

To Whom it May Concern

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

I am a near neighbour of the site in consideration. 6-8 adults live at my residence (depending on time of year and work locations).

I object to the project for reasons noted herein. My submission strongly objects as the development will:

1. fundamentally change for the worse the living environment that has been built over the centuries
2. negatively affect the native fauna and flora
3. negatively affect the community's faith in Government at both the State and Local levels
4. fail to deliver the outcomes being sought by the NSW State Government.

Further, this application should be rejected or, at a minimum, deferred in the public interest until after the preferred scenario from Council is resolved given:

- the lack of appropriate community engagement,
- respect for the process between the Council and the State Government,
- the disregard for established planning controls,
- the out-of-date content contained in the documentation,
- the lack of appropriate consideration given to the character and nature of the area or the heritage buildings, and
- the clash with the expectations of the community
- much of the supporting documents from developer funded parties supports development for affordable housing in Ku-ring-gai and/or generally for Roseville-Lindfield rather than for the specific development.

A flyer from Hyecorp was received at my residence on the day of the short consultation period and was scheduled for a time (4pm to 630pm) prior to my return home. No other engagement has been sought by the developer. The derisory treatment of the community may be seen as representative of the attitude of the developer.

There are moves to agree a preferred scenario with the Council that would allow both the Council and the NSW State Government to recognise and support the unique character of Roseville while delivering the housing outcomes being sought. To move ahead before this is resolved would be unsupportable and would cause irreversible damage while calling that process into question.

In addition, this development, while ostensibly inspired by the Government's desire to address community issues regarding housing, which have unarguable merit, has

migrated to seeking the Government's support for a developer to make money at the expense of the community. As such it is a direct challenge to the NSW Labor Government's role and position. A Labor Government effectively enabling the consolidation of wealth for a profit motivated, elite property developer and its investors by steamrolling the community, must be detrimental to the public interest and to its faith in the political party which prides itself on its community and social credentials. Principles matter, values matter.

Looking at the application itself, and regarding the argument for the affordable housing in-fill element of the development, even this is a sup to the developer's desire to profit and a cynical attempt to manipulate the State Government and Minister. The holding of part of the development for affordable housing for 15 years is simply a deferral of profit at the expense of the community while increasing the current realisation of benefits. While it may appear as some form of largesse, it is clear that this creates an appreciating asset that will reap a significant bonus for the developer at the end of this relatively short period. If genuine, the application would be looking to provide the affordable housing without asking for the extreme nature and mass of the development proposed. (It is notable that the same developer has work being done on the Pacific Highway, Roseville in the same location with the price of a 1-bedroom unit already being over \$1.m and 2 bedrooms from \$1.725m, not in the realm of affordable housing. Having to wait 15 years to realise an ever-increasing capital windfall on the additional units on Lord Street and Roseville Avenue while receiving a steady income along the way is undoubtedly attractive). (Reference 6.2.5.1, page 8 of Affordable Housing Strategy annexure I, and urban.com.au)¹.

The development is in stark contrast to the preferred option being proposed which will be the preferred option for the reason that is the preference of the community. Having a development that has been rushed through to take advantage of the time between the initial announcement and the proposed response is a cynical attempt to take advantage of the State Government with a development which is significantly out of character with all around it and which is ostensibly not in line with the outcomes that the State Government has publicly stated as the driver for its actions.

Even if one can move past the cynical attempt to manipulate the State Governments fairly formed intent to the benefit of a private commercial investor, and leaving aside the destruction of what should probably be heritage houses, the negative impact on the surrounding area has been glossed over in the rush to secure the super-profits on offer which can only be assumed to be an unintended consequence of this State Government initiative. Located adjacent to a number of heritage sites and within the Clanville Conservation Area, it is big and brash; clearly not something that anyone will

¹ Of the 48 units put forward for affordable housing, only 8 will be retained past 15 years. The "17%" floorspace on a straight-line basis will therefore fall rapidly by 83%.

be proud of. Put briefly, it is so out of keeping with the rest of the suburb, that generations to come will question how and why it was allowed to proceed.

It is also noted that the quality of the EIS and the weakness of the supporting 'reports' is so woeful as to be an almost deliberate insult to the integrity of the Minister and the State Government in asking for their support.

The detail of the development is also flawed. While there are multiple issues with the application and its supporting documentation, the ostensible issues to the concept itself include:

