

May 26th, 2025

Department of Planning, Housing and Infrastructure

Locked Bag 5022

Parramatta NSW 2124

Re: SSD-78996460.- 16-24 Lord St & 21-27 Roseville Ave, Roseville

Dear Commissioners

I am writing to formally object to the proposed high-rise development at the above address. There are several compelling reasons why this application should not be approved at this time. My objections are as follows:

1. Potential change TOD zoning areas

A decision on SSD-78996460 should be deferred until Ku-ring-gai Council's Preferred Housing Scenario for the Gordon to Roseville corridor has been properly assessed and considered.

The Council's proposal represents a locally informed, considered approach to meeting the TOD housing targets while recognising the importance of heritage, environmental, and community values. It identifies areas for development that are more context-sensitive and capable of supporting sustainable population increases without the disproportionate impacts of high-rise overdevelopment.

Approving SSD-78996460 risks undermining this carefully developed alternative, locking in an outcome that will be inconsistent with community-supported planning priorities. It would also limit the State's ability to align infrastructure, services, and amenities with a coordinated and balanced vision for the area.

Postponing the decision ensures that both the State Government and the local community can move forward with development that reflects genuine consultation, complies with planning standards, and delivers better long-term outcomes for residents, heritage, and the environment.

2. Non-compliant Height and setbacks

By the inclusion of affordable housing, the proposal takes advantage of a 30% increase in allowable height. But even with this generous allowance the developer (Appendix H Variation Request) seeks a further increase of between 2.3m – 1.6m over various parts of the building. The proposal acknowledges this non-compliance in Appendix B.

Likewise, the building setbacks on Lord St, Roseville Ave and Martin Lane are only 6m whereas Ku-ring-gai Council's Development Control Plan mandates 10m setbacks.

This combination of excessive height and inadequate setbacks will result in a visually dominant building that detracts from the character of the streetscape and amenity of neighbouring properties including the Roseville Presbyterian Church at 28 Lord St.

3. Environmental Impact Statement omissions.

a. Insufficient Cumulative Impact Assessment

While the document briefly mentions surrounding developments (existing and allowed), it lacks a detailed cumulative impacts assessment. This includes potential combined effects on:

- Traffic congestion,
- Urban heat island effect,
- Local biodiversity,
- Waste infrastructure, and
- Community infrastructure demand.

Given the scale of the development (259 apartments), omitting cumulative environmental and social impact analysis across the precinct is a significant oversight.

b. Omission of Climate Change Resilience Discussion

There is no dedicated section on the building's climate resilience. While flood risks are noted (e.g., PMF events), the report does not explore:

- Future climate risk scenarios (heatwaves, intense rainfall),
- Cooling loads under increased average temperatures,
- Long-term water efficiency planning.

This is a critical gap given NSW's commitments to climate adaptation (NSW Climate Change Adaptation Action Plan 2025-2029).

c. Minimal Public Transport Strategy Detail

Despite being within a Transport Oriented Development (TOD) area, the report does not provide sufficient:

- Quantified projections of public vs. private transport usage,
- Discussion on capacity of local road, rail and bus networks to absorb additional demand,
- Clear modal split targets or commitments beyond generic references to 'GTP Mode Share'.

d. Lack of Clear Construction Phase Risk Mitigation

The EIS provides general mitigation measures but omits detailed analysis on:

- Noise and dust impact on nearby sensitive receptors during demolition and excavation,

- Disruption to local traffic and pedestrian safety during construction,
- Cumulative construction impacts if nearby developments occur simultaneously.

These are critical for public amenity, particularly for neighbouring low-density dwellings.

e. Biodiversity and Ecological Connectivity Gaps

The report includes an Arboriculture Impact Assessment (Appendix Z), but does not discuss:

- The role of the site's vegetation in larger ecological corridors,
- Any fauna habitat usage or displacement effects,
- Opportunities for biodiversity enhancement or offsetting strategies.

In summary, the proposed SSD presents numerous concerns—ranging from design non-compliance to significant omissions in environmental and infrastructure assessments. Until a well rounded and community-aligned planning framework is in place, it would be premature and potentially detrimental to approve SSD-78996460. A deferral would allow for better-informed decisions that respect both the character of Roseville and the broader planning objectives for the area.

Yours sincerely

David Mulholland

Bancroft Ave Roseville