

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

I am writing to object to the development application by Hyecorp under State Significant Development Application SSD-78996460. As a long-term resident located directly opposite the proposed site, at the intersection of Martin Lane and Roseville Avenue, I am deeply concerned about the detrimental impact this oversized development of extreme density will have on our neighbourhood and broader community.

Let me be clear: I am not opposed to development per se. As a potential downsizer, I welcome thoughtful growth and change in Roseville. However, what is being proposed is not thoughtful – it is opportunistic, profit-driven and entirely out of keeping with the character and needs of our local area.

This application represents the worst of the "profit over planning" approach that too often in the past defined urban development in NSW. I strongly endorse Dr Tony Richards' concept of the "missing middle" and his critique of past planning decisions being steered by those with deep pockets and staying power, rather than by planners in genuine public interest. The result has been outcomes enriching developers while failing communities, of which this proposal is another example.

I am encouraged by recent efforts by the NSW Government to correct this imbalance—particularly through Minister Paul Scully's push for "density done well." But let me be equally clear: the Hyecorp proposal is not an example of this approach. It is a throwback to outdated, developer-first planning. It is being rushed through under the guise of the State Significant Development (SSD) pathway, with minimal to non-existent consultation and a deeply inadequate and disappointing Environmental Impact Statement (EIS) that glosses over serious concerns while presenting a one-sided, promotional view on behalf of the developer. The EIS fails to acknowledge or assess the already overstretched infrastructure in our area and instead paints a deceptively "perfect" picture. A marketing tool rather than an objective appraisal.

Furthermore, the proposal appears to be exploiting a short-term planning loophole strategically taking advantage of the period between the gazettal of Transport-Oriented Development (TOD) guidelines and the release of Ku-ring-gai Council's (KMC) updated plans. When we were being courted, several developers and agents openly outlined this deliberate strategy to push approvals through the brief window before KMC's alternatives were made public. Most residents, in good faith, waited to see the outcome of Council's process. Hyecorp, however, moved swiftly to lock in agreements with a small subset of landowners, excluding the wider community from the conversation almost entirely. During these meetings, nine storeys were never mooted.

If approved, this development risks leaving a damaging legacy, especially when KMC is poised to present a well-researched, community-supported alternative that will deliver necessary housing in a far more balanced and sympathetic way. The proposal needs to be rejected to enable a positive, valuable outcome rather than set a negative precedent.

My family has lived in our home for 38 years, investing in its care and preservation, and in the wellbeing of this neighbourhood. I urge decision-makers to reject this rushed and unrepresentative proposal. A decision of this magnitude and excessive density must be made not in haste but with due diligence, integrity, and genuine respect for the community it affects, now and into the future.

I object to the development application on several grounds:

1. **Denial of procedural fairness:** The application undermines ongoing negotiations between Ku-ring-gai Municipal Council and NSW Planning.
2. **Avoidance of oversight:** Designating the project as State Significant Development is a tactic to bypass Council approval and scrutiny.
3. **Planning contraventions:** The proposal violates local heritage and design principles expected from KMC and introduces overwhelming density.

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

4. **Infrastructure neglect:** Existing issues like drainage, traffic and parking are ignored.
5. **Overstated description of consultation:** The claim of broad community consultation is false; post-submission variation suggests an attempt to evade scrutiny.
6. **Ongoing Uncertainty:** Residents have endured prolonged anxiety due to rumours, conflicting statements and concerns over the scale and duration of the project. Should the project be approved, the only certainties will be the 5 to 7 years of stalling and construction, impinging residents' ability to sell and escape.

### SUPPORTING ARGUMENTS

#### 1. Denial of procedural fairness

- **Lack of proper consultation on TOD Approach**

- While the KMC undertook extensive consultation on its preferred development option, no similar community input was sought on the broader TOD approach or the current application.
- Proceeding without hearing the Council's alternative would constitute a denial of procedural fairness.

