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

Submission address: Lord Street 350 metres distance from proposed development.

I am writing to object to the SSD-78996460 development.

I am a local resident on Lord Street at 350m distance from the proposed Hyecorp development. I am writing to oppose the development application of Hyecorp on Lord Street/Roseville Avenue, Roseville. Housing uplift as well as providing affordable housing are important goals for our future strategy at all levels. This can be achieved with the same amount of housing uplift in Ku-Ringai council through thoughtful sites selection that takes into account local variations of heritage, road facility support and topography. This is being taken through Kuringai Council's preferred scenario for TOD proposal. Hyecorp development has significant issues which I have identified below:

Incompatibility with Local Character and Heritage

The proposed 9-storey development is grossly incompatible with the established low-density heritage single/double storey residential character of Roseville and the Clanville Heritage Conservation Area. Ku-ring-gai Council is currently in the process of submitting a preferred scenario plan which will aim to preserve the local character and heritage of Lord Street/Roseville, Roseville whilst achieving the same housing uplift in the council area. Should the preferred scenario be adopted, this development will be out of context in the heritage preservation/building strategy of the Lord Street/Roseville area (with remaining 1-2 storey houses). It will undermine the effort of a more local engaged and considered approach to providing housing whilst maximising the preservation of heritage/character. It will destroy 9 houses that contribute to the value of the heritage conservation areas.

Photomontages presented in the EIS (Figures 28-31) reveal that the massing will overwhelm neighbouring properties and immediate adjacent heritage-listed items such as the Roseville Scout Hall. It will overshadow (due to its North aspect) opposite 19 Lord Street Roseville (heritage listed item). No amount of façade articulation or material selection can mitigate the incongruity of this scale and bulk in a conservation area intended to preserve suburban garden character.

Traffic, Transport, and Parking - Unrealistic Trip Generation

The Transport Impact Assessment (TIA) from Hyecorp grossly underestimates vehicle trips:

- Despite providing 344 car parking spaces for 259 apartments, the applicant claims only 43 AM peak and 32 PM peak vehicle trips.

- Based on standard NSW trip generation rates (0.4 trips per apartment per hour), the expected volume is realistically closer to 104 trips per peak hour. Due to the two local schools near by (Roseville public and Roseville College), the peak hours locally are across 2 hours of 7:30-9:30am.. Even allowing for reduction for the increased uptake of public transport, additional trips are likely to be higher than the current transport impact assessment. Given the high car parking provision (344 spaces), this development is likely to generate more vehicle trips than claimed.

Lord street and Roseville Street along the west aspect (approximately 200metres west) is characterised by significant land induration where there is poor visualisation of on-coming traffic. This is compounded by two problematic intersections on Lord Street.

- Lord street intersection with Glencroft Avenue
    - Glencroft is a busy street that takes on most of the traffic approach to the Roseville College with both right/left turn onto Lord Street. Currently, there are already traffic control mechanism including single lane/ speed hump on Glencroft Avenue close to the Lord street. This leads to traffic waiting on Lord street to turn right on what is effectively a single lane each way street during peak school hour time.
- Lord street intersection with Martin Lane.
    - Martin lane is immediately adjacent to the development. The pedestrian strips are very narrow with no natural strip separating from the road and has no ability to expand further. It is used by motorists who as a rat run to bypass the significant traffic limits at the broader East Roseville boundaries (see below). It is utilised by local pedestrian residents as well as schoolchildren both on commuting to school as well as travelling between sports at Roseville park and Roseville College. Currently, it is a single lane traffic shared between both directions during peak hours. Even with no parking, it is a street that cannot accommodate the increase in traffic both during construction and after built.
    - Flood wall bulding (Fig 14, Appendix T) is proposed along the Martin Lane and East side of the development. This is at a height of 1.2-1.4metres and further reduces visibility between motorists and pedestrians.

Broader traffic issues of accessing arterial major road.

There is current suboptimal access to the adjacent major roads which is unable to be expanded due to topography and major rail infrastructure (Pacific Highway to the East and Archbold Road to the West).

- Current local area access to Pacific highway is via a single lane (two way) over-rail bridge (Clanville Road). There is traffic buildup on Hill Street at peak time, forcing diverted

traffic through Martin Lane (see above). It is a difficult intersection with recent accident and unfortunate fatality on May 2025.

- Current local area access to Archbold road is via the western end of Lord Street and Roseville Avenue. Due to the topography, there is significant poor visualisation in turning both to left or right into Archbold road traffic where there is acceleration of the oncoming northbound cars from the downhill slope.

