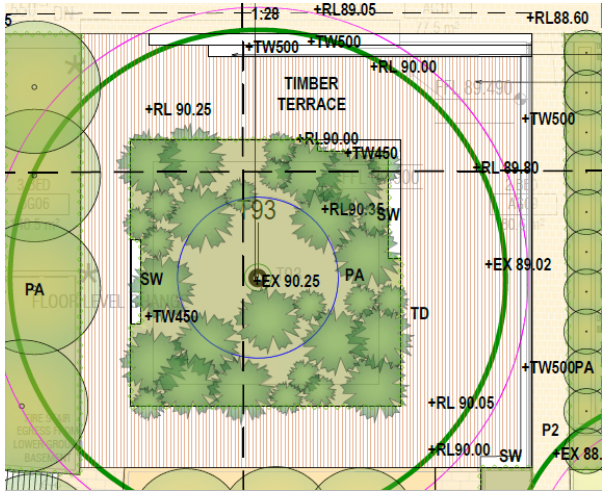
Summary of Issue Raised	Response	Refer to
plant schedule is required. Root mapping as required by the arborist and SEARS has not been undertaken and submitted for trees: 5, 20, 49, 52, 67, 74, 85, 86 & 102. Refer comments below under 'TREE REMOVAL and IMPACTS'. Root mapping results and supporting documentation with recommended outcomes and photographs is required to enable assessment of tree impact.	including the use of raised structures, hand excavation, and relocation of footings to protect the trees that will be retained.	**Assessment Appendix P**
BASIX Commitments The area of proposed indigenous planting of 1430.4m^2 is not indicated on the plans in accordance with the BASIX certificate requirements. To enable assessment a BASIX compliance plan is required to ensure consistency with BASIX commitments. Refer to comments below under 'LANDSCAPE DESIGN and CHARACTER' regarding planting palette and context.	The proposed landscape area is 3,222m^2 (approximately 34% of the total site area) of which approximately 70% (2,256m^2) is proposed as native (endemic) species and will be guided by the Connecting with Country framework to achieve ESD and BASIX low water use commitments.	**Updated Landscape Design Report Appendix D**
State Environmental Planning Policy (Housing) 2021 Chapter 4 of SEPPH states that Deep soil zone means: a landscaped area with no buildings or structures above or below the ground. The application fails to provide deep soil zone calculations or compliance plan. The applicants submitted deep soil calculations (Plan SSDA-050 Rev 4 and LD-DA003 Rev 1) is based on landscape area which has a differing definition and requirement. To enable assessment of the requirements of the SEPP and ADG a deep soil zone compliance plan and calculations is required.	A revised deep soil plan is provided within the Landscape Report at **Appendix D**, ensuring hardstand areas are not included in deep soil calculations. The proposed deep soil zones exceed the minimum ADG requirement (being 15% of the site is pervious, and a minimum dimension of 6m). The proposal achieves 30% deep soil area on the ground floor and co-locates deep soil with communal open space areas in accordance with the ADG guidelines.	**Updated Landscape Report Appendix D**

Summary of Issue Raised	Response	Refer to
The sites' location within a heritage conservation area with a single residential context with large garden areas of deep soil, a minimum 15% / 1405.6sqm of the site area to be deep soil should apply.	Figure 36 Updated deep soil plan  *Source: Land + Form*	
Apartment Design Guide		
Part 3E Deep soil The application lacks deep soil zone calculations and a compliance plan, which are necessary for assessment against the SEPP and ADG standards. Although the provided diagram claims 34% deep soil, independent calculations suggest only 14.5%, which is	Refer to comment above. Section 2.10 of the Planning Systems SEPP specifically states that Development Control Plans do not apply to SSD and as such the KDCP deep soil requirement does not apply. It is noted that the amount of decking to the central landscape area has been reduced as part of the updated landscape design.	**Updated Landscape Report Appendix D**

Summary of Issue Raised	Response	Refer to
inadequate. Inclusion of the following areas in the deep soil calculations should be checked and clarified: extensive decking in central communal open space; extensive decking in private open space areas; and various areas less than 6m wide. The 50% deep soil requirement of the KDCP is not achieved. It is suggested that the deep soil landscape area is reconsidered to significantly reduce the areas of decking used and to consolidate deep soil zones into areas with a minimum 6m in width to support canopy tree planting. It is also suggested that this deep soil zone be provided solely within common areas (rather than private open spaces) so that the maintenance of larger canopy trees is not the responsibility of individual owners but of the overall development.		
Part 4O-1 Landscape Design For a site area of 9370.9m^2 with a minimum 15% deep soil (1405m^2) a minimum 18 large trees (12-18m high) or 36 medium trees (8-12m high) are required in accordance with Part 4O, table 4 of the ADG. The KDCP requires a minimum of 31 large trees capable of reaching 18m in height. Tree/plant quantities have not been depicted within the plant schedule. It is requested the plant schedule be updated to include plant quantities. Proposed tree plantings particularly within the site frontages are limited to small and medium sized trees, which fails to reflect the established and desired	In relation to deep soil, refer to commentary above. Section 2.10 of the Planning Systems SEPP specifically states that Development Control Plans do not apply to SSD and as such the KDCP requirements relating to tree planting does not apply. The proposed tree canopy coverage is 39.7% of the site which is significantly higher than the Government Architect's *Greener Places Design Guide* of 25%. The proposal includes the planting of 105 additional trees within the site. In terms of the tree planting specification, large trees, Australian natives and evergreens are proposed with a mature height of up to 12m and a 15m mature canopy spread, to respond to local character and promote diversity. The following tree species are proposed within the site setbacks: ▪ Crepe Myrtle (*Lagerstroemia indica*) – mature height up to 4m ▪ Blueberry Ash (*Eleaocarpus reticulatis*) – mature height up to 6m	**Updated Landscape Report Appendix D**

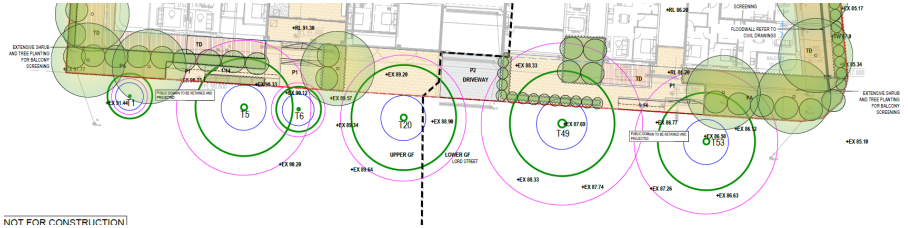
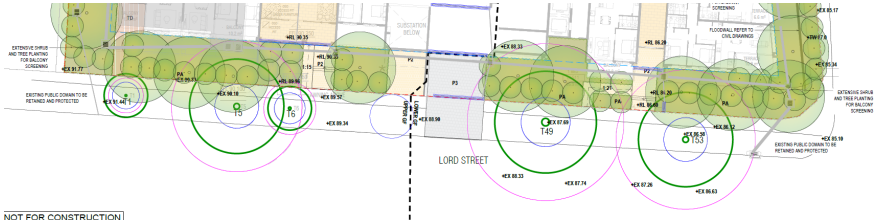
Summary of Issue Raised	Response	Refer to
landscape context where tall trees contribute to the streetscape. Proposed planting of Corymbia ficifolia does not reflect the locally occurring plant community as it is an endemic species to the southwest of Western Australia.	▪ Summer Beauty (*Corymbia ficifolia*) – mature height up to 12m ▪ Common Lilly Pily (*Acmena smithii*) – mature height up to 5m ▪ Lemon Scented Myrtle (*Bachousia citriodora*) – mature height up to 5m ▪ Water Gum (*Tristaniopsis laurina*) – mature height up to 12m ▪ Weeping Lily Pily (*Waterhousea floribunda*) – mature height up to 10m.	
Objective 4O-2 Landscape design contribute to the streetscape and amenity The proposal lacks tall trees at the site frontages, which negatively affects the streetscape and amenity, especially given the scale of the development. Private open spaces encroach on street frontages, limiting viable tree planting in common and public areas. Trees in private spaces can be removed by future owners, affecting the overall landscape design. It is recommended to limit private open spaces to the building line. The proposed hard surfaces on Lord St are uncharacteristic and impact significant trees. Reducing hard surfaces and increasing deep soil zones for tall tree planting and retaining existing significant street trees is recommended.	The proposal includes the planting of 105 additional trees within the site. In terms of the tree planting specification, large trees, Australian natives and evergreens are proposed with a mature height of up to 12m and a 15m mature canopy spread, to respond to local character and promote diversity. It is noted that, of the six existing high value trees to be retained on site, four of these are located to site boundaries, retaining existing tree canopy to the street frontages. Due to the removal of the lower ground floor apartments, the deep soil areas within the front setbacks have been rationalised to respond more appropriately to the slope of the land. These gardens have also allowed for direct street access for the ground floor town houses facing Roseville Avenue, providing a stronger response to the garden character of Roseville.	**Updated Landscape Report Appendix D**
Planting on structures soil depths and soil volumes Landscape Plans are insufficient to fully assess if adequate soil depths are provided in planters for the proposed planting and in accordance with ADG and KDCP as no detailed planter heights are depicted.	Planter depths are now identified on the revised Landscape Plans. Please refer to **Appendix D**. Planters range from 300mm to 600mm in depth.	**Updated Landscape Plans Appendix D**

Summary of Issue Raised	Response	Refer to
Tree removal and impacts		
The consulting arborist has noted that extensive paved surfaces, retaining walls, and a driveway are planned within the Tree Protection Zones (TPZ) of several trees, potentially impacting their roots. Root Mapping Investigations are necessary to identify root locations and determine if design changes or root-sensitive construction methods are needed to protect these trees. This investigation has not been provided, which is against the SEARs, ADG, and KDCP requirements. Without this, the impact on publicly owned trees cannot be assessed. The current design, with extensive decking, does not adequately protect significant trees or provide sufficient clearance around them. Specific trees likely to be adversely impacted include: 1. Trees 5, 20, and 49 (Brush Box) on Lord St, which are part of a historic avenue street tree planting and have high landscape significance. TPZ development encroachment up to 37% will result in adverse impact beyond sustainable levels. As per the applicants arborist recommendations further investigations (root mapping) is required to determine the extent of impact. 2. Tree 88 (Chinese Elm) on Roseville Ave frontage, proposed for transplanting. The provided methodology does not ensure its	Root mapping was undertaken for Trees 20, 67, 85, 86, and 102 to assess the extent of root impacts from the proposed works. The investigation confirmed that Trees 67, 85, and 102 can be retained with appropriate mitigation measures, while Trees 20 and 86 will need to be removed. The findings have informed root-sensitive design solutions, including raised structures, hand excavation, and relocation of footings to protect the retained trees. The original Arboricultural Impact Assessment (dated 3 April 2025) incorrectly identified Tree 93 as a Sydney Blue Gum. Further analysis by the Project Ecologist confirmed the species is a Flooded Gum, based on diagnostic fruit characteristics (refer Appendix 7 of updated Aboricultural Impact Assessment at **Appendix P**). In the updated Landscape Plans, the extent of decking around Tree 93 has been reduced, increasing the surrounding soft landscape area (refer to the figure below). The updated Arboricultural Impact Assessment recommends retaining and protecting Tree 93 despite a ‘major’ (21% NRZ) encroachment from proposed seating walls, retaining walls, pathways, and the building/basement footprint. While this encroachment and changes to site conditions may affect groundwater movement and nutrient availability—potentially reducing the tree’s Useful Life Expectancy (ULE) and health—the AIA outlines mitigation measures to support its long-term retention. These include root-sensitive design and construction methods for decking, pathways, and seating walls, ongoing project arborist supervision, and tree protection measures throughout construction. Pruning of trees T67 and T116 is required. The updated AIA confirms that the extent of pruning required is acceptable and will not impact the long term viability of these trees. The canopy of T5 is not impacted by the proposed development.	**Updated Landscape Report Appendix D**

Summary of Issue Raised	Response	Refer to
survival. The tree could be retained in its current location with design adjustments. 3. Tree 93 (Sydney Blue Gum) centrally located on the site, part of a critically endangered plant community. The applicant's arborist fails to identify the extent of SRZ (structural root zone) and TPZ (tree protection zone) coverage of the proposed decking (over 90%) and the significant changes to the trees growing environment as a result. It is recommended the extent of decking and development encroachment be reduced to no more than 15% and the remaining TPZ area maintained as soft landscape with no construction works. Design amendments are necessary to ensure the viable retention of these significant trees and to align with ADG and KDCP objectives.	Figure 37 Landscape design – tree 93  SSDA Lodgement Landscape Design  Revised RtS Landscape Design Source: Land + Form	

Summary of Issue Raised	Response	Refer to
Landscape design and character		
A full Planting Plan and Plant Schedule indicating location, quantity and pot size of proposed planting has not been provided which is contrary to the SEAR's, ADG and KDCP requirements. Without a full planting plan and complete plant schedule, assessment of the proposal is unable to be fully assessed.	A full planting plan and plant schedule are provided as part of the updated Landscape Plans. Please refer to **Appendix D**, drawing LD-DA0001.	**Updated Landscape Plans Appendix D**
The landscape plans fail to provide sufficient detail as to the proposed wall heights and soil depths provided in planters in accordance with the ADG.	Planters depths are identified on the revised Landscape Plans. Please refer to **Appendix D**, drawing LD-DA0001.	**Updated Landscape Plans Appendix D**
The proposed predominantly native plant palette fails to recognise, maintain and enhance the established landscape character and context within the heritage conservation area as required by the ADG. Of the 112 species proposed only seven are non-native / exotic species equating to 6%. The existing landscape character and context is that of an exotic landscape palette beneath a tall tree canopy of endemic tree species. The planting palette shall be revised to reflect the established landscape character of the HCA with a minimum 60% to be exotic species.	In accordance with the Connecting with Country Framework, sustainability principles and BASIX requirements a predominantly native plant palette is proposed. The proposed planting palette has been selected to both respond to the site's location and integrate the proposal into the local context.	**Updated Landscape Plans Appendix D**
The planting of many trees less than 3.0m from the wall of the dwellings results in an exemption under Part 13 of the KDCP. To ensure their ongoing protection under council's DCP it is recommended all tree plantings be suitably setback from the building to	It is assumed Council's comment in relation to distance from the "wall of the dwellings" refers to the wall of the proposed development. While it is noted that some trees are less than 3m, they form part of the mitigation measures with respect to the visual impact and replacement tree planting. As part of the SSDA proposed mitigation measures, it will be required to maintain these trees for the life of the development. Further it is noted that section 2.10 of the Planning Systems SEPP specifically states that Development Control	

Summary of Issue Raised	Response	Refer to
ensure their protection, future growth and ongoing viability.	Plans do not apply to SSD and as such the KDCP requirements relating to tree planting does not apply.	
The extent of decking proposed over the SRZ and TPZ of tree 93 will significantly alter its growing conditions with an adverse impact to loss of nutrient availability and replenishment, and solar warming of the soil. It is recommended the extent of decking and development encroachment within the TPZ be limited to no more than 15% and the remainder of the TPZ maintained as soft landscape area to maintain the trees growing environment at sustainable levels.	As part of the updated Landscape Plans, the extent of decking surrounding tree 93 has been reduced. Refer to earlier commentary and figures in relation to Tree Removal and Impacts.	**Updated Landscape Plans Appendix D**
The proposed transplanting of tree 88 due to extensive hard landscape works does not provide certainty that the tree, which contributes positively to the streetscape, can be viably retained. To retain the tree in-situ, there is further design opportunity to reduce the extent of ground level hard surface areas and maintain existing ground levels.	Tree 88 is recommended for retention and protection despite 'moderate' (19% NRZ) encroachment from proposed pathways and seating walls. The updated AIA finds that impacts are not expected to significantly impact tree health, condition or structural viability given the species' known tolerance to moderate levels of root disturbance and the existing good health/vitality of the specimen, subject to the implementation of root-sensitive design and construction of pathway and seating walls, and project arborist supervision and tree protection measures throughout construction.	**Updated Arboricultural Impact Assessment Appendix P**
The extent of hard surface treatments within the Lord St site frontage is uncharacteristic of the established landscape context and results in unnecessary tree impact to trees within the public domain. It is recommended the extent of BUA within the street frontage be significantly reduced and viable deep soil landscape area increased to maintain existing street trees.	As part of the updated Landscape Plans, the extent of hard surface treatments within the Lord Street setback has been reduced and the area of deep soil landscape increased, as shown in the figure below. All trees within the public domain surrounding the site are proposed to be retained, save for Tree 20 and Tree 86, which are proposed to be removed and replaced. The retention of mature trees within the public domain to the site frontages will contribute to maintaining the established landscape context.	**Updated Landscape Plans Appendix D**

Summary of Issue Raised	Response	Refer to
	Figure 38 Lord Street setback – deep soil landscape  SSDA Lodgement Landscape Design  Revised RtS Landscape Design *Source: Land + Form*	
Tall tree planting outcomes to complement and enhance the tree canopy that characterises Ku ring gai and the public domain has not been satisfied. Increased setbacks within street frontages with increased deep soil landscape area is required.	Tree plantings within the street setbacks are expected to achieve a mature height of up to 12m, with a width of up to 15m. All trees within the public domain surrounding the site are proposed to be retained, save for Tree 20 and Tree 86, which are proposed to be removed and replaced. The retention of mature trees within the public domain to the site frontages will contribute to maintaining the established landscape context. A deep soil plan is provided as part of the Landscape Plans at **Appendix D**. A revised deep soil plan is provided within the Landscape Report at **Appendix D**. The proposal achieves 30% deep soil area on the ground floor	**Updated Landscape Report Appendix D**
Health		
Acoustic report The NVIA identified that residential condenser units may be located on individual balconies or unit floors, with a general statement that compliance can be	The NVIA Addendum (**Appendix K**) confirms that all condenser units are proposed to be located at rooftop level as illustrated on the architectural plans. No condensers are proposed on balconies or unit floors.	**NVIA Addendum Appendix K**

Summary of Issue Raised	Response	Refer to
achieved through standard acoustic treatments. However, the submitted architectural plans (dated 2 April 2025) appear to show that residential condensers are proposed to be located on the rooftops of Levels 8 and 9. This discrepancy indicates that the acoustic assessment does not reflect or assess the finalised mechanical plant locations. Given the number of residential units proposed (259 dwellings) and the potential for cumulative rooftop noise emissions, it is recommended that: ▪ The acoustic report be updated to reflect the most recent architectural plans, clearly identifying the confirmed location of all mechanical plant, including residential condenser units; and ▪ A detailed assessment be undertaken of the noise emissions from the proposed rooftop condenser locations, including cumulative impacts and mitigation strategies, to ensure compliance with relevant operational noise criteria. ▪ If any screening is required this should be detailed on the architectural plans, dimensioned and include an RL to the top of the screen.	The NVIA Addendum assesses the assesses potential noise impacts of the proposed rooftop mechanical plant on nearby sensitive receivers. The NVIA Addendum finds that the attenuation provided by the proposed parapets around the edge of each rooftop is predicted to sufficiently mitigate noise from the rooftop plant units to nearby sensitive receivers. No additional acoustic treatment is required to achieve compliance with the established project noise emission objectives.	
Contamination report A Preliminary Site Investigation (PSI) prepared by Douglas Partners Pty Ltd has been provided. Further consideration of the recommendations should be undertaken.	Further groundwater testing is provided in the Preliminary Site Investigation (PSI) Addendum at **Appendix O**. The supplementary ground water testing has been undertaken in response to recommendations outlined in the original PSI, which identified the presence of shallow groundwater requiring further investigation. The findings of the further ground testing concluded that the shallow groundwater at the site does not present a human health or environmental risk and support the conclusion of the PSI that	**PSI Addendum Appendix O**

