

Ms Kiersten Fishburn
Secretary
NSW Department of Planning, Housing and Infrastructure
Submitted via the NSW Major Projects Portal

28 May 2025

Dear Ms Fishburn,

Re: Submission [2-4 Woodside & 1-3 Reid Street \(SSD-7926146\)](#)

Thank you for the opportunity to provide feedback on the State Significant Development Application proposal at 2-4 Woodside & 1-3 Reid Street (SSD-7926146), Lindfield (SSD-78493518).

Friends of Ku-ring-gai Environment (FOKE) have been strong advocates for the protection of Ku-ring-gai's neighbourhood character, environment, heritage and liveability for the past 30 years.

FOKE wishes to express its objection to the proposed development for the following reasons:

Statutory Context

The proponent has not taken into consideration mandatory statutory considerations which the consent authority is obligated to consider when assessing and determining DA's, including:

- Ku-ring-gai Council' LEP 2015 and DCP, as required under Section 4.15 of the EPAct 1979.
- The Apartment Design Guide
- The SEPP Housing Guide 2021

Nor does it comply with ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979 - SECT 1.3 Objects of Act *a) (b), (c), (d), (e), (f), (g), (h), (i), (j)*.

Built Form and Urban Design

The proposal at 2-4 Woodside & 1-3 Reid Street, Lindfield is incompatible with the neighbouring heritage conservation area. The proposed nine-storey residential flat building will have a negative impact on Blenheim Road Heritage Conservation Area and Wolseley Road Heritage Conservation Area and Heritage items including

- o 12 Blenheim Road
- o 11 Blenheim Road
- o 15 Blenheim Road
- o 19 Blenheim Road 'Lochinvar'
- o 22 Kenilworth Road
- o 23 Treatts Road
- o 42 Nelson Road, 'Fieldhead'
- o 44 Nelson Road
- o 45 Treatts Road
- o 47 Treatts Road 'Coromandel'
- o 50 Nelson Road

Height

The proposal at 2-4 Woodside & 1-3 Reid Street, Lindfield:

- breaches the maximum height plane associated with wall height, lift overruns and screening
- breaches the maximum building height of 30.35m, by 1.75m building height limit of 28.6m under the Housing SEPP

Traffic

The Traffic Impact Assessment by Varga Traffic Planning is flawed and not evidence based.

The projected change in traffic generation potential of the site will have major negative implications on the road network, road capacity, vehicular access and street parking/loading, particularly as it is so close to two traffic 'pinch points' along Lindfield Avenue - a roundabout almost on top of the junction where two lanes of cars queue to enter and one lane of cars exits the Pacific Highway via a tunnel under the railway line while others exits the Pacific Hwy via the railway tunnel under the railway line while others can only 'snake past' cars vying for parking outside IGA/Harris Farm.

Already there is insufficient street parking in the area, particularly along Lindfield Avenue, Tryon Road, Havilah Road, and Woodside Avenue. The proposed development will compound and entrench the unavailability of street parking.

The additional traffic generated from the proposed development will create danger for drivers and particularly pedestrians who need to cross Lindfield Avenue to the Pacific Highway. It will also endanger the safety of its occupants and neighbouring residents, particularly during emergency events, when emergency vehicles (ambulances, fire engines, police) may be required to assist them but may not be able to reach them to provide lifesaving services. Traffic constantly banks up on Lindfield Avenue at the entry and exit from the railway tunnel to and from the Pacific Highway.

Views

The proposal fails to acknowledge that it will lead to the loss of trees and 'greenery' and destroy this unique environmental heritage from Lindfield, which has been characterised by the 'natural' dominating the 'built' form. As such the proposal will have a severely negative and irreversible impact on Lindfield's character, heritage and environment. The existing birds and wildlife cannot survive without trees.

Trees and Landscaping

The proposal seeks to remove 30 trees, with 9 trees classified as high importance value, 21 classified as low importance value. The trees identified as having high importance value and are in good shape. It is unacceptable that they be cut down.

