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

I am writing in response to the Development application by HyeCorp under State Significant Development Applications SSD-78996460 to provide my feedback.

I am not opposed to the development of the Roseville area, and support the NSW State Government's objective to increase housing supply generally as well as in Ku Ring Gai, however in my opinion, the application lodged by HyeCorp under the TOD scheme is not in the public interest.

The key issues are:

- The size and nature of the Development
- The impact on the character of the area
- Major infrastructure and access concerns within the immediate area
- Concerns with key aspects of the Development application understating a range of impacts it will have on the local area
- The Development is wholly inconsistent with the alternative development process by Ku Ring Gai Council, which would apply if agreed to by the State Government, and risks a hotchpotch outcome rather than a structured and considered approach to Development in the area
- The rush to have the Development approved under the current TOD
- Lack of consultation by the Developer

My detailed reasons for this are set out below

#### Size and Nature of Development

Height and scale

- The proposed Development of 4 buildings with a height up to 9 storeys is considered excessive with significant impacts on privacy, access, streetscape and the general character of the area
- The Development will tower over neighbouring properties, particularly those to its west, with major impacts of privacy, shadowing and street congestion
- Whilst the Developer has included the required number of affordable housing units to achieve a 30% bonus, the economics of the Development in an area of where the purchase price of the land will greatly exceed many other parts of Sydney means the (affordable) apartment sizes will be smaller (compared to similarly priced apartments in parts of Sydney where the land is less expensive
- There is currently significant uncertainty in relation to whether this proposed Development will be approved in isolation (under the existing TOD) and become an island surrounded by 1-2 storey houses, or be the first phase of similar developments along both streets (refer attachment A).

• The fact that proposed Development is adjacent to the Metro exclusion corridor further exacerbates the issue and increases the risk of the Development becoming an isolated island (despite suggestions to the contrary by the Developer – refer Attachment A)

#### Character

- The proposed Development is inconsistent with the character of the surrounding properties in an existing heritage conservation area with a significant number of heritage listed properties, including:
  - o 10 Roseville Avenue
  - o 12 Roseville Avenue
  - o 16 Roseville Avenue
  - o 22 Roseville Avenue
  - o 29 Roseville Avenue
- o 31 Roseville Avenue
- o 32 Roseville Avenue
- o 19 Lord Street
- o 28 Lord Street
- It will result in the loss of a number of properties that contribute to the heritage streetscape, including 23 Roseville Avenue, 20 Lord Street and 22 Lord Street in particular, which are of a similar character to the properties noted above
- The design of the properties is not consistent with those within the area

### Infrastructure and Access

- Roads in the immediate vicinity of the proposed Development are narrow, with significant congestion issues during weekdays in particular, including:
  - Martin Lane (adjacent to the east side of the Development)
    - is a narrow lane with parking on both sides
    - is the only throughfare from Roseville Avenue to Lord Street between Hill Street and Archbold Road
    - is accessed by public and private buses (with few other practical alternatives available to them)
    - Ku Ring Gai Council is aware of the issue based on multiple notifications by both bus companies and the public
    - During the week with cars parked on both sides, access is only possible with cars travelling in the same direction – opposing traffic having to wait for access
    - This results in major bottle necks in both Lord Street and Roseville Avenue
  - **Roseville Avenue** (adjacent to the north side of the Development)
    - Roseville Avenue from Martin Lane to Archbold Street narrows and at times when traffic is parked on both sides (weekdays in particular), access is only possible with cars travelling in the same direction only able to travel within the lane – opposing traffic having to wait for access

- During peak hour (acutely in the morning peak), traffic is regularly backed up from the east and west sides due to issues accessing Martin Lane noted above
- This impacts both traffic wishing to access Martin Lane as well as through traffic (waiting for vehicles turning into Martin Lane)
- Access to Roseville East side generally has limited access (both in and out) to the west, east and south in particular (refer attachment B):
  - There are few north-south running roads between Hill Street and Boundary Street, creating rat runs through Trafalgar Avenue, Martin Lane and Glencroft Avenue
  - The issue is exacerbated by traffic caused by Roseville College students (parking and being dropped off / picked up) in Bancroft Avenue (which is part of the rat run)
  - Hill Street
    - Narrow street, including split level in part
    - Exit to south via left turn only on to Boundary Street with major traffic issues in the morning peak regularly backs up
    - Exacerbated by many vehicles wanting to access Archer Street to do so means crossing three lanes in a very short distance to access the right turn lane, which itself regularly backs up
  - **Boundary Street** is a very busy major road providing access to Roseville Bridge and the Northern Beaches area, with traffic sequencing favouring traffic travelling east from the Pacific Highway:
    - This means challenging access for vehicles exiting from East Roseville (Spearman Street (left turn only), Wandella Avenue (left turn only AM peak) and Clermiston Avenue(left turn only)
    - There is no access in PM peak on any street from Archbold Street to Pacific Highway (and only Wandella Avenue at other times)
  - **Clanville Avenue** access to the Pacific Highway is via a narrow single lane bridge which allows 3-4 vehicles access each light sequence and is regularly backed during morning peak hours in particular.
- Access north of Roseville East is via narrow suburban streets and lanes (towards Lindfield which also has a significant number of pinch points)
- The success of the Metro extension from Chatswood to Sydenham has reduced parking during weekdays and increased the congestion around the area
- Roseville currently has a limited town centre with one small grocery store, resulting in major grocery purchases being made in Chatswood and Lindfield which are more developed. It is expected that most of these trips will be made by vehicle, again via the limited access in to and out of East Roseville.

