

To: NSW Department of Planning, Housing and Infrastructure

RE: OBJECTION to SSD-78996460 – Residential Development with in-fill affordable housing, 16–24 Lord Street & 21–27 Roseville Avenue, Roseville

Date: May 26, 2025

TO WHOM IT MAY CONCERN,

I am writing to **formally object** to the proposed residential development with in-fill affordable housing, 16–24 Lord Street and 21–27 Roseville Avenue Roseville SSD-78996460. This objection is based on substantial concerns regarding lack of community engagement by Hyecorp, heritage preservation, infrastructure capacity, environmental impacts and misalignment with local planning strategies and the concept of affordability. The reasons I strongly believe SSD-78996460 should be **rejected** are outlined as follows;

1. PREMATURE SSD PROGRESSION, NON-COMPLIANT WITH IMMINENT KUR-RING-GAI COUNCIL PREFERRED SCENARIO

The application, lodged under the Transport Oriented Development (TOD) scheme, should not in the public interest be further progressed nor determined until Ku-ring-gai Council's Preferred Scenario is implemented into the planning framework in a matter of weeks.

The TOD planning controls were introduced without public consultation and in December 2024, a mediation agreement between Ku-ring-gai Council and the NSW Government allowed the Council to develop alternative planning controls tailored to the local area of the TOD precincts at Roseville, Lindfield, Killara, and Gordon.

Proceeding with this development prior to the imminent implementation of Kur-ring-gai Council's Preferred Scenario undermines the collaborative, democratic planning efforts and completely disregards the community's input because this **SSD is non-compliant under Kur-ring-gai Council's Preferred Scenario.**

2. INADEQUATE COMMUNITY ENGAGEMENT FROM HYECORP

The community consultation process for this development has been insufficient:

2.1 LACK OF COMMUNITY NOTIFICATION

Residents within close proximity, including homes only 400m from the development and surrounding neighbours did **NOT** receive the Hyecorp community flyer and were not notified of the development nor the community drop-in session held on 12 March 2025. If we were notified, we would have most certainly tried to attend the community drop-in

session to object to Hyecorp's proposal from the very beginning because it will have a major negative impact on the area we have lived for over a decade.

2.2 DELAYED COMMUNITY NOTIFICATION

Flyers intended to inform residents were distributed **after** the community session on March 12, 2025, rendering them ineffective for meaningful engagement.

2.3 INVALID FINDINGS FROM COMMUNITY ENGAGEMENT DUE TO SMALL SAMPLE SIZE

A total of 5 people attended the community drop-in session and those who attended were primarily individuals from the 9 houses selling to Hyecorp who have direct financial interests in the development. A total of 34 people completed the online survey. GYDE admits in its Engagement Summary Report "that a response rate of 39 is unlikely to provide a representative sample and the findings are not considered valid or reliable.

Such shortcomings in community consultation and engagement **fail to meet the standards** expected for SSDs of this scale and significance.

3. DISPROPORTIONATE SCALE AND ADVERSE HERITAGE IMPACT

The proposed development's scale is incongruent with the surrounding neighbourhood:

3.1 EXCESSIVE BUILDING HEIGHT

The plan includes buildings up to nine storeys, dwarfing and destroying a historic area characterised by one to two-storey R2 federation residences built in the 1900s. The proposed development is situated right next to a heritage listed Scout Hall and hut. **All 9 federation houses proposed to be demolished by Hyecorp are recommended to be retained in Kur-ring-gai Council's Preferred Scenario.**

3.2 ADVERSE IMPACT ON HERITAGE CONSERVATION

The site is situated amidst three heritage conservation areas, with 54 heritage-listed houses nearby. The demolition of nine houses contributing to these areas poses a significant threat to the suburb's historical fabric. The Heritage Impact Statement (Appendix GG) claims that 'the primary street frontages within the subject site to Lord Street and Roseville Avenue are highly modified'. It is unrealistic to expect that any 1900s homes have not had any updates and it should be highlighted that any renovations and or modifications are sympathetic to the Heritage conservation area and have been approved by Ku-ring-gai Council's rigorous DA approval system so that they align with the heritage conservation area.

On the other side of Roseville Ave are 4 Heritage Listed homes (10,12,16,22), clearly similar Federation homes that are deemed to be of historical value, given they are all

Heritage listed. This is one of many reasons residents including ourselves moved to this area to enjoy living in the heritage housing .

