

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

I. INTRODUCTION

My name is Isabelle Afaras and I reside directly opposite the site of Hyecorp’s Proposed Development (“**Proposed Development**”). I write to express my strong objection to the Proposed Development based on a deep and well-informed understanding of the local area and its unique character, amongst other reasons.

I am 23 years old and completed my university degree at the end of 2024. As a young person, I am acutely aware of the housing challenges facing my generation. I wholeheartedly support thoughtful, well-integrated developments that are sensitive to their context. However, I cannot support proposals that reflect the tactics of large-scale developers seeking to capitalise on short-term loopholes at the expense of the community. Specifically, Hyecorp appears to prioritise opportunism over well-planned principles, with little regard for the community consultation process.

Having lived in Roseville for 20 years, I feel incredibly fortunate to be part of a suburb defined by its leafy tree-lined streets, heritage homes and a strong sense of history and community. Equally, I recognise that some development in Roseville will be necessary – as proposed in Council’s Preferred Scenario (“**the Preferred Scenario**”) which I fully support in its endeavour to carefully balance the preservation of heritage and the provision of new housing.

As I am intimately familiar with the character and challenges of my area, I trust that my insights – grounded in lived experiences – will be carefully considered in the assessment of this Proposed Development.

II. COUNCIL’S PREFERRED SCENARIO

It is disappointing that, notwithstanding the ongoing Mediation between Ku-ring-gai Council and the State Government, a loophole currently allows developers to bypass this process – effectively undermining the opportunity for thoughtful-well integrated planning, instead enabling opportunistic developers to fast-track applications before a consensus is reached. This subverts what otherwise could be a collaborative path to achieve the required housing targets in a manner that is consistent with the principles of “density done well”.

Progressing this Proposed Development while the Mediation process continues is not in the public interest. The Transport Oriented Development (“**TOD**”) regime itself was imposed without community or Council engagement, ignoring the nuanced understanding that Ku-ring-gai Council holds of its own district. Importantly, if the Preferred Scenario is adopted, the TOD regime would be set aside – yet the Preferred Scenario would still deliver the required housing target in a manner aligned with local context. For example, the Preferred Scenario focuses on development in more suitable locations such as Hill Street and upper Victoria Street as well as on the other side of Pacific Highway. This approach demonstrates that housing targets can be met without bypassing democratic planning processes and given the value of the land in these alternate locations, this would be at a price point that is more within my reach.

III. COMMUNITY CONSULTATION BY HYECORP

Despite residing directly across the road from the Proposed Development, my family did not receive Hyecorp’s flyer until after the scheduled date of their community consultation drop-in session. This was not an isolated incident within my local area – many neighbouring properties received no notification at all. Several residents have also expressed that they received a flyer notifying them of the drop-in session after it was held!

It is deeply troubling that a developer of Hyecorp’s scale and experience could fail to execute the most basic principles of community consultation and yet dedicate 4 pages of their Environment Impact Statement Report (“**EIS**”) to asserting that they engaged with “stakeholders which share a direct interface with the site”. The EIS’s own admission that only “5 members of the community attended the [community drop-in session]” is a clear depiction of the failure of Hyecorp to appropriately engage with the community. This figure, presented as evidence of outreach reflects Hyecorp’s clear non-compliance with the “Undertaking Engagement Guidelines for State Significant Projects” (“**the Guidelines**”). Only a brief read of these Guidelines is required to ascertain some of Hyecorp’s non-compliance, including but not limited to Section 3.4 which states the need to “ensure the engagement is proportionate to the scale and impact of the project”. A development of this magnitude, being 9-storeys high, situated in a low-density residential street undoubtedly warrants comprehensive and meaningful engagement.

Indeed, the barriers to proper consultation were minimal. For example, it is entirely reasonable for Hyecorp to door-knock immediate neighbours – or, at the very least, ensure the timely delivery of their flyers. It is particularly telling that only 5 people attended the drop-in session on 12 March 2025, despite the apparent distribution of over 1,300 flyers surrounding the site! This cannot reasonably be presented as evidence of community involvement and the suggested 0.38% attendance rate from

“delivered” flyers astounds me. Even then, I understand that 1 attendee was an option holder of the Proposed Development site, and 2 were a couple well-known to that owner. Thus, given the scale and magnitude of the Proposed Development, the failure to meet even the simplest of requirements alone, no matter the locality, is unacceptable. I am therefore unsure how the Proposed Development could seriously be considered for approval. I further raise concerns about the precedent that may be set if this proceeds.

IV. OTHER PERTINENT ISSUES WITH THE PROPOSED DEVELOPMENT

Even if the significant failure to adequately consult and the Preferred Scenario issues are disregarded (which would be conceivably inappropriate), the Proposed Development nonetheless presents serious and substantive concerns.

1. *Height and impact on overshadowing and privacy*

- At 9 storeys, the Proposed Development is grossly out of scale with the existing built environment nearby, which consists of 1-2 storey dwellings. The abrupt vertical intrusion would not only be visually jarring, but would also overwhelm the surrounding streetscape, fundamentally altering the established character of a suburb known for its heritage value. The Proposed Development would also create significant issues related to overshadowing and loss of privacy for adjacent residences, rendering the scale of this development simply incompatible with the prevailing neighbouring fabric.