Summary of Issue Raised	Response	Refer to
	the site can be made suitable for the proposed development subject to completion of the remaining recommendations listed in the PSI.	
Engineering		
Water management ▪ Supporting hydraulic calculations that demonstrate compliance with Part 24C.3-4 of the Ku-ring-gai DCP that requires rainwater retention and re-use to be provided to achieve a 50% reduction in runoff days are required. A water balance model is required. ▪ Stormwater plans to clearly show OSR volumes and location. Cross section details of the tank showing surface and invert levels are required. ▪ No stormwater disposal system has been submitted for the basement level(s). ▪ No supporting calculation for the pump-out pit based on the 100 year 2 hour storm has been submitted as per Part 24B.5 of the KDCP. ▪ Stormwater design does not show the rising main from the pump-out tank directed to the on-site detention tank. ▪ The location of the access pits to the detention system and rainwater tank are to be shown outside of the communal area (not within private courtyard). ▪ According to the Flood Impact Risk Assessment prepared by PTC, the proposed development includes a flood mitigation strategy involving the construction of an impermeable wall along the	▪ Hydraulic calculations that demonstrate compliance with Part 24C.3-4 of the Ku-ring-gai DCP confirming that rainwater retention and re-use is provided to achieve a 50% reduction in runoff days are provided at Section 4.2.5 of the IWMP. A water balance model is provided at Section 4.2.5 of the IWMP. ▪ Stormwater plans showing OSR volumes and location are provided at Appendix 1 of the IWMP. Cross section details of the tank showing surface and invert levels are provided at Appendix 1 of the IWMP. ▪ The details of the stormwater disposal system proposed for the basement levels are provided at Appendix 1 of the IWMP. ▪ The calculation for the pump-out pit is provided at IWMP Section 4.2.2. The basement pump-out pit has been designed in accordance with Australian Standard AS/NZS 3500.3 Plumbing and Drainage Part 3: Stormwater Drainage. ▪ The rising main from the pump-out tank directed to the OSD tank is detailed at Appendix 1/civil drawing no 403 & 420. of the IWMP. ▪ The rising main from the pump-out tank directed to the OSD tank is detailed at Appendix 1/civil drawing no 403 & 420. of the IWMP. ▪ As part of the updated design, the flood wall has been removed. The building habitable floor levels have been set so that there is more than 500mm freeboard to the property for all events up to and including 1% AEP storm events. In the post-development scenario, there is minimal impact on the project site and on adjoining properties as the natural passageway of the watercourse is largely retained. There is an increase in afflux of greater than 50mm in areas within the site (to the east of the building), however this is acceptable as it is within the development site and the development has been designed to accommodate the flood levels. There are no proposed driveways or basement access proposed within this area and these	**Updated Integrated Water Management Plan** **Appendix L** **Updated Flood Impact Risk Assessment** **Appendix M**

Summary of Issue Raised	Response	Refer to
north-eastern to south-eastern boundary of the site to protect against floodwaters from 1% and 20% AEP storm events. The stormwater plans are to show that the wall will provide at least 500mm freeboard above the Design Flood Standard, exceeding Council's 300mm requirement, ensuring flood immunity up to the 1% AEP event.	access points have adequate freeboard. Therefore, the proposed development complies with afflux requirements.	
Vehicle access and parking ▪ The provision of visitors parking and car share space have not been met. Given that the SEPP is silent on visitor parking requirements, Council's DCP requirements prevail. A total of 43 visitor parking spaces and four dedicated car share spaces are required. ▪ The minimum sight lines for pedestrian safety as per Figure 3.3 of AS2890.1:2004 have not been demonstrated on the exit approach.	The proposed development, as amended, will provide 252 dwellings. As such the proposed parking has been updated to provide three car share spaces and 42 visitor parking spaces, in accordance with the DCP requirements. The updated TIA notes that sight lines at the exit driveway have been reviewed against the requirements of Figure 3.3 in AS2890.1:2004 and appropriately accommodated to ensure safe pedestrian visibility and movement. Structure adjacent to the driveway (kerbs, etc.) will remain below driver height at the property boundary.	**Updated Traffic Impact Assessment Appendix J**
Waste management A longitudinal section through the driveway and into the basement carpark is required to clearly demonstrate that there will be 2.6 metres clear headroom along the whole of the travel path required for the small waste collection vehicle. The section must include realistic slab/beam depths, stormwater pipelines and other overhead services.	A longitudinal section has been provided at Appendix 3 of the updated Waste Management Plan (**Appendix S**). The section demonstrates that 2.6 metres of headroom has can be provided to allow a waste vehicle to access the basement and loading dock area.	**Updated Waste Management Report** **Appendix S**
Ecology Tree 93, a mature Eucalyptus saligna (Sydney Blue Gum) centrally located on the site, is a remnant canopy specimen of the Sydney Blue Gum High	It is noted that, following further detailed analysis in consultation with the Project Ecologist, Tree 93, initially identified as Sydney Blue Gum, has been confirmed as **Flooded Gum** (*Eucalyptus grandis*) based on diagnostic fruit features (4–5 incurved	**Updated Arboricultural Impact**

Summary of Issue Raised	Response	Refer to
Forest critically endangered ecological community of high ecological value. The proposed development encroaches more than 90% into the TPZ and SRZ likely leading to its decline or loss. This impact has not been adequately assessed in the arborist report. A Biodiversity Development Assessment Report (BDAR) should be required due to the significant impacts identified, despite a BDAR waiver being submitted. The waiver applies only to minimal impacts, which is not the case here. A BDAR would likely necessitate redesigning the proposal to minimise impacts on Tree 93. Recommendations include: • Limiting encroachment into the TPZ to no more than 15% • Retaining the remaining TPZ as soft landscape with no construction or disturbance These measures would help preserve Tree 93's health and ecological value, support deep soil function, and maintain recreational amenity. The current design does not adequately avoid impacts, triggering the need for a BDAR and compliance with the BC Act	valves, exserted or at rim level) (refer Appendix 7 of the updated AIA) (refer Appendix 7 of Updated Aboricultural Impact Assessment at Appendix P). A Request for a BDAR Waiver was prepared by East Coast Ecology and submitted to DPHI. The BC Act requires that development applications are required to be accompanied by a Biodiversity Development Assessment Report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. The Request for a BDAR Waiver assessed the biodiversity impacts of the proposed development and found that the proposal is not likely to have any significant impacts on biodiversity values. The Request for a BDAR Waiver was assessed by the Director Greater Sydney of the Department of Climate Change, Energy, the Environment and Water and the Secretary of the DPHI, with the updated BDAR Waiver granted on 2 December 2025. The surroundings of Tree 93 have been amended to include more soft landscaping around the base of the tree. The AIA includes recommendations for root sensitive construction methods, project arborist supervision and tree protection measures throughout the construction phase of the project. These recommendations are considered to be acceptable to ensure the longevity of Tree 93.	**Assessment Appendix P**
Heritage		
Inappropriate demolition of existing buildings at 16-24 Lord Street and 21-27 Roseville Ave The proposed works will result in the demolition of all dwellings currently located at Nos. 16-24 Lord Street and 21-27 Roseville Ave, Roseville. These dwellings are part of the Clanville HCA and make an important	Urbis Heritage has undertaken a detailed assessment of the dwellings currently located at Nos. 16-24 Lord Street and 21-27 Roseville Ave, Roseville to determine the contributory value of these buildings to the Clanville HCA. The HIS Addendum provides a detailed response to Council's comments on demolition as outlined below. Through extensive historical (DA records) and fabric analysis undertaken of the existing dwellings. Urbis Heritage have established that most primary street-frontages within the	**Heritage Impact Statement Addendum & Updated Heritage**

Summary of Issue Raised	Response	Refer to
contribution to the character and significance of the HCA. The proposed demolition of these contributory buildings and gardens and the construction of a multi-storey residential flat building does not satisfy the objectives of the KLEP2015 to conserve the heritage significance of the conservation area in terms of loss of contributory property and introduction of a detracting building in the heritage conservation area.	subject site to Lord Street and Roseville Avenue are substantially modified. Some retain their original scale; however most have undergone notable changes to their principal facades that have altered their original presentation. These additions are the result of a previous heritage conservation approach which accepted prominent additions provided that the additions match the original style of the building. This has resulted in visually dominant changes, including some second storey additions, which do not have well resolved relationships with the original forms below. The dwellings may be perceived to have some value as a streetscape of early dwellings in passing views, but on closer inspection the streetscape is more prominently characterised by notably altered dwellings. The subject site constitutes the eastern extent of the HCA and given the changes to the dwellings within, is not considered to make a defining contribution to the significance of the HCA like intact dwellings do. The heritage significance of the HCA will be retained despite their removal. There is a fundamental question of the contribution of buildings, when it is deemed appropriate for significant development uplift to facilitate more housing in key strategic locations close to transport. Rather than noting buildings that are of a particular scale and period are automatically contributing, Urbis has conducted a detailed study to assess the intactness of these dwellings, to genuinely contribute as original dwellings to the conservation area, in which it has been found, with detailed evidence, that due to alterations and additions, they do not present as the original dwellings. Due to these modifications the buildings cannot make an important contribution to the character to the character of the HCA and therefore should not prevent development of more housing in a key location.	**Impact Statement Appendix T**
Inappropriate setting and view impacts The proposed development is inappropriate for the heritage conservation area (HCA) due to its bulk and scale. It will drastically and adversely alter the low-density residential character of the Clanville HCA, which includes many heritage items. The building will visually dominate and detract from the area's setting,	The HIS Addendum provides a detailed response to Council's comments relating to the inappropriate setting and view impacts of the development. The updated VIA assesses 10 additional viewpoints from surrounding locally listed buildings. The proposal will be visible from several nearby heritage items, most notably the Roseville Scout Group Hall (I115), with lesser visibility from other items including 31 Roseville Avenue (I697), 22 Roseville Avenue (I695), 10–16 Roseville Avenue (I112–I114), 19 Lord Street (I106), 32–40 Roseville Avenue (I698–I699) and St Luke's Hall (I689). Of the ten additional viewpoints assessed, only one Viewpoint 16 at *31 Roseville*	**Heritage Impact Statement Addendum & Updated Heritage Impact**

Summary of Issue Raised	Response	Refer to
overshadowing the single-storey Federation and Interwar houses with their established gardens. The development will also negatively impact the setting of the nearby Scout Hall, which holds historical significance due to its prominent corner location. The large building will overshadow the Scout Hall, altering its visual prominence. Additionally, the proposal will obscure views from several heritage items on Roseville Ave and Lord Street, and from the heritage conservation area across the road on Lord Street. The transition from low-rise to high-rise will result in a loss of trees and a towering built form, providing little visual relief. Overall, the development does not respect the established built form and landscaped character of the streetscape, leading to irreversible impacts on the heritage significance of the locality.	*Avenue, adjacent to the Scout Hall* experiences a **severe** visual impact. Two viewpoints (*19 Lord Street* and *22 Roseville Avenue*) experience **moderate–severe** impacts, with the remainder rated **moderate** or **negligible**. Views from other heritage items are generally filtered or screened by existing vegetation, topography, and intervening development, resulting in minor or negligible change. **Figure 39** below shows the location of the site (edged in blue) within the full extent of the HCA (edged in red). The approximate location of the viewpoints assessed as having moderate-severe impacts are identified in yellow. As can be seen, the proposal is limited towards the western edge of the HCA, and the large majority of the HCA will remain unaffected by the development. The updated HIS finds that the proposed development will not impact on the setting or significance of the HCA. Figure 39 Location of moderate-severe view impacts within the HCA 	**Statement Appendix T** **Updated Visual Impact Assessment Appendix I**

Summary of Issue Raised	Response	Refer to
	The VIA and HIS have been updated to respond to the revised design. The revised scheme reduces height, bulk and massing, increases upper-level setbacks, lowers the podium height, and applies a material palette informed by the surrounding Clanville HCA. These changes lessen visual prominence and improve the interface with heritage items. For the Scout Hall, impacts are most apparent in views from the western end of Roseville Avenue. These are moderated by: ▪ A four-storey human-scale podium adjoining the Hall. ▪ Retention and augmentation of mature vegetation. ▪ Introduction of an activated green space to the south, enhancing its setting and interface. No changes are proposed to the setting or curtilage of any heritage item. The development scheme proposed for the subject site responds to a needed source of high-density residential living opportunities within the vicinity of multiple public transport corridors as per the TOD provisions. Given the subject site's proximity to the Roseville train station, and the effect of the Housing SEPP (existing TOD sites and LMR) and Council's alternative, the area's future character is expected to change. As a result of these changes, it is acknowledged that heritage conservation areas and heritage items will exist in the future in the context of higher density development than what exists today. The proposed development aligns with this anticipated transformation; however, it is recognised that the heritage conservation provisions of the KLEP 2015 and KDCP are relevant to the SSDA. Whilst DCPs do not apply to SSD under s2.10 of the Planning Systems SEPP, the Ku-ring-gai Development Control Plan still provides relevant guidance to assess the impacts a development could have on the HCA and the heritage items in the vicinity. Nevertheless, it is noted that the heritage conservation provisions of the KDCP do not anticipate the scale of development that the Housing SEPP (TOD and LMR) and Council's alternative would allow. Therefore, there are challenges in reconciling the objectives of the KDCP and the project. Using the KDCP provisions as guidance, it is acknowledged in the HIS that there will be some visual impact given the notable	

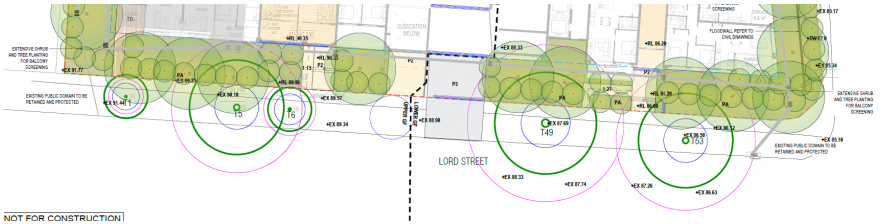
Summary of Issue Raised	Response	Refer to
	difference in scale between the dwellings in the surrounding HCA and the proposed development. However, measures to moderate the difference in scale and maintain some architectural dialogue with the surrounding area have been included in the proposal to mitigate heritage impacts on the adjacent listed item, heritage items within the vicinity and the local Clanville HCA.	
Inadequate setbacks The proposed 9-storey building does not respect the established pattern of built elements in the streetscape, being larger and taller than all surrounding buildings. It features a sheer 5-storey base with a small setback for the 4 storeys above, resulting in insufficient setbacks to provide a transition between adjacent buildings of different scales. The setback from the Scout Hall will be 10 metres from a 5-storey high sheer wall, and just over 12 metres from the stone building to a 5-storey high sheer wall. The proposed 5 storey wall will have the appearance of a rectilinear sheer high wall which is notably different in scale and contrast to the single storey heritage buildings.	The HIS Addendum provides a detailed response to Council's comments in relation to inadequate setbacks. The setbacks of the proposed development have been informed by the established setback pattern within the surrounding Clanville HCA. The proposal incorporates a principal façade setback to Lord Street and Roseville Avenue that is consistent with the existing surrounding dwellings within the HCA and features a 6m setback to the podium level and an increased setback of 9m to the base of the tower form to provide a visual transition between the development and the adjacent Roseville Scout Hall item. Additionally, the scheme of the proposal has been revised to include a reduce podium height of four storeys to the Roseville Scout Hall item interface in the north-eastern corner of the subject site.	**Heritage Impact Statement Addendum & Updated Heritage Impact Statement Appendix T**
Adverse impacts on character The proposed minimal setbacks to the side boundaries on both sides, is not the general character of the streetscape and will increase the bulk of the building and have an obtrusive and unacceptable impact. The proposed development will be located in the centre of the Clanville HCA as well as the vicinity of several heritage items and an HCA and does not harmonise or enhance the area's distinctive identity as it is very	The HIS Addendum provides a detailed assessment in relation to adverse impacts on character. The design development of the proposal has been resolved in conjunction with ongoing heritage advice to ensure limited impacts to views of the HCA. Further, as discussed above, no works as part of the proposal are to be undertaken to the adjacent heritage item or heritage items within the vicinity. Whilst it is acknowledged that a degree of visual impact will result to the surrounding streetscapes due to the proposed development, the proposal has been architecturally resolved to provide a sensitive resolution to the existing character of the area, ensuring that the significance of the heritage items within the vicinity is conserved.	**Heritage Impact Statement Addendum & Updated Heritage Impact Statement Appendix T**

Summary of Issue Raised	Response	Refer to
dominant in the streetscape and will be visible from all surrounding sides.	While the proposed scheme has a contemporary character and massing that differs to the early 20th century character and single-double storey scale of the dwellings in the surrounding HCA, the design incorporates landscaping and material elements which allow the proposal to respond to the established character of the HCA. The material palette selection responds to the heritage character of the surrounding heritage items within the vicinity and the broader Clanville HCA dwellings, through incorporation of darker earthier tones to the podium to be read at streetscape level, while the upper levels incorporate lighter neutral tones differentiating between the podium and upper massing, and emphasises the human-scale resolution of the podium form. The proposed design features a contemporary architectural style as opposed to the older Federation styles which characterise the HCA which would be inappropriate due to the larger scale of the building. This architectural approach is in line with the anticipated future redevelopment within the vicinity of the subject site and the planned future character of the area arising from the Housing SEPP and Council's alternative controls. The proposed footprint and vertical scale is larger than the one-two storey dwellings characterising the HCA, however, the increased scale of the development addresses the increased local demand for affordable residential options and is in line with planned future higher density character of the area arising from the Housing SEPP. The use of a podium partly moderates the difference in scale between the development and its surrounds. Views to items within the vicinity will not be extensively impacted as a result of the proposal due to the situation of the development in relation to items within the vicinity located along Roseville Avenue and Lord Street, with the exception of views to the Roseville Scout Group Hall Item. Some minor views from the western end of Roseville Avenue looking east to the item may impacted, however any potential impacts will be largely mitigated through the existing densely vegetated character of Roseville Avenue. The densely vegetated character of the Roseville Avenue and Lord Street streetscape will be retained as per the proposed development which includes a degree of new streetside plantings that are in line with the character of the area.	

