# Residential development with in-fill affordable housing, 59-63 Trafalgar Avenue 1A&1B Valley Road Lindfield (SSD-79276958)

#### Dear Sir/Madam,

My name is Ian Herbert. I am a local resident living in Trafalgar Avenue, Roseville, about 745m away from the proposed development.

I am writing to express my strong objection to the SSD-79276958, which is entirely out of character with the neighbourhood and contrary to the community's alternative proposal to the TOD legislation for this area.

There are several aspects to which I have objections such as:

- Significant height density and bulk: 220 units in nine stories and 33m, which is above maximum building height;
- Situated outside of development in Ku-ring-gai Council's alternative TOD scenario), allowing no transition to lower density housing which surround it on all sides;
- Significant impacts on the Heritage Conservation Area (HCA) (including four adjacent heritage properties);
- Significant overshadowing / privacy / solar access issues;
- Significant acoustic issues due to location of site and scale of development;
- Significant reduction of tree canopy and mature trees;
- Significant traffic and parking issues (represented by the 367 parking spaces in building).

I have particular comment on the following issues.

1. Relevant Planning Instrument

This application completely fails to acknowledge and seeks to pre-empt ongoing negotiations between Ku-ring-gai Council (KC) and the NSW Department of Planning, Housing and Infrastructure (DPHI) regarding a more suitable development framework for Roseville than the destructive and prescriptive Transport Oriented Development (TOD) instrument.

The DPHI and Minister Scully has agreed to allow KC time to develop a strategy that meets the State Government's housing targets for Ku-ring-gai based on genuine consultation with residents, and hence it is not in the public interest that this development application is approved.

Castle Hill No. 8 Pty Ltd (the applicant) would have been well aware of this situation yet have chosen to not refer to it.

KC has engaged independent experts who have undertaken an extensive review of the municipality to identify areas where higher density housing is more appropriate. The outcome of all that time, effort and money was to develop the alternative scenarios. The community have voted on these scenarios, and notably the original TOD scenario was rejected in favour of the more location-suitable ones.

It is misleading and unethical that Castle Hill No. 8 Pty Ltd submission fails to mention the impact of the proposed development in the context of the alternative scenario.

### 2. Heritage

I have moved into the area in recent years from the Northern Beaches were architecture is more eclectic. The Roseville-Lindfield are has a more unified character, mainly Federation and California bungalows, established gardens and trees with hedged boundaries. It is relaxing to walk the streets, admiring the gardens and the well-kept homes, many of which are named. This is something which should be preserved for furture generations, not destroyed.

The Heritage Impact Statement (HIS) remarks that the existing homes which make up the consolidated development block, are not in keeping with the Heritage Conservation Area, and therefore would be no loss.

The HIS then goes on to show that the development has insignificant impact on the heritage significance of the Heritage Conservation Area, within which the proposal sits.

The sheer bulk of the proposal will destroy the character of the whole neighbourhood, particularly because it will dominate and degrade all the surrounding streets, and is outside of the KC preferred scenario boundary. The development is over 33 metres high whereas the surrounding 1 and 2 storey buildings are 4.5 - 6.7m tall. The HIS is a biased discussion of the heritage impact and does not present a fair picture of the negative impact on the overall neighbourhood.

#### 3. Traffic increases

The proposal is for 220 units with 367 parking spaces.

The EIS nominates a 36/56 public to private transport split for this community when travelling to work. Most families in Sydney have two persons working. That means approximately 440 additional workers. 56% of 440 = 246 people potentially driving out from this development each morning. To be more conservative, if only half the building's adult occupants drive to work, or car share, this number is still over 120 additional vehicle movements each morning and night.

The EIS at Appendix Q says that the proposal is expected to result in a net increase of between 39 trips per hour AM peak and 29 vehicle trips per hour PM peak. The numbers were generated from rates from a 2024 TfNSW guide, but the survey information used in that guide is dated 2012. The numbers must logically be grossly understated.

It is my experience in driving to work for 40 years that the morning peak is more spread out while the evening peak is more concentrated so I don't believe that there will be less trips in the evening compared to the morning. In addition, various sporting training for children and adults will generate further trips each evening.

There are limited access points to the area as shown in the EIS.

I regularly use Trafalgar Avenue to get through to Gordon or Pymble. With this many additional vehicles generated by one development, traffic around Lindfield will be gridlocked

on many occasions. The intersection at Lindfield Avenue and Balfour Street where people have to access the Pacific Highway will be particularly bad.

## 4. Construction traffic

As a civil engineer with 40 years' experience in Sydney, I have extensive knowledge of both the required planning and the execution of such projects. It is clear that the planning and forethought for this project is either misguided or entirely inadequate.

However, I also have concern about the impact of construction traffic with respect to noise and access, particularly during the excavation phase. The local roads will be blocked by trucks, and will only be accessible if street parking is prevented. The streets are not wide enough and have not been constructed to cater for the weight and number of the construction trucks. Road surface deterioration will quickly ensue. The streets around the development and up to Lindfield Station are already parked out each week day due to the minimal public commuter parking available at the station, particularly since the Metro opened at Chatswood.

The Traffic Impact Statement relating to "Heavy Vehicle Access Routes" states that "some of the surrounding local roads (including Lord Street and Roseville Avenue) .... <u>do not permit</u> <u>access to vehicles over three tonnes</u>", and that no "swept path" analysis has been done to determine whether such heavy vehicles can adequately turn into the local roads from the arterials [emphasis added].

As such, the TIS should have determined that the location of the site is inappropriate for such a development.

5. Visual Impact

The EIS again fails to consider the KC proposed scenarios (refer point 1. above) when it says "the proposed development has acceptable visual impacts and may be supported".

The visual impacts are severe, but the nominated points for reference are streets away. I will be able to see the development from within a block of my house.

The development should not be approved as it is outside of the preferred scenario and will completely visually intrusive of the R2 properties surrounding it, and according to the EIS, limiting various south and west neighbours to only 2 hours of sunlight in June.