2. *Metro tunnel reserve limitations*

- The Proposed Development is further constrained by the presence of the Metro tunnel reserves, which impose structural planning limitations on the site and surrounding areas. These constraints effectively isolate the Proposed Development, amplifying the concerns raised in Point 1.

3. *Heritage*

- The Proposed Development is uniquely situated at the sensitive intersection of 3 designated conservation areas and lies in close proximity to 54 heritage-listed houses. The character of East Roseville is defined by its leafy streets, historic architecture and established greenery –

features that have long been cherished by residents through delicately considered planning controls.

- The Proposed Development will require the demolition of approximately 89 trees, the majority of which are mature. This loss of built and natural heritage would irreversibly damage the aesthetic fabric of the neighbourhood.
- The EIS states that “central to the design are all the characteristics that make Roseville unique, such as the leafy tree-lined streets”. It is difficult to reconcile this claim with the proposed removal of 89 out of 115 trees (77%), and thus Hyecorp’s statement is mere marketing rhetoric that lacks alignment with the actual impacts of the Proposed Development.
- Roseville’s identity is defined by its commitment to conservation and its enhancement. The Proposed Development would irreversibly undermine this commitment. Further, the destruction of 9 homes undermines such efforts to preserve eastern Roseville’s character, setting a troubling precedent for any future development.

4. *Traffic*

- The Proposed Development would significantly worsen the existing traffic and parking conditions in an area already constrained. Martin Lane, a narrow street that often only accommodates the passage of cars in one direction at a time, frequently experiences heavy vehicle volumes during peak hours, with bottlenecks occurring as cars must yield to oncoming traffic. Buses struggle to navigate Martin Lane due to parked cars on either side. The surrounding local road network – including Roseville Avenue, Clanville Road and Boundary Street is similarly ill-equipped to handle any increased traffic flow. For example, I regularly encounter extended delays when attempting to access the Pacific Highway from Hill Street or Clanville Road on weekday afternoons. Similarly, I routinely observe vehicles attempting to turn left from Hill Street onto Boundary Street, with vehicles banked up past Oliver Road during the morning rush, resulting in significant wait times.
- Further, the already narrow width of Roseville Avenue directly opposite the Proposed Development and extending towards Archbold Road is compounded by on-street parking on both sides which is always filled up by 9am on weekdays. This makes two-way traffic difficult, forcing vehicles to wait near Martin Lane to allow larger vehicles such as buses and trucks to pass. The situation is worsened by the presence of Roseville College, adding to the

intensity of weekday traffic, where the high volumes of student drop-offs and pick-ups increase congestion and severely limit available parking for local residents.

- The EIS surmises the “net increase in traffic” as “considered minor”. However, it is difficult to reconcile this assessment with the proposal for 344 parking spaces serving 259 apartments, especially considering that many families own multiple vehicles and will travel to work or attend the school drop off, thus exceeding the 344 figure. This associated vehicle volume cannot be characterised and dismissed as being “considered minor”.
- Further, the road surface opposite the Scout Hall on Roseville Avenue has required frequent maintenance due to the damage caused by vehicle traffic and rain. This issue would likely be exacerbated during the 2-year construction period, which will involve ongoing use of heavy equipment including cranes and trucks. I further query how these machines will be able to pass through.

5. *Affordability*

- I understand that the affordable housing provisions are time-limited, in this case, to 15 years only. I further understand that just 2% of the apartments will be dedicated to affordable housing in perpetuity. That is, the irreparable destruction of 9-character homes for 8 honourable apartments. This proportion is tokenistic and is clearly being used as a lever to gain planning concessions and is not demonstrable of a sincere effort to contribute to the public good.
- The EIS states that local “schools”, amongst other things will be able to “cater for additional residents”. However, it is unclear how this aligns with Hyecorp’s positioning as a provider of affordable housing which they mention on 47 pages of their EIS, given that Year 12 tuition fees at Roseville College is currently \$38,340, and further, Roseville Public School is close to capacity which will be fuelled by 6-storey development on Hill Street.
- It is important to highlight the pricing of Hyecorp’s nearby development, Juliet Roseville, where 1-bedroom apartments reportedly start at \$1,000,000 and 4-bedroom apartments exceed \$4,300,000. These prices are significantly above typical market rates, raising significant doubt as to the accessibility of such developments for young people such as myself or those genuinely in need of affordable housing. Further, to support these prices I can only imagine that the rent will be well beyond my reach considering Sydney market rents. Prices at

the Proposed Development site are likely to be higher due to its specific location and the expected impact of isolation.

V. CONCLUSION

Suffice to say, I am acutely aware of the housing crisis currently affecting young people, and, for that reason, I support development. But my support is qualified. I support development that is thoughtful, contextually appropriate and reflective of both the character of the neighbourhood and the consensus of the local community. I support the broader proposal for additional homes in Ku-ring-gai, but I urge that this target be pursued in a manner consistent with the principles outlined above – principles that require meaningful community engagement, developer accountability and proper planning principles not rhetoric.

Accordingly, I respectfully request that this Proposed Development not proceed, in the public interest and in light of the Preferred Scenario, which better aligns with the expectations and values of the community it seeks to serve.

Yours Sincerely,

Isabelle Afaras