- **Council's proposal meets government housing targets**

- The Council's plan satisfies NSW's Low and Medium Density Housing requirements and Minister Scully indicated on Sky News he would consider the Council's proposal in place of TOD if it met housing targets.
- Hyecorp is attempting to fast-track approval before alternative options are considered, bypassing public consultation.

- **Premature decision not in public interest**

- A decision before the Council's alternative is officially presented is premature and contrary to public interest.
- If the Council's plan is later accepted, this development could stand as an excessively large and unsuitable outlier, a one-off mistake that blights.

- **Destruction of local heritage and resident investment**

- The proposal undermines the area's heritage character, for which residents have paid a premium and invested in maintaining. Approval would cause personal financial loss for residents, with no compensation, redistributing wealth to subsidise developer profits.
- An example: the Heritage Report condemns 23 Roseville Ave because of its out-of-era carport to the side and an extension to the rear. However, with the original core structure in superb condition (right) the baby is being thrown out with the bathwater, only to be replaced with a modern monolith.

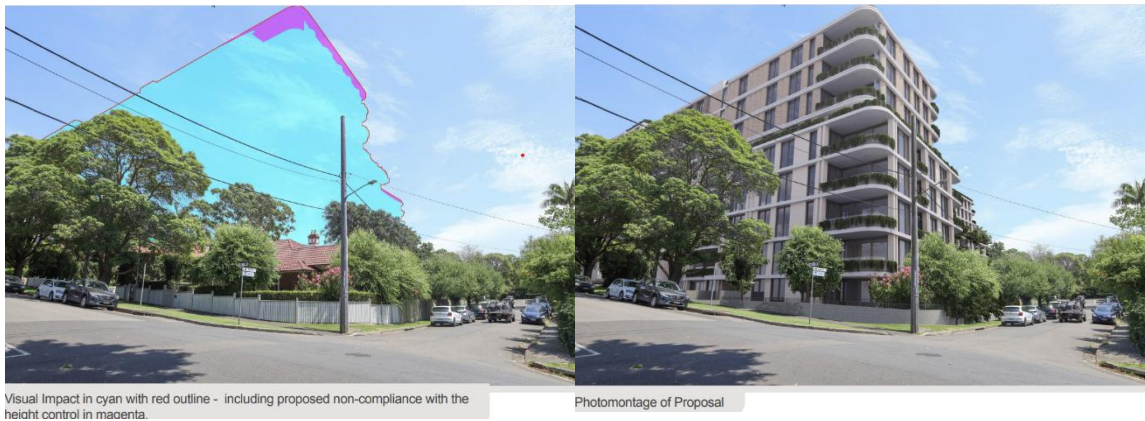


23 Roseville Ave, 9 May 2025

It is unacceptable to propose replacing existing heritage streetscape aspects with an enormous development and then simply dismiss the impact as acceptable, low and unimportant. The proposed density is an extraordinarily large first step for development into a heritage area, as shown overleaf in the before and after pictures overleaf from Urbaine's Visual Impact Assessment (pp 19-20, 23- 24):

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

### *Intersection of Lord St and Martin Lane*



### *Intersection of Martin Lane and Roseville Ave*



- **Personal impact and community devaluation**

- Long-term residents feel betrayed as their decades of investment and community pride are threatened.
- Property values are already declining, with 10% reductions in asking prices due to the uncertainty and threat.
- Families are left powerless as their homes and efforts are potentially devalued to benefit a private developer.

## 2. Avoidance of oversight

- **Misuse of SSD pathway:** The several agents and developers who approached us outlined their strategy to move quickly and race through a narrow “window of opportunity” between government and council being in control. The development was inappropriately but deliberately nominated as a State Significant Development to bypass Council and fast-track government approval. This reflects opportunism, not responsible urban planning.
- **Circumventing community input:** The project sidesteps Ku-ring-gai planning policies that prioritise community engagement. An alternative Council-led plan would meet housing targets while preserving neighbourhood character, amenity and support.
- **Not of State Significance:** Local residential developments do not meet the true intent of SSDs, which typically involve large-scale public infrastructure (hospitals, civil works etc). Trying to pass a local residential project off as being of significance to the wider state is an overt abuse of the system to try and bypass Council’s intent and the will of the residents.