Building up to 9 storeys with the modern architecture of this proposed ‘orphan’ development is in no way sympathetic to this heritage area and its surroundings. This development will dominate the local landscape from all view points, particularly given that 1-2 level R2 heritage dwellings will surround it. In addition, the proposed building height is over 30m, which exceeds the 22m TOD allowance and the maximum 30% for affordable housing (total 28.6M), nor does it comply with the setbacks required.

3.3 ADVERSE VISUAL IMPACT

The development would create a stark contrast in the streetscape, overshadowing existing homes, creating privacy issues and forever altering and destroying the suburb's unique character.

Ku-ring-gai Council’s Preferred Scenario aims to protect 80% of heritage conservation areas near train stations, preserving early 20th-century neighbourhoods unique to Sydney. This development contradicts those preservation efforts.

4. INFRASTRUCTURE STRAIN AND SAFETY CONCERNS

The development raises serious concerns regarding infrastructure and safety:

4.1 SYDNEY METRO TUNNEL PROXIMITY

A significant portion of the proposed development lies within the Sydney Metro underground corridor. Is the reliance on a desktop impact assessment sufficient when the conclusions of a desktop study (Appendix W – Sydney Metro Study) indicates 2 of the 4 buildings have a material amount of the foundations in the second reserve including most of building B, as per the plans below. (not a small amount as described).



This report does not guarantee that it will not negatively impact this infrastructure, so why risk the \$20.12B NSW Government investment for such a small benefit (\$77.68M risk per apartment), especially considering past incidents like the 2005 Lane Cove Tunnel collapse, which underscore the need for thorough geological assessments rather than desktop studies?

In addition, two unprecedented sink holes have recently opened up near the M6 Motorway tunnel construction. Why risk similar sink holes on or near the Sydney Metro tunnel just for some apartments that don't even comply with Ku-ring-gai Council's Preferred Scenario? Development on or near the metro tunnel that could compromise its structural integrity and or inhibit the metro's ability for future expansion is **not in the public tax-payer's interest.**

4.2 LOCAL INFRASTRUCTURE STRAIN

The area already experiences issues with decreased water pressure, sewerage, and stormwater management. The Council's street sweeper cannot even access the kerbside gutters in most streets in Roseville because they are lined with commuter cars. This causes drains to become blocked and causes major issues with storm water run-off. The NSW Treasurer recently highlighted the pressing issue of ageing infrastructure, including water pipes and power systems, some of which are over 50 years old. Adding 728 residents to the area will increase the strain on key infrastructure.

5. ADVERSE TRAFFIC, PARKING, ACCESS AND SAFETY IMPACTS

5.1 COMMUTER CAR PARKING IMPACTS ON ROSEVILLE

The residential streets of Roseville are already inundated by commuter cars such that residents can't even park in their own streets. We cannot get a car park anywhere near the station because commuters come in from nearby areas and as far as the Northern Beaches to park all day in Roseville to use the train, so that residents can't even park in their own streets nor park anywhere near the train station.

The Hyecorp images of the proposed development do not show **any cars** at all parked on the street outside the development which is completely false and misleading because Roseville Ave, Lord St and Martin Lane are already completely parked out (and have been for at least the past decade) and that is without the proposed 9 storey development. Their images show how "out of touch" they are with the area, due to their complete lack of community consultation and engagement.

There are also community concerns about where all the construction vehicles and associated machinery for this development would even park as the residential streets of Roseville are filled with commuter parking from very early in the morning?

5.2 REDUCED ACCESS TO SCHOOLS AND ARTERIAL ROADS

Martin Lane is one of the major access lanes for a large number of Roseville residents to access the main arterials of Archbold Road and Boundary Rd to access the City of Sydney and key infrastructure such as Roseville Public School. Martin Lane is by

definition a “narrow road,” effectively a one-way lane as it is parked out on both sides of the lane every day by commuters, making it already extremely difficult to navigate.

This development will further congest Martin Lane so that the local Public School won’t be easily accessible to East Roseville residents. Children may have to walk up to 1.2kms to school because it will be too difficult to access Martin Lane (as a result of construction and congestion) to drive children to Roseville Public School or Roseville College. This could pose a potential safety risk for school children.

