

SUMMARY

Submission on Revised Application for 2,4,6,8,10,12,14,16 Pockley Ave, Roseville

Project ID: SSD-77825469

This submission comments on

- Bushfire
- Bushfire Evacuation Risk
- Traffic and Access
- Construction Traffic
- Design
- Environment
- Proposed Link from Shirley Road to Pockley Avenue
- Stormwater Management

BUSHFIRE



Figure 1: Remnant Blue Gum High Forest Adjacent to the Site

Whilst the proposed development is not classified as Bushfire Prone Land the surrounding properties in Alexander Parade and Findlay Asvenue are on Bushfire Prone Land. Bushfires don't stop at lines on a map and the embers spread over considerable distances (Canberra 2003 and Los Angeles 2025 are 2 examples).

Remant Blue Gum Forest extends along Blue Gum Creek. It splits at the junction of Pockley Avenue at he bottom of MacLaurin Parade to form two tributaries – one between Nola Road and Corona Avenue, and the second between the Rifleway and Pockley Avenue up to Larkin Street. The area at the corner of Kings Ave and MacLaurin Pde is Council owned.and well maintained. The vegetation has many significant tall trees consistent with the species found in Blue Gum High Forest. Thus it presents a significant bushfire risk from steeply sloping terrain towards the Pacific Highway, and ember spread promoting the spread.

BUSHFIRE EVACUATION RISK

The Environmental Impact Statement Infill Affordable Housing, 2-16 Pockley Avenue, Roseville dated 17 April 2025 states

“7.20 Bushfire Risk

The site is not identified as being bushfire prone land. Being located in an urbanised and well established residential suburb, **there is a low risk of bushfire**. Therefore, a Bushfire Impact Assessment has not been prepared for this SSDA.”

The risk is real. This statement is contrary to what is clearly shown in the simulation – link [here](#). The consequences would be diabolic. The outcome during and after a bushfire would be similar to the recent experiences in Los Angeles.

In 1994 a bushfire threatened the area with 12 houses lost. The fire started in Lane Cove National Park east of De Burghs Bridge and spread quickly to the end of Grosvenor Road before advancing up the valley of Blue Gum Creek. On the Friday evening around 8.45pm many residents in Alexander Parade, Roseville were directed to evacuate, and others directed to be prepared for evacuation. There was a lack of water pressure for the fire brigades, multiple helicopters emptied all the swimming pools and insufficient pressure to extinguish embers by hose, so buckets had to be used. Only a wind change late Sunday evening saved further destruction as it blew back on the fire, thereby helping to contain it. The Mosman Fire Brigade was active on the Sunday morning at the end of Findlay Avenue where fences had been blackened.

Having lived through the 1994 bushfire and with climate change accelerating it's **not a matter of if, but when will it happen again.** It's probably sooner than thought.

Access from the Pacific Highway is effectively by single lane roads as street parking reduces the two and three lane three roads - Findlay Avenue, Corona Avenue and MacLaurin Parade - to single lane roads. The Findlay Avenue link to Alexander Parade will be blocked by fire reducing access to MacLaurin Parade and Corona Avenue. Kings Avenue is similarly affected to become a single lane road.

Thus emergency vehicle access and resident egress is severely compromised.

The bushfire simulation clearly [here](#) shows the evacuation risk as exit roads are blocked by fire. Ember spread is deemed to be 400m but the experiences in Hobart (1967), Canberra (2003) and Los Angeles (2025) show otherwise.



Figure 2: Bushfire Closing Exit Roads Kings Avenue, MacLaurin Parade, Pockley Avenue

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Figure 2 clearly shows a bushfire encroaching the development site. At this stage access for emergency vehicles would be denied to housing in Alexander Parade. Evacuation access is closed off. Figure 3 shows bushfire advancing up Nola Rd to Larkin Street and along Pockley Avenue

The focus of the paper by Thomas Cova (2005) "Public Safety in the Urban-Wildland Interface: Should Fire-Prone Communities Have a Maximum Occupancy?" is evacuation egress or accessibility out of an area in an evacuation.

For areas with 300-600 dwellings the Minimum number of exit roads is 3. Existing dwellings, new and proposed total 766.

Do assessors want to explain to an enquiry why their decision was made? Or worse, stand in front of the coroner and explain?