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

- **Misleading affordable housing claims:** Of 259 units, only 48 are designated as "affordable," of which just 8 – barely 3% – are permanently so, while the rest revert to market rates after 15 years. Despite this miniscule contribution, the developer claims a 10-times / 30% increase in buildable height (from 6 to 9 storeys), which is inequitable. On top of this, a hard-to-spot variation has already been lodged requesting an additional increase in height of more than a metre. Where and when does this development stop shifting the goalposts?
- **False affordability narrative:** Given all units will be priced at over \$1 million and some above \$4 million, the project does not genuinely address affordable housing needs for ageing populations, as suggested in the EIS (p11).

### 3. Proposed building scale and form

Describing a 9-storey, 259-unit building as having “minimised bulk and scale” is a falsehood; using materials incompatible with the surrounding heritage character is offensive. Contrary to the EIS positive assessment (p11), there is no evidence of thoughtful design regarding layout, form, materials, or landscaping with consideration of local surrounding character.

- **Demolition within a Heritage Conservation Area:**
  - That the removal of 9 heritage dwellings and 89 trees only **MAY** impact residential amenity is offensive. And of the trees left standing, how many will survive the massive excavation and changed environmental conditions (deep soil zone, more shade, changed drainage)?
- **Incompatible building scale:**
  - The proposed nine-storey development does **NOT** align with surrounding one- and two-storey structures. The visual impact of such density is a step too far.
  - Claim of "co-existence with lower scale development" is refuted.
- **Inappropriate design and materials:**
  - Façade and materials clash with the area’s established character: blonde brick and Art Deco features clash with predominant Federation and Californian bungalow styles.
  - EIS claims to "honour local architecture" – dating back to 1896 – are negated by a design and scale incongruent with the surrounding area. Approval would contradict the NSW Government’s stated heritage protection goals.
- **Contravention of local planning ethos:**
  - The proposed development conflicts with KMC’s alternative plan by being less respectful of heritage, scale, and design. While KMC’s proposal meets the volume of TOD more sensitively and with fewer negative impacts, the current development – if approved pre-emptively – will likely be the only one built under TOD in the area, resulting in a modern, out-of-place structure amid a neighbourhood of historic houses.
  - Residents bought into and paid a premium for the privilege of living in a heritage area. We have respected, protected and strengthened that heritage with great care but the development threatens to disregard these efforts and values, with little to no consultation or recompense.

### 4. Infrastructure neglect

- **Drainage** in the area of the proposed development has not been superficially addressed:
  - Roseville has Sydney’s oldest pipes with the development planning no upgrades despite existing issues such as rushing gutters and overflowing canals. The additional 259 dwellings can only worsen drainage problems.

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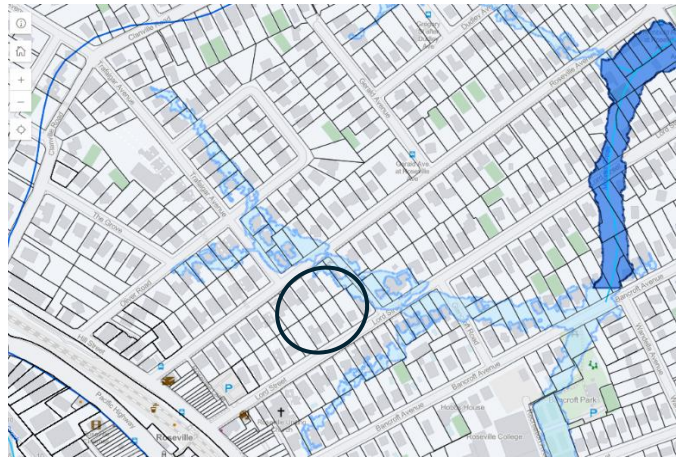
- EIS (pp42) mentions building an impermeable flood wall to protect the development and says overages “will be safely conveyed” (pp43), but not as to where. In all likelihood, that floodwater will flow into neighbouring properties.