Martin Lane is also a bus route for several buses including the bus route for Roseville Public School and Killara High School. The mobility of the bus is already severely compromised in the lane. Increased congestion in Martin Lane from the development will mean the school bus cannot easily access local schools.

The Roseville Presbyterian Church on Lord Street runs after school care for school children and also runs gymnastics and ballet classes for children. A large number of parents park on Lord St and Martin Lane or exit the church carpark onto Martin Lane after picking up children in the evening. Construction for the proposed Hycorp development until 8pm will create congestion for parents trying to collect children in the evening.

5.3 RESIDENTIAL CAR USAGE IN ROSEVILLE

The Hycorp EIS claims that “the project will help ease traffic congestion” which is completely false and misleading. To falsely assume that people who live near the train station do not drive cars and so emissions will decrease is unfounded. 2021 Census data revealed 37% of households in Roseville have 2 cars, 40.7% have 1 car and 15.4% have 3+ cars. There are no supermarkets nor amenities in Roseville (only some basic shops) and the main access for grocery shopping for residents is via car.

In addition, riding bicycles in Roseville during peak hour is unsafe as the streets are lined with commuter vehicles and are already hazardous as cars attempt to navigate effectively one-way streets.

The Traffic Impact Assessment for the project concluding “there will be no adverse impacts resulting from the proposal” is false and misleading. A comparison to 2021 Census data suggests 233 of Hycorp’s residents would be exiting and entering Lord St Roseville every day to get to and from work, plus there will be residents exiting and entering to access schools.

On site parking requirements correlated with 2021 Census data suggests there will be at least 417 cars owned by Hycorp residents and this will result in a surplus of at least 108 cars that will revert to kerbside street parking in surrounding streets because of the deficit of onsite parking.

5.4 PEDESTRIAN SAFETY ISSUES

A large number of school children walk directly past the proposed development site to access the train station. Many other people including the elderly also walk to and from the station. The increased traffic and congestion along with 19 metre semi-trailers used for construction and other construction vehicles pose a potential safety risk for pedestrians.

5.5 LIMITED EGRESS

With only one set of traffic lights providing access to the Pacific Highway for all of East Roseville, increased traffic from the development would lead to significantly worse 'bottlenecks' at already limited entry and exit points. These factors would diminish the quality of life for current residents and strain local infrastructure.

Other access points e.g. from Hill St require people to cross three lanes of traffic to access the right turn lane into Chatswood. It is dangerous and only a matter of time before there is another major accident.

Most streets from Roseville are No Right Turn onto Archbold Road so this major arterial road is also inaccessible. The proposed Hycorp development with at least 728 residents will add **significant** congestion to a suburb that is already severely compromised in its access to major arterial roads. It is unsustainable and unsafe for residents, especially in the event of an emergency such as a bushfire where residents need to evacuate. Proceeding with the development without addressing these infrastructure challenges poses risks to both new and existing residents.

6. ADVERSE EFFECT ON TREE CANOPY AND BIODIVERSITY

The Hycorp development will result in the **removal of at least 91 trees**. This will have a **devastating** impact on the area as the trees provide shade and oxygen to displace the carbon monoxide that infiltrates the area from surrounding major arterial roads such as The Pacific Highway. The trees also provide habitats to a lot of Australian wildlife including native birds protected in NSW by the Biodiversity Conservation Act 2016 and include habitats of protected species. The Department of Climate Change, Energy, the Environment and Water works to protect all such native species and their habitats, and Hycorp makes no reference to the impact upon Australian native wildlife.

In addition, removal of these significant 91 large trees will result in an increase in urban heat and a temperature increase in Roseville, as the area where the development is proposed to go is in a low point between two hills where warm air will be trapped and that, along with the huge volumes of concrete and hard surfaces, will result in creating a 'hot box' of apartments that will most definitely **not** be environmentally friendly.

Removal of the trees will threaten the Critically Endangered Ecological Communities (CEEC) of Sydney Turpentine Ironbark Forest (STIF) trees and Blue Gum High Forest trees (CEEC) and the wildlife and birdlife that depend upon these forests. They are Threatened Ecological Communities (TEC) and are listed under NSW Biodiversity Conservation Act (2016) and Commonwealth Environment Protection and Biodiversity Conservation Act (1999). The site contains the seedbank of Blue Gum High Forest and Sydney Turpentine Ironbark Forest – Critically Endangered Ecological Communities.

