

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 Application \(SSD-78996460\) by Hyecorp](#). This development is inappropriate for Roseville, not in the public interest, it contradicts [Ku-ring-gai Council's Preferred Alternative Scenario](#), and prioritizes corporate profit over community well-being.

I urge the NSW Government to reject Hyecorp's proposal and adopt Ku-ring-gai Council's approach, which, unlike the NSW Planning TOD or Hyecorp's proposal, was developed through extensive community consultation.

Key Objections:

Project Does Not Appear to Meet the Criteria Required to be Designated as a SSD.

The project appears to fail criteria set out under [The Environmental Planning and Assessment Act 1979 \(EP&A Act\)](#) where it is stated that “a development is considered significant to the State if it is over a specific size, is in an environmentally sensitive area or will exceed capital investment value”. None of the eight examples given on the NSW State Government website (see link above) are remotely close to the Hyecorp proposal which purports to be a State Significant Development.

Affordable Housing Misrepresentation

Hyecorp's application as a State Significant Development appears to be solely reliant upon designation of 17% or 48 of the proposed 259 units as “Affordable Housing”.

Hidden on page 121 of the [Hyecorp's Environment Impact Statement](#) is the following paragraph:

6.2.5.1. Affordable Housing Provision

The proposed development will deliver a significant quantum of affordable housing, as outlined in the Affordable Housing Strategy at Appendix I, and specifically 48 dwellings or 17% of the total development GFA. Of the total development GFA, 2% will be maintained in perpetuity, will the other 15% to be held for 15 years in accordance with Section 21 of Housing SEPP.

Only 2% of 259 units held in perpetuity as “Affordable Housing” is clearly insufficient grounds for the project to be considered a valid SSD.

This temporary Affordable Housing benefit does not justify the permanent negative impact on the community. It primarily serves to enrich the developers and may offer only short-term illusory political relief to the current housing crisis.

Inadequate Community Consultation

Hyecorp's consultation process was inadequate. Despite their claim of distributing 1,355 flyers, my household on Clanville Road, less than six hundred meters from the site, received no notification or invitation to the 11 March 2025 meeting.

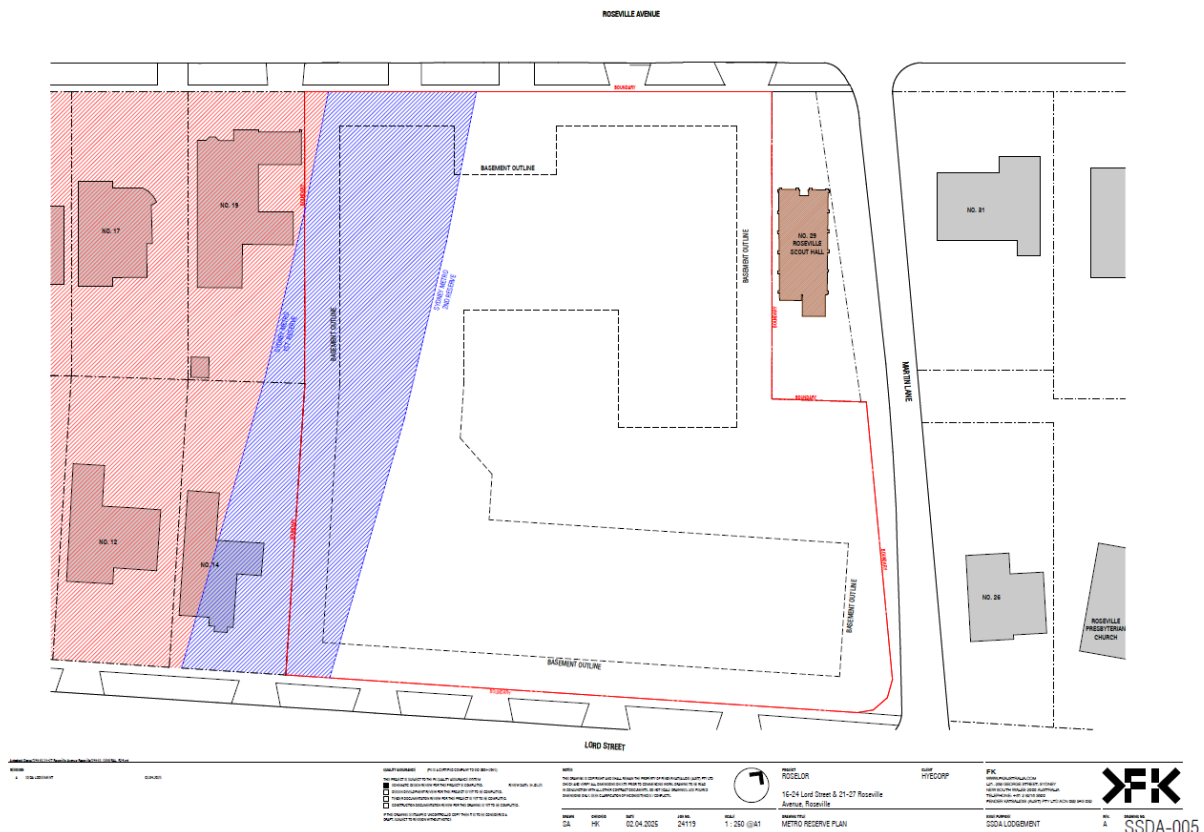
I work in a shop on Hill Street, Roseville, approximately 350 meters from the proposed development, and we received no notification of the Hyecorp SSD Development or the 11 March 2025 meeting.