- The proposed Development will add 320 vehicles to the area, increasing congestion and traffic problems within the area
- Little has been done to deal with access issues within the area, and the works to improve Boundary Street have worsen access for residents in East Roseville
- The proposed Development site includes an area subject to flooding, with concerns about the impact the Development will have on flood events for neighbouring properties
- Power, drainage and sewerage infrastructure within the area reflects older technology, again with concerns about the impact of such a large development.

## Developer Consultation

 HyeCorp has indicated that it has engaged in extensive community consultation, including a community meeting. We understand a flyer was meant to be sent to residents in the surrounding area but I can confirm that we did not receive any notification of it. It is speculation, but perhaps this is due to the proximity of our property to the proposed Development.

## **Developer Application**

- The assessment of the heritage value of the individual properties in 16-24 Lord Street and 21-27 Roseville Avenue by Urbis is not independent and has concluded that each of the properties are of either no or little heritage value, however several are of a similar character to other heritage listed properties within the immediate vicinity, including 23 Roseville Avenue, 20 Lord Street and 22 Lord Street.
- The speed at which the Development application has been completed and lodged raises concerns about due process in circumstances where Ku Ring Gai Council is in the process of finalising its preferred alternative for discussion and consideration with the Department.
- The impact on a significant number of heritage listed sites within the immediate vicinity has not been adequately addressed
- Infrastructure and access issues have been played down in the application and do not reflect the current real world position, let alone the impact of this Development on the immediate area (congestion and access in particular)

## Construction Impacts

- The size and scale of the proposed Development mean that construction impacts will continue for up to two years, assuming no major delays including:
  - Construction noise
  - Impact on local parking, with existing parking likely to be reduced further with the scale of construction vehicles required generally as well as parking restrictions introduced for construction traffic
- Heavy construction equipment parking and travelling on roads not designed for such vehicles, including large scale cranes and concrete trucks

# Ku Ring Gai Alternative Proposal

- The alternative proposal being put forward by Ku Ring Gai Council provides an outcome that is in line with the State Government's target for housing uplift with the LGA.
- Ku Ring Gai Council has requested that all SSDs currently lodged with the Department (including SSD-78996460) not be saved due to the following concerns:
  - "... some proposals currently working through the SSD system might be prejudicial to any alternate scenario it might adopt. This is particularly the case where transition between different densities and housing typologies that Council might seek to apply are juxtaposed against out of scale development reflected in some current SSDAs. Also, Council's alternate TOD Scenario includes development uplift for individual heritage items where they would otherwise be "isolated" by adjoining TOD development. This would allow their integration into a larger master planned site and not leave them stranded."
- To approve the application with this uncertainty is a major concern as given the different approaches under the TOD and Ku Ring Gai Council's alternative which would zone the site as R2 with a maximum height of 9.5m (consistent with houses within the immediate vicinity)
- The Ku Ring Gai alternative, if adopted has significantly fewer negative impacts than that in the proposed HyeCorp Development and deals with many of the concerns that I have raised in this response:
  - o Better conserves the streetscape and heritage area
  - Reduces risk of ad hoc and inconsistent outcomes, including the "stranded island"
  - Moves the Developments away from problematic access points

# Personal Impact

- We settled in Roseville over 20 years ago due to the leafy surrounds and the heritage character of the area, including the Federation era property we currently live in
- Our property is in close proximity to the proposed Development and should the Development proceed as per the application, will be severely impacted by:
  - o Overshading
  - A significant reduction in privacy
  - The streetscape within the immediate vicinity
  - Congestion on Martin Lane, Roseville Avenue and Lord Street, being the main access points to and from our property
  - Road access to our property is already very challenging and is likely to be far worse with heavy construction equipment using these streets, with Martin Lane and Roseville Avenue in particular
  - Construction impacts for up to two years, including noise, impact on local parking, heavy construction equipment parking and travelling on roads not designed for such vehicles

## Attachments



#### B – Access Map and Photos



A single lane bridge on light allows 4-5 cars each cycle out and 1 in
B major morning grid lock back along Hill Street - challenging access on LH
C challenging exit in morning peak to busy arterial road - backs up in mornin
D dangerous exit to busy arterial road
E narrow lane with major AM and PM gridlock - used by buses as well
i no right turn

no right turn (peak hours)

Hill Street looking towards Boundary Street (weekdays cars parked both sides)



#### Left turn only



Spearman Street looking towards Boundary Street



Wandella Avenue looking towards Boundary Street (no right turn am Peak)



Roseville Avenue looking towards Archbold Street (no right turn)



Roseville Avenue near Martin Lane (narrow)



Martin Lane from Roseville Avenue end (major congestion at peak times)



Martin Lane from Lord Street end (cars parked both sides weekdays)



Clanville Road access to Pacific Highway (backed up during AM peak)