Summary of Issue Raised	Response	Refer to
	It is understood that the proposed building would be of a notably different scale and typology than that which currently exists. However, the proposal exists in a legislative context which will facilitate some uplift of the same type in nearby areas with vicinity to the nearby Roseville railway station. The development would be in line with the planned mixed future character of this area whilst providing in demand affordable accommodation. The location of this development is appropriate given its proposed location in an already highly modified streetscape and in close proximity to a key transport link. The proposed development is in line with the updated TOD provisions which pertain to developments located within the vicinity of transport corridors. The design of the proposal has been resolved with ongoing guidance from a heritage consultant so as to mitigate adverse impacts to the character of the surrounding HCA. The development would be in line with the planned future character of this area, of varying building heights and scales, whilst providing in demand affordable accommodation. The location of this development is appropriate given its proposed location in an already highly modified streetscape and in close proximity to a key transport link.	
Incompatible bulk-massing scale and form The proposed 9-storey residential building is inconsistent with the surrounding area's bulk and scale. It will adversely affect views from heritage conservation areas (HCAs) and heritage items, obstructing views of the sky, tree canopies, and terracotta rooftops. The development does not match the predominant scale of its setting, impacting the Clanville HCA and nearby heritage items. The large scale of the building is out of context with the streetscape and lacks a transition to the adjacent buildings. The increased density will irreversibly degrade the heritage significance of the Clanville HCA and nearby heritage areas due to its inconsistency	The HIS addendum (**Appendix T**) provides a detailed assessment in relation to incompatible bulk-massing scale and form. The scale and form of the proposal has been developed in conjunction with ongoing heritage consultation to produce a scheme that acknowledges the forms of existing conservation area and heritage items within the vicinity, including the adjacent heritage listed Roseville Scout Hall item. The revised proposal integrates a four-storey scale podium component in the north-east corner adjoining the heritage item to establish an informed and considered interface. Additionally, the scheme applies a dark earth-tone material application to the podium level which has been informed by the material treatment of the surrounding Clanville HCA and will be read in relation to the adjacent heritage items. Overall, careful refinement of the scheme's material and colour palette, massing configuration, architectural articulation and horizontal façade articulation establish a form that interacts with heritage listed items within the vicinity and the properties within the HCA.	**Heritage Impact Statement Addendum & Updated Heritage Impact Statement Appendix T**

Summary of Issue Raised	Response	Refer to
with the existing low-scale historic built form. At 9 storeys, it will be the tallest structure in Roseville, creating a disproportionate and overbearing impact, disrupting sightlines, and failing to provide an appropriate transition in built form.	While the proposed scheme has a contemporary character and massing that differs to the early 20th century character and single-double storey scale of the dwellings in the surrounding HCA, the design incorporates landscaping and material elements which allow the proposal to respond to the established character of the HCA. The proposed design features a podium level on its primary frontages to Lord Street, Roseville Avenue and Martin Lane, and to the western boundary with existing dwellings, to relate to the human scale of the surrounding locally listed items within the vicinity including the adjacent Roseville Scout Hall item and the dwellings within the broader Clanville HCA. The massing of the proposal similarly considers the pedestrian connection with the adjacent Scout Hall item through incorporation of a green space adjoining the heritage item to the south. The green space will serve to activate the use of the item and will establish an appropriate interface with through increased setbacks between the development. Further, the integration of a central connecting courtyard will break up the massing of the proposal. The form of the development is also mitigated through the proposal's chamfered edges and balcony protrusions. The material palette selection responds to the heritage character of the surrounding heritage items within the vicinity and the broader Clanville HCA dwellings, through incorporation of darker earthier tones to the podium to be read at streetscape level, while the upper levels component incorporates lighter neutral tones differentiating between the podium and upper masses, and emphasises the human-scale resolution of the podium form. It is understood that the proposed building would be of a notably different scale and typology than that which currently exists. However, the proposal exists in a legislative context which will facilitate some uplift of the same type in nearby areas with vicinity to the nearby Roseville railway station. The development would be in line with the planned future character of this area whilst providing in demand affordable accommodation.	
Landscape loss The proposed development's tree plantings at the site frontages are limited to small and medium-sized trees, which do not align with the established landscape context where tall trees enhance the streetscape. This	The HIS Addendum provides a detailed assessment in relation to landscape loss. Extensive historical analysis of the dwelling group has not found any existing landscape features on the subject site to be of significance. The proposed development incorporates extensive landscape plantings particularly around the boundary to ensure	**Updated Landscape Plans Appendix D**

Summary of Issue Raised	Response	Refer to
lack of tall trees fails to contribute effectively to the streetscape and amenity, especially given the scale of the proposal. The extensive hard surface treatment proposed for the Lord St frontage is uncharacteristic of the existing streetscape and will negatively impact trees. Further root mapping by a consulting arborist is needed to assess the impact on existing trees. Additionally, the proposed use of predominantly native plants does not match the established landscape character of the heritage conservation area, which typically features exotic species.	that the densely vegetated character of the surrounding Clanville HCA is retained and that appropriate screen plantings are incorporated In terms of the tree planting specification, large trees, Australian natives and evergreens are proposed with a mature height of up to 12m and a 15m mature canopy spread, to respond to local character and promote diversity. 105 additional trees are proposed to be planted on site. The following tree species are proposed within the site setbacks: ▪ Crepe Myrtle (*Lagerstroemia indica*) – mature height up to 4m ▪ Blueberry Ash (*Eleaocarpus reticulatis*) – mature height up to 6m ▪ Summer Beauty (*Corymbia ficifolia*) – mature height up to 12m ▪ Common Lilly Pily (*Acmena smithii*) – mature height up to 5m ▪ Lemon Scented Myrtle (*Bachousia citriodora*) – mature height up to 5m ▪ Water Gum (*Tristaniopsis laurina*) – mature height up to 12m ▪ Weeping Lily Pily (*Waterhousea floribunda*) – mature height up to 10m As part of the updated Landscape Plans, the extent of hard surface treatments within the Lord Street setback has been reduced and the area of deep soil landscape increased, as shown in the figure below. Existing vegetation of significance located on the subject site is to be retained and incorporated into the proposal to retain the established landscape character of the HCA. The design scheme features minimal intervention of additional hard-paved area to the frontage of Lord Street, Roseville Avenue and through the centre of the site. Small sections of hard-paving have been incorporated to establish residential courtyards and pedestrian pathways in these areas. The proposed development incorporates extensive landscape plantings particularly around the boundary to ensure that the densely vegetated character of the surrounding Clanville HCA is retained and that appropriate screen plantings are incorporated. Continuation of substantial landscaping along the street front to both Lord Street and Roseville Avenue. This would continue the	**Heritage Impact Statement Addendum & Appendix T**

Summary of Issue Raised	Response	Refer to
	established character of street planting in the HCA and serve to soften the visual bulk of the development in the streetscape. Figure 40 Lord Street setback – deep soil landscape  SSDA Lodgement Landscape Design  Revised RtS Landscape Design *Source: Land + Form*	
Inappropriate form, details, materials and colours The proposed use of light-coloured materials and finishes will be visually dominating and obtrusive in the streetscape, especially when viewed from surrounding heritage conservation areas. It is recommended to use darker, earthy tones to create a more recessive building that better aligns with the aesthetic of the surrounding heritage items and conservation areas. The overall scale and form of the proposed development will be obtrusive and dominant, adversely	The HIS Addendum (**Appendix T**) provides a detailed assessment in relation to form, details, materials and colour. The HIS notes that the revised proposal incorporates the application of dark earth-tones to the podium component to establish visual emphasis, whilst the larger form is to be finished with a lighter brick material application to appear recessive in contrast with the darker podium form. The proposed material palette as a whole has been informed by the prevailing materiality of nearby heritage items within the vicinity and the broader Clanville HCA, whilst including contemporary elements so as to not mimic the heritage character of the surrounding streetscape. The HIS also notes that the contemporary materials such as brick and concrete on its façade articulation blends in with the neutral colour range of the existing character of the Clanville HCA.	**Updated Architectural Plans** **Appendix B Design Report Addendum** **Appendix C Heritage Impact Statement**

Summary of Issue Raised	Response	Refer to
impacting the heritage conservation area and nearby heritage items.	In addition to the above, the SDRP has reviewed the proposed materials and finishes and is in support of the colour palette. The SDRP's review found that the use of lighter material best achieved a recessive building form. The use of sandstone and other darker, earthy tones has been implemented within the ground plane and at lower levels to respond to the aesthetic of the surrounding area. The building massing has been carefully articulated to minimise the visual impact of the development on the surrounding area, including a reduction of the Building A podium height and the inclusion of increased setbacks within the Lord Street façade. Setbacks from the street which relate to the prevailing building line and the use of a podium to give less prominence to the highest part of the development. Incorporation of staggered setbacks which increase at the tower height place, to further reduce the appearance of the development as a singular monolithic mass in the streetscape. Incorporation of chamfered corners, horizontal articulation of floor slabs and undulating facade projection along Roseville Avenue to soften the presentation of the development's overall visual impact when read within the context of adjacent heritage items and the surrounding Clanville HCA. Utilisation of a material palette which has been informed by the material treatment of the surrounding Clanville HCA. The development incorporates darker earthier tones to the podium to be read at streetscape level, while the tower component incorporates lighter neutral tones differentiating between the podium and tower masses and emphasises the human-scale resolution of the podium form.	**Addendum Appendix T**

4.2. RESPONSE TO GOVERNMENT AGENCIES

Table 11 Response to Government Agencies

Summary of Issue Raised	Response	Refer to
TRANSPORT FOR NSW (TFNSW)		
TfNSW has reviewed the submitted information and has no requirements as the proposed development is unlikely to have a significant impact on the state classified road network.	Noted – no further action required.	**N/A**
HERITAGE COUNCIL OF NSW		
A review of the Roseville Avenue & Lord Street, Roseville Historical Archaeological Assessment by Artefact Heritage and Environment, dated March 2025 has found several inconsistencies affecting its conclusions. These relate to the history of the study area which identified that it was in use from 1814-1890s (Phase 2) and contained a dwelling and orchards (pg. 33) The assessment then states that on page 42 that the site has no known development.	The Historical Archaeological Assessment prepared by Artefact has been updated to respond to Heritage NSW's comments and to clarify that, whilst the study area is within the Clanville Estate land grant – which was in use during Phase 2 – the site itself was not located near the residence of the estate. The amended report identifies that there is no evidence to indicate that the study area contained structures associated with the estate or any other infrastructure. This information has been reclarified throughout the report. Therefore, it is accurate to state that the site has no known development associated with this period, as it was merely in the proximity of development associated with the Clanville Estate. Additionally, the updated report clarifies that the site has nil-low potential to contain significant archaeological resources, and as such the proposal is assessed to result in neutral impacts in terms of historical archaeology.	**Updated Historical Archaeological Assessment Appendix U**
The report also states that development in Phase 4 (1920s – present) would have removed any archaeology on the site. This conclusion is questioned as evidence from multiple archaeological sites across greater Sydney shows that housing from this period is not characterised by large	As discussed above, the updated Historical Archaeological Assessment clarifies that there is no evidence to suggest that the study area contained any structures or other infrastructure associated with the Clanville Estate, which limits the potential for archeologically significant resources to be found on the site.	**Updated Historical Archaeological Assessment Appendix U**

Summary of Issue Raised	Response	Refer to
scale excavation for foundations and archaeology is often present once they are demolished.	The report also states that agricultural remains and evidence of land clearance from Phase 1 and evidence of post-subdivision development during Phase 3 are not expected to have survived through the archaeological record. Moreover, the site observations identified that the site has high levels of ground disturbance associated with the construction of multiple dwellings and associated swimming pools and subsurface services on the subject site during Phase 4. Subsequently, it is the conclusion of the Historical Archaeological Assessment that even if archaeological resources associated with Phases 2 or 3 existed on the site (the potential of this is assessed as being nil-low) they would have been destroyed due to high levels of ground disturbance and future development.	
The Archaeological Assessment states that 'If considerably intact and in situ archaeological resources associated with Phases 1-3 are identified, they may reach the threshold for significance at a Local level' (pg. 58). Heritage NSW disagrees and considers that if substantially intact and in situ archaeology was uncovered on site from Phase 2, particularly from the years 1814-1850s, it would be of State significance given the rarity of uncovering early historical archaeology from the first half of the nineteenth century in this area.	The updated Historical Archaeological Assessment clarifies that Phases 1-3 are considered to have nil-low potential to have any significant archaeological resources, including Phase 2 since there is no evidence to suggest that the study area contained any structures or other infrastructure associated with the Clanville Estate. Based on this assessment, it is unlikely that substantially intact or in situ remains would be identified in the study area. If any archaeological resources were identified they are unlikely to be associated with any significant development and will likely be highly disturbed due to Phase 4 development, as described above. Potential remains associated with early structures would be limited to footings and former pathways which would only confirm historical sources (such as historical mapping) and offer no further research potential, meaning they would not meet the threshold for heritage significance.	**Updated Historical Archaeological Assessment Appendix U**

Summary of Issue Raised	Response	Refer to
	Therefore, the Historical Archaeological Assessment concludes that there is nil-low potential for substantially intact and in situ archaeology to be uncovered on the site, and any archaeology that was uncovered would not reach the threshold for significance as set out in the NSW Heritage criteria for assessing significance related to archaeological sites and relics. A full assessment against these criteria is provided in Section 5.2 of the amended report.	
The Archaeological Assessment should be updated to address the issues outlined above. The Conclusions and Recommendations regard historical archaeology should be reconsidered following update of the assessment and provide more suitable mitigation measures for any archaeological resource which may be present. As well as the unexpected finds protocol, these mitigation measures should include archaeological monitoring or possible test excavation to establish if archaeology is present. If archaeology is found to be present and assessed to be of local significance or above, an appropriate salvage excavation methodology will be required. Heritage NSW advises that the current approach for the management of any identified State significant archaeology is preservation and conservation in situ as a preferred heritage outcome.	As discussed above, the updated Historical Archaeological Assessment clarifies that there is no evidence to suggest that the study area contained any structures or other infrastructure associated with the Clanville Estate, which limits the potential for archeologically significant resources to be found on the site. The amended assessment concludes that the potential for the site to contain significant archaeological resources is nil-low and the impact of the proposed development on historical archaeology is neutral. Therefore, it is not considered necessary to include the additional mitigation measures identified by Heritage NSW as the site is unlikely to contain any significant archaeology.	
The updated Archaeological assessment should be provided to HNSW for review as part of the SSD process	Noted, this will be facilitated by DPHI.	**N/A**
SYDNEY METRO		
Following this review, Sydney Metro advises that it is not in a position to make a decision until the additional information outlined below is provided for Sydney Metro's further review: ▪ A detailed survey plan which accurately defines the boundaries between the development including the proposed building footprint, the rail corridor (first and second reserve), rail infrastructure and any	▪ A detailed survey plan which accurately defines the boundaries between the development including the proposed building footprint, the rail corridor (first and second reserve), rail infrastructure and any Sydney Metro substratum land is provided at Appendix G of the Metro	**Metro Impact Assessment Appendix N**

Summary of Issue Raised	Response	Refer to
Sydney Metro substratum land. All measurements contained within the survey plan must be verified by a registered surveyor. ▪ Plan and cross-sectional drawings showing the rail corridor, sub soil profile, proposed basement and/or foundation excavation and structural design of the development's sub-ground support adjacent to the rail corridor. All measurements contained within the cross-sectional drawings must be verified by a registered surveyor. ▪ An engineering impact assessment demonstrating that there will be no adverse impacts on the Sydney Metro Northwest rail corridor, in accordance with the Sydney Metro Underground Corridor Protection Technical Guidelines. ▪ Structural foundation layout and design documentation for the development, which demonstrates that: – the foundation design ensures that all loads from the development are transferred and have no adverse impacts on the rail corridor, rail infrastructure or rail easements; – any deformation induced by bulk excavation will not have adverse impacts on the rail corridor, rail infrastructure or rail easements. ▪ Risk assessment report, in accordance with Section 7.3 of the Sydney Metro Underground Corridor Protection Technical Guidelines. ▪ An electrolysis report, prepared by a suitably qualified consultant, on the electrolysis risk to the development from stray current and measures to control that risk. ▪ An acoustic assessment report, which confirms that the proposal; – Complies with the State Environmental Planning Policy (Transport & Infrastructure) 2021 and the NSW Department of Planning & Environment's document titled "Development Near	Impact Assessment. All measurements contained within the survey plan have been verified by a registered survey. ▪ Plan and cross-sectional drawings showing the rail corridor, sub soil profile, proposed basement and/or foundation excavation and structural design of the development's sub-ground support adjacent to the rail corridor are provided at Appendix A of the Metro Impact Assessment. All measurements contained within the cross-sectional drawings have been verified by a registered surveyor. ▪ An engineering impact assessment demonstrating that there will be no adverse impacts on the Sydney Metro Northwest rail corridor, in accordance with the *Sydney Metro Underground Corridor Protection Technical Guidelines*. Refer to the Metro Impact Assessment. ▪ Structural foundation layout and design documentation for the development, which demonstrates that the foundation design ensures that all loads from the development are transferred and have no adverse impacts on the rail corridor, rail infrastructure or rail easements; and that any deformation induced by bulk excavation will not have adverse impacts on the rail corridor, rail infrastructure or rail easements are provided at Appendix A of the Metro Impact Assessment. ▪ A Risk assessment report, in accordance with Section 7.3 of the Sydney Metro Underground Corridor Protection Technical Guidelines, is provided at Appendix B of the Metro Impact Assessment. ▪ An Electrolysis report, prepared by a suitably qualified consultant, on the electrolysis risk to the development from	

Summary of Issue Raised	Response	Refer to
Rail Corridors and Busy Roads – Interim Guideline" (2008) and the Sydney Metro Underground Corridor Protection Guidelines. – is designed, constructed and maintained so as to avoid damage or other interference which may occur as a result of air-borne noise, ground-borne noise and vibration effects that may emanate from the rail corridor during rail construction and operations; and – does not have any noise or vibration impacts on the rail corridor or rail infrastructure ▪ Section 1 of the Geotechnical Investigation states that the purpose of the report is to assess the hydrogeological conditions across the site. However, Section 5.2 (Groundwater) does not clearly specify the recommended groundwater level to be used for design purposes. Please confirm the groundwater level to be adopted for design, in line with the overall objective of assessing site-wide hydrogeological conditions. ▪ Desktop impact assessment on Sydney Metro assets, as referenced in the Geotechnical Investigation Report and Environmental Impact Statement.	stray current and measures to control that risk, is provided at Appendix F of the Metro Impact Assessment. ▪ An Acoustic assessment report, which confirms that the proposal: o complies with the *State Environmental Planning Policy (Transport & Infrastructure) 2021*, the *Development Near Rail Corridors and Busy Roads – Interim Guideline* and the *Sydney Metro Underground Corridor Protection Guidelines*; o is designed, and will be constructed and maintained, so as to avoid damage or other interference which may occur as a result of air-borne noise, ground-borne noise and vibration effects that may emanate from the rail corridor during rail construction and operations; and o does not have any noise or vibration impacts on the rail corridor or rail infrastructure is provided at Appendix J of the Metro Impact Assessment. ▪ Groundwater levels observed in the monitoring wells during the investigation period are provided within section 5.2 of the Geotechnical Investigation Report (Appendix E of the Metro Impact Assessment). The design groundwater level can be referenced from the observed data in the report, taking into account the lowest structural level of the site, which is Basement 3 at RL 75.200 toward the northeast, varying up to Ground Floor Level at RL 90.350 in the southeast, giving a total level difference of approximately 15.15 m. As the RL 75.200 refers to the top of the slab, an additional 600 mm is considered to account for slab thickness and compacted	

