

Re: Strong Objection to State Significant Development (SSD) Application SSD-78996460 – Residential Development with In-fill Affordable Housing, 16-24 Lord Street & 21-27 Roseville Avenue, Roseville

To the Assessing Authority,

I, Bianca Falloon of 3 Arrunga Avenue, Roseville NSW 2069, write to lodge my objection to State Significant Development (SSD) Application SSD-78996460. My property is located a few streets away from the proposed development, and as a concerned resident, I am deeply invested in the preservation of our neighbourhood's unique character, village feel and amenity.

This application, lodged under the Transport Oriented Development (TOD) scheme, should **NOT**, in the public interest, be further progressed or determined until Ku-ring-gai Council's Preferred Scenario for East Roseville is formally resolved and adopted. I strongly support the Council's Preferred Scenario, which accurately recognises and seeks to protect the unique character and existing built form of the East Roseville area.

The attempt to classify this development as "State Significant" appears to be an opportunistic exploitation of 'affordable in-fill housing' and 'Transport Oriented Development' planning pathways. This strategy seeks to fast-track approvals for a design that prioritises maximum density and developer profit, superficially appealing to government policy while flagrantly disregarding the neighbourhood's established heritage significance, local character, and community value.

My comprehensive objection to this planned development is based on the following critical reasons:

1. Unacceptable Height, Bulk, and Scale – Erosion of Neighbourhood Character

The proposed development of four buildings, up to nine-storeys (31.1m) each, represents an egregious departure from the existing and desired built form of East Roseville. Our neighbourhood is predominantly characterised by one to two-storey houses, a character which the Council's Preferred Scenario rightly seeks to retain, limiting development in this specific area to R2 zoning with a 9.5m height limit.

This isolated cluster of towers, effectively an "island" of high-rise within an area destined for lower-density housing, is entirely out of context. It will fundamentally and permanently alter the established streetscape and overall character of Roseville, creating a jarring and visually dominant presence. The Architectural Plans (pages 23, 24, 31, 32 of the EIS) shamelessly underplay the visual impact from adjoining properties and the public domain, which will be nothing short of "Moderate-Severe," including a projected 71% loss of sky view from affected properties.

2. Profound Loss of Privacy and Amenity

The scale of this development will lead to an unacceptable and inhumane invasion of privacy for neighbouring properties. Despite the EIS (Section 6.1.2.2) only providing a "coarse illustration" up to Level 5, the proposed nine-storey height will grant balconies and windows from higher levels direct, complete views into the private backyards and living spaces of surrounding homes. Residents have paid a premium for the expectation of privacy within their own homes and gardens, and this development would completely nullify that right.

Furthermore, the impact on solar access is severe and has not been considered. As per the EIS (Section 6.1.2.1), the proposed building will completely block the north-facing windows and backyards of houses across Lord Street from 2 pm and 3 pm respectively during the winter solstice. This constitutes a violation of the right to natural light, deeply impacting the fundamental Australian lifestyle and the health of gardens, solar panels, and internal living environments. The creation of cooler, damper microclimates will be a direct consequence.

3. Inadequate and Exploitative Application of "Affordable Housing"

The claim of "affordable in-fill housing" serving the public interest is, in this instance, a smokescreen for corporate profit maximisation.

- Only 18.5% of the apartments are designated as affordable housing, with the vast majority reverting to market rate after a mere 15 years.
- Critically, only **nine** apartments are slated to remain permanently affordable. This meagre offering can hardly justify the widespread destruction of amenity and property value for over 200 neighbouring homes.
- This represents corporate welfare disguised as social policy, where profit maximisation is achieved through density bonuses with minimal genuine public benefit.
- Locating "affordable" units in a premium North Shore suburb, where even these units are projected to cost \$600k+, is inappropriate and unlikely to genuinely address housing affordability for key workers. The majority of apartments will likely sell for \$800k-\$1.5M+, contributing to gentrification rather than the stated aim. Current unit prices among other new builds along the pacific highway are selling for \$3M+.
- The community will bear permanent costs, while the temporary benefit of most "affordable" units disappears, wasting public resources in a location where many workers cannot afford to live long-term.

4. Severe Traffic and Parking Congestion

Roseville already suffers from significant traffic congestion, particularly during morning peaks, exacerbated by limited exit points. The addition of 344 cars using Lord Street as the *only* access point, serving an estimated 728 new residents, will generate unbearable daily congestion on already busy residential streets.

- Martin Lane is already effectively a one-way street during peak hours, causing significant tailbacks onto Roseville Avenue and Lord Street. This development will render it unmanageable. Since the implementation of no right hand turns from many access points onto Archbold road, the smaller streets including Martin Lane have become a rat run during morning peak hours, being particularly dangerous around Roseville College.
- The impact on key intersections out of Roseville will be severe.
- Local streets are already essentially one-way due to parked cars, and the additional parking demands for construction workers and future residents will exacerbate this.
- The proximity to Roseville College means existing drop-off and pick-up times already cause significant congestion, a situation that will become untenable.

- Emergency services access will be severely compromised, and safety hazards for children, the elderly, and pedestrians will dramatically increase.

5. Overburdened Local Infrastructure

Roseville's existing infrastructure is simply not designed to absorb the demands of this scale of development.

