

Subject: State Significant Development Application

Re: Residential development with in-fill affordable housing, 16-24 Lord Street & 21-27 Roseville Avenue Roseville (the “Proposed Development”)

Application: SSD-78996460

Objection to the proposed State Significant Development Application for Lord Street and Roseville Avenue, Roseville

I am a parent in the immediate vicinity of the Proposed Development. I strongly believe in the need to make Sydney metropolitan housing for essential workers, and my own children. In this regard, I’m supportive of proportionate development in Roseville. However, I object to the Proposed Development in its current form on two primary grounds:

1. Proportionality, particularly in light of the preferred development scenario published by Ku-ring-gai Council
2. Inadequacies and patently optimistic assessments of the impacts of the Proposed Development on the surrounding area.

In addition, whilst I do not have experience in reviewing development applications for residential developments of this nature, if this is approved I sincerely hope the developers’ buildings significantly surpass the quality of their development application.

1. Proportionality of the proposed development

- Considering and approving the Proposed Development under the State Government’s TOD provisions whilst aware of an alternative proposal from Ku-ring-gai Council to deliver requisite housing targets (the “**Alternative Proposal**”), particularly in the knowledge that the Proposed Development is contrary to the Alternative Proposal, is irrational.
- This could clearly result in multiple 9-storey buildings perpetually located next to 2-storey houses. This impact is amplified by the non-compliance of the Proposed Development with the State Government’s own maximum height limits even after the developer availing themselves of the concessional 130% additional height. This is clearly not adequately addressed through disproportionately small setbacks of 6 / 9 metres proposed for lower / upper floors (respectively).

2. Inadequacies and optimistic assessment of the impacts of the Proposed Development on the surrounding area

There are multiple impacts contemplated by the Proposed Development that appear either inadequate or patently optimistically assessed, including:

- Flood impacts
 - As shown in the Existing Flood Planning Area diagram (Fig. 39 of the Environment Impact Statement (“**EIS**”)), the immediate area of the Proposed Development is flood-prone. This is clearly accepted by the applicant due to the proposed to establish a “flood wall”.

- Nevertheless, the EIS contemporaneously reaches the very optimistic conclusion that the flood wall has minimal impact on the flow of water. This seems reflective of “modellers” performing desktop analysis without visiting the site during a significant rain event. It is incomprehensible that a flood wall (which is clearly considered necessary) does not result in any downstream impact: the EIS notes there is no “flood affectation on ... the entire frontage from Lord Street”. For example, the Roseville Presbyterian Church (St Luke’s) and houses at 31-37 Lord Street are clearly “downstream” from the Proposed Development and surely must be impacted by the diversion of overflow due to the proposed flood wall.
- Traffic impacts
 - The traffic modelling is similarly optimistic in both the estimate of the “net increase” in vehicle trips as well as the assessment that the traffic generated is considered “minor” and “not expected to have a material impact on the operation of the surrounding road network”. This again appears to be based solely on desktop analysis – any site visit during peak morning and afternoon times would show that accessing both Pacific Highway and Archer Street from the area of the Proposed Development already results in significant wait times – for example, on a recent weekday morning (at 8.20am) when attempting to attend an appointment in Chatswood, I waited over 10 minutes to turn left from Hill St onto Boundary Street to then turn right onto Archer Street.
 - The traffic modelling similarly does not consider weekend impacts. Again, any person who has actually spent time physically in the Roseville area would be aware that traffic can be as heavy on weekends as during peak weekday times.
 - The veracity of the traffic modelling is further brought into question by the on-site parking proposed as part of the Proposed Development. The assertion that residents are expected to utilise public transport is clearly disconnected from the number of car parks proposed (which significantly exceed the number of proposed apartments), i.e. if the vast majority of residents of the Proposed Development are utilising public transport for work purposes, why are so many parking spaces necessary? And if this is because residents will drive on weekends, why aren’t the weekend traffic impacts assessed? The increased traffic also does not consider the increased risk to pedestrians. As a parent of children who are consistently encouraged to walk/ride in the suburb, this is of particular concern.
- Shading impacts
 - Given the extent of the Proposed Development, why are shading impacts limited to the buildings in the immediate vicinity? Similarly, why is the shading analysis only until 3pm? The properties at 31-35 Lord Street are clearly at risk of impacts from shading, particularly late afternoon sun for North-west facing dwellings.
- Other impacts
 - The heritage impact arguments are disingenuous and lack quantitative evidence for some of the broad-based assertions – e.g. use of words such as “extensive” and “mass”. These are largely subjective assertions without quantitative support. The implication from the application is that it isn’t worth keeping any heritage aspects. This is disingenuous as the EIS implicitly concedes there are heritage aspects but seeks to justify demotion of the heritage aspects by pointing out that the items have some contemporary aspects.

- Separately, parts of the application assume the Proposed Development is the only development of that nature (e.g. heritage significance will be retained despite their removal), however, other parts of the application assume the rest of the suburb will be converted into apartments (e.g. view impact assessment). Assuming the Alternative Proposal proceeds, this clearly won't be the case. The application is silent on the mitigants for the view impact assessment, assuming the Proposed Development is the only one of that nature in the area due to the Alternative Proposal proceeds, particularly those viewpoints that are assessed as "Moderate-Severe"?