Summary of Issue Raised	Response	Refer to
	subgrade, resulting in a base level of approximately RL 74.600. ▪ The Desktop impact assessment on Sydney Metro assets is provided at Appendix J of the Metro Impact Assessment.	
AUSGRID		
No objection to the proposal. The Applicant is encouraged to continue to discuss their requirements directly with Ausgrid, and that a connection application is made to as soon as practical. Special care should be granted to surrounding Ausgrid cables within vicinity of the proposed development and any future driveways.	Noted	**N/A**
DCCEW WATER		
No objection to the proposal. A condition of consent has been recommended requiring the applicant to obtain a water access license to account for the maximum predicted water take for construction and operation activities unless an exemption applies.	Noted	**N/A**
NSW SES		
Redesigning the proposed flood wall to minimise afflux on pedestrian footpaths, and seeking advice from the Department of Climate Change, Energy, the Environment and Water (DCCEEW). The currently proposed design increases “the flood depth on the footpath from 340mm deep to 530mm deep”3, this depth of flooding is unsafe for vehicles, children and the elderly	The flood wall has been deleted as part of the revised proposal.	**N/A**
Ensuring any emergency management strategy considered for the site aligns with the existing emergency management arrangements and the Shelter-in Place Guideline for Flash Flooding where applicable.	An emergency management strategy is provided at Section 8 of the updated FIRA, taking into consideration the Shelter-in Place Guideline for Flash Flooding where applicable.	**Updated FIRA Appendix M**
Recommend considering the impacts of climate change. It is estimated that the actual probability of a 1 in 100 AEP for this catchment area is approximately a 1 in 44 AEP event for the current 2024 scenario. For the	The impacts of climate change are considered at Section 7.1.5 of the updated FIRA. It is considered that the assessment 19.7% increase against the 2024 scenario is appropriate because it	**Updated FIRA Appendix M**

Summary of Issue Raised	Response	Refer to
proposed development site, this could result in more frequent inundation and/or isolation than what is currently expected based on previous modelling.	exceeds the median increase for long-term intensity increase for scenario SSP1-2.6 (increase of approximately 17%). The increase is approximately equivalent to the design 0.2% AEP storm event for which freeboard is still provided.	
Recommend ensuring that all openings to the basement (ramp, vents, etc) are situated above the Probable Maximum Flood (PMF), or reconsidering basement carparking if this is not feasible to reduce risk to life and property	All openings to the basement ramp are situated above the PMF as shown on Figure 15, Section 6 of the FIRA and Appendix 1, civil drawing no 400 of IWMP.	
CPHR		
Flood behaviour The Flooding SEARs require a Flood Impact and Risk Assessment (FIRA) to be prepared in accordance with the Flood Impact and Risk Assessment – Flood Risk Management Guideline LU01 (DPE, June 2023). The Flood Impact and Risk Assessment Report (PTC,1 April 2025) (Flood Report) provided as part of this EIS does not provide adequate information to ensure flood constraints in the vicinity of the development can be effectively considered. The typical outputs of an adequate flood assessment are outlined in Table 6 of the Flood Impact and Risk Assessment – Flood Risk Management Guideline LU01.	The updated FIRA provided at **Appendix M** has been prepared in accordance with Flood Impact and Risk Assessment – Flood Risk Management Guideline LU01 (DPE, June 2023). The FIRA details the consideration of flood constraints in the vicinity of the development at Section 4 and 7/Appendix 2. The required outputs in accordance with Table 6 of the Flood Impact and Risk Assessment – Flood Risk Management Guideline LU01 are provided at Appendix 2 of the FIRA.	**Updated FIRA Appendix M**
No objection to the proposal subject to the following: ▪ Section 73 compliance certificate ▪ Building Plan approval ▪ Care to certina tree species within proximity to Sydney Water underground assets. Any trees proposed or planted that may cause destruction to Sydney Water assets will require removal or compensation.	Noted	**N/A**

4.3. RESPONSE TO PUBLIC SUBMISSIONS AND SPECIAL INTEREST GROUPS

The following response to public submissions and special interest groups has been structured according to the categorisation of issues and thematic breakdown provided by Gyde at section 3.2 and Table 1 of their ER Addendum (**Appendix F**) and **section 2.1** of this RTS report.

Table 12 Response to Public Submissions and Special Interest Groups

Theme	Response
Traffic and parking	
289 mentions of traffic and parking in submissions ▪ TIA does not reflect actual conditions and traffic counts. ▪ Inadequate capacity of existing road infrastructure to accommodate current or additional traffic volumes. ▪ Exacerbation of existing congestion on local roads (Lord St, Roseville Ave, Martin Lane, Clanville Rd, Hill St) already operating at capacity with peak-hour delays. ▪ Increased risk of severe traffic bottlenecks due to reliance on a single signalised access point to Pacific Highway. ▪ Generation of parking overflow exceeding 100 vehicles, leading to spill over into already congested, commuter-occupied residential streets. ▪ Increased congestion and safety risks on Martin Lane due to its narrow, effectively one-way configuration.	A revised Transport Impact Assessment (**TIA**) has been provided by Ason Group at **Appendix J** which has informed the response to the key themes identified in the submissions relating to traffic and parking. ▪ **Traffic study accuracy** - the revised TIA has used site specific traffic surveys undertaken by ASON Group on 27 March 2025 at key intersections surrounding the site, along with observations of queues and delays. It also used current Transport for NSW data showing traffic volumes and changes since COVID-19 ensuring modelling reflects actual current conditions. SIDRA modelling was calibrated using observed data ensuring intersection performance assessments reflected actual local conditions. Figure 41 Surveyed Intersections  *Source: Ason Group*

Theme	Response
▪ Elevated road safety risks for children and pedestrians near schools and the Scout Hall due to higher traffic volumes.	▪ **Road capacity** – Baseline modelling shows all surveyed intersections currently operate at Level of Service (LOS) A, except Pacific Highway/Clanville Rd/Shirley Rd, which operates at LOS B/C in peak periods which is typical for a major arterial. With the development in place, LOS, average delay, and degree of saturation remain unchanged, indicating there is spare capacity at local intersections. ▪ **Congestion** – The revised TIA has found that the development is expected to add about 42 more cars in the morning peak hour and 31 more in the afternoon peak hour. This is less than one extra car per minute. This traffic will be spread across different routes, so no single street will see a big increase. ▪ **Access point reliance** – The TIA notes that cars will enter and leave via Lord Street, then use Hill Street to reach Pacific Highway. Modelling shows the Pacific Highway/Clanville Rd/Shirley Rd intersection continues to operate at LOS B/C post-development, with no increase in degree of saturation. The low trip generation and multiple approach/departure options reduce reliance on any single movement. ▪ **Parking overflow** - The development includes 344 parking spaces, which is more than the minimum required under the Housing SEPP and Council's DCP but less than the maximum allowed under Council's DCP. This includes spaces for residents, visitors, car share vehicles, and affordable housing tenants. The TIA confirms that this ensures the proposed parking can meet demand, so people don't need to park in surrounding streets. The parking supply is designed to meet resident needs while supporting sustainable travel (a key principle of the TODs) and to avoid on-street spillover. Visitor parking has been updated to meet Council's DCP requirements (42 spaces) and three car share spaces have been provided.to encourage reduced private car ownership. ▪ **Martin Lane safety** – Martin Lane is not proposed as a vehicle access point for the development. All site access is via Lord Street, avoiding additional traffic on the narrow laneway. The TIA This design choice directly addresses concerns about congestion and safety in Martin Lane. ▪ **Pedestrian safety** – The TIA confirms that the driveway design meets safety standards for visibility. Safety features such as mirrors, warning lights, and signs will be used. The access point is away from the Scout Hall, and the small increase in traffic means the risk to pedestrians will be low. ▪ **Construction Phase Management:** Section 9.6 of the updated TIA (**Appendix J**) details an overview of the Construction Pedestrian and Traffic Management Plan (**CTPMP**) which confirms that non construction worker parking will be provided on site. Workers will be encouraged to use the nearby Roseville Station and bus services; site induction will include public transport information and arrangements for tool/equipment drop-off. Heavy vehicle routes, works zones and pedestrian/cyclist safety measures are outlined in Sections 9.5-9.8 to ensure minimal

Theme	Response
	disruption. A detailed CTMP will be developed prior to commencement of construction in accordance with relevant conditions of consent. The updated TIA demonstrates that the proposed development will generate only minor additional traffic volumes, well within the capacity of the local road network. Intersection performance will remain at existing levels, parking provision is sufficient to avoid overflow, and access arrangements protect sensitive streets and pedestrian safety. Overall, the transport and parking impacts are assessed as acceptable and manageable with standard design and operational measures. By adding local traffic data, balancing parking supply, and managing construction impacts, the assessment ▪ Promotes sustainable travel behaviour. ▪ Reduces car dependency. ▪ Maintains local amenity and accessibility. The changes strengthen the RTS by demonstrating responsiveness to stakeholder feedback and alignment with State and Council transport priorities.
Surrounding context/character	
230 mentions of surrounding context/character in submissions ▪ EIS misrepresents likely future development; ignores TOD Alternate Preferred Scenario and Sydney Metro excavation limits; overestimates surrounding redevelopment potential; nine houses on site are contributory to the Clanville HCA. ▪ Inconsistency with East Roseville's low-rise, heritage-focused character. ▪ Permanent erosion of the suburb's garden suburb identity and overall streetscape integrity.	Public submissions raised concerns that the Environmental Impact Statement (**EIS**) was not reflective of the likely future development in East Roseville, as it did not consider Ku-ring-gai Council's Alternative Planning Scenario or the constraints of Sydney Metro excavation limits. Submissions also argued that the proposal would be inconsistent with East Roseville's low-rise, heritage-focused character and would permanently erode the suburb's "garden suburb" identity. At the time of lodgement of the EIS (16 April 2025), Ku-ring-gai Council's Alternative Planning Scenario was not a relevant environmental planning instrument or a "proposed instrument" under section 4.15(1)(a)(ii) of the EP&A Act. It was endorsed by Council on 5 June 2025 and submitted to DPHI on 10 June 2025, both dates after lodgement. Accordingly, it was not required to be considered in the EIS to assess future character and its omission at that stage was consistent with statutory requirements. As the Housing SEPP Transit-Oriented Development (**TOD**) provisions applied in Roseville, the initial future character assessment was therefore based on the TOD provisions. Council's alternative was finalised on 14 November 2025, as such the RTS now considers the final gazetted changes to the Ku-ring-gai LEP 2015 and the Housing SEPP, made by *State Environmental Planning Policy (Ku-ring-gai Station Precincts) 2025*.

Theme	Response
	The Response to Submissions includes a thorough assessment, applying the relevant planning principle for compatibility in the urban environment, against the State and local planning frameworks relevant to the desired future character of the area: ▪ Council's finalised alternative controls for the Roseville Station precinct ▪ Areas excluded from the LMR provisions under the Housing SEPP, as shown on the Low and Mid Rise Housing Exclusion Map (LMR exclusion map – **Figure 10**) that will remain low density (including areas within the Sydney Metro reserves). ▪ Adjacent mapped TOD sites (including 18-20 Roseville Avenue and 18-20 Bancroft Avenue & 23-27 Lord Street) ▪ Potential LMR development outside the LMR exclusion areas to the north and east of the site, within 800m walking distance of Roseville Station. This assessment found that, while the proposal is different to the existing low-scale character, it appropriately reflects and is compatible with the future mixed character envisaged for East Roseville by both State and local planning frameworks. **Inconsistency with East Roseville's low-rise, heritage-focused character** ▪ The site is within 200 metres of Roseville Station and is subject to the TOD provisions under the Housing SEPP, which identify it as suitable for increased market and affordable rental housing. ▪ While these controls have been disapplied to some surrounding sites, sites to the immediate north and south remain subject to TOD controls and can develop to a similar scale. ▪ The LMR controls apply to sites to the north and east, which allow for development of at four storeys, including the Infill Affordable Housing (**IAH**) bonus. ▪ The current low-rise character is acknowledged; however, the future character will be a mix of low- and mid-rise residential buildings with a range of building heights alongside retained Federation-period single-storey dwellings and heritage properties. ▪ A detailed assessment found that, while the proposal is taller than existing homes, the revised development will be consistent with the mixed nature of the desired future character, and complement the existing heritage character by including key elements such as: - **Setbacks** consistent with the prevailing development pattern, with upper levels set back 9–12 metres to reduce bulk.

Theme	Response
	- **Height transitions**, stepping down to four storeys at the edges closest to existing dwellings and heritage items, including the Scout Hall. - **Material palette** refined in response to State Design Review Panel (**SDRP**) advice, using brick, sandstone, and darker tones at podium level to complement the Clanville Heritage Conservation Area (**HCA**). - **Extensive landscaping** that softens the building's appearance, integrates with the streetscape, and retains existing trees. ▪ These measures ensure the development respects the heritage context while fitting into the planned mix of building types in the area. **Permanent erosion of the garden suburb identity and overall streetscape integrity** ▪ The "garden suburb" character — generous landscaped setbacks, mature canopy trees, and a mix of native and exotic plantings — was a guiding design principle from the outset. ▪ The proposal protects and reinforces this identity by: - **Retaining the central significant mature tree** in the courtyard. - **Increasing deep soil area** from 23% to 30% of the site in response to submissions — more than double the Apartment Design Guide minimum. - **Planting 105 new trees**, achieving 39.7% canopy cover, exceeding the Government Architect's 25% benchmark. - **Providing landscaped setbacks** to all boundaries, supporting substantial tree planting and maintaining a green edge to the street. - **Mixing native and exotic species** to reflect the established planting character of East Roseville. These measures align with DPHI's requirement that the proposal retain and enhance the area's green, leafy character as part of the desired future streetscape, even as building forms evolve under future planning scenarios. **Why the original EIS did not assess against Ku-ring-gai Council's Alternative Planning Scenario** At the time the EIS was lodged (April 2025): ▪ The Alternative Planning Scenario was **not in force** as an environmental planning instrument and was **not a relevant "proposed instrument"** under section 4.15(1)(a)(ii) of the EP&A Act. ▪ It was **not endorsed by Council until 5 June 2025** and **not submitted to DPHI until 10 June 2025** — both dates after the EIS lodgement.

Theme	Response
	▪ DPHI had not confirmed agreement for the Alternative Planning Scenario to replace the TOD controls, and Council's legal challenge to the TOD controls was still before the courts. Given this, the EIS correctly referenced the **current, in-force TOD controls** under Chapter 5 of the Housing SEPP, which were the applicable statutory provisions at the time. This approach is consistent with other EIS documents for "saved" / mapped TOD sites in Ku-ring-gai, many of which either make no reference to the Alternative Planning Scenario or only note why it was not considered. **Justification for the approach to assessing future character in the original EIS** ▪ The EIS assessed future character using the **statutory controls in force at the time** the TOD provisions under the Housing SEPP because these were the only confirmed planning framework noting that Council's alternative was not endorsed by Council until 5 June 2025. ▪ DPHI only issued guidance on whether the LMR controls would apply to areas no longer covered by TOD provisions in August 2025, after lodgement. ▪ A review of other Ku-ring-gai TOD site EIS documents shows **no consistent approach** to considering Council's alternative scheme, with most assuming Housing SEPP controls govern surrounding context. ▪ Given the highly uncertain status of the 'Alternative Planning Scenario' at the time of lodgement of the EIS, as reflected above, the alternative planning scenario was not relevant to the future character of the area and was not a matter which was required to be considered as part of the EIS. The approach taken in the EIS was therefore reasonable and consistent with practice across similar SSDs, ensuring the assessment was based on the **current, enforceable planning instruments at that time**. ▪ Notwithstanding the above, now that the Council's alternative controls have been gazetted, the RTS has since expanded the future character analysis to include both the TOD provisions, LMR controls and Council's adopted alternative controls. ▪ The site is in a location identified for change, with planning controls allowing a mix of low- and mid-rise housing near public transport, alongside single storey dwellings and retained heritage items. **Rationale for including potential future development over Sydney Metro reserves in the future character assessment** ▪ DPHI's key issues letter required the desired future character assessment to take into account the **protection reserves around Sydney Metro underground infrastructure**.

Theme	Response
	▪ The assessment within the EIS acknowledged these reserves as a significant constraint but took the view that they do **not prevent redevelopment** of affected sites as lots could be appropriately amalgamated to allow for adequate basements. ▪ Council's alternative controls and concurrent changes to the Housing SEPP now prohibit the application of the LMR controls to properties to the west of the site as part of the LMR exclusion area. ▪ As these sites are now unable to be developed for residential flat buildings under the LMR controls these sites have been considered to remain low rise single dwellings in the revised future character assessment. The proposal has been assessed against the desired future character of the Roseville area and found to be compatible with this mixed future character. It incorporates key elements including height transitions, consistent setbacks, heritage-responsive materials, and substantial landscaping that ensure it respects East Roseville's heritage and garden suburb identity, while aligning with the planned transition in character. Refinements made in response to SDRP and DPHI feedback further strengthen its fit within the evolving streetscape. The original EIS applied the correct statutory controls in force at the time of lodgement, consistent with other TOD site assessments, and has since been updated to address Council's alternative controls.
Planning	
227 mentions of planning in submissions ▪ Undermining of strategic planning outcomes by proceeding prior to the finalisation of Ku-ring-gai Council's "Preferred Scenario". ▪ Misapplication of the SSD/TOD planning pathway, bypassing local planning controls and preventing proper community-level assessment. ▪ Inconsistency with Council's established vision for heritage protection and low-density zoning, resulting in erosion of the area's established character. ▪ Statutory compliance, inconsistent with Ku-ring-gai LEP 2015, DCP, Apartment Design Guide, Housing SEPP 2021, and objects of the	**1. Strategic Planning Outcomes** The proposal was lodged in full compliance with the planning framework and Departmental guidance in place at the time the key relevant facts and dates are provided below: ▪ **Nov 2023** – State Government introduced Infill Affordable Housing (IAH) provisions including SSD pathway. ▪ **May 2024** – Transport Oriented Development (TOD) provisions commenced. ▪ **21 November 2024** – Council and DPHI agreed to consult on four alternative scenarios, each delivering at least the same dwelling capacity as TOD. ▪ **15 November – 17 December 2024** – Exhibition of four scenarios: – Scenarios 2a and 2b allowed development on the site at a scale similar to TOD. – Scenarios 3a and 3b excluded the site. ▪ **January 2025 –** SEARs issued for the project. ▪ **31 Mar 2025** – Council resolved to exhibit Scenario 3b (excludes site). ▪ **2 April – 22 April 2025** – Scenario 3b exhibited; not endorsed or in force as a statutory planning control.