- The local stormwater, sewerage, and waste management systems are already at capacity and will be critically strained by the increased load from an estimated 728 new residents.
- Water pressure and power infrastructure will also be impacted.
- Roseville Station's capacity, while a transport hub, is not designed for such a massive population increase from a single development immediately adjacent to residential areas.

6. Catastrophic Environmental Impact

The proposal necessitates the removal of an alarming **91 trees**. This destruction of mature tree canopy will have a dramatic and detrimental impact on:

- The local wildlife and biodiversity, running counter to broader government environmental policy.
- The leafy streetscape character of Roseville, which is highly valued by residents.
- Air quality, critically impacting residents, particularly those with allergies.
- The urban heat island effect, as vital cooling tree canopy is lost.
- Flood risk, due to 15m excavation and altered drainage patterns.

7. Construction Health Crisis and Impacts

The projected 24-month construction period (or longer), with extensive hours (Mon-Fri 7 am – 8 pm, Saturday 8 am – 1 pm), will impose an unacceptable health crisis and living environment on residents.

- The demolition of nine homes and 15m of excavation will generate severe dust, posing significant health risks to residents, especially those with dust allergies.
- The sheer volume of construction vehicles (trucks, cranes) navigating narrow streets will cause immense disruption, noise, and damage to road surfaces.
- There will be no escape for affected residents on Lord Street from the daily health emergency and constant disruption for at least two years.

8. Critical Risks Posed by Proximity to Sydney Metro Tunnel

The proposal involves a 15-meter excavation directly adjacent to the Sydney Metro underground tunnel, which runs under 14 Lord Street. This proximity introduces catastrophic risks:

- Ground instability and subsidence threaten the foundations of neighbouring homes.

- The cumulative vibration from Metro trains and prolonged construction activities creates a significant risk of structural damage to surrounding properties.
- Emergency evacuation complications during construction near critical tunnel infrastructure are a serious concern.
- The safety assessment appears to prioritise tunnel protection while inadequately addressing the profound risks to residents.

9. Unjust Property Value Extraction and Wealth Transfer

This development represents a parasitic business model designed to maximise developer profit at the direct expense of existing residents.

- Hycorp seeks to extract maximum value by destroying the very characteristics – heritage character, solar access, privacy, quiet amenity, and leafy streetscape – that residents paid premium prices to secure when investing in this neighbourhood.
- Residents' retirement planning and family wealth are being directly sacrificed for corporate profit maximisation, with no compensation for this forced loss of property investment.
- This is a forced subsidisation of developer profits through the destruction of residents' property value.

10. Exploitation of TOD Policy and Planning Inequity

This application deliberately exploits a transitional window in TOD policy, demonstrating a cynical attempt to game the system and circumvent local planning principles.

- The application was rushed through after the TOD introduction (May 2024), seeking approval for 31.1m buildings in an area where Ku-ring-gai Council's preferred update (which the State Government has signalled agreement with) would limit height to a maximum of 9.5m under R2 zoning.
- This constitutes systematic abuse of policy transition periods, rewarding corporate profit over genuine strategic planning and local democracy.
- Residents will be permanently locked into 9.5m height limits for their own properties while suffering the impacts of 30+ meter towers immediately adjacent, creating a profound planning inequity.
- The SSD pathway fundamentally bypasses robust Ku-ring-gai Council assessment, where community voices carry significant weight, reducing community consultation and allowing a State Minister to decide rather than a council with local planning knowledge and expertise. This is a clear misuse of SSD intent, which was designed for genuinely state-significant infrastructure projects, not local residential developments.

11. Inadequate Community Engagement

Hycorp's community engagement for this project has been woefully inadequate and a disservice to the community.

- I did not receive a flyer in my letterbox before the community drop-in session on 12 March 2025.

- Had I known about it, I would have had availability to attend the community drop-in session at Lindfield Seniors Centre/Community Hall between 4:00-6:30 pm on Wednesday 12 March 2025.
- I was not aware of the dedicated project pages on the Hyecorp website prior to 25 March 2025.
- I was not aware of the community survey on the Hyecorp website.
- Hyecorp and/or its representatives otherwise provided no information to me and/or sought no feedback about the project.
- I found out about the proposed development through my neighbour. This lack of genuine consultation further undermines the legitimacy of this application and demonstrates a clear disregard for community input.

Conclusion: A Call for Refusal

This State Significant Development Application SSD-78996460 is fundamentally flawed and contrary to the public interest. It represents an opportunistic, profit-driven overdevelopment that will irrevocably destroy the cherished character, amenity, and liveability of East Roseville. It is a clear case of corporate greed prioritising maximum profit at maximum community cost, exploiting planning loopholes and undermining local democratic processes.

The developer could easily meet affordable housing targets on sites directly adjacent to Roseville Station and within the town centre (e.g., Hill Street/Pacific Highway corridor), which offer appropriate high-density sites closer to transport and are commercially zoned. Instead, they have chosen this site precisely because it is surrounded by single-family homes on all four sides, allowing for maximum density and thus maximum resident impact and profit extraction.

I urge you to consider the overwhelming negative impacts this development will inflict upon our community and uphold the integrity of responsible planning. Do not approve this application.

Sincerely,

Bianca Falloon, 3 Arrunga Avenue, Roseville NSW 2069