

**Re: Residential development with in-fill affordable housing, 16-24 Lord Street & 21-27 Roseville Avenue, Roseville (SSD-78996460)**

As a neighbour directly opposite the development, I am writing to formally object to the Hycorp proposed development of the four 9-storey apartment buildings. This submission outlines serious concerns regarding the inappropriate nature of this development and its significant negative impacts on our established residential community and surrounding heritage conservation areas.

**Traffic and Transportation Concerns**

**Inaccurate Traffic Assessment**

The traffic report relied on by Hycorp is outdated. They used data from 2016 and not from 2021.

Using Hycorp's own stated data, 56% of Roseville's residents travel to work by car. Data from 2021 Census states that average Roseville household size is 2.9 people per household. Therefore based on the census data, with Hycorp's 259 proposed units, this equates to 751 residents (259 units x 2.9 household members).

Applying 2021 census data showing car ownership in Roseville, it is reasonable to predict that there will be 417 cars owned within the Hycorp development.

Assuming the 417 cars belong to working adults, and 56% of workers travel to work by car, then it is reasonable to assume that 233 of Hycorp's residents would be entering/exiting Lord St by car each day. The Transport Impact Assessment has estimated 43 cars (AM) and 32 cars (PM) entering and exiting on Lord St in peak hours, which grossly underestimates what the data would suggest. Simple mathematics alone would suggest that this logic is flawed, especially given in addition to the workers who travel by car to work that many households also have one parent who need to drive their children to school or older kids who drive to University, etc.

**Onsite Parking Requirements**

As per above, based on an estimated 417 cars owned by Hycorp residents, the provided 309 resident parking spaces would fall short, resulting in a net overflow of approx. 108 cars that we have to assume would need to find street parking in the surrounding streets.

**Traffic Impact on Local Infrastructure**

All traffic access into and out of the development is proposed through Lord Street only. This creates an unacceptable bottleneck and fails to utilise Roseville Avenue as an alternative access point, which would distribute traffic load more appropriately. It is unacceptable that Lord Street alone would bear the brunt of all resident traffic and services traffic (such as garbage collection).

The additional traffic generated will severely impact:

- **Peak period congestion** at key intersections including Hill Street onto Boundary Street and Clanville Road onto the Pacific Highway, as well as Lord Street onto Archbold Road.
- **Local streets** that are already functioning essentially as one-way due to existing traffic volumes and parked cars, especially due to proximity to Roseville College.

## Environmental and Infrastructure Impact

### Loss of Natural Light

As indicated by section 6.1.2.1 in the EIS document from Hycorp, the proposed building will completely block the north-facing windows of all the houses across the street from 2 PM. This is an extremely unfair burden that neighbouring houses, including mine, have to bear.

### Significant Tree Removal

The proposal requires removal of **91 established trees** to accommodate the development. This represents a substantial loss of urban canopy and environmental amenity that cannot be adequately compensated through replacement plantings.

### Infrastructure Strain

Pg 30 of the Hycorp EIS acknowledges that the site is flood affected. With the eastern portion subject to inundation.

## Sydney Metro Reserve Tunnel Impact

The proposal involves excavation at 16 Lord Street into the Sydney Metro Reserve Tunnel, raising serious concerns about structural integrity and potential impacts on critical transport infrastructure. Not to mention that excavation 15m below ground at this juncture would prevent future expansion of the Metro tunnel for future infrastructure needs.

## Construction Impact

### Extended Construction Period

Construction is expected to take **at least 2 years** (assuming no delays) with an exceptionally broad working window:

- Monday to Friday: 7:00 AM to 8:00 PM
- Saturday: 8:00 AM to 1:00 PM

This 13-hour daily construction window is unreasonably extensive, particularly during winter months when work will commence and continue in darkness, affecting residents' reasonable amenity. Even single residential dwelling construction is not allowed to continue outside of business hours. It's unfathomable that large scale and prolonged construction would be allowed until 8 PM at night and also on Saturdays.