Theme	Response
EP&A Act; inadequate independent environmental and infrastructure studies. ▪ Objection to the proposed height variation on the grounds that the applicant has used an inappropriate Legge methodology instead of the Merman approach for determining “ground level (existing)”, has treated the in-fill affordable housing height bonus as an entitlement, and has failed to adequately justify the exceedance or demonstrate compatibility with the surrounding low-rise, heritage-constrained context.	▪ **15 April 2025** – DPHI Housing Policy and Codes team confirmed to applicants that the TOD controls still applied in Ku-ring-gai, and SSD applications could be lodged immediately. ▪ **16 April 2025 –** SSDA formally lodged on the NSW Planning Portal under TOD/IAH provisions. ▪ **1 May – 28 May** – SSDA formally exhibited ▪ **17 May 2025** – DPHI Housing Policy and Codes team advised that the TOD controls would be removed after 13 June 2025, but SSD applications lodged or with valid SEARs before that date would be “saved”. ▪ **5 Jun 2025** – Council endorsed its alternative TOD proposal. ▪ **10 Jun 2025 –** Council’s alternative proposal formally received by DPHI. ▪ **13 Jun 2025** – TOD controls removed from most of Ku-ring-gai, except for “saved” SSD applications which remain mapped under the Housing SEPP including this site. **Justification:** ▪ Earlier exhibited Council scenarios (Scenarios 2a and 2b) supported similar scaled development on the site, meaning exclusion was not certain until the preferred scenario was considered by Council for exhibition at its meeting on 31 March 2025. ▪ At lodgement, the Alternative Planning Scenario was **not in force** as an environmental planning instrument and was **not considered a relevant “proposed instrument”** under section 4.15(1)(a)(ii) of the EP&A Act. ▪ The Department’s guidance was explicit that applications lodged or issued with valid SEARs before submission of an alternative scheme would be assessed under the TOD controls in place at lodgement/issue of SEARs. ▪ Given this clear Departmental position, the lodgement and determination of the SSDA does not undermine strategic planning. The application was validly lodged under the applicable controls and is currently being assessed in accordance with them. **2. SSD/TOD Planning Pathway** The pathway was correctly applied and is consistent with State housing policy for these reasons. ▪ TOD provisions were introduced to increase housing supply including affordable rental housing in locations with strong public transport access. ▪ IAH provisions incentivise affordable rental housing in market developments through bonus height and floor space, with a State Significant Development pathway for projects over $75 million. ▪ Both pathways support delivery of housing targets under the National Housing Accord.

Theme	Response
	▪ TOD provisions were developed following consultation with councils, planning stakeholders, housing providers, and community organisations. ▪ Areas were selected through a State-led review of stations suitable for increased housing density based on accessibility. ▪ Under the Housing SEPP, TOD provisions apply to Heritage Conservation Areas but exclude locally listed heritage buildings. ▪ DPHI confirmed in April and May 2025 that SSD applications lodged before the disapplication date would be assessed under TOD controls, regardless of Council's alternative scheme. **3. Heritage and Local Character** The proposal respects heritage values while supporting the planned transition in character. Design measures include: ▪ **Height transitions** - stepping down to four storeys near existing dwellings and heritage items, including the Scout Hall. ▪ **Setbacks** - upper levels set back 9–12 metres to reduce bulk. ▪ **Material palette** - brick, sandstone, and darker tones at podium level to complement the Heritage Conservation Area. ▪ **Landscaping** - extensive planting to soften the building's appearance, integrate with the streetscape, and retain existing trees. **Assessment:** ▪ Council's alternative controls envisage a mix of low- and mid-rise residential buildings alongside retained dwellings and heritage properties. ▪ The proposal aligns with the desired future character, which is considered to be a mixed character of varying height and scale across the precinct, and an uplift in scale than is currently present. ▪ The revised design balances delivery of new housing under the controls available to the site, whilst respecting East Roseville's heritage and garden suburb identity. **Conclusion** The SSDA was validly lodged under TOD provisions in force at the time, in line with clear Departmental guidance, and is "saved" under the **13 June 2025** mapping changes noting that the site remains mapped as a TOD site under the Housing

Theme	Response
	SEPP. The SSD/TOD pathway has been correctly applied, and the proposal delivers higher-density housing in a location identified for change while incorporating measures to respect and enhance the area's heritage and character. **4. Statutory Compliance** The proposal has been assessed against all relevant statutory planning controls and supporting guidelines, including the Ku-ring-gai LEP 2015, the Housing SEPP 2021, and the Apartment Design Guide (**ADG**). ▪ **LEP and Housing SEPP compliance:** The development is permissible with consent under the Housing SEPP, complies with the applicable floor space ratio, and generally complies with the maximum building height, with only minor exceedances for discrete roof elements justified under Clause 4.6. ▪ **ADG compliance:** The design meets or exceeds the majority of ADG objectives, including deep soil provision, communal open space, and apartment amenity. Minor variations (e.g. solar access to private open space) are supported by strong amenity outcomes. ▪ **DCP provisions:** As a State Significant Development, the proposal is not subject to DCP controls under section 2.10 of the Planning Systems SEPP, though DCP guidance has informed the design response. ▪ **Environmental and infrastructure studies:** Comprehensive and updated technical assessments have been prepared by independent specialists, covering traffic, flooding, heritage, ecology, arboriculture, visual impact, noise, wind, contamination, and infrastructure servicing. These confirm the proposal can be accommodated without unacceptable environmental or infrastructure impacts. **5. Clause 4.6 – Building Height Variation** Public submissions raised concerns about the methodology used to determine "ground level (existing)", the treatment of the in-fill affordable housing height bonus as an entitlement, and the lack of justification for the exceedance in a low-rise, heritage-constrained context. In response: ▪ **The clause 4.6 variation request** has been revised to adopt the *Merman Investments* approach, using the prevailing existing ground level across the site rather than public domain levels, ensuring localised excavations do not distort the height plane. The variation is minor, limited to discrete roof elements, and will not result in unacceptable visual, heritage or amenity impacts. The request recognises that the height bonus is not automatic and demonstrates that strict compliance is unreasonable and unnecessary, with sufficient environmental planning grounds to justify the contravention, including improved contextual fit, sensitive scale transitions and setbacks to adjoining low density dwellings and heritage properties, and delivery of high-amenity affordable housing in a well-located site close to Roseville Station, consistent with TOD controls applying to the site.

Theme	Response
	Overall, the RTS demonstrates the proposal is consistent with the applicable statutory framework, supported by robust independent studies, and aligns with the objects of the EP&A Act by promoting orderly, sustainable development in an accessible location.
Heritage	
215 mentions of heritage in submissions ▪ Urbis Heritage Impact Statement considered flawed; inadequate analysis of conservation area and subdivision/street pattern; omission of affected heritage items; significant adverse impacts on HCA and nearby heritage items (including Roseville Scout Hall, St Luke's Hall, 19 Lord Street, 22 Roseville Avenue, 16 Roseville Avenue, 31 Roseville Avenue); loss of nine contributory dwellings and gardens. ▪ The site's location within and adjacent to three Heritage Conservation Areas, including 54 nearby heritage-listed houses, is likely to compromise the visual integrity and cultural value of the conservation areas. ▪ A permanent and intrusive impact on the streetscape is anticipated, undermining the setting and significance of multiple nearby heritage items. ▪ The demolition of nine federation houses, which are considered contributory items, is contrary to the heritage conservation objectives. ▪ The heritage-listed Scout Hall and surrounding listed homes would be visually dominated and overshadowed.	**1. Adequacy of the Heritage Impact Statement (HIS) and Analysis of Conservation Area/Subdivision Pattern** Public submissions, including the heritage review by Lisa Trueman for the Eastside Roseville Action Group, alleged the HIS was flawed, lacked detailed historical and fabric analysis, omitted affected heritage items, contained factual errors, and failed to assess the contribution of the existing houses to the Clanville HCA. ▪ The **HIS Addendum Letter (November 2025)** (**Appendix T**) directly addresses these claims: The updated HIS assesses ten specified heritage items, overlaying the Ku-ring-gai LEP heritage map with VIA viewpoints, and undertaking detailed historical and fabric analysis of each dwelling. ▪ **Compliance with Guidelines**: Prepared in accordance with the *Guidelines for Preparing a Statement of Heritage Impact* (NSW Department of Planning and Environment, 2023) and the *Assessing Heritage Significance* criteria issued by the Heritage Council of NSW. The addendum expands the detailed assessment under each criterion. ▪ **Historical and Fabric Analysis**: Undertaken for each dwelling, informed by site inspections, DA records, building documentation, historical aerial imagery, and subdivision records. Previous DA plans demonstrate alterations over time. Internal inspections confirmed no features warranting individual local heritage listing. ▪ **Subdivision Pattern and Context**: The group retains the original Roseville Station Estate subdivision pattern (1896), which has historic interest but does not confer individual heritage significance. ▪ **Representative Quality and Intactness**: While some dwellings retain Federation Queen Anne or Bungalow elements, they are common examples and not highly intact compared to other Ku-ring-gai HCAs. Extensive modifications — including second-storey additions, reconstructed verandahs, painted brickwork, and altered fenestration — diminish their contribution to the HCA. ▪ **Factual Accuracy**: Minor historical inaccuracies do not affect heritage fabric or the overall findings. The HIS is supported by over 60 pages of documentary research. ▪ **Reversibility**: Although technically possible, reversal of major alterations is rarely pursued due to loss of space and value. Modifications are widespread and materially change the streetscape. ▪ **Conclusion**: Located at the western extent of the HCA, the group's altered condition means it does not make a defining contribution to the area's heritage significance. The HCA's significance will be retained despite their

Theme	Response
	removal. The extent of the HCA outside of the LMR area and the recently gazetted LMR Exclusion Area will preserve a larger proportion of the HCA intact, providing an improved heritage outcome. **2. Location within/adjacent to Three HCAs – Impact on Visual Integrity and Cultural Value** Analysis confirmed: ▪ None of the dwellings meet the threshold for individual local heritage listing. ▪ Conservation areas are designated for external character; internal fabric is not controlled unless individually listed. ▪ The group comprises modified, common Federation examples lacking exemplar quality. ▪ Extensive façade alterations reduce aesthetic contribution to the HCA. **Design measures to mitigate impacts**: ▪ Step down to four storeys at sensitive edges, including existing dwellings and the Scout Hall interface. ▪ 6m landscaped setbacks to all frontages; upper levels setback 9–12m. ▪ Continuation of substantial landscaping along Lord Street and Roseville Avenue to soften bulk and maintain street planting character. ▪ Material palette informed by the HCA – darker earthy tones at podium, lighter tones above to emphasise human scale. ▪ Chamfered corners, horizontal slab articulation, and undulating façades to break down massing. ▪ Architecturally resolved green space south of the Scout Hall to activate and enhance its setting. **3. Streetscape Impact and Setting of Heritage Items** The altered condition of the group means it does not make a defining contribution to the HCA's streetscape. The design has been refined with heritage advice to ensure a sensitive interface, particularly with the Scout Hall. **Mitigation measures**: ▪ Setbacks aligned with prevailing building line; podium reduces prominence of upper levels. ▪ Staggered setbacks at upper levels to reduce bulk. ▪ Continuation of substantial landscaping along both street frontages. ▪ Chamfered corners, horizontal articulation, and undulating façades to avoid monolithic appearance. ▪ Material palette referencing the HCA – darker tones at podium, lighter above. ▪ Green space adjoining the Scout Hall to improve its setting and separation.

Theme	Response
	4. Demolition of Nine Federation Houses The HIS and addendum confirm: ▪ Most primary street frontages are substantially modified. ▪ While some retain Federation elements, alterations diminish heritage value. ▪ Eastern HCA location and altered condition mean no defining contribution to heritage significance. ▪ Reinstatement to original form is not feasible. **Design response**: ▪ Redevelopment aligns with State policy for increased housing near transport and responds to Council's alternative controls. ▪ Incorporates heritage-responsive measures – setbacks, landscaping, and material selection – to respect HCA character despite removal. **5. Visual Dominance and Overshadowing of the Scout Hall and Surrounding Listed Homes** Based on the Heritage Impact Statement and subsequent Addendum prepared by Urbis, the visual impact of the proposal on the Roseville Scout Hall's curtilage and interface has been addressed through a combination of design, material and landscape measures. The assessment confirms that the Hall's curtilage will not be physically altered, with the proposed building respecting the established setback pattern along Roseville Avenue. Refinements to reduce impacts include: ▪ Podium height reduced to four storeys at the north-east corner adjoining the Scout Hall. ▪ Upper levels setback 9–12 m. ▪ Landscaping and green space to frame and enhance the Hall's setting. ▪ Material palette and façade articulation complement the Hall and HCA. ▪ Shadow diagrams confirm compliance with ADG solar access requirements. The integrated historical and fabric analysis underpins the proposal's approach. The altered condition and limited representative quality of the existing dwellings mean their removal will not undermine the HCA's overall significance. The design incorporates substantial mitigation measures – landscaping, setbacks, articulation, and materiality – to ensure compatibility with the heritage context while delivering housing in a location identified for change.

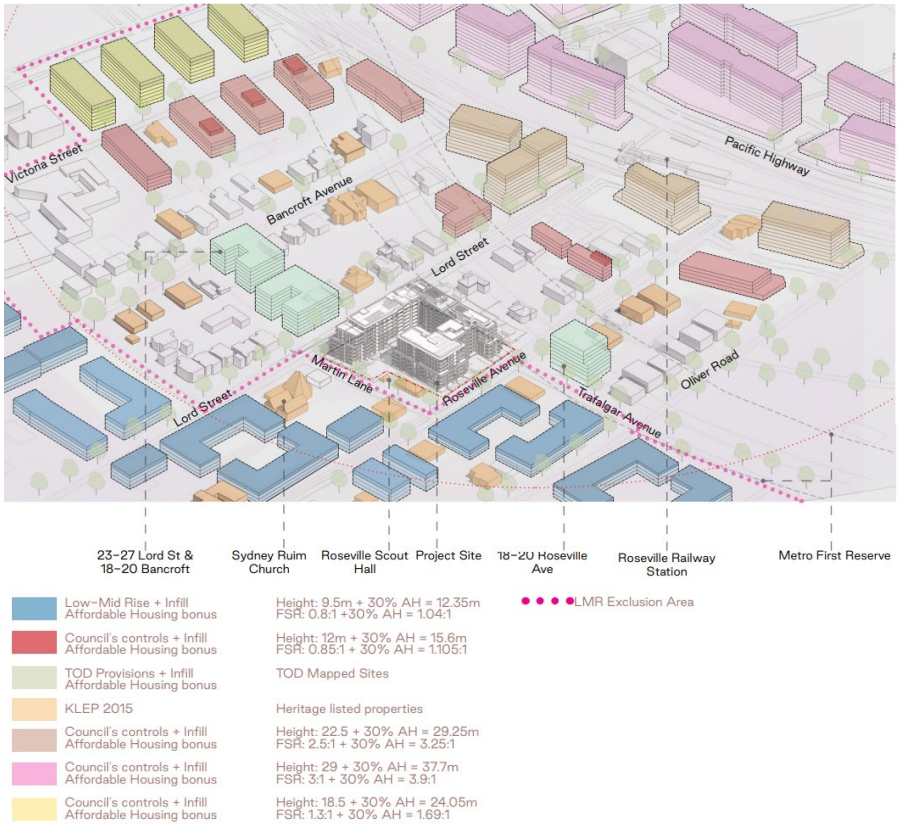
Theme	Response
Community Engagement	
218 mentions of community engagement in submissions ▪ Engagement process did not meet SEARs or NSW Government guidelines; disputed flyer distribution; low participation; lack of engagement with non-English speaking residents; questions over validity of the Engagement Outcomes Report and Social Impact Assessment. ▪ Inadequate community notification, with many residents receiving flyers after the consultation period had closed or not at all. ▪ Poor attendance at the drop-in session, with participation skewed toward landowners seeking to sell rather than the broader community. ▪ Limited promotion of the online survey, resulting in misleading outcomes. ▪ Consultation process perceived as rushed and structured to minimise genuine community engagement.	The community engagement program for this project, including its design, delivery, documentation, and reporting, was undertaken by Gyde Consulting on behalf of the Applicant. Information and responses relating to community engagement matters in this RTS are drawn from Gyde Consulting's Engagement Outcomes Report dated 16 April 2025 and the associated Response to Community Submissions Report dated 12 November 2025 (**Appendix F**). Gyde has confirmed the adequacy, accuracy, and completeness of the community engagement program in its reporting. This Submissions Report collates and presents Gyde's engagement-related content within its report alongside responses to all other technical and design matters prepared by the relevant specialist consultants. Gyde has provided a detailed response to Community Submissions which includes issues raised by Community Groups (section 4.1) and Additional Issues Raised by the Community in the submissions to the SSDA (section 4.2). These responses should be read in conjunction with this RTS and its supporting documentation. The Gyde Report addresses the engagement activities documented in its Engagement Outcomes Report which informed the EIS. The Gyde Report states: *"It is our assertion that the engagement program for this project was robust, met all statutory requirements for State Significant Development and was designed in accordance with the Undertaking Engagement Guidelines for State Significant Projects (March 2024) (the Guideline)."* According to the Gyde Report, the program included: ▪ *A dedicated project webpage.* ▪ *Two rounds of flyer distribution to local properties.* ▪ *A community drop-in session.* ▪ *An online survey.* ▪ *Direct contact channels (phone and email).* The Gyde Report also states: *"We note that submissions raised matters relating to proportionality, accessibility, timing, the level of detail in information provided, and the nature of opportunities for dialogue. While the project team considers that the engagement program was appropriate and consistent with the Guidelines, we recognise that some community members would have preferred additional targeted activities, more detailed online content, longer*

