

Department of Planning Housing and Infrastructure
Attention: Akshay Bishnoi
Submitted via the NSW Major Projects Portal

21 July 2026

Dear Akshay

RE: SSD-81623209-Mod 3, 9-21 Beaconsfield Parade, Lindfield – Design Refinements

We are writing to formally object to the proposed Modification 3 (Design Refinements) for 9-21 Beaconsfield Parade, Lindfield.

The Proponent describes the ‘minor’ modification plans and we quote:

- *Refinement of internal apartment planning capturing structural engineering requirements, market feedback and enhancing apartment amenity with minor elevational adjustments;*
- *Improvements to the basement layout to enhance circulation, provide 12 additional residential car parking spaces to reflect the amended unit mix and adjust the operational waste management strategy accordingly;*
- *Amendment to the unit mix to increase number of 3-bedroom units than originally approved, reflecting Lower North Shore downsizer market demand. The approved total of 399 units remains unchanged;*
- *Minor reduction in total GFA and consequential updates to the affordable housing provision and proportionate height standard;*
- *Replanning of the internal communal facilities in the development and diversifying the offering for future residents;*
- *Improvements to the Building 3 entry points (E and F) to ensure they are equitable and accessible; and*
- *Accommodation of an essential structural transfer at Level 7 of Buildings 1 and 3, and Level 8 of Building 2 resulting in respective 100mm height increase on each building and provision of equitable lift access to level 10 of Building 3 resulting in a lift overrun centrally located within the building causing no overshadowing impact.”*

The key elements of the proposed modifications that are of concern to FOKe are:

- **“Amendment to the unit mix to increase 3-bedroom units than originally approved, reflecting Lower North Shore downsizer market conditions”. Nine (9) additional 3 bedroom apartments and twelve (12) additional car spaces to accommodate the additional 9 x 3 bedroom apartments and the removal of one (1) affordable dwelling, and reducing the number of 2 bedroom apartments by twelve (12).**
- **‘Replanning of the internal communal facilities in the development and diversifying the offering for future residents’; Extensive areas of shaded passive paved open space areas exist with three (3) small areas of natural grass and elevated garden beds, limited seating, token putting green, ensure these communal areas will be under-utilised by residents.**

- Accommodation of an essential structural transfer at Level 7 of Buildings 1 and 3, and Level 8 of Building 2 resulting in respective 100mm height increase on each building and provision of equitable lift access to level 10 of Building 3 resulting in a lift overrun centrally located within the building causing no overshadowing impact. **The access to fifty (50) affordable and eight (8) in perpetuity dwellings are clustered together in Building 1a above each other on Level 1-7 and are distinctly separated from the market/private dwellings. The entrance to Building 1a via 'poor doors/lifts' has not been addressed. Also noted that all the recreational facilities being 'private' gym amenities, golf simulator, cinema, larger community /work from home space, pool and sauna are within the private areas of Building 3. We question whether the above listed 'private' 'community' facilities will be available for the use of affordable and in perpetuity residents or only to be accessed and used by the residents of the market/private purchased apartments?**

Rationale for the Modifications are not supported.

Reconfiguration to target the Ku-ring-gai Downsizer market remains inadequate

The revised changes to the plans are based on the financial incentive to target Lower North Shore downsizers in Ku-ring-gai with additional eight (8) three bedroom apartments will not satisfy the needs of this target demographic. In the process (12) two bedroom apartments are being removed and one (1) affordable apartment.

To quote a retired property valuer who recently downsized to a large 3 bedroom apartment in Lindfield who has examined several of the proposed TOD SSDs stated:

"The 3 bedroom apartments which downsizers go for are large being typically 190-220sm internal + large balconies. All have at least 2 and some 3 lock up car spaces and separate lock up storerooms. For example, our unit has about 380sm on title. The Tryon Road Mirvac complex was developed on similar principle and has a good percentage of owner occupiers.

As a general comment a lot of what I've seen in the SSD are much smaller units and a high proportion of 1 & 2 bedders. The 3 bedroom units are rarely over 120sm. It's difficult to call them 3 bed, more 2+ study and have limited parking/storage. They are not really attractive to downsizers."

The average internal size of the seventy-eight (78) three bedroom units being proposed by the Proponent range from 100sqm to 134 sqm in size with only five (5) three bedroom units being over 130sqm. The remaining seventy-three (73) three-bedroom range between 100sqm and 119sqm internally.

While the Proponent purports to modify the dwelling mix to increase the number of 3-bedroom units to target the local "downsizer" market, this modification creates severe, compounding adverse impacts that increase the unaffordability of housing in Ku-ring-gai for normal income families and low income workers seeking one and two bedroom units.

Merging configurations within a rigid, pre-approved structural envelope generates sub-optimal architectural layouts while exacerbating traffic, heritage, overshadowing, and amenity concerns across the site and to the adjacent low-density environment.