- There has been no appropriate consideration to the impact on heritage sites and to the existing built form of the neighbourhood. There has been little to no consideration evident regarding respect for the scale, form, setback or architectural detailing of the area.
- There has been no genuine consultation with the community. The pamphlet distributed way too late to be a real attempt and a meeting taking place when those working would not be available does not equate to a genuine consultation. The pamphlet itself trumpets "Affordable Housing" - a valid ambition, but a false claim in this case presumably designed to appeal to the neighbouring residents to garner misplaced support. The Gyde Engagement Outcome Report similarly ignores the return to the developer of the affordable housing after 15 years, making an implicit admission that this was not raised directly and is only found by searching the 39 plus documents in the submission.
- There is already a paucity of parking available in the area. Despite what the developer would have one believe, it can be noted that even in the houses involved, there is angst on the parking difficulties.
- Traffic flows at critical times are today tight, particularly as the commuter traffic meets the school traffic. In addition to the pressure on Martin Lane (already a busy rat run), exits from Roseville are limited and are very slow during these peak periods. This will become extreme and will require the construction of new roads over the trainline to the highway if there is to be any access or egress, including for emergency vehicles such as are required generally and at the need of the retirement and aged care facilities around the corner. It is noted that the contention in the documentation provided by Urbis (Hyecorp's EIS writers) at pp.79-80 as to the volume of traffic and impact is patently wrong.
- The reports generally try to paint a positive picture but are in reality rushed, incomplete and rely on incorrect or outdated data. They also tend to promote the developer's interests and not those of the community or public. This challenges many of the Hyecorp assertions and invites the Government to make the wrong

conclusions. For example, the use of a bicycle plan from 2012 (reference Ason Group document at annexure Q page 13-17). Similarly, the use of data from 2016 regarding journey to work types (pre-dating the Metro by many years and repeated at page 28). Similarly, a brief review of the report from Ason Group relied on by Hyecorp uses data from the ABS 'Statistical Area 2' from 2016.

Referencing the ABS site found at

<https://dbr.abs.gov.au/region.html?lyr=sa2&rgn=121031408> (tab: Family & community) the 2011, 2016 and 2021 ABS data provides as follows for methods of travel to work for journeys by car (as driver or passenger), motorcycle, truck, taxi and rideshare:

	2011	2016	2021
Vehicle journeys as driver or passenger	4,813	5,022	2,944
Vehicle Journeys (above plus m'bikes, taxi and ride share)	4,918	5,126	2,999
Total Working Population	9,684	11,808	10,035
Journey as % of Total Population	50.7%	43.4%	27.4%

The Ason Group puts the number at 56% for cars and passenger alone. Regardless, the number decreases by 7.3% over the 5 years. Even allowing for the advent of Covid impacting the 2021 figures, it is unlikely that number increased between 2016 and 2025 – and at a regular rate of decline would now be in the vicinity of 10-12% to around 30%.

The same report provides the basis for the estimate that the 250 dwellings will only impact the vehicle traffic nominally (at page 31) at between 32-43 additional trips.

The haste with which the developer has sought to railroad the State Government with misleading reports based on incorrect or out of date data must give cause for pause and a better, more accurate consideration of what is truly in the public interest.

- There is little infrastructure to support the volumes of people this development will attract. The schools and other facilities are insufficient for the current populations. This will only get worse without significant investment from the State Government, including the need to obtain land on which to place these facilities.
- The overshadowing prevents the quiet enjoyment of surrounding premises. The visual impact and ability for those in the units to intrude on others solitude is clearly negative. Other aspects, such as the access to solar energy are all issues highlighted even in the developer's own materials (reference section 61.2.2).

- The local natural environment will be denuded. After the destruction of 89 trees (perhaps 91 per the AIA in parts but this is inconsistently stated) and numerous other plants, the local native fauna including galahs, cockatoos, possums, bush turkeys, kookaburras, native bees, frogs and butcher birds will be negatively impacted. The overshadowed remnants will also suffer and will create an inability to promote the growth of existing new trees and plants or to encourage native fauna to return. This is not in the public interest and will significantly adversely affect the local amenity and community.

On this, the Arboricultural Impact Assessment provided by Hyecorp and prepared by Creative Planning Solutions (annexure Z) is at best unclear on the number of trees to be impacted. Weasel words in the caveat to the 26 trees being retained and protected (such as “should the works proceed in their current form, it is recommended that” (at page 4) precede the pronouncement on the protection. Remarkably no trees of the 89 to be destroyed are a priority for retention.

Of the 26 trees for retention or protection only 10 are considered of High Retention Value (page 18). Put differently, 10% of the trees on the site are considered of High Retention Value (reference page 32 for definitions). Further, of this 10%, 50% are subject to major, potentially sustainable incursions into the Tree Protection Zone (some by a considerable percentage – see table pp26-31) and only 20% are not impacted. It is noted that the categorisation of the trees is performed by the same organisation that recommends their removal or retention.

The Social Impact Assessment by Gyde is another of the Hyecorp reports that relies on old data and extrapolation or assumption to put a positive spin on the proposal and support the Hyecorp desires at the expense of the public interest (annexure EE). Gyde’s assessments are entirely aligned to the desires of the Developer. It may have misunderstood the assignment as it asserts that the “purpose of the project is to deliver high quality market and affordable housing near Roseville Station” whereas it is clearly not based on providing affordable housing as is clear from the twilighting of the vast majority of the affordable housing it goes on to champion as “Very High Positive”. We should be under no mistake, this development is not to increase housing supply and look after those needing affordable housing, it is a property development on prime real estate which the developer is cloaking to garner State Government and Ministerial support.

Gyde bases its recommendations on flawed information including such as the misleading statement that it retains existing significant trees (less than 20%) and puts stock on such trivialities as a central courtyard (so important to it that it lists

it twice in a list of 10 key considerations at page 7 and the reliance of the 17% of affordable housing by floorspace with no reference to the withdrawal of this in 15 years.