Theme	Response
	notice periods, and more direct conversation with the proponent. These preferences have been noted and will inform Hyecorp's approach to ongoing engagement as the project progresses." The Gyde Report references its Engagement Outcomes Report (16 April 2025) and describes the content and distribution of community flyers, the format and attendance at the drop-in session, the survey period and number of responses, and engagement with directly impacted residents. It also notes feedback received on aspects such as timing, level of detail, accessibility, and opportunities for dialogue, and records that these preferences will inform future engagement. The Gyde Report also provides the following responses to the matters raised in the public submissions relating to community engagement (refer to Table 1 on Page 22 of **Appendix F**). According to Gyde: *"Flyers were distributed to 1,300 local properties commencing 3 March 2025 through Flyers Direct, providing information about the proposal, survey link, and details of the community drop-in session. Following reports of low attendance, an additional 200 flyers were hand-delivered by Gyde on 18 March 2025 to ensure broader coverage. The community survey remained open for three weeks, allowing residents sufficient time to respond. These measures exceeded standard notification practices for projects of this scale."* *"A community drop-in session was held on 12 March 2025 at the East Lindfield Seniors Centre, attended by members of the Hyecorp project team including the architect, development manager, and engagement manager. While only five community members attended, it is acknowledged that the turnout was low and not representative of the interest in the application as demonstrated in the high volume of submissions received during the public exhibition period. Notwithstanding, the drop in session was only one of a number of opportunities for residents to provide feedback. As noted above, extended flyer distribution was implemented to increase awareness and participation in the ongoing survey."* *"The survey was clearly promoted in the community flyer under a highlighted "Have Your Say" section, including both a QR code and written web link for accessibility. It was also linked through the dedicated Hyecorp project webpage, which remains active for ongoing updates. A total of 34 community responses were received—consistent with participation levels for comparable SSDA projects within Ku-ring-gai indicating adequate community awareness and opportunity to provide input."* *"The engagement process was designed and delivered in line with the NSW Government Undertaking Engagement Guidelines for State Significant Projects (March 2024). Activities were proportional to the scale of the proposal and*

Theme	Response
	provided multiple avenues for feedback (website, survey, drop-in session, direct contact). The engagement met all statutory requirements, providing clear, accessible project information and meaningful opportunities for input throughout the consultation period." For the full detail of Gyde's methodology, findings, and responses to community feedback, refer to Appendix F.
Height, Scale and Form of Buildings	
160 mentions of height, scale and form of buildings in submissions ▪ The proposed height is excessive relative to planning controls and surrounding built form. ▪ The proposed form appears disconnected from established neighbouring developments. ▪ The development will appear isolated due to Metro tunnel constraints preventing comparable nearby height. ▪ The scheme provides insufficient step-down transitions, creating abrupt visual dominance over heritage dwellings. ▪ Overdevelopment relative to block size (nine amalgamated lots) with excessive floor-space ratio compared to surrounding context.	The revised proposal directly addresses concerns about height, bulk, and scale by: ▪ Reducing overall height and podium scale. ▪ Providing clear step-downs and upper-level setbacks. ▪ Enhancing articulation and materiality to respond to heritage context. ▪ Demonstrating compliance with FSR and exceeding landscaping/open space benchmarks. ▪ Showing, through updated VIA and future character analysis, that the building will integrate with its evolving context and not appear isolated. ▪ These changes ensure the development is proportionate to its site, respectful of its heritage interfaces, and consistent with both current controls and the desired future character for Roseville. **1. Proposed height relative to planning controls and surrounding built form** ▪ **Height reduction:** Since exhibition, the maximum building height has been reduced from 31.2 m to 30.1 m, with all primary built form elements now complying with the 28.6 m height control. ▪ **Minor exceedances:** The only height variations are for discrete roof features (lift overruns and parapets), up to 1.07m above the control. These are not visible from the public domain and have no material impact on overshadowing, heritage, or amenity. ▪ **Compliance:** The revised clause 4.6 variation request demonstrates that strict compliance is unreasonable in this case, and that the minor exceedances are justified on environmental planning grounds. **2. Relationship to established neighbouring developments** ▪ **Podium transition:** A four-storey podium is proposed, with upper levels set back 9 m (and 12 m at Level 8) to reduce perceived bulk and create a clear transition to the surrounding lower-scale context. ▪ **North-east corner refinement:** The podium height at Building A has been reduced from five to four storeys to better relate to the adjacent heritage-listed Scout Hall.

Theme	Response
	▪ **Articulation and materials:** The Lord Street façade has been broken into three distinct volumes following the slope, with vertical recesses, curved corners, and a darker podium palette to complement the Heritage Conservation Area (**HCA**). **3. Perceived isolation due to Sydney Metro tunnel constraints** ▪ **Future character analysis:** The updated assessment (refer figure below and **Section 4.1** of this Report) shows the site is between other TOD-mapped sites to the north and south, where 9-storey buildings are permissible. In addition, areas beyond the LMR exclusion to the east and north would be able to achieve uplift to 4 storeys under the LMR controls with IAH bonus. Whilst it is acknowledged that Council's finalised alternative and the LMR exclusion will prevent any development over the Metro reserve to the west between the site and higher density development around Roseville Station. When combining the range of applicable controls, it is considered that the future character of the area would be mixed with a range of low and medium and high-density development. **Conclusion:** Whilst the site may appear isolated and out of character against the existing context, it will appear more consistent with the future context under the finalised planning controls as shown in **Figure 42**.

Figure 42 Future character



Source: FKA

4. Step-down transitions and visual dominance over heritage dwellings

- **Height transitions:** The design steps down to four storeys at sensitive interfaces, including the Scout Hall, existing dwellings and properties within the HCA.
- **Setbacks:** Upper levels are set back 9–12 m to reduce bulk and improve solar access to neighbours.

Theme	Response
	▪ **Visual Impact Assessment (VIA):** Of 10 additional heritage viewpoints assessed, only one experienced severe impact, with most rated moderate or negligible. The reduction in height and massing improved impacts at key locations, such as the corner of Lord Street and Martin Lane (from severe to moderate–severe). ▪ **Screening:** Mature trees and new planting in setbacks soften views and reduce visual prominence. **5. Floor-space ratio and perceived overdevelopment** ▪ **Compliance:** The proposal's gross floor area (30,247.6 m²) equates to an FSR of 3.23:1, which complies with the maximum permissible 3.25:1 under the Housing SEPP. ▪ **Site amenity:** 30% of the site is provided as deep soil landscaping — more than double the ADG minimum — supporting canopy tree planting and the area's garden character. ▪ **Open space:** Communal open space accounts for 25.12% of the site area, exceeding ADG requirements, and is co-located with deep soil zones to maximise usability and environmental benefits. ▪ **Overdevelopment:** The proposal's height, bulk and scale have been reduced and refined to suit the site's context and the HCA. Building height is lowered to 30.1 m, with only minor, non-visible roof elements above the 28.6 m control. The podium at the Scout Hall interface is reduced to four storeys, and upper levels are set back 9–12 m in full compliance with ADG privacy setbacks, ensuring a clear transition to neighbouring low-scale dwellings. Articulation, a darker podium palette, and landscaped setbacks, including deep soil zones double the ADG minimum, further soften the form. The design is proportionate, sensitive to heritage, and consistent with State policy for well-located housing.
Tree removal	
137 mentions of tree removal in submissions ▪ The scheme will result in the loss of 89-91 established trees, including critically endangered ecological communities (Blue Gum High Forest and Sydney Turpentine Ironbark Forest remnants), destroying habitat for native and threatened species. ▪ Significant loss of canopy cover, urban cooling capacity, native wildlife habitat.	▪ The Arboricultural Impact Assessment (**AIA**) undertaken for the proposal included detailed tree surveys, species identification, ecological value assessment, and root mapping for trees within the Notional Root Zones (**NRZ**) of proposed works. The AIA identified and mapped the location of Blue Gum High Forest and Sydney Turpentine Ironbark Forest remnants on the site. The retention strategy prioritises viable specimens within these communities, and the landscape plan includes replacement planting with locally native species to offset canopy loss and provide long-term habitat value. While 90 trees require removal, 105 new trees will be planted, achieving a net gain in canopy cover and delivering 39.7% canopy coverage — well above the Government Architect's 25% benchmark. ▪ The proposal provides 30% deep soil area (more than double the ADG minimum) to support large canopy trees and maintain the area's garden character. Replacement planting will use advanced stock of locally native species to accelerate canopy establishment and integrate habitat features such as native understorey planting, flowering and

Theme	Response
▪ Concerns about practicality of retaining significant Sydney Blue Gum (Tree 93) without detailed root mapping and construction management.	fruiting species, and structural diversity to support native and threatened fauna. These measures will maintain and enhance urban cooling capacity and biodiversity over time, while ensuring the landscape matures to complement the surrounding Heritage Conservation Area. ▪ The CPS Arboricultural Impact Assessment (30 October 2025) confirms Tree 93 is Eucalyptus grandis (Flooded Gum), not Sydney Blue Gum, following consultation with the Project Ecologist and diagnostic fruit analysis. It has a long Useful Life Expectancy (>40 years), medium–high landscape significance, and high retention value, making it a priority for retention and a key contributor to local canopy cover. CPS has identified a 21% encroachment into the Notional Root Zone (**NRZ**) from proposed seating walls, retaining walls, pathways, and part of the building/basement footprint, with no encroachment into the Structural Root Zone (**SRZ**). While classified as “major” under AS4970-2025, the encroachment is considered potentially sustainable with mitigation. Measures include reducing decking around the tree to increase soft landscape area, and using root-sensitive construction for decking, pathways, and seating walls — lightweight, raised, low-profile structures above existing ground with minimal excavation for isolated supports/piers. Final design and methodology will be reviewed and approved by the Project Arborist prior to works. For seating walls, test excavation for pier/footing locations will be undertaken under arborist supervision using hand tools or pneumatic devices. If roots >25mm are found, the arborist will determine whether relocation or redesign is required. These measures, combined with arborist supervision and tree protection throughout construction, are intended to ensure the long-term health and viability of Tree 93. ▪ While some tree removal is unavoidable due to the approved building footprint and infrastructure requirements, the RTS demonstrates that high-value specimens will be retained where viable, impacts on ecological communities will be minimised, and a robust replacement planting program will deliver a net gain in canopy cover, habitat provision, and urban cooling capacity. Tree 93 will be retained with detailed root-sensitive construction management to ensure its ongoing health.
Infrastructure	
128 mentions of infrastructure in submissions ▪ Unsustainable demand placed on ageing local utilities infrastructure (water, sewerage, electricity), which is already under strain.	The application was referred to Sydney Water and Ausgrid who raised no objections in relation to demand on local infrastructure. The development will be subject to application Section 7.11/7.12 development contributions payable to Council which will contribute funds towards any required upgrades under Council jurisdiction.

Theme	Response
▪ Inability of existing water infrastructure to service an additional 728 residents, with low water pressure already reported in the area. ▪ Increased car dependence for daily needs due to the absence of new local retail or amenities in the proposal.	The site is located within a TOD area, less than 400m from Roseville Train Station, providing convenient and direct access to public transport and further amenities.
Overshadowing/solar access	
127 mentions of overshadowing/solar access in submissions ▪ Significant loss of north-facing sunlight to homes across Lord Street and Roseville Avenue from 2pm onwards. ▪ Extended overshadowing of backyards, gardens, and solar panels of neighbouring dwellings, reducing liveability and creating “damp microclimates”. ▪ Winter overshadowing by the proposal will be particularly severe, impacting energy efficiency and passive heating for surrounding dwellings.	▪ The updated solar access and overshadowing analysis undertaken for the Response to Submissions assessed the proposal against both current and future development scenario. This modelling confirms that overshadowing impacts are localised and primarily affect immediately adjacent buildings to the west and south. ▪ For properties to the west, shadows extend over the building during the morning mid-winter period but are largely confined to setback zones by midday. For properties to the south, there is no impact in the morning, with partial shading occurring from 1 pm onwards, affecting building fronts only. Rear gardens are already shaded by the buildings themselves in the afternoon. ▪ The analysis demonstrates that adjoining properties will continue to receive at least three hours of direct sunlight between 9 am and 3 pm on 21 June, meeting the Apartment Design Guide (**ADG**) requirements for neighbouring development. Discrete rooftop elements above the permissible height plane limited to lift overruns and small sections of parapet result in minor additional overshadowing to between 9am and 3pm, the proposal would result in greater overshadowing than a compliant building height to 12 Lord Street at 10am and 11am on mid-winter, and 14 Lord Street at 12pm and 1pm on mid-winter. The quantum of this additional overshadowing ranges from 23.1m^2 to 16.4m^2. The revised building height demonstrably reduces the shadow cast to these neighbouring properties. The proposed building height will have a minimal overshadowing impact, particularly to the rear garden of these properties, in comparison with a compliant building height. All neighbouring properties will continue to receive greater than 3 hours of sunlight at mid-winter. ▪ In relation to potential impacts on solar panels, the study found that any shading is limited to short periods in mid-winter and does not materially affect year-round solar performance. The design also ensures that future developments on surrounding sites can achieve the required solar access standard under the ADG. ▪ The RTS concludes that while some increase in overshadowing is inevitable with a building of this scale, the impacts are within acceptable parameters, are largely seasonal, and have been reduced through design refinements

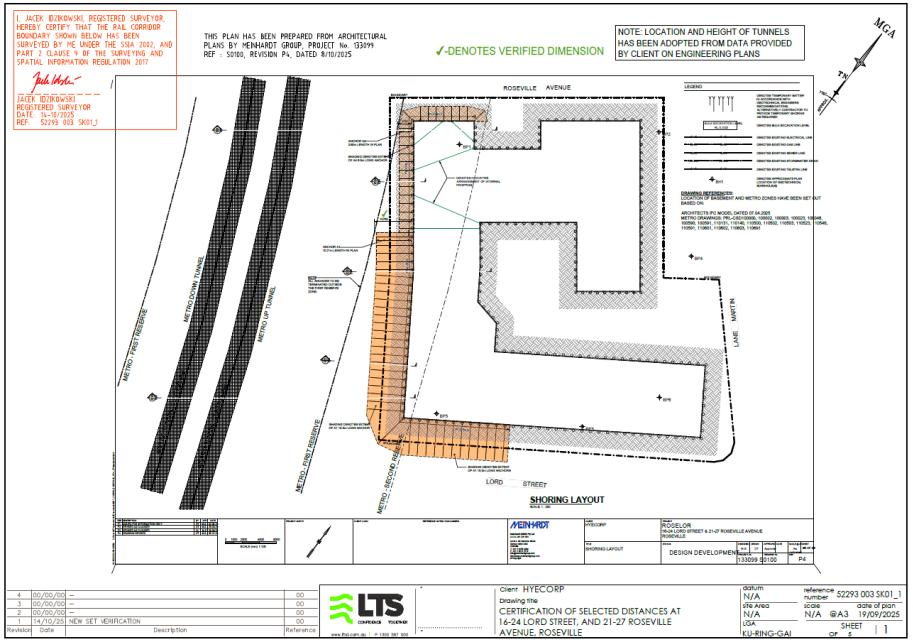
Theme	Response
	including lowering the overall building height, increasing upper-level setbacks, and stepping down to four storeys at sensitive interfaces. The minor height exceedance is justified on environmental planning grounds as only results in minor additional overshadowing, visual, or amenity impacts compared to a compliant scheme. These measures help maintain liveability, support passive heating, and avoid the creation of damp microclimates in surrounding properties.
Issues beyond the scope of the project	
104 mentions of issues beyond the scope of the project in submissions ▪ Mental health impacts and community stress being caused by the proposal. ▪ Erosion of public trust in government processes and developer intentions, undermining confidence in the planning system. ▪ Additional strain placed on already overstretched social infrastructure, including schools and healthcare services.	▪ Gyde has confirmed in their Response to Community Submissions (page 23 of **Appendix F**) that "*To minimise stress and safeguard wellbeing:* ▪ *A community engagement programme will be maintained throughout all project phases, ensuring transparent, two-way communication and early notice of construction activities.* ▪ *Opportunities for public input and feedback will be encouraged, helping residents feel informed, involved, and supported.* ▪ *Construction-related stress will be mitigated by strict management of noise, dust, and traffic, with a dedicated community liaison officer available to respond promptly to concerns."* ▪ Concerns regarding trust in government processes are outside the control of the Applicant. The SSDA has been prepared and lodged in accordance with the applicable planning provisions and guidance. As noted in Gyde's Response to Community Submissions (page 23 of **Appendix F**) *"The proponent is committed to conducting this project with full transparency and compliance with all statutory planning and environmental requirements. All studies, assessments, and consultation outcomes are publicly available during the entire development application process."* ▪ The Social Impact Assessment (EIS Appendix EE) has examined the capacity of local social infrastructure and concludes that the proposal can be supported by existing and planned services. Any required upgrades or contributions will be secured through development contributions as part of any consent.
Privacy/overlooking	
84 mentions of privacy/overlooking in submissions	▪ The western balconies have been reduced in depth to sit wholly within the 9 m and 12 m setbacks required by the ADG. In addition, the design has been amended to incorporate non-accessible landscaped zones in these setback areas, further reducing balcony size and protecting visual privacy by limiting direct sightlines to adjoining

Theme	Response
▪ Bulk, scale and direct transition impacts especially at the western interface. ▪ Direct overlooking into backyards, swimming pools, and living areas of existing dwellings within approximately 100m of the proposed towers. ▪ Loss of privacy to neighbouring outdoor spaces due to increased overlooking from the proposed apartment buildings. ▪ Overlooking of sensitive uses, including Roseville College and the adjacent Scout Hall, resulting in potential privacy impacts.	properties. These changes also respond to concerns about bulk, scale, and direct transition impacts along the western elevation. By pulling back the upper-levels and introducing layered landscaping, the interface with the neighbouring low-density dwellings is softened, reducing the perception of a continuous vertical wall. The combination of increased setbacks, recessed balcony edges, and planting breaks up the horizontal massing, provides visual relief, and creates a more graduated transition in scale between the proposal and the adjoining properties. ▪ The proposed development has been designed and sited to carefully control views towards neighbouring properties and sensitive uses, while maintaining natural light and openness for residents. Solid upstands on all glazing elements redirect sightlines outward and upward, away from private spaces. Translucent glazed balustrades provide an additional layer of visual screening, reducing potential overlooking while still allowing daylight penetration. ▪ Balcony locations have been considered to maximise privacy, with increased setbacks and strategically placed landscaped planters enhancing screening while maintaining ventilation and outlook. Landscaped side setbacks, canopy tree planting, and boundary level differences further reduce opportunities for direct views into neighbouring backyards, gardens, and pools. ▪ The relationship to the adjacent Scout Hall has been a key consideration in the design. Planting within the site setback to the Hall has been increased, providing a stronger visual buffer and ensuring any potential overlooking is minimised. A reduced podium height is provided at the north-east corner, and an activated green space has been introduced to improve amenity while maintaining privacy. ▪ Overall, the RTS demonstrates that the combination of increased setbacks, façade treatments, balcony design refinements, strategic landscaping, and level changes will effectively mitigate overlooking impacts, protect the privacy of neighbouring properties and sensitive uses, and ensure compliance with ADG privacy objectives.
Visual impact	
68 mentions of visual impact in submissions ▪ Concern that the original VIA omitted key public-domain viewpoints, particularly from nearby heritage items and streetscape locations, reducing the ability to assess bulk, scale, and heritage impacts. Request for inclusion of specific	▪ In response to the SJB submission provided on behalf of ERAG, the updated Visual Impact Assessment (**VIA)** (**Appendix I**) has incorporated ten additional viewpoints from nearby heritage items and key public domain locations, as recommended by DPHI. These include: I115 (Roseville Scout Group Hall), I697 (31 Roseville Avenue), I695 (22 Roseville Avenue), I112 (10 Roseville Avenue), I113 (12 Roseville Avenue), I114 (16 Roseville Avenue), I106 (19 Lord Street), I698 (32 Roseville Avenue), I699 (40 Roseville Avenue) and I689 (St Luke's Hall, 28 Lord Street). These additional viewpoints align with the majority of SJB's recommended locations, including

