

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 [16-24 Lord Street & 21-27 Roseville Avenue, Roseville](#) (SSD-78996460)

Thank you for the opportunity to provide feedback on the State Significant Development Application proposal at 16-24 Lord Street & 21-27 Roseville Avenue, Roseville (SSD-78996460) Roseville.

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 take into account when assessing and determining DA's, and 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
- It does not comply with ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979 - SECT 1.3 Objects of Act a) (b), (c), (d), (e), (f), (g), (h), (i), (j)

Design Quality

The proposal:

- fails to demonstrate a high level of environmental amenity for any surrounding residential or other sensitive land use.
- is too high (up to 9-storeys) and will have negative impacts on multiple streetscapes with overshadowing / privacy / solar access / streetscape / character / amenity and views.
- fails to demonstrate a high level of environmental amenity for any surrounding residential or other sensitive land use.
- overall size will of the proposed development (4 buildings up to 9-storey each) is too big and will negatively impact on the context that surrounds it
- will negatively impact on the existing built form in the neighbourhood (1-2 storey houses)
- will negatively impact on the future built form in the neighbourhood (remaining 1-2 storey houses under Council's Preferred Scenario)
- will negatively impact on significant development constraints at surrounding sites due to the Metro tunnel reserves (effectively this will be like an isolated island of 4 towers surrounded by 1-2 storey houses)

Heritage

The proposal negatively impacts on the surrounding heritage, including:

- the site being in the middle of three heritage conservation areas (C36 Lord Street/Bancroft Avenue Conservation Area, C35 The Grove Conservation Area, Clanville Conservation Area C32) in addition to 54 heritage listed houses nearby (of which 9 houses are proposed to be demolished).
- Negative impacts on heritage items:
 - 19 Lord Street
 - 28 Lord Street, St Luke's Church Hall
 - 10 Roseville Avenue
 - 12 Roseville Avenue, "Lawarra
 - 16 Roseville Avenue
 - 22 Roseville Avenue
 - 29 Roseville Avenue, Roseville Scout Group Hall
 - 31 Roseville Avenue
 - 32 Roseville Avenue
 - 40 Roseville Avenue
 - 45 Roseville Avenue
 - 47 Roseville Avenue

Traffic

- 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.
- Already there is insufficient street parking in the area, particularly along Lord Street for visits to the Roseville Uniting Church. 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. 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.
- The impact of the additional traffic that will be generated by the proposed development particularly during peak periods including the Martin Lane rat-run; congestion at key intersections out of Roseville; local streets that are already essentially one-way; Roseville College drop-off and pick-up.

Visual Impacts

The proposed development will have negative visual impacts from adjoining properties and the public domain.

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

Trees and Gardens

- Unacceptably 91 trees are proposed to be removed to accommodate the proposed development.

Biodiversity

The proposal is located within the garden suburb of Roseville 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 Roseville'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 Hill Street and its migratory birds, many of them endangered.
- The proposal downplays the environmental sensitivity of the site. It is disappointing 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.
- The proposal will have a significant negative impact on threatened ecological communities.

Social Impact

- The proposal impacts on the existing residents whose homes and amenity are irreversibly negatively impacted.
- The proponent offers no community benefits, however, impacts heavily on 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.
- The loss of trees and tree canopy impacting directly on residents and cumulatively on connectivity of canopy, impacts adjoining remnants of endangered and critical ecological communities and connecting National Parks.
- 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. ecological, traffic, parking, water, stormwater run-off, water pressure, 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 [16-24 Lord Street & 21-27 Roseville Avenue, Roseville](#) 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