

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

Dear Sir/Madam,

I am a local resident living in Trafalgar Avenue Roseville, about 166m away from the proposed development.

I am writing to express my strong objection to the SSD-78996460, which is entirely out of character with the neighbourhood and contrary to the community's alternative proposal to the TOD legislation for our area.

**1. Relevant Planning Instrument**

This application completely fails to acknowledge and seeks to pre-empt ongoing negotiations between Ku-ring-gai Council (KC) and the NSW Department of Planning, Housing and Infrastructure (DPHI) regarding a more suitable development framework for Roseville than the destructive and prescriptive Transport Oriented Development (TOD) instrument.

The DPHI and Minister Scully has agreed to allow KC time to develop a strategy that meets the State Government's housing targets for Ku-ring-gai based on genuine consultation with residents, and hence it is not in the public interest that this development application is approved.

Hyecorp would have been well aware of this situation yet have chosen to not refer to it.

KC has engaged independent experts who have undertaken an extensive review of the municipality to identify areas where higher density housing is more appropriate. The outcome of all that time, effort and money was to develop the alternative scenarios. The community have voted on these scenarios, and notably the original TOD scenario was rejected in favour of the more location-suitable ones.

It is misleading and unethical that Hyecorp's submission fails to mention the impact of the proposed development in the context of the alternative scenario.

**2. Heritage**

I have moved into the area in recent years from the Northern Beaches where architecture is more eclectic. East Roseville has a more unified character, mainly Federation and California bungalows, established gardens and trees with hedged boundaries. It is relaxing to walk the streets, admiring the gardens and the well-kept homes, many of which are named.

The Heritage Impact Statement (HIS) within the EIS states the "dwellings may be perceived to have some value as a streetscape of early dwellings in passing views, but on closer inspection the streetscape is more prominently characterised by notably altered dwellings". I would think that the point of a Heritage Conservation Area considers the contribution of "passing views" in creating the feel and ambience of an area. The HIS says that the existing dwellings' front presentations to Lord Street and Roseville Avenue have been highly compromised, but this is incorrect. In fact, most of the properties have retained the front characters and the additions are at the side and rear. Even the first floor extensions have been completed sympathetically and therefore retain their essential heritage character.

The HIS focuses only on the impact of the demolition on the impacted 9 properties and fails to acknowledge how destroying these 9 properties, destroys the character of the whole neighbourhood, particularly because it is in the central part of East Roseville and dominates and degrades all the surrounding streets. The development is over 30 metres high whereas the surrounding 1 and 2 storey buildings are 4.5 - 6.7m tall. The HIS is a biased discussion of the heritage impact and does not present a fair picture of the negative impact on the overall neighbourhood.

### 3. Community consultation

Section 5.1.1 of the EIS labelled "Community Stakeholders and Engagement Activities" refers to an information flyer being distributed. As a resident of 15 Trafalgar Avenue, only 8 houses away from the proposed site, we did not receive a flyer, nor any information regarding a "community drop-in session". The fact that only "[f]ive members of the community attended the session and provided feedback" would seem to indicate that many affected people in the surrounding streets did not receive the flyer either.

The community consultation was therefore non-existent or fatally flawed in its execution.

### 4. Traffic increases

The proposal is for 259 units with 309 resident parking spaces (344 spaces overall). The EIS nominates a 36/56 public to private transport split for this community when travelling to work. Most families in Sydney have two persons working. That means approximately 500 additional workers.  $56\% \text{ of } 500 = 280$  people potentially driving out from this development each morning. To be more conservative, if only half the building's adult occupants go to work, or car share, this number is still over 190 additional vehicle movements each morning and night.

The EIS at Appendix Q says that the proposal "is expected to result in a net increase of between 32 and 43 vehicle trips during the weekday peak hours". The numbers were generated from rates from a 2024 TfNSW guide, but the survey information used in that guide is dated 2012. The numbers must logically be grossly understated.

The alternative development scenario which received the highest community votes recognises that higher density developments, among other things, need to have mainstream supermarkets within easy walking distance of the developments. Lindfield and Gordon have existing supermarkets and it makes more sense for higher rise developments in those locations. There is also more parking infrastructure in Gordon and Lindfield. Roseville does not have any large supermarket or parking infrastructure. Families and individuals need to use cars to do their basic shopping. Under the alternative scenario this East Roseville area is recognised as unsuitable for high density development.

There are limited access points to the area as shown in the EIS. I will focus on the one I use most being Clanville Road to Pacific Highway. This utilises a single lane bridge across the North Shore rail line. Current traffic signal phasing only allows 4-5 cars to exit turning right onto the Pacific Highway when I use it between 7 and 7:20am each weekday. This is less for those turning left towards Chatswood and the city because of the pedestrian crossing, and often due to traffic banked up from further towards Chatswood.

## 5. Construction traffic

As a civil engineer with 40 years' experience in Sydney, I have extensive knowledge of both the required planning and the execution of such projects. It is clear that the planning and forethought for this project is either misguided or entirely inadequate.

However, I also have concern about the impact of construction traffic with respect to noise and access, particularly during the excavation phase. The local roads will be blocked by trucks, and will only be accessible if street parking is prevented. The streets are not wide enough and have not been constructed to cater for the weight and number of the construction trucks. Road surface deterioration will quickly ensue. The streets around the development and up to Roseville Station are already parked out due to the minimal public commuter parking available at the station, particularly since the Metro opened at Chatswood.

The Traffic Impact Statement relating to "Heavy Vehicle Access Routes" states that "some of the surrounding local roads (including Lord Street and Roseville Avenue) .... do not permit access to vehicles over three tonnes", and that no "swept path" analysis has been done to determine whether such heavy vehicles can adequately turn into the local roads from the arterials [emphasis added].

As such, the TIS should have determined that the location of the site is inappropriate for such a development.

## 6. Hydrology

The EIS says at one point only 3ml/year groundwater seepage is expected. This number seems ludicrously low. The underfloor of our property in Trafalgar Avenue experiences ground water seepage which increases during periods of rainfall. The Kopwa Retirement village only has two basement levels and it is constantly pumping water to the stormwater system even during dry times.

The alternative scenario took into account the known flood area, the existing stormwater system and ground types, and determined that this area not suitable for development of the proposed scale.

## 7. Visual Impact

The EIS again fails to consider the KC proposed scenarios (refer point 1. Above) when it says "[w]hile it is acknowledged that the building will have a significant impact on the neighbouring dwellings, this outcome was anticipated as it is the first proposed higher-density development on the street." The development should not be approved as it would be the only development of its scale, and will be completely visually intrusive of the R2 properties surrounding it.

At page 75, the EIS states that the "low-level houses adjoining the site are not visually apparent from this location, as they are concealed by street tree canopies and hedges. Despite minor height breaches, the building's compliance deems the proposal acceptable, although the visual impact is assessed as moderate to severe." The pictorial depiction of the impact is misleading since they did not pan out to show the severity of the difference between existing properties and this proposal.

Further, page 76 accurately describes the impact as severe when it says the “visual impact from the increased scale of this development, relative to the existing houses adjoining the site, is assessed as severe but permissible within the context of future development in this area.”

Alternative scenarios have been voted on by the public of Ku-ring-gai and those scenarios only have R2 development in this area, hence the EIS is incorrect and misleading when it refers to “future development”.