Theme	Response
angles and locations to ensure a complete and representative visual impact assessment. ▪ Substantial visual bulk is introduced, dominating the narrow, tree-lined residential streetscape. ▪ Loss of sky views (up to 70% reduction reported in EIS) from neighbouring homes. ▪ Visual incompatibility with the existing federation-era streetscape. ▪ VIA omits or misrepresents key viewpoints; fails to assess views from within heritage curtilages and private dwellings; avoids most significant impacts on the Clanville HCA; additional viewpoints identified by SJB as necessary.	multiple views of the Scout Hall (A–E), side-on views from Martin Lane (C), approaches from Roseville Avenue and Trafalgar Avenue (A, F), and boundary interfaces with 14 Lord Street (G, H). It is noted that intersection views (D, E) and private views (I) have not been assessed, however, the inclusion of the additional viewpoints ensures that the updated VIA addresses the principal public-domain heritage and streetscape concerns raised in the ERAG/SJB submission, while maintaining a consistent and transparent assessment methodology in line with SEARs Item 8 – Visual Impact. ▪ Of the 21 viewpoints assessed in total, only seven in the immediate vicinity of the site experience moderate to severe impacts, with the remainder rated moderate to negligible. Significant visual impacts in the immediate surroundings are expected, as this is the first proposed medium-density development in an area undergoing a planned change in character. When reviewed against the permissible building envelope and future development plans for Roseville anticipated by Council's finalised alternative and the LMR provisions that are applicable beyond the gazetted exclusion area, the building's visual impact is assessed as acceptable. ▪ The revised design proposed in the Response to Submissions reduces the visual bulk of the development through a lower overall building height, reduced podium height, and increased upper-level setbacks to 9 m and 12 m. The podium at the north-east corner has been lowered to better relate to the adjacent Scout Hall, and the Lord Street façade has been broken into three distinct volumes following the slope, with vertical articulation, curved corners, and a darker podium palette to complement the surrounding Heritage Conservation Area (**HCA**). ▪ The proposal maintains the existing tree-lined residential streetscape, with additional canopy tree planting proposed to all site setbacks. Mature trees are retained where viable, and new planting in landscaped buffers softens the building's presentation to the street. ▪ In relation to sky view loss, the VIA clarifies that a high percentage loss of sky does not necessarily equate to high visual impact, as the value of the view depends on the quality of the features being obscured. For example, where loss of sky view is up to 70%, this often means that the majority of the affected view is sky rather than valued natural or built features. In viewpoint 7, the sky view loss ratio is 3% : 97%, yet the overall visual impact is negligible. ▪ To address compatibility with the Federation-era streetscape, the design incorporates materials and detailing informed by the HCA — including brick, sandstone, and darker tones at podium level — while using lighter tones above to reduce visual mass. Chamfered corners, horizontal slab articulation, and undulating façades further break down bulk and create a human-scale interface. The materials palette has been refined in the Response to

Theme	Response
	Submissions to better respond to the surrounding Federation-period character, and the retention of existing trees contributes to the established streetscape identity. ▪ Overall, the RTS demonstrates that the revised proposal reduces visual bulk, responds sensitively to its heritage context, and has been assessed from an expanded range of viewpoints to ensure impacts are accurately understood and appropriately mitigated.
Construction impacts	
67 mentions of construction impacts in submissions ▪ Prolonged dust (including silica from sandstone), noise, vibration, and traffic disruption expected during a construction period exceeding two years. ▪ Compromised emergency vehicle access on already narrow streets during excavation works, creating safety risks. ▪ Risk of foundation damage to neighbouring properties due to the depth of excavation proposed.	▪ Construction impacts associated with the proposed development, including in relation to dust, noise, vibration, and traffic impacts, will be managed and mitigated through a Construction Environmental Management Plan (**CEMP**), and related sub-plans such as a detailed Construction Traffic Management Plan (**CTMP**). It is anticipated the relevant construction management plans will be conditioned by the consent authority as part of any approval. Preliminary assessments of construction impacts have been conducted in various documents submitted with this proposal, including the Noise and Vibration Impact Assessment and the Transport Impact Assessment, and it has been concluded that any impacts on surrounding properties or the local community can be appropriately managed. ▪ A detailed CTMP will be prepared prior to the commencement of demolition and construction which will appropriately manage any potential impacts to the road network by introducing appropriate protocols and mitigation measures. The CTMP will outline how construction vehicles will access the site, including how appropriate road access will be maintained for other vehicles throughout the construction process. All excavation works will be contained within the site boundaries and will have minimal impact on emergency vehicle access. ▪ A Geotechnical Investigation has been undertaken as part of the proposal and was submitted with the Environmental Impact Statement. The Geotechnical Investigation includes appropriate management and mitigation measures to ensure that impacts to neighbouring properties will be limited, including foundation damage. It is anticipated that the consent authority will require that dilapidation surveys be conducted pre- and post-construction as a condition of consent to confirm whether the construction process has resulted in damage to any surrounding properties.
Biodiversity and wildlife	
64 mentions of biodiversity and wildlife in submissions	▪ A Request for a BDAR Waiver was prepared by East Coast Ecology and submitted to DPHI. The BC Act requires that development applications are required to be accompanied by a Biodiversity Development Assessment Report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. The Request for a BDAR Waiver assessed the

Theme	Response
▪ Direct loss of habitat for native birdlife and threatened species due to the loss of canopy cover. ▪ Increased urban heat island effects by replacing the existing significant vegetation with concrete bulk.	biodiversity impacts of the proposed development and found that the proposal is not likely to have any significant impacts on biodiversity values. The Request for a BDAR Waiver was assessed by the Director Greater Sydney of the Department of Climate Change, Energy, the Environment and Water and the Secretary of the DPHI, with the updated BDAR Waiver granted on 2 December 2025. ▪ The proposal features extensive landscaping and retains mature tree canopies. 34% of the site is provided as landscape area, with 39.7% tree canopy cover. The communal courtyard provides sunlight, fresh air, and natural light, mitigating the urban heat island effect and reducing energy usage. Highly planted green edges and tree planting reduces direct sunlight on glazing and reduces direct sunlight on glazing.
Metro Tunnel	
56 mentions of metro tunnel in submissions ▪ Location of the proposed development partially within Sydney Metro first and second protection reserves, creating risks for future infrastructure delivery. ▪ Concerns raised regarding subsidence, safety, and the potential obstruction of future tunnel expansion. ▪ Serious safety risks highlighted through comparisons to past incidents, including the Lane Cove Tunnel collapse and recent M6 sinkholes.	The site is partially located above Sydney Metro's second protection reserve. In response to Sydney Metro's referral comments and the Department of Planning, Housing and Infrastructure's request, the Applicant undertook further consultation with Sydney Metro and prepared a detailed **Metro Impact Assessment** (**Appendix N**) in accordance with the *Sydney Metro Underground Corridor Protection Technical Guidelines*. This assessment includes: ▪ A **registered survey plan** accurately defining boundaries between the development footprint, the rail corridor, rail infrastructure, and any Sydney Metro substratum land. ▪ **Plan and cross-section drawings** showing the rail corridor, subsoil profile, proposed basement/foundation excavation, and structural design adjacent to the corridor. ▪ An **engineering impact assessment** demonstrating that the foundation design will transfer loads without adverse impacts on the rail corridor or infrastructure, and that bulk excavation will not cause deformation affecting Metro assets. ▪ A **risk assessment report** addressing potential subsidence and safety risks, with mitigation measures to ensure structural stability. ▪ An **electrolysis report** assessing stray current risks and control measures. ▪ An **acoustic assessment** confirming compliance with relevant SEPP and Sydney Metro guidelines, ensuring the development will not be adversely affected by noise or vibration from the rail corridor.

Theme	Response
	The Metro Impact Assessment confirms that the proposal will not obstruct future tunnel expansion or compromise the safety or operation of Sydney Metro infrastructure. The depth of the tunnel reserve below ground level varies from approximately 3 m to over 12 m, allowing for appropriate engineering solutions to avoid impacts. **No works, including demolition, tree removal or stormwater pit installation, are proposed within the first reserve.** All structural and excavation methods have been designed to protect the integrity of the Metro corridor, with ongoing liaison between the project team and Sydney Metro to ensure compliance with technical requirements. A plan certified by LTS Surveyors mapping the reserve boundaries against the proposed shoring layout is provided at **Figure 43** below. Overall, the RTS demonstrates that the proposal has been rigorously assessed against Sydney Metro's protection guidelines, incorporates engineering and construction measures to eliminate subsidence and safety risks, and will not impede current or future Metro operations. Figure 43 Proposed shoring layout *Note: The metro first reserve is limited in height and depth. No works are proposed within the first reserve*  *Source: LTS*	

Theme	Response
Flooding	
23 mentions of flooding in submissions ▪ The eastern portion of the site is flood-affected, and is specifically prone to inundation, yet the proposal intensifies risk by replacing permeable ground with extensive impervious surfaces. ▪ Increased stormwater runoff to neighbouring properties due to the extent of impervious surfaces proposed, exacerbating flood risk.	▪ The eastern portion of the site is partially flood-affected in events greater than the 20% AEP storm. In response to submissions and agency feedback from the Department of Climate Change, Energy, the Environment and Water and the SES, the Flood Impact Risk Assessment (**FIRA**) has been updated. The design now sets all habitable floor levels to provide a minimum 500 mm freeboard for all events up to and including the 1% AEP storm, ensuring robust flood protection. ▪ The updated FIRA confirms the proposal will have minimal impact on floodwater flow and will not encroach into any flood storage areas. A post-development flood study shows that changes to water depths on adjoining properties are negligible, meaning neighbouring land will not be adversely affected. ▪ To address concerns about increased impervious surfaces, the development incorporates 34% of the site as landscaped area, including 30% deep soil zones to promote infiltration. A combined on-site detention (**OSD**) and water treatment tank is proposed to reduce peak stormwater discharge, meeting Ku-ring-gai DCP 2024 performance requirements. Rainwater runoff will be connected to and discharged into an existing Council drainage pit on Lord Street, which has been assessed as having sufficient capacity for the proposed development. ▪ The updated Integrated Water Management Plan (**IWMP**) and FIRA both conclude that stormwater and flooding impacts are acceptable and in accordance with relevant requirements. ▪ Overall, the RTS demonstrates that the proposal will not exacerbate flood risk. The removal of the flood wall, elevation of habitable floors, extensive landscaping, and incorporation of OSD and water treatment measures ensure the development manages stormwater effectively, maintains safe flood conditions, and protects both the site and surrounding properties.
Noise impacts	
14 mentions of noise impacts in submissions ▪ Prolonged construction activity, spanning approximately two years, is expected to generate significant noise, dust, and vibration, with potential health and amenity impacts on surrounding properties.	▪ Construction impacts such as noise, vibration and dust will be temporary and managed through a detailed Construction Management Plan in accordance with regulatory requirements to minimise disruption to surrounding properties. ▪ In operation, the development has been designed to comply with relevant acoustic and traffic standards to ensure amenity is appropriately protected

Theme	Response
▪ Ongoing noise from increase density, traffic, and communal facilities is likely to disrupt the quiet suburb.	
Landscaping	
7 mentions of landscaping in submissions ▪ Limited capacity for mature replacement planting due to basement excavation depth. ▪ Inadequate landscape buffers to screen bulk or provide meaningful canopy replacement. ▪ Submissions highlighted inconsistencies in deep soil figures, inclusion of non-compliant areas, and reduced capacity for tall canopy planting impacting garden suburb character.	▪ The 'C' shape of the proposed basement has been specifically designed to maximise the available deep soil for planting on site and to facilitate the retention of existing mature trees within the site. The proposal provides 30% of the site area as deep soil for replacement tree planting. This significantly exceeds the ADG guideline of 15%. ▪ 6m landscape buffers are proposed to all four site boundaries, with tree species specified to provide substantial tree canopy and screening, including mature canopies up to 15m in width. 39.7% of the site is proposed to be provided as tree canopy cover. ▪ The discrepancy between the EIS, architectural plans, and landscape plans is acknowledged. The 23% figure in the EIS was correct at lodgement, based on the ADG compliance assessment in the submitted Architectural Design Report (2,160m^2). In response to submissions, the deep soil plan has been updated to remove non-compliant areas, reconcile figures across all documents, and include a clear calculation diagram in the updated Landscape Report (**Appendix D**). The revised design achieves 30% deep soil area, exceeding the ADG minimum of 15%, with zones co-located alongside communal open space to maximise canopy tree planting and reinforce the garden suburb character. This figure is now consistent across all plans and documentation and reflects the updated deep soil landscape plan at page 26 of the Landscape Design Report.
CPTED and SIA	
7 mentions of CPTED and SIA in submissions ▪ Inadequate Social Impact Assessment, with inaccurate claims of community support, especially in respect of educational infrastructure, traffic and overall social cohesion.SIA based on inadequate engagement; affordability claims questioned; market pricing likely to exclude target groups; limited genuine affordable housing benefit.	▪ Gyde Consulting (who also undertook the SIA for the project) has provided the following response to CPTED and SIA in their Response to Community Submissions (page 21-22 of **Appendix F**) that *"The Social Impact Assessment (SIA) was prepared based on a comprehensive review of the findings from the specialist reports, including the Traffic Impact Assessment, and incorporates the mitigation measures recommended by technical experts.* *The proposal is located within the Roseville Primary School and Killara High School catchments. Enrolment data indicates a decrease in student numbers at Roseville Primary School over the past five years (from 638 in 2019 to 533 in 2024) and a projected 0.4% decline in the population of primary school-aged children (5–11 years) within the*

Theme	Response
▪ Loss of neighbourhood character and amenity; emotional distress from environmental change; no meaningful community benefits; increased pressure on infrastructure. ▪ Affordable Housing provision limited to 15 years, not in perpetuity.	*Lindfield–Roseville SA2. The proposal is expected to generate approximately 66 additional children in this age group, which can be readily accommodated within existing local school capacity.* *Similarly, the Lindfield–Roseville SA2 is projected to experience a 1.2% reduction in secondary school-aged children (12–17 years) by 2036, while the proposal will generate an estimated 58 additional students. This modest increase is unlikely to create capacity issues at Killara High School. The NSW Department of Education has implemented a range of measures to address local school capacity pressures, including upgrading or expanding existing schools, adjusting catchment boundaries, redistributing enrolments, and supporting the role of non-government schools. The DoE's Strategic Plan 2018–2023 identifies ongoing investment in school infrastructure across the North District to accommodate projected growth of an additional 21,900 students by 2036.* *In terms of community infrastructure, the development is expected to accommodate approximately 700 residents. While this will increase demand on local sports fields, parks and community facilities, the impact is expected to be minimal and offset by the inclusion of communal open spaces within the development that support resident recreation and social interaction.* *As identified in the SIA, while some temporary changes to the local social environment may occur during construction, the proposal is expected to enhance social cohesion through the introduction of new residents, greater diversity in housing, and increased opportunities for community interaction. Accordingly, the SIA provides an appropriate and accurate assessment of social impacts and confirms that the proposal will not place unreasonable pressure on local schools or community infrastructure."* ▪ The revised design delivers 55 tenure-blind affordable rental dwellings (17% of total GFA) in a highly accessible location managed by a registered community housing provider (Link Wentworth). While some of the affordable rental housing will be managed for a minimum of 15 years in accordance with the Housing SEPP, 2% of the affordable dwellings will be provided in perpetuity. The RTS notes that this meets statutory requirements and delivers a meaningful long-term benefit, particularly in a location with strong transport and service access. Concerns about neighbourhood character and amenity have been addressed through design refinements, including reduced building height, increased setbacks, enhanced articulation, and a material palette informed by the surrounding Heritage Conservation Area. These changes help the development integrate with its evolving context while retaining key elements of the area's garden character. In relation to **CPTED (Crime Prevention Through Environmental Design)**, the proposal incorporates: ▪ Clear delineation of public and private spaces.

Theme	Response
	▪ Passive surveillance through sightlines from podium and ground-level apartments. ▪ Well-lit communal areas and entries. ▪ Landscaping designed to avoid creating concealed spaces.
Waste Management	
5 mentions of waste management in submissions ▪ Inadequate access provided for waste collection due to constrained laneways and existing congestion. ▪ Increased traffic congestion on Martin Lane and Lord Street resulting from waste truck movements.	Waste collection for the development will be undertaken entirely within the site, using a dedicated loading bay at the lower ground level. This bay is accessed via the basement driveway from Lord Street, avoiding the need for waste trucks to stop or manoeuvre in surrounding streets, including Martin Lane. The updated Waste Management Plan (**Appendix S**) and updated TIA (**Appendix J**) include swept path diagrams demonstrating that small rigid waste collection vehicles can safely enter, manoeuvre, and exit the site in a forward direction. A longitudinal section confirms that the required 2.6 m headroom is maintained along the entire travel path, accommodating waste vehicles without conflict with building services or structure. Bin transfers from chute rooms to the main bin room will be managed using a bin tug during off-peak hours to minimise any potential interaction with resident vehicles. If preferred, bins can also be transported between levels via lifts, further reducing the need to use ramps. Because waste collection occurs within the site and is scheduled to avoid peak traffic periods, the RTS confirms there will be no adverse impact on traffic congestion in Martin Lane or Lord Street as a result of waste operations. Overall, the RTS demonstrates that waste management arrangements are safe, efficient, and designed to avoid on-street impacts, ensuring compliance with Council and industry best practice.
Sustainability	
4 mentions of sustainability in submissions ▪ Reduced solar panel viability for surrounding homes due to overshadowing. ▪ Higher energy demand for surrounding dwellings by intensifying the urban heat island effect, leading to greater reliance on air conditioning. ▪ Diminished local climate resilience through removal of established trees.	The updated solar access and overshadowing analysis confirms that any shading of neighbouring properties, including solar panels, is limited to short periods in mid-winter and does not materially affect year-round solar performance. The design refinements, including reduced building height, increased upper-level setbacks, and stepped massing — further minimise overshadowing impacts. To address urban heat island concerns, the proposal incorporates 34% of the site as landscaped area, with 30% deep soil zones and 39.7% canopy cover — significantly exceeding the Government Architect's 25% benchmark. The retention of high-value trees, combined with the planting of 105 new trees (including large native canopy species), will enhance shade, reduce heat absorption, and improve local microclimate conditions.