Figure 3: Bushfire Advancing up Nola Rd to Larkin & along Pockley

Action Review Bushfire and Evacuation Risks in light of simulation, past experience and access issues

TRAFFIC CONSIDERATIONS

Appendix N_Transport and Accessibility Impact Assessment_PI is based on fiction. Referring to the Pacific Highway it states

"It typically carries three traffic lanes in each direction in the vicinity of the site"

On site inspection would have shown the "expert" that there are only 2 lanes north bound in the vicinity of the site. Inspection of Figures 4 and 6 show only two lanes northbound.

Ku-ring-gai Council have made references in their previous submission

"Key transport-related works already identified in the Development Contributions Plan 2010 that are being re-assessed include road widening on Pacific Highway to accommodate 3 northbound lanes and fully controlled right turns into Maclaurin Parade."

However, there are no plans or provisions for these road works.

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The **gradient Pockley to Larkin intersection is 17 %** and steeper at this intersection than the average.

Pacific Highway access is via Findlay Avenue, Corona Avenue and MacLaurin Parade. Corona Avenue is left turn only at traffic lighted Boundary Street, Findlay Avenue is unlighted but enables left and right turns on to three laned Pacific Highway. However the Findlay intersection is on a blind corner so oncoming traffic is not easily seen. A right turn across three north bound lanes into three lanes of quickly moving south bound traffic on the Highway is hazardous and rarely used.

The intersection of MacLaurin Parade and the Pacific Highway is traffic lighted. However this intersection is blocked by stationary southbound traffic from Boundary Street to MacLaurin Parade. At AM Peak Hour the only way to turn right from MacLaurin Parade is to drive into the intersection thereby blocking it for north bound traffic.

The report Appendix N_Transport and Accessibility Impact Assessment_PI fails to amalgamate the traffic effect of developments under construction and the developments proposed being 2-16 Pockley Avenue, 2,4 Larkin St & 1, 3 5 Pockley Ave (SSD-77829461) and 7,9,11 Pockley Ave (Ku-ring-gai Council eDA0189/25) and 4 – 10 MacLaurin Parade (just finished) and the “Juliet” in Larkin Lane (Roseville Memorial Club site).

However, in Amendments the Appendix J - Supplementary Traffic Report makes a gesture at considering the effects on local traffic from other developments but only considers the other Aqualand proposal 2,4 Larkin St & 1, 3, 5 Pockley Ave SSD-77829461. Again, the traffic report is more fiction designed to convey conditions to assessors that favour the approval of the project, and not reality.

The report merely states

“That projected change in the traffic generation potential of the site as a consequence of the development proposal is minimal and will clearly **not have any unacceptable traffic implications** in terms of road network capacity”

thereby failing to consider the aggregate effects of traffic generated by all projects in Pockley Avenue, Larkin Street, MacLaurin Parade and Larkin Lane on the local road network and the access to the Pacific Highway especially at peak hours. Further the report fails to consider the effects of increased traffic and congestion at the MacLaurin Parade/Pacific Highway intersection for the 565 AM/PM School Bus, risking its abandonment due to excessive delays. It further fails to take into account the vehicles using MacLaurin Parade for U-turns to gain southbound Pacific Highway access which further exacerbates their intersection level of service – congestion. **The effects will be significant.**

The expert should get out of the office and spend a couple of hours monitoring existing conditions and add the aggregate affects of developments cited above to the report.

The Report adopted a traffic per dwelling generation factor of 0.19 based on the assumption that residents would use public transport. This shows an aggregate increase in traffic of 67 vehicles per hour, or 2.8 vehicles per 150 second cycle.

The ABS 2021 Census determined for this part of Ku-ring-gai that the modal split between private vehicle and public transport was 26% . This shows an aggregate increase in traffic of 98 vehicles per hour.

Both modal split values have been used to determine expected traffic generated by the aggregate developments – Appendices 1 & 2.

The traffic count on 11/06/2025 at peak hour showed the MacLaurin cycle time is 150 seconds, 6 vehicles left MacLaurin and 12 were left waiting for the next cycle. The last car to join the queue would exit after 2 cycles. Adding 67 vehicles per hour, 2.8 vehicles per hour, results in 14.8 vehicles for the next cycle for which the last car in the queue won't exit until it has waited for the third cycle or 7.5 minutes.

Adding 98 vehicles per hour, 4.1 vehicles per hour, results in 16.1 vehicles for the next cycle for which the last car in the queue won't exit until it has waited for the third cycle or 7.5 minutes.

Thus the additional aggregate units developments will increase waiting times by 1 cycle, from 5 minutes to 7.5 minutes for the last car to join the initial queue – a 50% increase.