Biodiversity

The proposal is located within the garden suburb of Lindfield that is connected through wildlife corridors to the Garigal National Park, and as such is of environmental significance.

- It will remove significant trees and reduce the tree canopy cover for the site and local area, reducing nesting, food and shelter for birds, possums and other wildlife, fungi and insects.
- It will 'deforest' Lindfield's tree canopy as well as the canopy for Greater Sydney that protects Sydney from over-exposure to UV radiation - and pollutants in the air, cools temperatures and supports wildlife habitat, which is particularly important when we are heading beyond 1.5 degrees Celsius with projected extreme and lengthy heat waves.
- It threatens the Critically Endangered Ecological Communities (CEEC) of Sydney Turpentine Ironbark Forest (STIF) trees and Blue Gum High Forest trees (CEEC) and the wildlife, birdlife, insects and fungi that are dependent upon these forests. They are Threatened Ecological Communities (TEC) and are listed under NSW's (Biodiversity

Conservation Act (2016) and Commonwealth's (Environment Protection and Biodiversity Conservation Act (1999) environmental protection legislation.

- It threatens the extinction of local wildlife and birdlife
- It does not acknowledge the environmentally sensitive land on the north-south railway line near Lindfield Avenue and its migratory birds, many of them endangered.

The proposal downplays the environmental sensitivity of the site. It is unacceptable that the applicant does not provide a thorough ecological report of the area.

The site contains the seedbank of Blue Gum High Forest and Sydney Turpentine Ironbark Forest - Critically Endangered Ecological Communities as evident by the self-seeded Turpentine tree (*Syncarpia glomulifera*) at 1 Reid Street. Along the railway line there are trees and remnant endangered forest near Woolsley and Treatts Road (western side of the railway line).

The proposal will have a significant negative impact on threatened ecological communities.

Social Impact

The proposed development will have a negative social benefit as a result of the destruction of homes, neighbourhood, heritage and environment.

- It fails to demonstrate how it will contribute to a higher level of environmental amenity for residents as well as for the environmentally sensitive wildlife corridors leading to Garigal National Park and Lane Cove National Park.
- The proposal offers no benefit to the existing community as the increase in density will overwhelm existing infrastructure and community services.
- The development will dramatically and negatively impact on the sense of community and what residents value about living in Lindfield.
- Already many residents feel a sense of 'grief' that their home and neighbourhood will significantly and irreversibly change due to the proposal.
- Many residents feel high levels of emotional distress about the loss of trees and tree canopy and the consequence of this for the survival of Ku-ring-gai's rich birdlife and wildlife.
- The term 'solastalgia' perhaps may describe the feelings of many Lindfield residents, a scientific term that describes the emotional distress felt when existing residents witness the destruction and degradation of their local environment.

Affordable Housing

The proposal fails to promote genuine and long term affordable housing with its provision to provide affordable housing for only a 15-year period.

Insufficient Environmental and Infrastructure Studies

The applicant fails to provide critical studies (e.g., environmental, traffic, parking, water, sewerage, energy and utilities) to support the intensified SSD proposal of nine storeys. Without these verified independent studies, the SSD risks unsustainable development, straining local infrastructure and exacerbating environmental degradation.

Conclusion

Friends of Ku-ring-gai Environment (FOKE) is of the view that the State Significant Development Application proposal at [2-4 Woodside & 1-3 Reid Street \(SSD-7926146\)](#) should be rejected as it will have a negative and detrimental impact on heritage, environment, traffic, urban design, neighbourhood character, visual amenity, liveability, tree canopy, open space, infrastructure and community benefit. As such FOKE requests that this SSD be rejected.

Thank you for considering FOKE's submission.

It is to be hoped that the NSW DPIH will take on board our concerns and reject the proposal.

Yours sincerely,

Janine Kitson

VICE PRESIDENT

cc Ku-ring-gai Mayor and Councillors

cc Matt Cross MP Member for Davidson

cc The Hon Alister Henskens SC MP Member for Wahroonga

cc The Hon Paul Scully MP Minister for Planning and Infrastructure

cc The Hon Scott Farlow MP Shadow Minister for Planning