

Submission Objecting to State Significant Development (SSD-78493518)

2-8 Highgate Road, Lindfield NSW 2070

To the NSW Department of Planning, Housing and Infrastructure (DPHI),

I strongly object to the proposed development at 2-8 Highgate Road, Lindfield (SSD-78493518) on the grounds listed below:

I note that an adjacent development proposal at 1-3 Reid St & 2-4 Woodside Ave, Lindfield (SSD-79261463) has been submitted by the same developer. My concurrent submitted objection to that proposal follows similar grounds, given their adjacency.

1. Built Form and Massing; Residential Amenity; and Environmental Amenity

- **Overbearing Scale:** The proposed 9-storey building is grossly incompatible and out of scale with the low-density, single-storey residential character of the adjoining neighbourhood, including the Blenheim HCA nearby. The bulk and height (30.3m) will dominate the streetscape, creating visual intrusion and loss of amenity for surrounding properties.
- **Non-Compliant Height:**
 - The height of the development at 30.3m is 1.7m above the maximum allowable height of 28.6m (inclusive of 30% affordable housing bonus)
- **Non-Compliant Setbacks:**
 - Ground-level setbacks (6m) are insufficient to mitigate the building's imposing bulk and scale. These setbacks are not even uniformly 6m with encroachments (e.g., mechanical risers) undermining compliance (Figure 32 of EIS).
 - Upper-level setbacks (Levels 4–5) do not universally achieve the required 9m, particularly along the northern edge (Figure 34 of EIS), exacerbating overshadowing and bulk impacts.
- **Solar Access Non-Compliance:**
 - 19% of apartments (16 units) receive *no solar access* to living spaces during mid-winter (EIS Section 6.2.3), exceeding the Apartment Design Guide (ADG) 15% threshold.
 - Adjacent development (SSD-78493518 at 2-8 Highgate Road) create a cumulative "canyon effect," with insufficient solar access and cross-ventilation
 - Western-facing units will suffer poor cross-ventilation and solar access due to proximity to adjacent developments (SSD-79261463 and SSD-78493518), breaching Apartment Design Guide (ADG) criteria.

- **Cumulative Overshadowing:** The EIS fails to assess the likely significant combined overshadowing impact from this development and the adjacent SSD-79261463 at 1–3 Reid Street & 2–4 Woodside Avenue, violating DPHI’s Cumulative Impact Guidelines.
- **Visual Impact:**
 - The Visual Impact Assessment (Appendix R) only evaluates public viewpoints, ignoring impacts from private properties.
 - As a personal example, from our own residence, we will experience negative visual impact with the western skyline and mature tree canopy from our front yard eliminated by an intrusive 9-storey wall.

2. Geotechnical and Flood Risks

- **Inadequate Stormwater Assessment:**
 - The geotechnical assessment in the EIS is inadequate, conducted with superficial testing.
 - The EIS dismisses flood risks despite an underground creek beneath the site. A 10.5m-deep 2-storey basement risks destabilising groundwater flows and exacerbating local flooding.
- **Flood History Ignored:** The EIS relies on theoretical models, ignoring real-world incidents. We residents regularly observe flooding during heavy rain, yet mitigation measures (e.g., OSD tank) lack detail.
 - Flooding along Woodside Avenue is a well-documented and recurring issue. As a local resident who uses Woodside Avenue daily, I have first-hand experience of the street’s flood vulnerability.
 - As an example, on 8 March 2022, flash flooding damaged property and irreparably destroyed at least one parked vehicle in the south side of Woodside Ave directly opposite the proposed development.
 - To give an indication of the extent of flooding risk across the vicinity, flooding also often occurs during heavy rain further up Woodside Ave, further eastward up to Blenheim Rd and Nelson Rd intersections.