The MacLaurin/Highway intersection at AM Peak Hour currently (11/06/2025) operates with average vehicle delay of 214 seconds - an RTA Level of Service (LOS) F – highly congested conditions. 6 vehicles per 150 second cycle exit MacLaurin, with 18 in the queue leaving 12 for the next cycle.

The letter from TfNSW states

“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 (i.e. the Pacific Highway).”

TfNSW fails to consider the blocked MacLaurin/Pacific Highway intersection effect on the Pacific Highway traffic.



Figure 4: Blocked AM Peak Hour MacLaurin/Highway Intersection



Figure 5: Driver Exit Visibility at Nola Road Intersection in MacLaurin Parade

The development vehicle entrance is at the intersection of MacLaurin Parade and Nola Road where there is a bend in MacLaurin Pde. The road narrows to two lanes at this intersection.. With parked cars, MacLaurin Pde has one trafficable lane. The left downhill lane slopes significantly towards the Nola Road level. Cars exiting left will have little vision of downhill traffic until well out of the exit to MacLaurin Parade as shown in Figure 5. For a vehicle exiting, the parked cars adjacent to the exit and the bend in MacLaurin will severely hamper visibility of vehicles descending MacLaurin Parade **thereby promoting accidents**.

There is no footpath in Larkin Street at street level, only 1.8 m to 2 m above street level on the Highway side. At the MacLaurin/Larkin intersection there are 9 steps up to the MacLaurin footpath. Parents with child strollers must use the road until Larkin Lane amongst traffic.

Given the very limited on street parking there needs to be more visitor parking given that residents in other developments will be scrambling for street parking. Many of the 2 bedroom units will be rented with the occupants unrelated to each, thereby creating a high proportion of 2 cars per unit where the design allowance is 1. Visitor parking is 10.6% of the total - inadequate.

Action: Redesign to have the vehicle entrance in Pockley Avenue to remove the accident promoting arrangement.



Figure 6: MacLaurin/Pacific Highway Intersection showing 2 lanes northbound, not 3 lanes



Figure 7: Narrow Access/Egress Roads

CONSTRUCTION TRAFFIC

Construction traffic inevitably affects the MacLaurin/Pacific Highway intersection often flattening the traffic lights. To reduce the impact on local residents construction traffic must enter the site from Pockley Avenue as reversing into the site from MacLaurin Parade with trailers will have a serious access impact for the residential areas especially at peak hours.

DESIGN

The design proposal is an overdevelopment of the site with inadequate deep soil planting. The Landscape plans show tall trees like blue gums and angophoras when mature. The setback from Pockley Avenue is shown as 10 m but that is from the site boundary to the internal surface of the facade. As the facade is likely to be 1 m deep, the real setback is 9m. The landscape plans show Blue Gums in Pockley Avenue, 1m from the site boundary leaving 8m for canopy. These trees grow to 30 m plus.

The revised design reduces the deep soil area by a significant amount which is inconsistent with the NSW Government's and Council's objective to increase the tree canopy in urban areas.

The design incorporates subterranean dwellings. With the developments in Larkin/Pockley and Pockley opposite, the sun access will fail to meet the 2 solar access at the June solstice.

Recently completed developments in Corona Avenue and MacLaurin Parade are not selling due to high prices (around \$2 to \$2.2 million) for minimum sized 2 bedroom units. How will the "affordable" units will be affordable as the rent will be considerably higher than the average for Roseville in order to meet the development costs?

It is proposed to remove roof top building plant screening. This will create potential for accidents for users of the Community Open Spaces on the roof tops.

ENVIRONMENT

The surrounding area is home to many native species of flora and fauna. Powerful owls visit regularly for their prey. They require tall trees. Possum entrails have been left in gardens many times, and as recently as 15 April 2025. Other avi-fauna include cockatoos, crested pigeons, king parrots, lorikeets and galahs. A whip bird is often heard at the bottom of Kings Avenue. The construction will severely compromise their habitat environs.



Figure 8: Possum Entrails from Powerful Owl



Figure 9: Powerful Owl Sighting 32 Shirley Road

PROPOSED SHIRLEY ROAD – POCKLEY AVENUE LINK

The proposed link between Pockley Avenue and Shirley road will do little to alleviate traffic issues at the MacLaurin/Highway intersection as the Shirley Road/Pacific Highway intersection is already overburdened. In AM peak hour it takes 2-3, sometimes as many as 4 traffic light changes for a right turn exit. Further it will encourage rat runs through suburban streets to avoid overburdened intersections, especially for traffic to and from Lady Game Drive and towards North Ryde. This proposed road will drive Shirley Road traffic to the MacLaurin Parade/Pacific Highway intersection increasing traffic access congestion.