Without any data, Gyde concludes that based on the 2021 Census (conducted during Covid) and its assertion that because weekly median rent for Sydney has increased, so has rental stress. It goes on to opine that as 17% of the floorspace (48 units) is “dedicated to affordable housing” this will help meet the need (page 4). There is no evidence provided on the actual rental stress in the suburb and ignores the developments already in place such as Hyecorp’s Juliete premises on the Pacific Highway (with no affordable housing). It also fails to acknowledge the temporary nature of the 17% floorspace which will revert to multi-million dollar apartments in 15 years with only 8 reserved for affordable housing thereafter (a reduction in affordable housing of c.83%); not a particularly encouraging legacy for the State Government’s scheme, nor something that Gyde has concerned itself with in drawing its developer led paper.

Gyde also references the aging population (page 4 & 12), again without any reference to recent developments (or any data at all) to form an opinion that this will be a problem for the suburb, or relevant details on Roseville itself. While challenging, Australia wide statistics are unhelpful. It ignores developments such as the new KOPWA residential age care facility (including a dedicated memory support care unit) boasting 102 residential beds. As a not-for-profit, this facility is open to a range of individuals across the economic spectrum.

The State Schools at Roseville (K-6) and Killara (7-12) noted in the Social Impact Assessment from Gyde and relied on by Hyecorp are the only schools that would be available in the State system. The “Anglican School” referenced is Roseville College, a girls’ school as part of the ASC schools corporation providing for students across Sydney with fees starting at \$23,040 and rising to \$38,340 in Year 12; not within the scope of affordable housing (or many others). Gyde’s assertion that somehow the Asquith Boys and Girls High Schools might be relevant is odd at best given this is a 45-60 minute train journey from Roseville Station as a simple search on Google Maps would have uncovered (or 15+km by vehicle). Gyde projects number of children needing schooling but provides no basis for the assumption made (reference also page 19).

On the aspect of infrastructure and community facilities, at page 19 there is a list of 4 open spaces. 1 of these is the memorial park on the Pacific Highway recently made almost unusable by another of this developer’s construction sites but with no mention of that reduction in amenity.

Astoundingly, Gyde asserts at page 5, that the impacts of Connecting with Country are High Positive because of what it seems to consider are “major inclusions” of:

- acknowledgement of the Gamaragal People and Country as a feature through wording on a boundary wall and/or embedded in paved elements
- interpretative panels / placards incorporated into the nature play area (to be guided by an Aboriginal Heritage Interpretation and Art Strategy).

This is despite its noting on the following page that there is a need to “prepare an Aboriginal Heritage Interpretation and Art Strategy as recommended in the Landscape Concept Plan and Design Report.” The report at page 12 is insultingly brief on the role of first nations people and their role in the region’s history. The report ventures into the comical by proposing that Country is enhanced because “increased building heights allow for new opportunities to view Gamaragal Country from the site” (page 25).

Also at page 4, Glyde ventures further into the realm of fantasy in asserting that the huge mass evident in the developers own documents, the sacrifice of 9 federation homes, the confessed impact on the flora and fauna, issues with drainage, traffic increases and on other aspects such as overshadowing (and bearing in mind while the outcomes of housing may be positive the built form is patently not) the overall impact of related to infrastructure is only “Low Negative”.

Poor use of data abounds. In the absence of doing the work, Gyde extrapolates for Roseville exemplar data from a macro level. For example at page 15 on the issue of birthplace, dwelling structures and children numbers which drives the need for parks, schools and other amenities to support the developer’s case. Again this detracts from any sense of independence or trust that the public could repose in their report.

The non-sequiturs in the report are numerous. Take a further example of the citing that by 2026 the majority of the housing need in the area will be for families (page 10) and the failure to reflect that need in the championing of 28 x 1-bedroom and 117 x 2 bedroom units. One is left to wonder how many of the affordable units will be for family sizes. An additional example at page 12 is the assertion that by 2036 there will be the demand for aged care facilities; undoubtedly true but in no way provided by this development, particularly as even the affordable housing will revert to the developer profit pool at around that time.

No relativity is provided with data to justify the conclusions being made or the impression being cultivated. Take for example the repeated fact that the average household size is 2.81 with the implication that this is too low. However, if we

look at, say, Wollongong, the average is 2.49 so appears to underperform Roseville in that respect.

Finally, the report uses pejorative language designed to influence the reader in favour of the very wealthy developers and against the local owners. Take for example the use of the blocks of land described as “significant sized blocks” without any reference or justification of this significance.

In closing, while the need for housing and the need for affordable housing is clearly a valid and valued goal for our community, this development is not the answer. It is a bad plan, done badly and without genuine consideration of the public interest. The Developer appears to be trusting that the Minister and Government will be so interested in the broader agenda that they will ignore the reality of what is being put forward.

The block and mass of the proposed development is so out character with the rest of the immediate neighbourhood as to be indefensible.

It is clearly in the public interest to reject the proposal and to await the decision of the Governments (Local and State) in the preferred scenario.