The material underestimation of traffic will significantly worsen congestion on Lord Street, Clanville Road, Martin Lane, Glencroft Avenue and access to Pacific Highway and Archbold road. The local road network cannot safely or efficiently accommodate such an increase. There is limited capacity for expansion due to existing development, topography and rail infrastructure.

Reference: Trip generation assumptions are based on the NSW Roads and Maritime Services "Guide to Traffic Generating Developments" (Version 2.2, 2002), which sets the standard peak-hour trip generation rate for residential flat buildings at 0.4 trips per dwelling.

Failure of Community Consultation

As a nearby resident on Lord Street (350metres), I have not received any flyer or addressed communication regarding the proposal, despite the EIS claiming extensive engagement efforts. I was not invited to any drop-in sessions, nor did I receive emails, door knocks or letters from Hyecorp or their consultants. I only found out about the Hyecorp development in late March when Ku-ringai council released the draft alternative to TOD and there was social media commentary on this lack of compatibility of this Development and the alternative TOD scenario.

This is a clear breach of the Secretary's Environmental Assessment Requirements (SEARs) which mandate genuine, inclusive engagement. The validity of the EIS's community feedback reporting is therefore highly questionable, as it does not represent the views of affected residents who were not effectively notified.

Other Developments in the Area

The EIS presented in Table 8 potential relevant local area developments which suggests a context of cumulative growth in the area. It included:

"Construction and operation of a new Sport and Wellbeing Centre including basement car parking, swimming pool, gym, learning areas, food technology space, amenities and storage, rooftop sports courts, landscaping, signage and tree removal.
27-29 and 347 Bancroft Avenue, Roseville. Approved 18/06/2021."

It is important to highlight that is is a closed, private use facility for Roseville College students only (private Anglican girls' school). It does not benefit the public realm or have community use. There is no enhancement in the community infrastructure or facility in the applicant's development application or potential relevant local area developments to support the prospective residents of the future development.

Given that the 2021 approved Roseville college development has already completed and is in use, the inclusion of this development would given the impression of local infrastructure growth. This calls into question the credibility of the EIS's social impact and infrastructure assessments.

Biased Social Impact Assessment (Table 30)

Table 30 of the EIS presents a highly skewed summary of social impacts, prioritizing speculative benefits for future residents while understating the significant and lasting negative impacts on existing residents.

- The removal of tree canopy, destruction of suburban character, loss of residential amenity, and construction disruption are minimized as "medium" or "low" negative impacts, rather than "very high" negative impacts.

- Benefits such as increased vibrancy are purely speculative and cannot compensate for the tangible harm. Increased vibrancy come from community infrastructure enhancement or well-thought-out commercial growth. This development does not provide community amenity/infrastructure enhancements or contribute directly to commercial/retail/entertainment growth locally.

Flood Risk Management Concerns

The EIS acknowledges that the site is partially flood-affected but does not adequately address the implications of a large 3-level basement in an overland flow zone. Figures 39–43 confirm moderate hazard along the site's eastern boundary and acknowledges that the wall barrier can be over-run in PMF flood setting. With increased impervious areas with the development and encroaching on overland flood flow path, it risks exacerbating the flash flooding to neighbouring properties/streets during high rainfall events. There is an increase of afflux up to 190mm (exceeding the DCP limits) on the footpath of Martin Lane which is a footpath that is used by community pedistrians and schoolchildren who can not resort to driving and on a very narrow pedestrian strip. The report argues that this acceptable despite it being above the limit. Accepting the higher flood depth (of up to 530mm) shows failure to mitigate worsening of the public safety risks.

It would also be important to extend the assessment of the impact on other adjacent street such as Bancroft Avenue rather than just neighbouring properties. Currently the assessment of the downstream impact is a simplified statement with no supporting modelling to verify these claims particularly in the direction of Glencroft Avenue and Bancroft Avenue. The application acknowledges that the main stormwater drainage is West to East. Due to the topography of Lord Street, this diverts into Bancroft avenue. In the recent heavy rainfall event, Bancroft Avenue was significantly affected by the storm-water flash flooding in 2020s (considered to be near PMF event).

Further detailed and broader impact of the flood risk to neighbouring streets should be assessed and/or presented.

For the reasons outlined above, I respectfully request that the application for SSD-78996460 which is lodged under the TOD scheme should be refused or be assessed against the shortly upcoming Ku-Ringai preferred TOD scenario submission/acceptance. If this application is assessed using the existing TOD rather than the likely upcoming change which is likely to be much longer lasting, it will undermine the efforts at ensuring the delivery of considered local development soluition that provides same degree of council area housing uplift that is sensitive to the local variations of heritage, traffic and topography.