Submission: Objection to SSD-78996460 – Residential Development with Infill Affordable Housing, 16-24 Lord Street & 21-27 Roseville Avenue, Roseville

I strongly object to the proposed State Significant Development (SSD-78996460) as it is not in the public interest, inappropriate for the Roseville location and conflicts with the <u>Council and Community</u> <u>Preferred Alternative to the Transport Oriented Development (TOD)</u>.

I urge the rejection of this proposal in favour of Ku-ring-gai Council's Preferred Alternative Scenario, which meets affordable housing requirements while minimizing adverse impacts on the local community.

The basis for my objection is outlined below.

1. Inadequate Community Consultation

The <u>State Significant Development Guidelines</u> emphasize that "Community participation is integral to assessing the merits of SSD projects" (p. 14). Similarly, the <u>Revised Community Consultative</u> <u>Committee Guidelines for State Significant Projects</u> highlight the importance of open discussions between companies, communities, and local councils.

Hyecorp's Environmental Impact Statement claims community consultation was conducted, including distributing 1,355 flyers, hosting a drop-in session on 11 March 2025, and providing information on their website (Section 5.1.1). However, as residents of Clanville Road (since 1999), less than 600 meters from the proposed site (see map below), we received no flyer, notification, or invitation to the 11 March meeting.



We were unaware of the project until mid-April 2025, when a local shop owner mentioned the proposed development.

Subsequent inquiries revealed that none of our neighbours in nearby streets were informed of the project or the 11 March meeting. The only public information we found was a <u>two-page PDF flyer</u> on the <u>Friends of Ku-ring-gai Environment website</u>. Our search engine did not direct us to the Hyecorp site or a dedicated project website.

The <u>Glyde Engagement Outcomes Report</u> notes that only five residents attended the meeting (p. 11), underscoring the inadequate outreach. This limited engagement lacks statistical or authoritative weight for a project of this scale.

A single public meeting on 12 March 2025 at 4:00 PM, with minimal publicity and held during working hours, is insufficient for a development of nine storeys (31.1 meters) with 259 apartments in an R4-zoned area surrounded by one- to two-storey homes (R2 zoning, up to 9 meters).

In contrast, Hyecorp's other local projects, <u>Juliet, Roseville</u> (7 storeys) and <u>Hyegrove, Willoughby</u> (5 storeys), received far greater publicity through dedicated websites and substantial social media promotion. This suggests Hyecorp deliberately minimized community engagement to expedite SSD approval under the NSW Government's <u>Transport Oriented Development (TOD) reforms</u> before Ku-ring-gai Council's <u>Preferred Alternative Scenario</u> is considered by the NSW Government.

It is abundantly clear that Hyecorp has structure the project by misusing the intent of an SSD under the TOD to maximise profit and avoid normal due process, planning controls plus normal Council DA oversight.

A 24 May 2025 *Daily Telegraph* article, "<u>Roseville residents seek donations to fight affordable housing</u> <u>development</u>," appears to be a strategic move by Hyecorp's founders, the Abolakian family, to portray community objections as opposition to affordable housing.

Planning Minister Paul Scully's comments in the article, labelling the community's donation drive as "staggering" and "un-Sydney-like," suggest that he has strong bias toward Hyecorp's proposal well before the NSW Planning Portal SSD objection submission deadline (28 May 2025) or before consideration of Ku-ring-gai Council's <u>Preferred Scenario</u>. This undermines any suggestion of NSW Planning due process and misrepresents community concerns, which focus on the project's scale and impact, not affordable housing itself.

Only 2% of the 48 affordable units will be available in perpetuity with the remaining 15% reverting to the market after 15 years – see section 6.2.5.1 on p121 of the Hyecorp Environmental Impact Statement.

With at least 19 SSD's now pending in the Ku ring-gai Council area following the TOD declaration I fear that the rush to approve SSD developments without due process by NSW Planning will serve only to enrich greedy developers, decimate the built form, character an environment of the area and potentially result in poor quality project outcomes which, in some cases, may result in Opal /Mascot Tower style structural defects

2. Excessive Height and Bulk in a Low-Density Area

The proposed development at 16-24 Lord Street and 21-27 Roseville Avenue, with a height of 31.5 meters (nine storeys), is incompatible with the surrounding R2-zoned area of one to two-storey homes located in the middle of three heritage conservation areas that include some 54 heritage listed homes in the vicinity.

The <u>Architectural Plans</u> (pp. 23–24) show that homes at 14 Lord Street and 19 Roseville Avenue will be overshadowed, while properties on Lord Street, Martin Lane, and Roseville Avenue will face the imposing bulk of the structure (pp. 31–32).