Modifying the dwelling mix to increase the number of 3-bedroom units within the physical constraints of the existing approved structural layout and basement design mean these apartments completely fail to satisfy the actual needs, expectations, and lifestyle requirements of the premium Lower North Shore downsizer demographic.

Consequently, this modification does not deliver authentic, liveable sizing options. Instead, it creates compromised, high-density units that fail to meet local demand, while undermining the strategic intent of providing diverse and affordable housing choices in the Ku-ring-gai local government area.

Additionally, FOKE **objects** to the modification based on the following specific grounds:

1. Architectural Details: Sub-Optimal Floorplans and Lack of Premium Infrastructure

- Merging adjacent 1- or 2-bedroom units within a fixed building envelope creates long, narrow "shotgun" layouts rather than wide, house-scale spaces. These deep floorplans force third bedrooms or study zones into dark building cores, restricting natural light.

- While the unit mix is being altered on residential levels, the basement remains structurally bound by the [Mod 1 basement redesign \(Determined May 2026\)](#). The open communal grid lacks private side-by-side lock-up garages. Forcing premium downsizers to rely on tandem bays or remote, chain-link storage cages fails the basic asset-security requirements of locals vacating multi-million-dollar priced properties.

2. Traffic and Parking Intensification

- Local market data confirms that affluent downsizers transitioning into 3-bedroom residences are multi-vehicle households, often retaining two vehicles.
- By swapping investor-grade units for multi-car downsizer households, local traffic volumes will spike during peak commuter times. This creates severe bottleneck friction on a narrow residential street coping with massive local high-density changes already proposed for Beaconsfield Road e.g., 'Beacon House' 4 Beaconsfield Road (36 apartments under construction); 3 and 3a Beaconsfield Road (approved for 88 apartments); 5-7 Beaconsfield Road; including others in local vicinity being 12-16 Bent Street (approved for 111 apartments); 19-25 Balfour Street (amended proposal for 71 apartments); 9 -17 Balfour Road (proposing 114 apartments); 2-4 Drovers Way and 9a Gladstone Road (proposing 119 apartments), along with several current SSDs on the east side of the Lindfield TOD. This is an area with few traffic lights onto the Pacific Highway and few alternative routes at peak periods. Approximately 2000+ additional dwellings will be added to this area confined by narrow streets if all are approved.
- The amended traffic study does not assess the cumulative impact of the TOD SSDs in Lindfield. The proponent has only assessed the traffic generation from 9-21 Beaconsfield Road's 399 apartments. No cumulative traffic study has been undertaken.

3. Encroachment on Local Heritage Character

- The visual dominance and scale of this 9-10storey development fails to offer a sympathetic form or step-down transition to the adjacent heritage conservation area, character homes and adjacent low-density pockets.
- Crowding oversized unit envelopes into the tree canopy upper storeys cements the loss of deep-soil planting zones. This permanently removes the mature tree canopy and native vegetation characterising the historic Blue Gum high Forest (BGHF) and Sydney Turpentine Ironbark Forest (STIF) ridgetop Ku-ring-gai streetscape.
- The Deep Soil cover has been further reduced since Modification 1. It stands at a paltry **20.2%** for the size and impact generated by this development.
- Beaconsfield Road, Lindfield (NSW) sits across two critically endangered ecological communities: **Blue Gum High Forest** (BGHF) and **Sydney Turpentine-Ironbark Forest** (STIF). Local indigenous canopy trees include the **Sydney Blue Gum** (*Eucalyptus~saligna*), **Blackbutt** (*Eucalyptus~pilularis*), **Turpentine** (*Syncarpia~glomulifera*), and **Sydney Red Gum** (*Angophora~costata*) none of which are listed as tree species included in the plantings in the landscape plan. The only BGHF or STIF ground layer, fern or grass species we have been able to identify on the landscape plan being the **Soft Bracken Fern** (*Calochlaena~dubia*). This approach is completely inadequate.

4. Heightened Overshadowing and Solar Deficit

- The revised structural distribution of the expanded 3-bedroom footprints creates bulkier external profiles. This worsens the building's overall massing, intensifying severe afternoon overshadowing on neighbouring low-density residential properties, particularly along the immediate streetscape and adjacent boundaries.
- Maximum height approved of 30.87 metres, is being increased so that the 4.6 Clause request has increased from an 11.7% overrun, to now a proposed **15.6%** overrun. This is essentially building height gain by stealth and should not be supported.

- Because these merged 3-bedroom apartments are deep, single-aspect shapes, they struggle to achieve the mandatory solar access required by the NSW Apartment Design Guide (ADG), reducing the liveability of primary living zones. Solar access is now below the mandated 70% of units and should not be allowed.

