

17 December 2025

via the NSW Planning Portal

The Hon Paul Scully MP
Minister for Planning and Public Spaces
GPO Box 5341
Sydney NSW 2001

Dear Minister Scully

Objection to Amended State Significant Development Application No SSD-77825469 "In-fill Affordable Housing Development, Pockley Avenue, Roseville"

I formally object to Amended State Significant Development Application No SSD-77825469, which seeks consent for a nine-storey apartment building containing 180 dwellings and 284 car spaces at 2–16 Pockley Avenue, Roseville.

The amended application does not respond to the serious concerns about the development raised by the 105 members of the public who lodged an objection to the original application, including myself, who is a nearby resident and parent of a one year old child.

The major change made by the amendment report is to include a rooftop communal open space. This does nothing to address the serious and adverse impact of the development on nearby residents. To the contrary, as identified by the letter from the Department dated 27 November 2025, it increases the building height by up to 2.64 m, increases dwelling numbers from 178 to 180 and only removes one single carspace, while adding an entire new level to the basement carpark.

These changes only exacerbate my concerns about the development set out in my original submission dated 17 June 2025.

The following matters are relevant and must be taken into account by the Department in their assessment of the amended application:

- 1 **Emergency evacuation issues (including bushfire):** The real and serious concerns raised in the public's submissions regarding the ability of local residents to evacuate the area in the event of a bushfire or other local emergency is not addressed at all in the amended application. Our property in Alexander Parade is zoned as bushfire prone and the proposed development is located to block one of two already congested exits to the Pacific Highway. We understand that there were evacuation issues in the 1994 bushfires and hold genuine concerns about our ability to evacuate the area in an emergency as we would be unable to evacuate on foot with a young child noting the steep uphill slope to the highway. We also understand that the proposed development is in the ember zone of bushfires based on Council's bushfire simulating created in August 2024.

Meanwhile, as acknowledged on page 85 of the Combined Submissions and Amendment Report prepared by planning & co on behalf of the applicant dated 25 November 2025 (the **Amendment Report**), no bushfire impact assessment has been prepared.

Required action: A bushfire impact assessment should be required and it must include an assessment of the evacuation issues identified above.

- 2 **Lack of adequate infrastructure including traffic impacts and adverse impacts on families:** The amended application and the accompanying reports and documents do not adequately respond to or acknowledge the fact that the West Roseville area already lacks

appropriate infrastructure for the local community, particularly for young families, as was raised in submissions from myself and other members of the public in response to the original application.

In relation to **traffic**, any visit to the intersection of Maclaurin Parade and the Pacific Highway in peak weekday periods will demonstrate the very high level of congestion that makes it near impossible to turn right and therefore to access Roseville station and East Roseville/Roseville Chase, and requires significant time to be allowed to access Lindfield by turning left. The Department should conduct such an in person inspection as part of the assessment of the application. The supplementary traffic report cannot be relied on. In this context, the proposal to insert 284 new permanent carspaces in addition to visitor spaces – on top of the carspaces yet to be occupied in the “Rosewood” development on Maclaurin Parade – simply cannot be accepted. The development is very close to the train station and carspaces should be restricted accordingly in line with the NSW Government’s ‘Transport-Oriented Development’ policy. Even 50 new carspaces across this and the parallel application No SSD-77829461 (111 dwellings, 150 car spaces at 2–4 Larkin Street and 1, 3 & 5 Pockley Avenue) would have a serious and adverse impact on the current traffic situation. (I note that the parallel application has not been amended by the applicant in response to overwhelming public objections similar to those made to the present application.)

In relation to **infrastructure for young families**, there is already (a) no pram-accessible footpath access from Maclaurin Parade to the Pacific Highway and Roseville station and shops (b) no local childcare centres or parks and (c) inadequate local school places – Alexander Parade has recently been excluded from the catchment area for the closest primary school, Lindfield Public School, with children required to attend the alternative and more distant Lindfield Learning Village. This is unacceptable and will become even more serious if the proposed development and the parallel development are approved.