### Construction Logistics

The narrow streets of Lord Street are wholly inadequate for accommodating:

- Heavy construction trucks and machinery
- Crane operations
- Construction worker parking
- Material deliveries and storage
- Road surface damage from heavy vehicle movements

## Building Scale and Character Impact

### Inappropriate Height and Bulk

The proposed development of four towers reaching up to 9-storeys is completely inappropriate for this established residential area. These 4 towers would effectively be an “island” because no similar high-rise dwellings can ever be built closer to Roseville Station because of the Metro Tunnel infrastructure preventing excavation. I understand this is the reason why 14 Lord Street was initially included but then subsequently excluded from the proposed development.

This excessive height and bulk will create:

- **Severe overshadowing** of properties on the southern side of Lord Street
- **Significant restriction of northern light** to existing homes
- **Complete loss of privacy** through overlooking of private spaces
- **Compromised solar access** affecting both amenity and energy efficiency
- **Destruction of established streetscape character**

## Heritage and Community Significance

### Heritage Conservation Impact

The site sits strategically in the middle of **three heritage conservation areas** with **54 heritage-listed houses** in the immediate vicinity. The proposed development shows complete disregard for this sensitive heritage context and will irreversibly damage the historic character that defines Roseville's identity. The Heritage-listed Scout Hall will be completely dominated by 9 storey buildings. 19 Lord Street is also Heritage Listed and directly opposite the proposed development.

The Hycorp EIS went into a lot of detail trying to justify why they chose certain materials to “complement” the current streetscape. However, the reality is, at the end of the day, no choice of brick or brick colour can make a 4 x 9 storey towers “blend” into this Heritage Conservation area. To claim in Appendix EE of the EIS that the impacts on local character is “Low Negative” is entirely a denial of the reality.

Pg 20 of Hycorp's EIS states that the project is likely to positively impact property values in the surrounding area. Nothing can be further from the truth unfortunately. The only 9 home-owners to benefit positively from this proposal are those whose properties are to be acquired by Hycorp that will see a windfall. Unfortunately, for everyone else, it will see their properties devalued by anywhere from 10-30% depending on how impacted they are and their proximity to the development site. It is incredibly cheeky bordering on the insulting to even suggest that this development will positively impact property values.

## Inadequate Community Consultation

**No genuine effort** has been made to engage with local residents to discuss this proposal. The notification process has been wholly half-hearted, denying the community adequate opportunity to understand and respond to the development's impacts. In particular, many residents are elderly or don't speak English and cannot be expected to read hundreds of pages of technical documents. Hycorp should have been made to put up a signboard outside the proposed site and to doorknock every single house in the surrounding streets. Simply letter-box dropping is inadequate and it was not even done in a timely manner with residents receiving the flyer AFTER the community consultation date.

## Affordable Housing Concerns

The affordable housing component appears **tokenistic**, designed primarily to justify a **30% density uplift** rather than provide genuine community benefit. Of the proposed affordable apartments, only **8 units** will be offered in perpetuity on a genuine long-term affordable basis to qualifying residents. This minimal commitment obviously prioritise profit over genuine effort to solve the housing crisis and does not justify the significant community impacts.

## Requested Action

I respectfully request that Minister:

1. **Refuse** this development application due to its inappropriate scale and community impact, as well as limitation of future expansion of Sydney Metro
2. Wait for the preferred Ku-ring-gai Council scenario to be voted on and work with the Local Council to achieve housing targets rather than forcing un-desirable development on local communities
3. Require a comprehensive and current traffic impact assessment
4. Require alternative access arrangements such that not all the traffic burden is on Lord Street
5. Mandate meaningful community consultation before any re-submission
6. Ensure genuine affordable housing commitments if any development proceeds – not just a tokenistic 8 Apartments to be held in perpetuity.

## Conclusion

This proposal represents overdevelopment that fails to respect our community's character, heritage significance, and residential amenity. The flawed traffic assessment, inadequate consultation, tokenistic affordable housing allocation, and excessive environmental impact make this development fundamentally inappropriate for Lord Street and Roseville Avenue.

I urge the Minister to protect our established community and refuse this application.