Additionally, the building will block sunlight to north-facing windows on Lord Street from 2 PM onward and to backyards from 3 PM onward. See shade diagrams above.

Metro Tunnel Risks

The proposed development is also very close to the Metro tunnel and encroaches on the first and second reserves - see the plan on page 6 of the [Architectural Plans](#) below.

The 15-meter excavation near the Sydney Metro tunnel under 14 Lord Street poses risks of ground instability, subsidence, and structural damage to nearby homes.

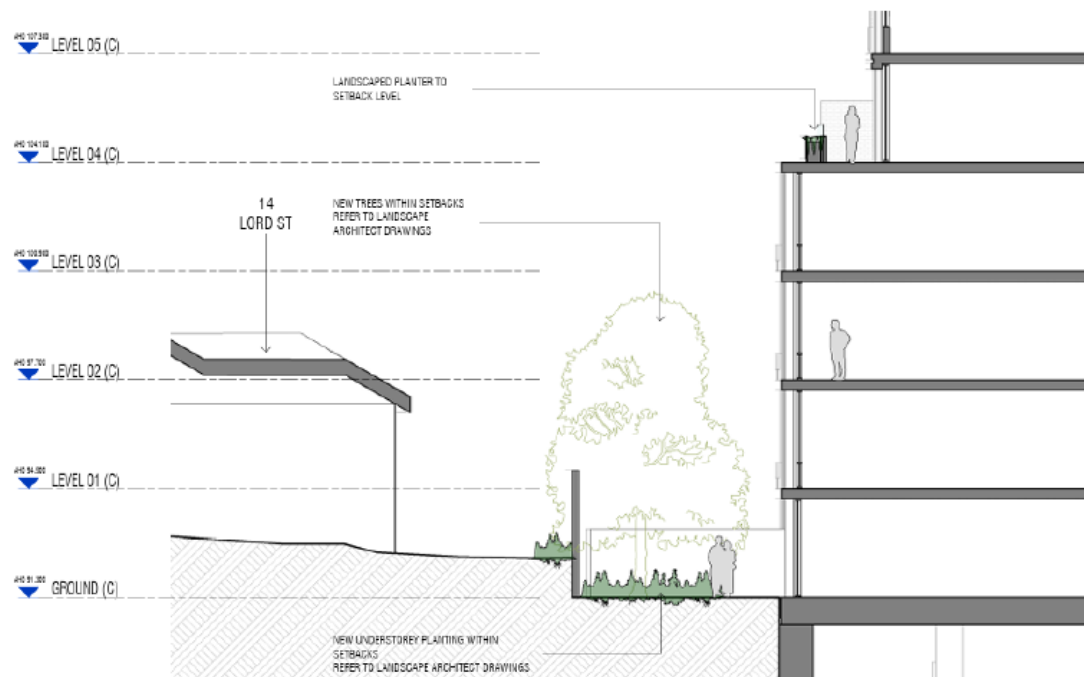


This proximity to the Metro tunnel effectively precludes further large-scale development along Lord Street and Roseville Avenue toward Hill Street.

Invasion of Privacy and Loss of Solar Access

The Environmental Impact Statement (EIS) understates the invasion of privacy for nearby homes, providing only a coarse illustration up to level 5, while the building extends to nine levels. Higher balconies will directly overlook the backyards of surrounding homes.

Figure 24 Western elevation section – Lord Street



Source: FKA

Figure 25 Northern elevation – Roseville Avenue



Source: FKA

Traffic and Parking Congestion

Roseville has become the major station of use for rail commuters originating from the mid Northern beaches and Frenchs Forest areas and, as a consequence, Hycorp's reliance on the [Ason Group's Transport Impact Assessment](#) (Appendix Q) is deeply flawed as much of report relies upon ABS data collected in 2016 well before the arrival of the Metro and the population/traffic increase since 2016.

The development's 259 apartments and 344 cars will exacerbate existing congestion on narrow streets like Lord Street, Roseville Avenue, and Martin Lane. These streets are already strained by commuters parking to access Roseville Station for NSW Rail and Metro trains.

Photos below illustrate the current choke points:

Martin Lane – One lane only due to parked cars - very congested during peak



Hill Street – very congested travelling South to Boundary Road



Hill Street – Traffic waiting to turn left on Clanville Road for Pacific Highway Access



Clanville Road – Cars Waiting to turn left into Hill Street or Access Pacific Highway



Infrastructure Strain

Local infrastructure, including drainage and traffic systems, will struggle during the construction phase and to support the large influx of new residents occupying 259 apartments with an additional 344 cars further increasing congestion.