5. Severe Loss of Privacy and Amenity

- The transition to larger 3-bedroom layouts typically results in expanded balcony areas or altered window placements. This creates direct, invasive lines of sight into the private open spaces and backyards of neighbouring properties, notably impacting properties like 25 Beaconsfield Parade.
- Forcing downsizers into a massive 399-unit layout means long, noisy common hallways and open courtyards, heavy reliance on shared lift cores, and high acoustic transfer within the site. This entirely undermines the quiet, private "aging-in-place" amenity that downsizers require.

4. Severe Deficiency in Internal and External Size

- Long-standing market data across Ku-ring-gai confirms that downsizers transitioning out of large family homes require a minimum of 150 sqm to 180 sqm of internal living space, alongside substantial, private terraces (30 to 50 sqm) to comfortably accommodate existing furniture and maintain an indoor-outdoor lifestyle. See earlier statement from a local downsizer and typical unit sizes being sought by Lower North Shore downsizers.
- The Proponent has strategically avoided adopting an oversized 150 m² minimum footprint for its 3-bedroom apartments—settling instead on a leaner average yield of roughly 111 m²—because their corporate business model focuses on the 'budget' downsizer, mass-market affordability, high density, and volume sales, rather than boutique luxury down-sizing which is desired on the Lower North Shore.
- The modified 3-bedroom units remain severely constrained by the building's rigid crowded high-density footprint. Merging smaller configurations results in compromised, narrow floorplans that fail to provide necessary house-scale proportions, wide corridors, and generous storage spaces required by an ageing demographic.

5. Substandard Basement Parking and Storage Infrastructure

- We also understand from our members that security, privacy, and extensive storage are non-negotiable for North Shore downsizers. The local market standard for 3-bedroom downsizer units is a private, walled-off side-by-side double or triple lock-up garage with integrated, secure storage.
- Mod 3 fails to alter the basement structure established under previous modifications. Incoming 3-bedroom occupants will be forced to use an open, high-density communal basement matrix. The lack of private lock-up garages, combined with a reliance on tandem parking bays and external, chain-link basement storage cages, is entirely incompatible with the asset-protection and accessibility needs of this premium buyer demographic.

6. Incompatibility with Aging-in-Place Principles

- True downsizer housing must support long-term "ageing-in-place." The extreme density of this 399-unit complex—originally optimized for young professionals and investors—creates high-traffic communal areas, lengthy internal corridors, and heavy reliance on shared lifts. This environment lacks the quiet, secure, and highly accessible setting that downsizers deliberately seek out when leaving their family homes and gardens.

Conclusion

The Proponent is seeking consent for a section 4.55(1A) modification application to SSD-81623209 relating to the approved residential flat building with infill affordable housing at 9-21 Beaconsfield Parade, Lindfield.

We understand that the modifications are primarily being made based on market feedback and financial market feasibility for the Proponent. The matters of consideration in section 4.15(1) of the Act are therefore not satisfied, and the proposal remains inconsistent with the applicable NSW Government infill planning framework. The amendments also result increased height, a negative amenity and environmental impact.

The plans also fail to ensure that the affordable housing is interspersed naturally among standard market or private units with access to common private internal common recreation areas such as being provided in Building 3. Clearly the placement of all 50-infill affordable and 8 affordable dwellings in perpetuity clustered in Building 1a on Levels 1-7 via a separate 'poor door' fails to integrate the affordable dwellings in accordance with the TOD policy guidelines which is not only discriminatory but totally unacceptable. The removed affordable unit needs to be reinstated back to 59 dwellings.

The Proponent's attempt to rebrand sub-optimal, high-density 3-bedroom units as suitable "downsizer" housing is a cynical marketing exercise that ignores the established socio-demographic realities of Lindfield and the broader Ku-ring-gai area.

This modification does not provide a genuine solution for locals looking to trade their family homes; it simply delivers a compromised high-density product under a false premise. Mod 3 fails to meet the premium downsizer expectations of the local market while introducing unacceptable traffic, overshadowing, visual amenity, impacts on ageing sewer infrastructure, heritage and environmental impacts to Lindfield.

We urge the Department to reject Mod 3 in its current form and require the Proponent to either maintain their original entry-level product mix or fundamentally redesign the development from the basement up, scaling back overall mass to deliver genuine, premium-grade, house-sized residences that truly serve the downsizer Ku-ring-gai community and which respects the environmentally and heritage sensitive North Shore context.

The modified project is not in the public interest and not worthy of approval.

Yours faithfully

Kathy Cowley

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PRESIDENT

cc Mayor and councillors Ku-ring-gai Council

cc Matt Cross MP Member for Davidson

cc The Hon Alister Henskens SC MP Member for Wahroonga

cc Nicolette Boele MP Member for Davidson

cc The Hon Chris Rath MLC Shadow Minister for Planning and Public Spaces