

Subject: Objection to SSD-78996460 – Residential Development at 16–24 Lord Street & 21–27 Roseville Avenue, Roseville

To: NSW Department of Planning, Housing and Infrastructure

Cc: Ku-ring-gai Council, Local Members of Parliament, Relevant Stakeholders

Date: 19 May 2025

Dear Sir/Madam,

I am writing to formally object to the proposed residential development (SSD-78996460) at 16–24 Lord Street and 21–27 Roseville Avenue, Roseville. This objection is based on substantial concerns regarding community engagement, heritage preservation, infrastructure capacity, and alignment with local planning strategies and affordability.

1. Premature Progression Amidst Ongoing Planning Revisions

The application, lodged under the Transport Oriented Development (TOD) scheme, should not proceed until Ku-ring-gai Council's Preferred Scenario is finalized and integrated into the planning framework. In December 2024, a mediation agreement between Ku-ring-gai Council and the NSW Government allowed the Council to develop alternative planning controls tailored to the local context of the TOD precincts at Roseville, Lindfield, Killara, and Gordon. Proceeding with this development prior to the resolution of these controls undermines the collaborative planning efforts and disregards the community's input.

2. Inadequate Community Engagement

The community consultation process for this development has been insufficient:

- **Lack of Notification:** Residents within close proximity, including ourselves and our neighbours on Dudley Avenue and Gerald Avenue, did not receive the 12 page flyer and were not notified of the development or the community drop-in session held on 12 March 2025.
- **Limited Participation:** The community session reportedly had minimal attendance, primarily from individuals with direct financial interests in the development. This does not constitute a representative sample of community sentiment.
- **Delayed Communication:** Flyers intended to inform residents were distributed after the community session, rendering them ineffective for meaningful engagement.

Such shortcomings in community consultation fail to meet the standards expected for developments of this scale and significance.

3. Disproportionate Scale and Heritage Impact

The proposed development's scale is incongruent with the surrounding neighbourhood:

- **Building Height:** The plan includes buildings up to nine storeys, dwarfing and scarring a historic area characterized by one to two-storey federation residences built in the 1900s. All these houses are retained in the Council development plan and given the restrictions of the Sydney Metro.
- **Heritage Conservation:** The site is situated amidst three heritage conservation areas, with 54 heritage-listed houses nearby. The demolition of nine houses contributing to these areas poses a significant threat to the suburb's historical fabric. The Heritage Impact Statement (Appendix GG) claims that 'the primary street frontages within the subject site to Lord Street and Roseville Avenue are highly modified'. This is simply not true, as can be seen by the attached photographs of these federation dwellings all built in the early 1900s, with any renovation in sympathy with this era. On the other side of Roseville Av are 4 Heritage Listed homes (10,12,16,22), clearly similar Federation homes that are deemed to be of historical value, given they are all Heritage listed. I have attached photos of these to the submission. This is why residents moved to this area to enjoy living in the heritage housing and Ku-ring-gai Council requires any alteration or development to retain the Heritage landscape.

Building up to 9 storeys with the modern architecture of this proposed orphan development in no way is sympathetic to this heritage area and its surrounding dwellings and Heritage homes, and will dominate the local region, particularly given that 1-2 level heritage dwellings will surround it. Also, the proposed building height is over 30m, which I believe exceeds the 22m TOD allowance and the maximum 30% for affordable housing (total 28.6M), nor do I believe it comply with the setbacks required,

Why do hundreds of residents who care for their heritage homes and history get impacted by 9 financially motivated homeowners and a rushed development proposal only looking to financially benefit themselves rather than comply with a sensible approach completed by our council after consultation with the residents?

- **Visual Impact:** The development would create a stark contrast in the streetscape, overshadowing existing homes and forever altering and destroying the suburb's character.

Ku-ring-gai Council's Preferred Scenario aims to protect 80% of heritage conservation areas near stations, preserving early 20th-century neighbourhoods unique to Sydney. This development contradicts those preservation efforts.

4. Infrastructure Strain and Safety Concerns

The development raises serious concerns regarding infrastructure and safety:

- **Sydney Metro Proximity:** A significant portion of the proposed development lies within the Sydney Metro underground corridor. Is the reliance on a desktop impact assessment sufficient when the conclusions of a desktop study (Appendix w – Sydney Metro Study) indicates 2 of the 4 buildings have a material amount of the foundations in the second reserve including most of building B, as per the plans below. (not a small amount as described).



This report is not definitive saying that it will not affect this infrastructure, so why risk the \$20.12B NSW Government investment for such a small benefit (\$77.68M risk per apartment), especially considering past incidents like the 2005 Lane Cove Tunnel collapse, which underscore the need for thorough geological assessments rather than desktop studies.

- **Local Infrastructure:** The area already experiences issues with water pressure, sewerage, and stormwater management. The NSW Treasurer recently highlighted the pressing issue of aging infrastructure, including water pipes and power systems, some of which are over 50 years old. This concern underscores the need for significant investment to modernize and maintain essential services across the state.