3. Overburdened Services and Infrastructure

- **Traffic Gridlock and Pedestrian Safety:**
 - The Traffic Assessment (Appendix U) uses state-wide averages, ignoring local traffic contexts eg school-related traffic from various schools in the vicinity (Lindfield

Public, Lindfield East Public, Lindfield Learning Village, Reddam) on top of commercial/retail traffic frequenting the Lindfield commercial centre, and commuter traffic making way to commuter parking at Lindfield train station.

- The intersection modelling is misleading, only assessing Lindfield Avenue and Woodside Avenue, while in reality the traffic situation is a tight four-way intersection including Havilah Road and Balfour Street. This Lindfield Ave-Woodside-Havilah-Balfour intersection is already severely congested during peak hours.
- That same intersection area has no marked pedestrian crossings (closest is the traffic light ~250m away on Lindfield Ave at the train station), already creating safety concerns for current foot traffic. My children must navigate this hazard on their daily walking commute to the station on way to school – several times they have been at risk of accident. Safety concerns will escalate multi-fold with increased pedestrian and vehicle traffic from higher density housing.
- I and my family walk and/or drive this intersection several times a day, so have first-hand knowledge of these traffic gridlock and pedestrian safety issues in this vicinity.
- The planned vehicular access to the development site from Woodside Avenue will only worsen existing congestion and compromise pedestrian safety further.
- **Public Transport Deficiencies:** Public transport justification is overstated. The T1 North Shore Line (of which Lindfield is a part) has recently been reported as Sydney's least punctual train line over the last 5 years (SMH, 15 May 2025). Reliance on public transport for TOD compliance is unrealistic.
- **Power Outages:** Frequent local electricity failures (e.g., multi-day outages in 2023–2024) highlight inadequate infrastructure capacity for the large number of new dwellings.
- **Lack of Green Space:**
 - No parks exist within 400m walking distance of the development site, contradicting TOD principles of walkable communities.
 - The closest parks with adequate facility for adult and children recreation are at Lindfield Oval in East Lindfield, Bertie Oldfield in Killara, or Roseville Park, all greater than 1.6km walking distance from the development site.
 - Again, we have personally experienced the challenge of lacking walkable green space in the area, having active children ourselves.

5. Heritage Impacts

- **Blenheim Heritage Conservation Area (HCA):**
 - Blenheim HCA is unique in having a very tight heritage context.

- Under Ku-ring-gai council's proposed TOD alternative, it will exist as a small-area HCA trapped within TOD boundaries.
- As such, it will be like a "low-density island" surrounded by high-rise TOD development to its south-west and mid-rise non-TOD development to its north-east.
- The development's bulk, scale and proximity to the Blenheim HCA will significantly erode this tight heritage context.
- The EIS also dismisses cumulative impacts, violating Clause 5.10 of KLEP 2015.

6. Flawed Cumulative Impact Assessment

- The cumulative impact assessment is flawed, and hence understated combined traffic, amenity, and services/infrastructure strain
- It has not included the impacts of all relevant development in the area, such as:
 - key nearby SSDs (e.g. SSD at Nelson Rd SSD, 3x SSDs at Middle Harbour Rd)
 - other non-SSD developments within the same TOD area, which are inevitable.

7. Inadequate Community Consultation

- Engagement was limited to flyers, a website, and two sessions at a senior citizens' centre. Many affected residents (e.g., my Blenheim Rd HCA neighbours) were not aware and notified.
- The Feedback Summary (Appendix D) misrepresents wider community sentiment by omitting or downplaying widespread concerns about mass & bulk, loss of amenity, infrastructure & service strain, destruction of heritage context, cumulative impacts of broader development
- The vast majority of my fellow residents have consistently expressed their grave concerns on these matters.

8. Misrepresentation of TOD Eligibility

- **TOD Boundary Discrepancy:**
 - The site's inclusion wholly in the TOD area is questionable.
 - Measuring 400m *walking distance* from Lindfield Station's ticket office, only the southeast corner (Woodside/Highgate intersection) OR midpoint of Lindfield Ave boundary (the limit of 2 Woodside Ave block) qualifies. (see Figures 1 & 2 below)

- Under these measurements, Blocks 4–8 Highgate Road and 1–3 Reid Street lie outside the TOD boundary and should not fall under TOD planning.