The link is on a blind corner in Shirley Road, down a steep incline around 20% to Pockley Avenue. Opposite this intersection there is a proposal for 58 units at 17-21 Shirley Road for which the vehicle entrance/exit is almost opposite the link exit.

In the event of a bushfire, Shirley Road will be used for evacuation and emergency vehicles from the length of Shirley Road adjacent to Blue Gum Creek up to the Rifleway and opposite Alexander Parade and Pockley Avenue.

It will be of little benefit to the precinct in a bushfire evacuation as it crosses the bushfire prone lands in Pockley Avenue.

STORMWATER MANAGEMENT

The proposed stormwater drainage is via a detention tank connected to the existing stormwater drainage at Pockley Avenue which then connects to the main stormwater system which discharges into Blue Gum Creek at the Kings Avenue creek crossing.

The report fails to consider the impact on the Blue Gum Creek flow especially with high flow events when the OSD fails to contain the storm event and the OSD overflows into Pockley Avenue via its overflow spillway thereby affecting properties opposite. OSD tanks are invariably shown to be undersized notwithstanding statutory design guides.

Residents in Alexander Parade whose properties back onto Blue Gum Creek have already lost land due to excessive flows from the developments in Nola Road such that the rear fence is now in Blue Gum Creek. This proposed development should have zero impact on land loss for these properties.

Action: Review the design, the size of the OSD and discharge volumes taking into account what happens in Blue Gum Creek and adjoining lands so that there is no likely loss of land by stormwater, not just the size of the discharge pipe and connection to the existing stormwater system.

APPENDICES

Appendix 1 Modal Split for Additional Traffic Generated by New Units, 0.26 Vehicle Trips per New Unit

Appendix 2 Modal Split for Additional Traffic Generated by New Units, 0.19 Vehicle Trips per New Unit

Modal Split for Additional Traffic Generated by New Units

	AM Peak Hour Traffic Generated			AM Peak Traffic Existing House			AM Peak Hour Traffic Increase
	New Units	Vehicle Trips per New Unit	AM Vehicles per Hour	Houses Demolished	Vehicle Trips per House Removed	AM Vehicles per Hour	Increase in vehicles per hour
2,4,6,8,10,12,14,16 Pockley Ave Project ID: SSD-77825469	180	0.26	47.00	8	0.68	5.00	42.00
2,4 Larkin St & 1, 3, 5 Pockley Ave Project ID: SSD-77825469	111	0.26	29.00	5	0.68	3.00	26.00
7,9,11 Pockley Ave Project ID: Ku-ring-gai Council eDA0189/25	42	0.26	11.00	3	0.68	2.00	9.00
4A, 6A, 6, 8, 10 Maclaurin Pde Project ID: Ku-ring-gai Council DA0382/21	40	0.26	10.00	5	0.68	3.00	7.00
Roseville Memorial Club Project ID: Ku-ring-gai Council DA0382/21	33	0.26	9.00	0	0.68	0	9.00
1 – 3 Corona Avenue Project ID: Ku-ring-gai Council DA00300/19	23	0.26	6.00	2	0.68	1.00	5.00
Total Increase in Traffic Generated by New Units AM Peak Hour							98

Modal Split for Additional Traffic Generated by New Units

	AM Peak Hour Traffic Generated			AM Peak Traffic Existing House			Traffic Increase
	New Units	Vehicle Trips per New Unit	AM Vehicles per Hour	Houses Demolished	Vehicle Trips per House Removed	AM Vehicles per Hour	AM Peak Hour Increase vph
2,4,6,8,10,12,14,16 Pockley Ave Project ID: SSD-77825469	180	0.19	34.00	8	0.68	5.00	29.00
2,4 Larkin St & 1, 3, 5 Pockley Ave Project ID: SSD-77825469	111	0.19	21.00	5	0.68	3.00	18.00
7,9,11 Pockley Ave Project ID: Ku-ring-gai Council eDA0189/25	42	0.19	8.00	3	0.68	2.00	6.00
4A, 6A, 6, 8, 10 Maclaurin Pde Project ID: Ku-ring-gai Council DA0382/21	40	0.19	8.00	5	0.68	3.00	5.00
Roseville Memorial Club Project ID: Ku-ring-gai Council DA0382/21	33	0.19	6.00	0	0.68	0	6.00
1 – 3 Corona Avenue Project ID: Ku-ring-gai Council DA00300/19	23	0.19	4.00	2	0.68	1.00	3.00
Total Increase in Traffic Generated by New Units AM Peak Hour							67