### *Site location issues:*

- On the low side of the street, on an old creek bed at the lowest point of water flowing from Oliver Street.
- Situated in a natural drainage channel leading to Moore Creek, already prone to overflow.

### *Infrastructure shortcomings:*

- Vegetated swales: appealing but ineffective for managing the anticipated increase in rainfall to hit Sydney under climate change.
- No investment planned for drainage, roads, commuter parking, or upgrading old services.



Area flood map Source: KMC

- The high-density development adds 259 residences without improving neighbourhood resources, merely straining them.

## • **Traffic**

The EIS claims “excellent access” (pp78) but ignores existing traffic conditions as described by the state government. In 2012, RMS declared ingress/egress to east-side Roseville “compromised” due to Boundary Street/Pacific Highway upgrade. Since then, traffic has worsened because of:

- Numerous new apartments built on Boundary and Victoria Streets
- Increased student numbers at Roseville College causing more parking and drop-offs
- The new Metro service from Chatswood, pushing commuter parking demand onto Roseville, the closest suburb with street parking. In addition, surrounding suburbs (Lindfield, Gordon, Killara, Crows Nest, Victoria Cross) offer little or no commuter parking.

The critical issues ingress to and egress from the east side of Roseville have been ignored. It is noble but unrealistic to assert the new residents will only or even primarily use public transport because **there is no supermarket in Roseville: shopping requires use of a car and ...**

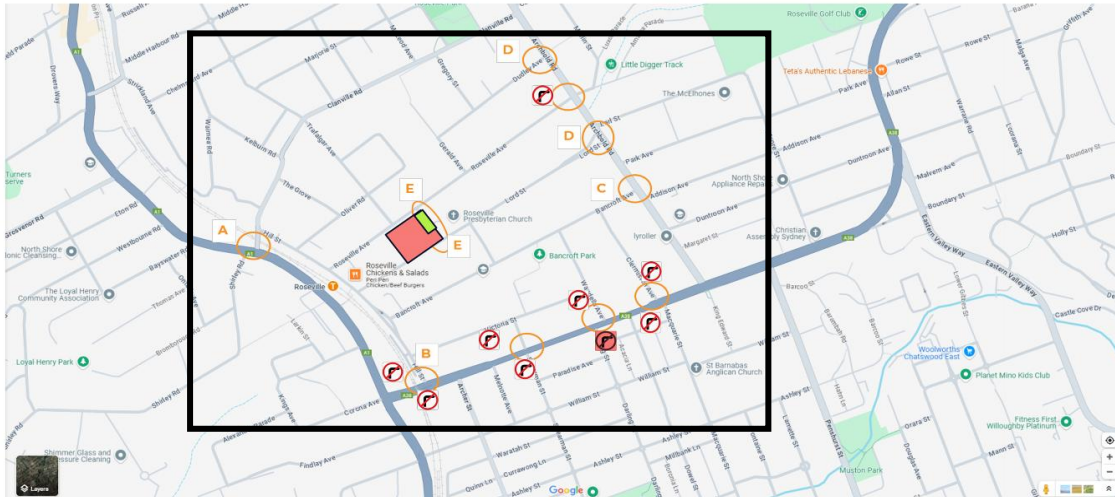
## **WE ALREADY CANNOT GET OUT!!**

As shown in the diagram overleaf, egress and ingress are restricted at every junction, every turn. Considerable time must be allowed and risks taken to get out of the east side of Roseville, especially when heading north.

- The traffic study used outdated data from 2016, ignoring changes over the past nine years and the more recent 2021 census data.
- The projected number of daily car movements (32 in the morning, 43 in the evening) from the development is unsubstantiated and likely underestimated. This is especially when considering higher occupancy and car ownership figures from the latest census, which have surely increased parking and traffic issues since the 2016 data used, as per the graphic and photos below.



