

May 26th, 2025

Department of Planning Housing and Infrastructure

Locked Bag 5022

PARRAMATTA NSW 2124

Re: SSD-78996460.- Lord St & Roseville Ave, Roseville

Dear Commissioners

I am writing to object to the proposed high-rise development at Lord St and Roseville Ave.

A decision on this application, should be postponed until after Ku-ring-gai Council's Preferred Housing Scenario (Gordon to Roseville) is formally assessed and adopted. This postponement is crucial for several reasons, primarily stemming from the significant interdependencies between local strategic planning and the assessment of State Significant Developments (SSDs).

Firstly, **the SSD-78996460 proposes 259 apartments, likely exceeding Council's current planning standards and potentially its preferred vision for the area.** Ku-ring-gai Council has explicitly stated that many SSD applications are inconsistent with its Preferred Scenario. The Council has even recommended to the Department of Planning, Housing and Infrastructure (DPHI) that "no State Significant Applications in the TOD precincts be saved due to the significant inconsistencies with Council's TOD Preferred Scenario." While DPHI has advised that the Government will look to prevent further DA lodgements once an alternative scheme is submitted and finalized, applications already in progress, like SSD-78996460, are at risk of being determined under the current, potentially conflicting, State Environmental Planning Policy (SEPP) for Transport Oriented Development (TOD).

Secondly, **Ku-ring-gai Council's Preferred Housing Scenario represents a carefully developed local planning strategy, incorporating wide community input and technical studies.** This scenario was approved earlier this year and was exhibited until April 22, 2025. It is a refined version of a community-preferred option (Scenario 3b) and aims to deliver housing in a way that responds to community feedback and preserves Ku-ring-gai's unique character, including heritage and tree protection. Determining SSD-78996460 before this comprehensive local strategy is assessed and formally adopted would pre-empt the outcomes of a robust, community-led planning process.

Thirdly, **the current State Significant Development framework, while designed for large-scale projects, is not intended to undermine community-informed strategic plans.** Local housing strategies are crucial for aligning growth with existing and future infrastructure, providing access to services, and enhancing local character. Approving an SSD that is inconsistent with a soon-to-be-finalised local strategy risks creating a fragmented and unsustainable development pattern. Concerns have already been raised by community groups, such as the Friends of Ku-ring-

gai Environment (FOKE), regarding the lack of critical supporting studies (traffic, parking, infrastructure, environmental assessments) for the current TOD preferred scenario. While the Council's preferred scenario seeks to address these, rushing the SSD determination could lock in developments that exacerbate existing infrastructure deficiencies.

Finally, **postponing the decision aligns with the principle of evidence-based planning and good governance.** It allows the State planning authority to consider the full implications of Ku-ring-gai's preferred scenario and ensure that SSDs contribute to, rather than detract from, the desired future of the local area. Given that the Council is actively working with the NSW Department of Planning to ensure its plan meets required housing numbers, a short delay to properly assess the local strategy would promote a more integrated and harmonious planning outcome for the entire precinct.

In conclusion, a decision on SSD-78996460 should be deferred to allow for the proper assessment and adoption of Ku-ring-gai Council's Preferred Housing Scenario. This will ensure that development in the Gordon and Roseville precincts is consistent with an integrated strategic vision, respects community aspirations, and avoids ad-hoc approvals that could undermine the long-term liveability and character of the area.

Yours sincerely

Vanessa Mulholland