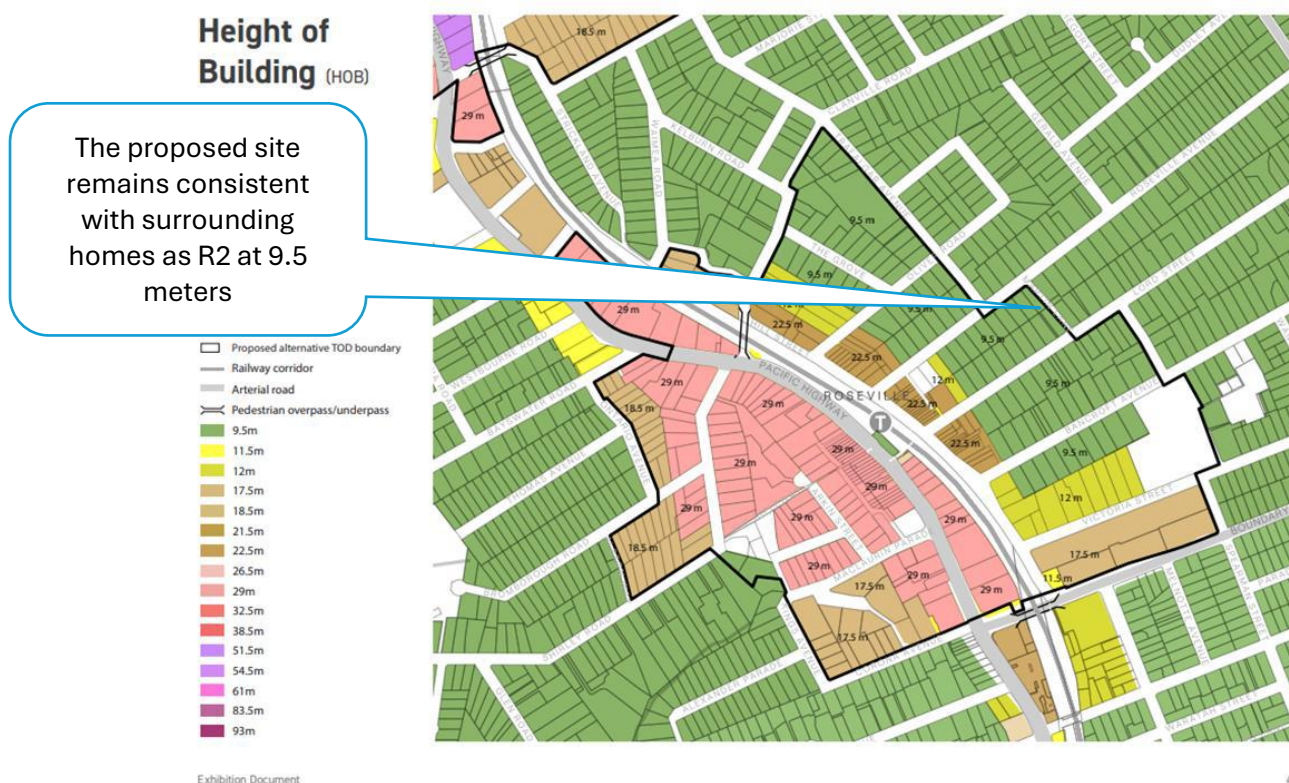
For example, there is no major supermarket in Roseville thereby requiring the use of cars to visit supermarkets in Lindfield or Chatswood.

Environmental Impact

The removal of eighty-nine trees (retaining only 26) will reduce the tree canopy by 31.8%, worsening air quality and increasing urban heat.

Support for Ku-ring-gai Council's Preferred Alternative Scenario

The Council's Preferred Scenario offers a balanced approach, retaining R2 zoning and building height of 9.5 meters which is consistent with surrounding areas – see extract below from the Ku-ring-gai Preferred alternative proposal page 3.



The [Roseville component of the Council Preferred Alternative](#) to the TOD better aligns with Roseville's character while still addressing affordable housing goals.

Compared to the NSW Government's TOD planning policy, the [preferred scenario](#) will result in the following improvements:

- Sixty-eight percent less impact on environmentally sensitive land
- Sixty-nine percent less impact on individual heritage items, including by retaining these items within low density residential areas.

- Eighty percent reduction in the amount of Heritage Conservation Area land where higher-density development will be permitted.
- Seventy-six percent less impact on tree canopy cover
- Ninety-three percent fewer properties affected by poor height transitions.
- Eighty-five percent increase in land upzoned for retail and commercial uses that will provide a range of services for residents.

Conclusion

SSD-78996460 will devastate Roseville's low-density character, overwhelm infrastructure, and disregard the community input gathered during Ku-ring-gai Council's consultation process for their alternative to the TOD.

I strongly urge the NSW Government to reject this proposal and adopt the Ku-ring-gai Council's Preferred Alternative Scenario for a sustainable outcome.