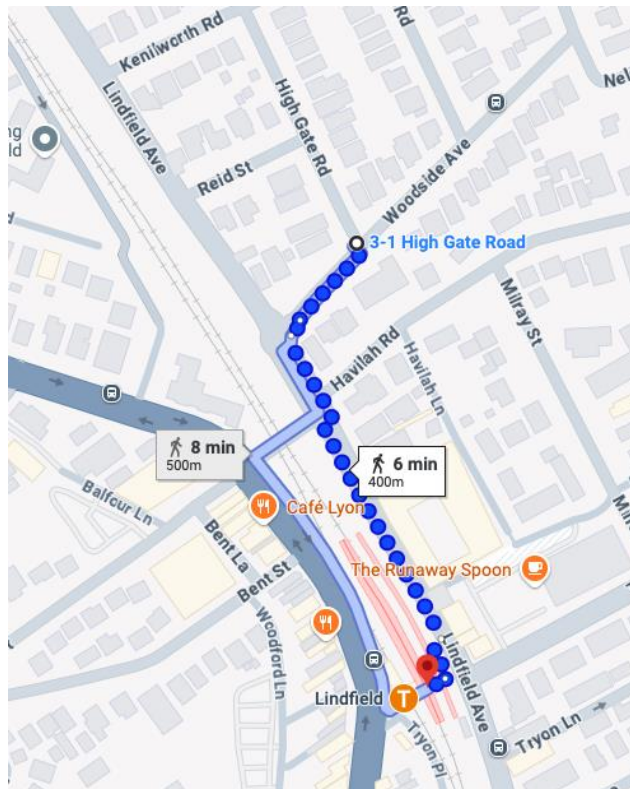


Figure 1: 400m distance

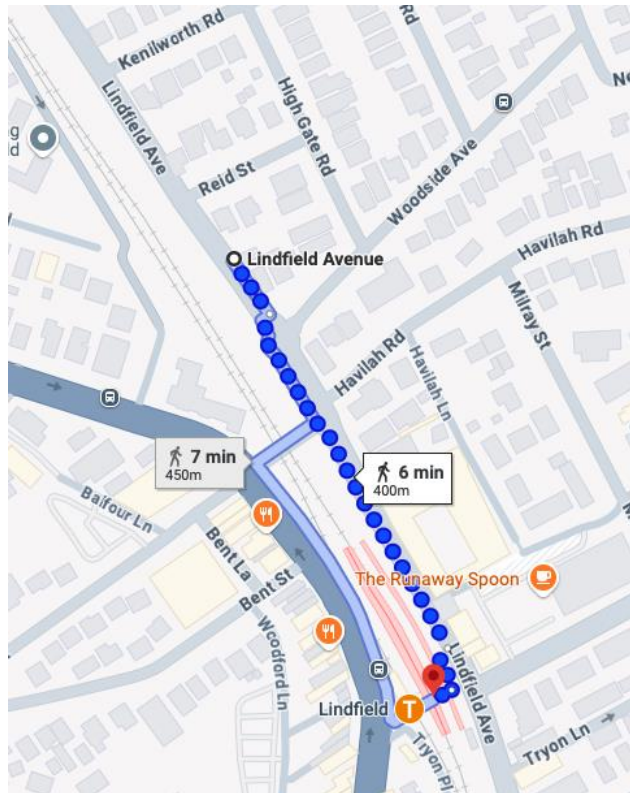


Figure 2: 400m alternative

To summarise, the proposal fails to comply with strategic, statutory, and community expectations. I urge DPHI to:

1. Reject the application in its current form.
2. Require revised designs that respect the surrounding lower-density and heritage context, mitigate flood risks, address infrastructure & services strain, and properly factor in cumulative impacts.
3. Reassess TOD eligibility using accurate 400m walking distances.