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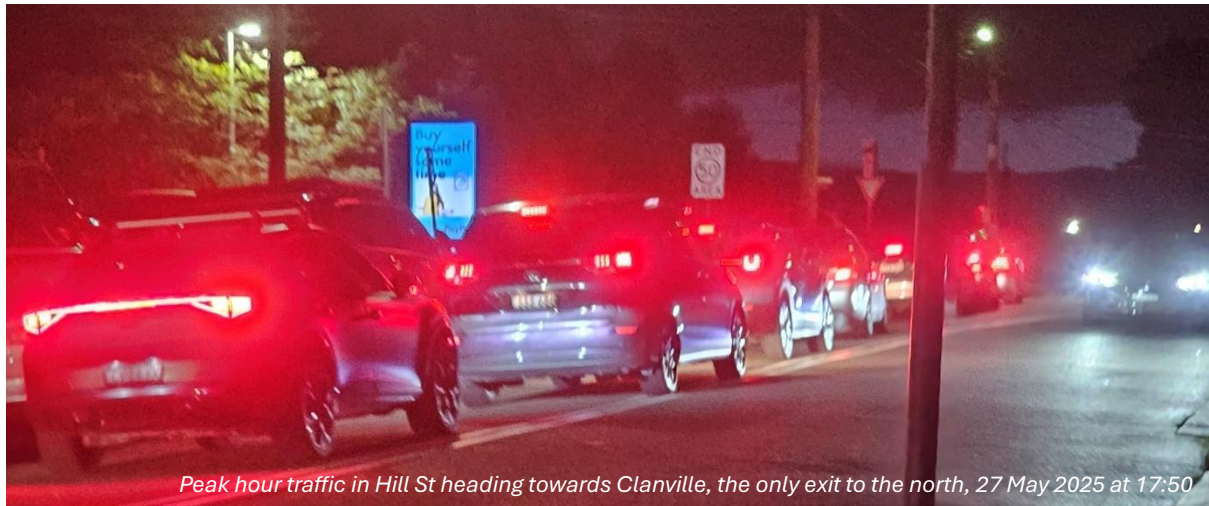


- A** single lane bridge on light allows 4-5 cars each cycle out and 1 in
- B** major morning grid lock back along Hill Street - challenging access on LH
- C** challenging exit in morning peak to busy arterial road - backs up in mornin
- D** dangerous exit to busy arterial road
- E** narrow lane with major AM and PM gridlock - used by buses as well
- no right turn
- no right turn (peak hours)





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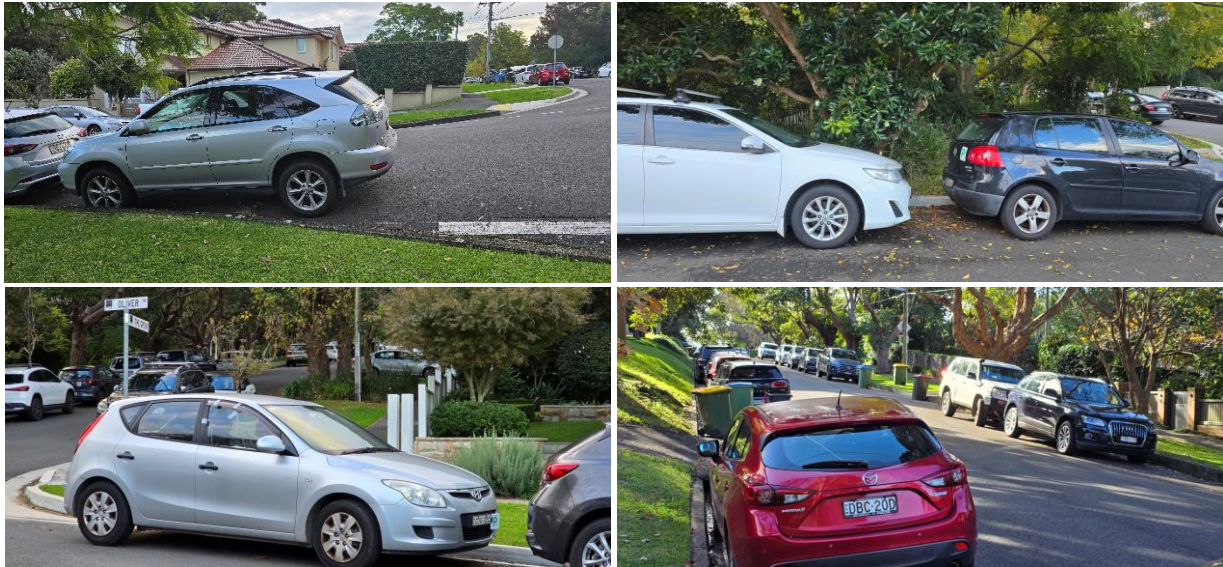
The addition of 259 new dwellings will only worsen existing traffic problems caused by Council and Government restrictions. Martin Lane and Hill St CANNOT withstand the injection of 344 additional cars into the area. Such obvious and critical infrastructure issues must not be ignored when both Council and State Government have contributed to creating them.