Theme	Response
	The updated **Ecological Sustainable Development (ESD) Report** (**Appendix Q**) outlines measures to improve energy efficiency and climate resilience, including: ▪ High-performance glazing and insulation to reduce heat gain and loss. ▪ Passive solar design to maximise natural light and ventilation. ▪ Energy-efficient appliances, LED lighting, and rooftop solar for the development. ▪ Water-efficient fixtures and a 10 kL rainwater tank for landscape irrigation. Overall, the RTS demonstrates that the proposal will not diminish local climate resilience. Instead, it will deliver a net gain in canopy cover, integrate sustainable building systems, and maintain the viability of surrounding solar installations, while actively mitigating urban heat island effects.
Wind	
1 mention of wind in submissions ▪ Wind tunnelling effects created by the proposed tall towers, disrupting the local microclimate and reducing residential amenity.	An Environmental Wind Impact Assessment was prepared with the EIS which assessed the potential wind impacts of the proposed development for future residents and surrounding properties. The assessment considered both the existing wind environment and predicted conditions with the proposed development in place, using Bureau of Meteorology data and established “walking comfort” criteria, which set a threshold wind speed of 16 metres per second (m/s). The assessment found that impacts on the public realm will remain acceptable as the proposal will be retaining the majority of the Council street trees. For the two trees required for removal, replacement planting will ensure the wind environment will not be negatively impacted by the proposal. A Wind Impact Assessment Addendum is included at (**Appendix AA**) and confirms that the updated design is anticipated to deliver similar or improved wind conditions relative to the SSDA lodgement scheme.

5. UPDATED PROJECT JUSTIFICATION

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

5.1. PROJECT DESIGN

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

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

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

A total of 252 residential dwellings are proposed on the site, including 55 dwellings for affordable rental housing, communal open space, landscaping and basement car parking. The revised design responds to the existing and future local character through significant changes to the massing, setbacks and articulation of the built form and refining the material palette to reflect the heritage conservation area.

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

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

5.2. STRATEGIC PLANNING CONSISTENCY

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

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

- Ku-ring-gai LGA housing targets set by DPHI.

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

5.3. STATUTORY PLANNING CONSISTENCY

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

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

In response to submissions relating to strategic and statutory planning consistency, the site remains mapped TOD site under the Housing SEPP/ As such the application has been assessed in accordance with the controls in force at lodgement. Notwithstanding, the revised design has been tested against the finalised TOD Alternative and LMR Exclusion Map, with height, setbacks, and massing refined to ensure compatibility with the mixed future character envisaged under both State and local frameworks.

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

5.4. COMMUNITY VIEWS

The SSDA was publicly exhibited between 1 May 2025 and 28 May 2025. Gyde have analysed the submissions (**Appendix F**) in an Engagement Report Addendum (**ER Addendum**). Gyde's analysis has confirmed that 389 unique public submissions were received over the public exhibition period, including:

- 386 submissions from members of the public.
- 3 submissions from community interest groups.

Gyde found that of the public submissions, 10 submissions were received in support (3%), 367 submissions objected (94%), and 12 submissions provided general comments (3%).

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

- Traffic and parking (289)
- Surrounding context/character (230)
- Planning (227)
- Community engagement (218)
- Heritage (215)
- Height, scale and form of buildings (160)
- Tree removal (137)
- Infrastructure (128)
- Overshadowing/solar access (127)
- Issues beyond the scope of the project. (104)
- Privacy/overlooking (84)
- Visual impact (68)
- Construction impacts (67)
- Biodiversity and wildlife (64)
- Metro Tunnel (56)
- Flooding (23)
- Noise impacts (14)
- Landscaping (7)
- CPTED and Social Impact Assessment (7)
- Waste management (5)
- Sustainability (4)
- Wind impact (1)

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

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

5.5. ENVIRONMENTAL IMPACTS

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

– **Natural Environment**: The proposed development addresses the principles of Ecologically Sustainable Development (**ESD**) as required by Section 193 of the *Environmental Planning and Assessment Regulation 2021*. It incorporates various measures to ensure environmental sustainability, conservation, and efficiency:

  - **Precautionary principle**: The development includes environmental assessments and mitigation measures to prevent serious or irreversible damage. Features like courtyard design for runoff management and tree protection measures are included. The project aims to achieve the NSW EPA's 80% recycling target for demolition waste.
  - **Intergenerational equity**: The development considers the needs of future generations by providing high-quality, affordable rental housing near Roseville train station, reducing reliance on private vehicles and lowering carbon emissions. Energy and water efficiency measures are also incorporated.

- **Conservation of biological diversity and ecological integrity**: A Biodiversity Development Assessment Report (BDAR) Waiver has been granted for the proposal. An Arboricultural Impact Assessment has been undertaken and the project includes mitigation measures to minimise impacts on biological diversity and ecological integrity. As part of the Connecting with Country and ESD strategy, native planting is proposed to contribute to ecological values.
- **Improved valuation, pricing and incentive mechanisms**: The project values environmental factors through various ESD initiatives. A Construction Management Plan will minimize pollution and waste, and establish recycling and landfill waste streams. Environmental ratings like BASIX and NaTHERS will promote resource efficiency, reducing running costs and increasing the development's value.

The updated ESD Report (**Appendix Q**) identifies initiatives that will be implemented to promote environmentally responsible design.

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

- **Built Form and Design**: The design has been updated to respond to the advice of the SDRP, including reducing the bulk and scale of the building form, enhancing the landscape design, communal open spaces and the amenity of proposed dwellings. The revised design has improved the development's compatibility with Roseville's desired future character through updating the massing and articulation of the built form and refining the material palette. The proposal continues to exhibit high quality-built form and design outcomes by thoughtfully integrating with its context, minimising bulk and scale, the retention of significant trees, and creating a dynamic and inclusive environment for the community. The proposal offers a diverse mix of apartment sizes and layouts, including affordable rental housing, to ensure a wide range of housing choices. The development provides a high level of amenity for future residents, including a high level of compliance with the ADG.

  The proposed building height has been reduced so that all habitable space and residential dwellings are located beneath the height limit. The roof level of the building complies with the maximum height control. In discrete locations, parts of the roof parapet, rooftop plant and lift overruns exceed the height control by up to 1.07m. The accompanying Clause 4.6 Variation Request finds that these minor exceedances will not result in any unacceptable environmental impacts.

- **Environmental Amenity**: Detailed analysis has been undertaken to demonstrate that the proposed development will achieve a high degree of amenity without creating adverse amenity impacts to surrounding development, public open spaces and existing heritage items:
  - **Overshadowing/privacy**: A detailed overshadowing analysis of the revised design is provided which assesses the shadows cast by the proposed development on the worst affected properties to the west and south of the site. The analysis shows that, between 9am and 3pm, the proposal would result in greater overshadowing than a compliant building height to 12 Lord Street at 10am and 11am on mid-winter, and 14 Lord Street at 12pm and 1pm on mid-winter. The quantum of this additional overshadowing ranges from 23.1m^2 to 16.4m^2. The revised building height, whilst still resulting in a minor exceedance to the maximum permissible building height, demonstrably reduces the shadow cast to these neighbouring properties when compared to the originally submitted design. The proposed building height will have a minimal overshadowing impact, particularly to the rear garden of these properties, in comparison with a compliant building height. All neighbouring properties will continue to receive greater than 3 hours of sunlight at mid-winter. With respect to privacy, the western balconies have been reduced in depth to sit within the 9m and 12m setbacks. The design has also been amended to include non-accessible landscaping and reduce the size of these balconies, protecting visual privacy and decreasing potential for overlooking impacts.

  - **Wind Environment**: The proposal includes design elements to ensure an acceptable wind environment for the proposed development, including the provision of glazing screens to balconies, the retention of trees and proposed tree planting. The proposal will have acceptable wind impacts on the surrounding public realm.

  - **Visual Impact**: The updated VIA has assessed a selection of 23 viewpoints from the immediate site context and surrounding area, including from locally listed buildings as required by DPHI in their key issues letter. While noting that moderate-severe visual impacts are

experienced in the immediate vicinity of the site, these do impacts do not extend to the wider area, with nil/negligible and minor/moderate impacts at locations from surrounding streets and from longer range views. The use of light-toned materials on the upper levels of the building, the reduced building massing, the incorporation of chamfered corners, façade articulation and balconies soften the built form and its presentation to the streetscape. Significant landscape planting within site setbacks and the retention of all street trees also assists in minimising the appearance of the built form. Overall, the short term visual effects and view impacts caused by the proposed development and assessed by the VIA are considered to be reasonable and acceptable in the context of the changing planning environment in the longer term.

- **Traffic, Transport and Parking:** An updated TIA (**Appendix J**) has been prepared to respond to the DPHI RFI and submissions which concludes:
    - The proposed development includes 344 car parking spaces. This provision exceeds the minimum parking requirements of the KDCP 2024 and Housing SEPP whilst remaining below the maximum KDCP 2024 thresholds.
    - Accessible parking spaces for residents and visitors, bicycle parking for residents and visitors, car share parking spaces, and motorcycle parking spaces are provided in accordance with or exceeding KDCP 2024 minimum requirements.
    - The proposal is expected to generate a net increase of 42 vehicle trips during the weekday AM peak hour and 31 vehicle trips during the PM peak hour, which is considered to be a minor increase. As such, the proposal is not expected to have a material impact on the operation of the surrounding road network.
    - The Green Travel Plan sets a mode share target of 40% private vehicle, 50% public transport and 10% active transport. The target will be achieved through initiatives provided by the developer, including promoting active travel, car-pooling and public transport, as well as providing information on sustainable travel choices to residents.
    - A Construction Pedestrian and Traffic Management Plan (CPTMP) is proposed to manage any potential impacts of the construction of the development on pedestrians and traffic. The CPTMP is to manage construction activities and vehicles to minimise the impacts on pedestrians, cyclists, on-street parking, vehicular access and the road network.
- **Noise and Vibration**: A wide range of mitigation and management measures are proposed to minimise potential noise and vibration impacts on surrounding receivers during the construction. In relation to the proposed residential apartments, specific design requirements for the built form are proposed to ensure that the surrounding rail and road network does not impact on achieving the required level of residential amenity.
- **Water Management**: A combined on-site detention/water treatment tank is proposed to reduce peak stormwater discharge from the proposed development. The principles of Water Sensitive Urban Design (**WSUD**) have been adopted in the stormwater design; firstly by minimizing impervious areas, followed by providing infiltration opportunity for runoff from impervious areas (and implementation of a rainwater tank to provide for reuse), and finally through treatment of runoff by various methods. The pervious areas of the site have been increased as part of the Response to Submissions to maximise WSUD.
- **Ground and Groundwater Conditions**: The potential impacts of the proposed development relating to excavations, shoring, foundations, groundwater and other geotechnical issues have been assessed in detail, with a range of mitigation and management measure proposed to ensure the proposal has acceptable impacts. The development of the proposal will have acceptable impacts regarding the construction of the basement and dewatering. The proposed basement construction has also been located and designed to minimise encroachment in the Metro protection reserve, thereby mitigating any potential for impacts on the Sydney Metro tunnel rail corridor beneath the western portion of the site.
- **Tree Removal**: To accommodate the proposed development, 90 trees require removal, and six trees will be retained and protected. A replacement tree planting ratio of 1:2.01 is proposed and the development will not result in any net loss of trees. All trees within the site that are assessed as having high retention value are proposed to be retained. One street tree assessed as having high retention value is required to be removed to facilitate the required Ausgrid access to the development's substation. This street tree is proposed to be replaced in accordance with Council's requirements. It is noted that, through further assessment by the project ecologist, the species of Tree 93 has been revised from Blue Gum to Flooded Gum. The revised proposal has enhanced the

landscape design to ensure the viable retention of all trees to be retained, in particular Tree 93 within the central courtyard.

- **Biodiversity**: The proposed development will require the removal of planted native vegetation, including trees and various ornamental shrubs and groundcovers; most of the vegetation consists of exotic species. None of the vegetation proposed to be removed could reasonably be assigned to a PCT. The vegetation is situated in a fragmented landscape, making it unlikely to be used by threatened species. The removed vegetation is not considered high-value habitat due to surrounding residential development. No sensitive or specialist fauna habitats will be impacted. There are no prescribed impacts on threatened entities associated with the proposed development. The Departments of Planning and Environment have determined that the proposed development is not likely to have any significant impact on biodiversity values a BDAR Waiver has been granted for the proposal.
- **Flooding**: In response to agency advice received, the previously proposed flood wall to the eastern site boundary has been removed and all residential apartments have been raised to achieve the flood planning level plus freeboard. An updated IWMP (**Appendix L**) and FIRA (**Appendix M**) have been prepared, including a Flood Emergency Strategy. The reports conclude that the proposal, when implemented with the proposed mitigation and management measures, will have acceptable impacts with regard to potential flood impacts, including in relation to neighbouring properties and streets.
- **Social Impact**: A SIA has been prepared by Gyde in accordance with the DPHI's 'Social Impact Assessment Guideline' (2023). The SIA considers the likely changes to the following elements of value to people: way of life, community, accessibility, culture, health and wellbeing, surroundings, livelihoods, and decision-making systems. The SIA identified the following potential positive and negative social impacts:
    - Increased supply of market and affordable rental housing.
    - Increased supply of affordable rental housing to cater for an aging population within the locality.
    - Impacts to the existing built form and character of the locality.
    - Proximity to existing services and infrastructure within Roseville Town Centre and nearby centres.
    - Reflection of Connecting with Country principles requires ongoing design to ensure satisfaction with the Connecting with Country process.
    - Impacts to residential amenity resulting from the demolition of dwellings within a Heritage Conservation Area and the removal of 90 trees.
    - Impacts to residential amenity through construction noise and dust.

  Overall, the project is predicted to provide a range of key community benefits. In addition, the proposal will generate indirect and direct employment opportunities during construction and operation. Negative impacts can be successfully mitigated through the strategies proposed in the SIA.
- **European Heritage**: In response to the submissions, Urbis has prepared a Heritage Impact Statement Addendum and updated Heritage Impact Statement (**Appendix T**) which assess the potential impacts of the revised design. The heritage assessment concludes:
    - The group of dwellings on the subject site do not provide an accurate reflection of the Clanville HCA's character as they do not feature a high degree of aesthetic significance and have been identified to not be "highly intact" or "high quality" examples of Federation houses within the area. The heritage significance of the HCA will be retained despite their removal.
    - Whilst the proposed development will be of a notably different scale and typology than that which currently exists, the proposal exists in a legislative context which will facilitate some uplift of the same type in nearby areas with vicinity to the nearby Roseville railway station. As such, the development will be in line with the planned future character of this area whilst providing in demand affordable accommodation.
    - A degree of visual impact to the setting of the HCA and the heritage item will arise as a result of the proposed development given the notable increase in scale. However, given the intended affordable residential housing programme, the proximity to the Roseville Railway corridor and

the planned high-density uplift affecting the future character of the area, the proposal is on balance considered as acceptable for the subject site from a heritage perspective

- **Aboriginal Heritage:** The Aboriginal Heritage Impact Assessment confirms that, given the widespread historical land disturbance, the likelihood of Aboriginal objects being present on the site is significantly reduced, and recommended that no further Aboriginal heritage assessments or investigations are required.
- **Archaeology:** The site's existing environment has been largely disturbed, with its current residential layout established by 1943 The updated HAA has addressed agency concerns and confirmed that due to historical high land disturbances, it is not anticipated that any significant archaeological relics would be encountered. The site has been assessed as having nil-low archaeological potential. Mitigation measures and unexpected finds protocols will ensure any possible impacts can be minimised.
- **Contamination and Remediation:** Additional ground water testing has been undertaken as part of the response to submissions. The supplementary ground water testing has been undertaken in response to recommendations outlined in the PSI, which identified the presence of shallow groundwater requiring further investigation. The findings of the further ground testing concluded that the shallow groundwater at the site does not present a human health or environmental risk and support the conclusion of the PSI that the site can be made suitable for the proposed development subject to completion of the remaining recommendations listed in the PSI.
- **Code Compliance:** reports have been prepared in support of this SSDA which confirm the proposed building is capable of compliance with the relevant BCA standards. In addition, waste management arrangements have been designed to comply with Council's requirements.

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

5.6. SUTABILITY OF THE SITE

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

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

5.7. PUBLIC INTEREST

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

- The development supports the Federal Governments National Housing Accord and the NSW Government priority to provide well designed market and affordable rental housing in a convenient and highly accessible location to meet the needs of all residents.
- Whilst the originally submitted SSDA included 48 affordable rental dwellings the proposed development has increased this number to 55 affordable rental dwellings that will be managed by a Community

Housing Provider (Link Wentworth) ensuring the needs of essential workers and vulnerable members of the community are provided for in Ku-ring-gai.

- The revised design has responded to relevant issues raised in the public submissions and with the implementation of the recommended measures, the development will not cause significant social or environmental impacts during construction and operation.
- The development will create 640 direct and 865 indirect jobs during construction and three ongoing jobs once completed, boosting the local economy.
- The development includes a high level of compliance with ADG design criteria, ensuring high standards of amenity for future occupants.
- All submissions have been considered on their merits in accordance with the EP&A Act and relevant guidelines. The RTS provides detailed responses to each matter raised, supported by updated technical assessments, ensuring that the proposal can be assessed and determined transparently and on its planning and environmental merits.
- Subject to the implementation of the recommended mitigation measures, no adverse social or environmental impacts result from the proposal during construction and operation of the development.

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

DISCLAIMER

This report is dated 10 December 2025 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Hyecorp Property Group **(Instructing Party)** for the purpose of response to submissions **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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

APPENDIX A UPDATED MITIGATION MEASURES

APPENDIX B UPDATED ARCHITECTURAL PLANS

APPENDIX C DESIGN REPORT ADDENDUM

APPENDIX D UPDATED LANDSCAPE REPORT & PLANS

APPENDIX E UPDATED CL4.6 VARIATION REQUEST

APPENDIX F ENGAGEMENT REPORT ADDENDUM

APPENDIX G UPDATED BCA REPORT

APPENDIX H UPDATED ACCESSIBILITY REPORT

APPENDIX I UPDATED VISUAL IMPACT ASSESSMENT

APPENDIX J UPDATED TRANSPORT IMPACT ASSESSMENT

APPENDIX K NOISE AND VIBRATION IMPACT ASSESSMENT ADDENDUM

APPENDIX L UPDATED INTEGRATED WATER MANAGEMENT REPORT

APPENDIX M UPDATED FLOOD IMPACT ASSESSMENT

APPENDIX N METRO IMPACT ASSESSMENT

APPENDIX O PRELIMINARY SITE INVESTIGATION ADDENDUM

APPENDIX P UPDATED ARBORICULTURAL IMPACT ASSESSMENT

APPENDIX Q UPDATED ESD REPORT

APPENDIX R UPDATED BASIX CERTIFICATE

APPENDIX S UPDATED WASTE MANAGEMENT PLAN

APPENDIX T UPDATED HERITAGE IMPACT STATEMENT

APPENDIX U UPDATED HISTORICAL ARCHAEOLOGICAL ASSESSMENT

APPENDIX V COMMUNITY HOUSING PROVIDER LETTER

APPENDIX W DRAFT ABORIGINAL HERITGAE INTERPRETATION STRATEGY

APPENDIX X UPDATED STATUTORY COMPLIANCE TABLE

APPENDIX Y SDRP ADVICE

APPENDIX Z UPDATED SITE SURVEY

APPENDIX AA WIND IMPACT ASSESSMENT ADDENDUM

APPENDIX BB UPDATED BDAR WAIVER

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