Building apartments like these at the expense of almost one hundred trees will impact biodiversity and is short-sighted. The removal of 91 trees will increase the carbon footprint of Roseville, increase the urban heat of the area and will ultimately **negatively impact climate change, which is not in the public interest.**

7. ADVERSE EFFECTS ON NEIGHBOURING PROPERTIES & ADVERSE SOCIAL IMPACTS

The development would negatively impact neighbouring residents:

- **Structural Integrity:** Properties such as 19 Roseville Avenue may experience foundation impacts, as identified in the Geotechnical Report.
- **Loss of light, solar access and privacy:** The height and positioning of the buildings would result in overshadowing and reduced privacy for adjacent homes, particularly on the eastern and southern sides.

These impacts are inconsistent with responsible and considerate urban development practices.

This proposed development has already had major negative social impacts on the residents of Roseville. It has caused anxiety and concern in the neighbourhood resulting in negative health impacts on residents. If the development proceeds, it will undoubtedly have negative social impacts on people in and around the area and as far reaching as people from the Northern Beaches who will no longer be able to park in Roseville to access the train.

This disharmony will not dissipate over time, as the repercussions of the inappropriate development that is non-complaint with the Local Council's preferred scenario will negatively impact upon residents into the future, as they are forced to live in an extremely altered suburb and fight traffic congestion on a daily basis.

8. ADVERSE HEALTH IMPACTS RELATED TO CONSTRUCTION ACTIVITY

The proposed two year construction period of the development will cause huge volumes of dust (some of which will no doubt contain silica particles from sandstone which can cause silicosis) for nearby residents, noise pollution and vibration 11 hours a day, increased levels of carbon monoxide from the reduction of trees, construction vehicles and increased traffic congestion, not to mention the negative health impacts from stress, anxiety and associated negative mental health impacts. There will also be reduced street access for emergency service vehicles such as ambulances, fire engines and police to enter and exit Roseville.

The GYDE Social Impact Statement in the Hycorp EIS quotes that “Those living close to sites with high levels of activity can suffer from the annoyance of noise that can cause disturbance of sleep, cognitive impairment, decreased mental wellbeing and other health and wellbeing impacts. Children, those with complex cognitive issues, the elderly and those with underlying mental health conditions are particularly vulnerable to the impacts of noise. According to the NSW Environment Protection Agency (2013), a range of health implications, including impacts on cardiovascular and respiratory health, can result from air born particle pollution, which includes dust and combustion emissions. Children, older adults and those with asthma, heart or lung disease are people most sensitive to particle pollution.”

The Statement proceeds to quote “Noise and dust resulting from construction may negatively impact those residents and workers that are more vulnerable, including those with mental health conditions and asthma. In the local area there is a significant population over the age of 60. 4.9% of the population have a long-term mental health condition, while 5.7% reported having asthma long term.”

These figures confirm that the development will have adverse health effects on Roseville residents, especially “older people and those with long term health conditions surrounding the site (sensitive receivers) may be susceptible to impacts related to construction activity.”

I am concerned about the level of dust and its negative impact on my family’s allergies and the noise pollution the construction will cause, interrupting students as they try to study for the HSC and complete homework. This is of concern because the construction is due to continue till 8pm at night which is completely unacceptable and will have a significant negative impact on the wellbeing of all residents of Roseville far and wide.

9. COMMUNITY SUPPORT FOR KUR-RING-GAI COUNCIL'S PREFERRED SCENARIO

I express my support for Ku-ring-gai Council's Preferred Scenario, which aims to balance increased housing needs with the preservation of the suburb's unique character and infrastructure capacity. This scenario emphasises the protection of heritage conservation areas, revitalisation of local centres, and appropriate building transitions.

The Council conducted a lot of community engagement including a community survey to gauge public opinion on the Preferred Scenario, yielding the following results:

- 70% agreed that it fully or partially preserved heritage conservation areas.
- 69% agreed that it minimised heritage item impacts and avoided environmentally sensitive areas.
- 66% agreed that it supported local centre revitalization.
- 56% agreed that it managed transition impacts effectively.
- 52% believed it ensured appropriate building heights

These statistics reflect a majority community preference for a development approach that respects the existing heritage and environmental context while accommodating growth. The Preferred Scenario aligns with these values, proposing thoughtful development that integrates seamlessly with the established neighbourhood fabric whilst still delivering the NSW Government its housing quantity.