### **Parking**

Roseville has long attracted work commuter cars seeking easy access to the heavy rail; and buses and now Metro at Chatswood to reach the city. Northern Beaches' residents are particularly prevalent due to easy access via Roseville Bridge. Counting council parking stickers on windscreens reveals that Northern Beaches cars alone can occupy as much as 30% of parking space in Roseville's streets.

In the absence of any significant parking infrastructure in Roseville, the recent opening of the Metro from Chatswood has noticeably worsened parking. Cars now stretch 600-800 metres from the station, blocking driveways, obstructing corner curves and pathways, jamming in nose-to-tail, all of which further congests the streets. Buses are even forced to reverse out of Martin Lane because they often cannot squeeze through the cars parked either side. If a visitor, tradie or service call is expected, residents must move their cars out of the driveway the night before because by 8:00am on weekdays, street parking is usually already full.

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*New “Metro-style” parking in surrounding streets can only be exacerbated by such a large development*

*Source: Marion Fagan*

## **6. Overstatement of consultation**

- Hyecorp’s claims of extensive community consultation are misleading. Of the five people in the photo taken at the meeting on 12 March, I understand those featured are a Hyecorp executive, the architect and a stakeholder from one of the optioned properties, who invited a husband-and-wife couple from across the road. I have heard of only one other nearby-resident attending the meeting making that photo not just an indication of the community consultation but what could be the extent of it – two uninvolved households.
- I received the Hyecorp brochure AFTER the meeting and like many others, mistook it for typical marketing material for the sale of developer properties. The brochure was not drafted as an invitation to attend nor as providing information about the development. It was usual glossy real estate fluff. I was also unaware of dedicated pages on Hyecorp’s website that were deactivated soon after the meeting.
- In addition, that a variation has already been submitted is concerning. Well concealed, it asks for a proposed uplift in height of more than a metre which begs the question as to what else is or will be concealed. The whole process is far from transparent.

## **7. Ongoing uncertainty**

We finished preparing our house for sale at the end of 2023 which, as luck would have it, coincided with the announcement of TOD. We had built a retirement home in the Snowy Mountains, purchased a bolthole in the inner west and, after 38 years, we were ready to leave our family home. But then came TOD; then came my husband’s diagnosis of brain cancer. We sold the bolthole; my husband died and now, the way forward is even more unclear.

Selling prices dropped because of the threat to the area; buyers are nowhere to be seen because of the prevailing confusion and potential unattractive overdevelopment. The filth of the construction process and the thought of enormous trucks squeezing through our narrow residential streets is anathema, along with the likelihood that it will be some 5-7 years before completion.

At a very personal level, unfavourable decisions may well be made for me by others; choices denied; viable options lessened at the very time in life I need to bravely move forward alone as a recent widow. This doesn’t sound like the Sydney and Australia I love.

**We can only destroy history once**