The updated social impact assessment by Forward-Thinking Aust Pty Ltd dated 26 August 2025 and submitted with the amended application (**Social Impact Assessment**) does not adequately address the above issues and cannot be relied on by the Department. For example, although a list of 6 childcare providers is included in the Amendment Report based on the Social Impact Assessment, only one of these is located in West Roseville and only 3 others are located in Roseville at all – but they are in East Roseville which is inaccessible from West Roseville based on the current peak hour traffic levels referenced above, especially for the majority of parents who need to drop off and pick up children before and after commuting to work in the CBD or North Sydney. The single childcare provider in West Roseville will be significantly impacted by the neighbouring proposed similar development on Shirley Road which will make it unsafe for children due to construction impacts.

The Social Impact Assessment acknowledges on page 35 that there is a “below-benchmark provision of parks with play facilities in Ku-ring-gai LGA”. None are identified in the document that are suitable for young children and none of the identified playgrounds are within reasonable walking distance of the development.

Our family was not included in the survey relied on in the Social Impact Assessment despite being in an area directly affected by the proposed development. The results cannot be relied on.

Critically, although page 80 of the Amendment Report references the requirement to provide infrastructure contributions, nothing has been proposed by the applicant. If the development is approved in any form, specific and significant infrastructure contributions to remedy the above issues must be required as a condition of consent.

Required action: Based on the above, the Department cannot approve the proposed development at this time while the above traffic and infrastructure for families issues are live i.e. until local schools, parks, childcare and library facilities are upgraded and the significant traffic issues faced by West Roseville are addressed.

At a minimum, a site visit should be conducted by the Department to assess these issues as part of the assessment process and any approval should be subject to the applicant being required to make significant and specific infrastructure contributions including at least (a) a local public playground and park suitable for young children and (b) upgrading footpaths to ensure accessible transit to the Pacific Highway for prams and wheelchairs.

- 3 **Building height:** As acknowledged on page 12 of the Amendment Report, the proposed building height exceeds the maximum permitted height by 6.35m or 22% - taking into account the additional 30% above the 22m maximum height that is allowed based on the bonus for affordable housing units included in the development under the Housing SEPP. This will have an unacceptable adverse effect on nearby residents in terms of overshadowing and impact on local character.

The proposed development far exceeds the height of other developments in the area that are being relied on – please refer to page 13 of the Social Impact Assessment which provides images of these other buildings which are a maximum of six stories. The difference between these developments and the proposed development is highlighted by the images on the following page of the Social Impact Assessment.

Required action: under no circumstances should the development be permitted to exceed the current maximum of six storeys.

- 4 **Inadequate provision for affordable housing:** Although the amended application provides for an increased number of affordable housing dwellings, the vast majority of these are only for a very short period of time. There are only 8 permanent affordable housing developments in a building of 180 dwellings (4%). This is unacceptable and does not justify the developer being permitted to build well over 20% above the maximum allowable height. The Social Impact Assessment also requires heavily on affordable housing, but this is essentially a façade at present. If the application is approved in any form, affordable housing dwellings should be permanent to justify the enormous imposition of this development on the local community.

Required action: the development should only be allowed to proceed if the proportion of permanent affordable housing dwellings is very significantly increased to at least the number of temporary affordable housing dwellings being proposed.

- 5 **Adverse impact on environmentally sensitive land and construction impacts:** these serious concerns raised in my previous submission have also not been addressed in the Amendment Report. To the contrary, they have been exacerbated by the proposed additional basement level which will increase excavation, construction and broader adverse environment impacts.

Required action: The proposed additional basement level should be refused and the applicant required to address these matters; this will likely result in the refusal of the application as it appears these matters cannot be addressed satisfactorily because of the outsize scale of the proposed development and its location on a slope leading to environmentally sensitive land including our “Environmental Living” zoned property on Alexander Parade which includes a creek flowing to Lane Cove National Park.

For all of the above reasons, the amended application manifestly fails to comply with mandatory SEARs, poses unacceptable and irreversible environmental, safety and social impacts, and should be refused.

Please let me know if I can provide any further information or assistance.

Yours sincerely

[personal details of submitter redacted]