10. HOUSING AFFORDABILITY OBJECTIVE NOT MET

If the NSW Transport Oriented Development (TOD) plan aims to deliver affordable housing, then focusing on high-cost suburbs like Roseville undermines that objective. Affordable housing in NSW is defined as housing for very low to moderate-income households, typically priced to be accessible to those earning less than 120% of the median income. However, Roseville's property market is among the most expensive in Sydney, with median apartment prices often exceeding \$2 million. For instance, recent listings show two-bedroom apartments priced between \$1.8 million and \$2.2 million, far beyond the reach of eligible affordable housing applicants.

Developing such high-end apartments in Roseville does little to alleviate housing stress for low-to moderate-income earners and contradicts the core intent of the TOD strategy. To genuinely address affordability, development should prioritise areas where land and construction costs allow for housing prices within reach of the intended demographic.

In The Hyecorp development only 9 apartments (3%) will remain permanently “affordable” into the future as the other “affordable” apartments are short-term (15 years).

11. FLOOD AND BUSHFIRE RISK

Recently the mid North Coast and Greater Sydney have experienced massive flooding due to unprecedented heavy rainfalls (May 2025). Ku-ring-gai is known to have one of the highest rainfalls in Sydney and as recently as 2022 the Roseville Bridge flooded. The proposal is located on a downward slope and thus makes it highly susceptible to flooding, during extreme rainfall events. This will put further strains on infrastructure and result in dangerous traffic situations for both drivers and pedestrians.

Ku-ring-gai is one of the most fire prone local government areas in Sydney and has the potential to affect residents in Roseville with its bushland corridors and valleys connected to Garigal National Park. The 2025 Los Angeles fires were house to house fires. In the Ku-ring-gai context with bushfire embers from fires in the surrounding national parks, the site could easily become a bushfire zone particularly with more climate fuelled bushfires.

With a bushfire in East Roseville this could cause massive traffic congestion leading to and along Lord Street as residents attempt to evacuate. The proposal will increase traffic congestion and if in a bushfire emergency, existing and future residents may not be able to evacuate safely. The applicant needs to provide more thorough bushfire risk assessments, particularly with rising temperatures and an increase in the prevalence of extreme weather events.

12. 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.**

13.CONCLUSION

In conclusion, following the substantial concerns outlined above including inadequate community engagement, disproportionate scale and adverse heritage impact, infrastructure strain, and adverse effects on neighbouring properties, I urgently urge the

NSW Department of Planning, Housing and Infrastructure to halt the progression and reject SSD-78996460.

This development will not achieve progressive affordable housing and contribute to the objective that the NSW government are trying to achieve. The NSW Department of Planning should question the voracity of this application as it's just a rushed application to 'beat' the timeframes that in December 2024 were agreed between Ku-ring-gai Council and the NSW Government, allowing the council to develop a Preferred Scenario tailored to the local context of the TOD precincts at Roseville, Lindfield, Killara, and Gordon. There are significant questions to be considered around the validity and efficacy of most the application information provided, including but not limited to:

- The social impact assessment
- The heritage impact assessment
- The community engagement procedure and outcomes
- The Traffic Impact Assessment
- The geotechnical investigation and the Sydney Metro Tunnel Study

Notably, at its Extraordinary Meeting on 31 March 2025, Ku-ring-gai Council resolved to request that the Department of Planning, Housing and Infrastructure (DPHI) ensure that no State Significant Development (SSD) applications within the Transport Oriented Development (TOD) precincts be preserved, due to significant inconsistencies with Council's TOD Preferred Scenario. This resolution underscores the Council's commitment to a planning approach that aligns with community values and the unique character of the area.

I respectfully request that the NSW Department of Planning and the State Government support Ku-ring-gai Council's resolution, ensuring that any development within the TOD precincts aligns with the collaboratively developed Preferred Scenario. This approach balances the need for increased housing with the preservation of the suburb's heritage and infrastructure integrity.

Thank you for considering this objection. Your attention to this important matter and the significant concerns raised is greatly appreciated.