The project's height is constrained from blending with future developments due to the Metro tunnel's proximity, which limits large scale development between the site and Hill Street. The proposal even encroaches on the Metro tunnel's first and second reserve – see page 5 of the Architectural Plans.

The demolition of 9 houses that contribute to the heritage areas will erode the historical fabric of the community and diminish the area's cultural significance.

No precedent exists in Roseville for such a tall structure. Hyecorp's <u>Juliet, Roseville</u> (7 storeys) and <u>Hyegrove, Willoughby</u> (5 storeys) are significantly lower, and the recently completed <u>Balfour Place</u> on Pacific Highway is only five storeys, with <u>Sunfield Residences</u> at three despite its high-traffic location.

3. Traffic and Parking Congestion

The success of the Metro has increased commuter parking around Roseville Railway Station, with vehicles parked up to 600–700 meters away. Narrow streets like Roseville Avenue, Lord Street, and Martin Lane are reduced to single-lane traffic during peak hours and school pick-up/drop-off times at Roseville College and Roseville Public (see photos below). Martin Lane is a particular choke point.

Martin Lane Congestion

Martin Lane Congestion



Traffic congestion is already severe on Hill Street, Clanville Road, during peak hour. The single-lane railway bridge on Clanville Road leading to the Pacific Highway constitutes a major choke point for cars attempting to access the Pacific Highway.

Hill Street toward Boundary Road

Hill Street toward Boundary from Lord Street



Clanville Road to Pacific Highway



Hill Street to Pacific Highway





The lack of a right-turn green traffic arrow at the Pacific Highway Clanville Road intersection causes significant delays with wait times often exceeding 3-4 traffic light cycles.

A recent accident at the Kia dealership on Clanville Road and Pacific Highway (see photo below) highlights the risks of rushed right turn manoeuvres to Clanville Road after light changes.



Recent Damage to Kia Dealership at Clanville Road and Pacific Highway

Turning right from Clanville Road, Roseville Avenue, Lord Street, or Bancroft Avenue onto Archbold Road is challenging during peak hours due to heavy traffic. The proposed development, with 259 apartments and up to 340 cars, will exacerbate these issues.

4. Infrastructure Strain

The development will significantly strain local infrastructure, including traffic choke points and drainage systems, which are not being addressed under the TOD framework. With no supermarket in Roseville, residents rely on car travel, further increasing traffic. The Metro tunnel constrains large-scale development between Trafalgar Road and Hill Street, limiting infrastructure upgrades.

5. Loss of Tree Canopy

The <u>Arboricultural Impact Assessment</u> identifies 116 trees, covering 31.8% of the site. Only 26 mature trees will be retained, with 89 removed, significantly reducing the area's tree canopy and environmental quality.

6. Ku-ring-gai Council's Preferred Alternative Scenario

Ku-ring-gai Council's <u>Preferred Alternative Scenario</u> for the TOD around Roseville, Lindfield, Killara, and Gordon stations offers a balanced approach that meets affordable housing goals while minimizing community and environmental impacts. The <u>Roseville component</u> retains R2 Low-Density Residential zoning for the proposed site (see map below), highlighting Hyecorp's attempt to secure approval before the NSW Government reviews this alternative.

Preferred Alternative Scenario – Zoning



Preferred Alternative Scenario – Height of Buildings



The Preferred Scenario offers significant improvements over the TOD SEPP, as outlined in the <u>Councillor</u> workshop presentation:

- **Principle 1**: Protect Environmentally Sensitive Lands 68% improvement.
- **Principle 2**: Minimize Impacts on Heritage Items 69% improvement.
- **Principle 3**: Preserve Heritage Conservation Areas 80% improvement.
- Principle 4: Minimize Impacts on Tree Canopy 76% improvement.
- **Principle 5**: Manage Transition Impacts 93% improvement.
- **Principle 6**: Ensure Appropriate Building Heights
- **Principle 7**: Support Local Centre Revitalization 85% improvement

Conclusion

The SSD-78996460 proposal is incompatible with Roseville's low-density character, inadequately consulted, and poised to overwhelm local infrastructure and traffic. Hyecorp's minimal engagement and rushed approach suggests an attempt to bypass community input and the Ku-ring-gai Council's Preferred Alternative Scenario, which better balances housing needs with environmental and community considerations.

I urge the NSW Government to reject this proposal and adopt the Council's Preferred Alternative Scenario for a more sustainable outcome.