Proceeding with the development without addressing these infrastructure challenges poses risks to both new and existing residents.

5. Adverse Effects on Neighbouring Properties

The development would negatively impact neighbouring residents:

- **Structural Integrity:** Properties such as 19 Roseville Avenue may experience foundation impacts, as identified in the Geotechnical Report.
- **Loss of Light and Privacy:** The height and positioning of the buildings would result in overshadowing and reduced privacy for adjacent homes, particularly on the eastern and southern sides.

These impacts are inconsistent with responsible and considerate urban development practices.

6. Traffic Congestion and Accessibility Issues

The development would exacerbate existing traffic and accessibility problems:

- **School Access:** Martin Lane, a key route for accessing Roseville Public School and Roseville College, would be heavily impacted by this development. This is also used by children in afterschool care at the church facility over the road, as well as commercial businesses such as dance and gymnastics. Sydney Buses (e.g. Bus 588) use this lane transporting the local community around the region.
- **Public Transport:** The area already suffers from limited parking with people parking here from the Northern Beaches and North Shore and other surrounding communities to access the train line to Sydney. It's an already congested access point to public transport. Additional trucks, builders and additional residents would strain these systems further.
- **Limited Egress:** With only one set of traffic lights providing access to the Pacific Highway, increased traffic from the development would lead to significant bottlenecks.

These factors would diminish the quality of life for current residents and strain local infrastructure.

7. Support for Ku-ring-gai Council's Preferred Scenario

I express my support for Ku-ring-gai Council's Preferred Scenario, which aims to balance increased housing needs with the preservation of the suburb's unique character and infrastructure capacity. This scenario emphasizes the protection of heritage conservation areas, revitalization of local centres, and appropriate building transitions.

The Council conducted a community survey to gauge public opinion on the Preferred Scenario, yielding the following results:

- 70% agreed that it fully or partially preserved heritage conservation areas.
- 69% agreed that it minimized heritage item impacts and avoided environmentally sensitive areas.
- 66% agreed that it supported local centre revitalization.
- 56% agreed that it managed transition impacts effectively.
- 52% believed it ensured appropriate building heights

These statistics reflect a community preference for a development approach that respects the existing heritage and environmental context while accommodating growth. The Preferred Scenario aligns with these values, proposing thoughtful development that integrates seamlessly with the established neighbourhood fabric.

8. Housing Affordability

If the NSW Transport Oriented Development (TOD) plan aims to deliver affordable housing, then focusing on high-cost suburbs like Roseville undermines that objective. Affordable housing in NSW is defined as housing for very low to moderate-income households, typically priced to be accessible to those earning less than 120% of the median income. However, Roseville's property market is among the most expensive in Sydney, with median apartment prices often exceeding \$2 million. For instance, recent listings show two-bedroom apartments priced between \$1.8 million and \$2.2 million, far beyond the reach of eligible affordable housing applicants. Developing such high-end apartments in Roseville does little to alleviate housing stress for low- to moderate-income earners and contradicts the core intent of the TOD strategy. To genuinely address affordability, development should prioritize areas where land and construction costs allow for housing priced within reach of the intended demographic.

Conclusion

In light of the substantial concerns outlined above—including inadequate community engagement, disproportionate scale and heritage impact, infrastructure strain, and adverse effects on neighbouring properties—I urge the NSW Department of Planning, Housing and Infrastructure to halt the progression and reject SSD-78996460. This development will not achieve progressive affordable housing and contribute to the objective that the NSW government are trying to achieve. The NSW Department of Planning should question the voracity of this application as its just a rushed application

to 'beat' the timeframes that in December 2024 were agreed between Ku-ring-gai Council and the NSW Government, allowing the council to develop alternative planning controls tailored to the local context of the TOD precincts at Roseville, Lindfield, Killara, and Gordon . There are significant questions to be considered around most the application information provided, including but not limited to:

- The social impact assessment
- The heritage impact assessment
- The engagement outcomes
- The geotechnical investigation and the Sydney Metro Tunnel Study

Notably, at its Extraordinary Meeting on 31 March 2025, Ku-ring-gai Council resolved to request that the Department of Planning, Housing and Infrastructure (DPHI) ensure that no State Significant Development (SSD) applications within the Transport Oriented Development (TOD) precincts be preserved, due to significant inconsistencies with Council's TOD Preferred Scenario. This resolution underscores the Council's commitment to a planning approach that aligns with community values and the unique character of the area.

I respectfully request that the NSW Department of Planning and the State Government support Ku-ring-gai Council's resolution, ensuring that any development within the TOD precincts aligns with the collaboratively developed Preferred Scenario. This approach balances the need for increased housing with the preservation of the suburb's heritage and infrastructure integrity.

Thank you for considering this objection.

Sincerely,

A resident of Roseville.

Attachments: Photographs of the Federation properties that will be lost forever and the area destroyed if this proposal proceeds, due only to the financial greed of a few, to the detriment of many.

1900's Federation Homes to be lost forever.

