

# **SSD-79276958 - Residential development with infill affordable housing, 59-63 Trafalgar Avenue 1A&1B Valley Road Lindfield**

I object to the proposed State Significant Development (SSD-79276958). It is not in the public interest, it is inappropriate for the Lindfield location and conflicts with the [Council and Community Preferred Alternative to the Transport Oriented Development \(TOD\)](#).

I urge the rejection of this proposal in favour of Ku-ring-gai Council's Preferred Alternative Scenario, which was progressed after extensive community consultation and meets affordable housing requirements while minimizing adverse impacts on the local community.

The basis for my objection is set out below.

## **The SSD "Purports to be Affordable Housing."**

Only forty-six units, the absolute minimum required for to qualify as a SSD, are affordable housing dwellings under the provisions of the Housing SEPP. Under clause 156 under Chapter 5 of the Housing SEPP, development for the purposes of residential flat buildings (with a GFA of at least 2,000 sqm) in a TOD area.

In the longer term however (i.e. after 15 years) ONLY 2% of the GFA of this project will be retained as affordable housing in perpetuity as stated in paragraph 3 of 3.2.2 on page 29 of the EIS: ***"The TOD provisions have established inclusionary zoning for TOD areas that requires the delivery of a 2% affordable housing contribution for all new developments that is to be managed by a register CHP in perpetuity"***

On this basis this project is NOT a true "Affordable Housing Project" at 2% of GFA.

## **Ku-ring-gai Council Preferred Scenario Offers a Superior Community Outcome to the TOD SEPP**

The [Ku-ring-gai Council Preferred Scenario](#) offers significant improvements over the TOD SEPP, based Council's seven principles as outlined in the [Councillor workshop presentation](#):

- **Principle 1:** Protect Environmentally Sensitive Lands – 68% improvement.
- **Principle 2:** Minimize Impacts on Heritage Items – 69% improvement.
- **Principle 3:** Preserve Heritage Conservation Areas – 80% improvement.
- **Principle 4:** Minimize Impacts on Tree Canopy – 76% improvement.
- **Principle 5:** Manage Transition Impacts – 93% improvement.
- **Principle 6:** Ensure Appropriate Building Heights
- **Principle 7:** Support Local Centre Revitalization – 85% improvement

## **Inadequate Community Consultation**

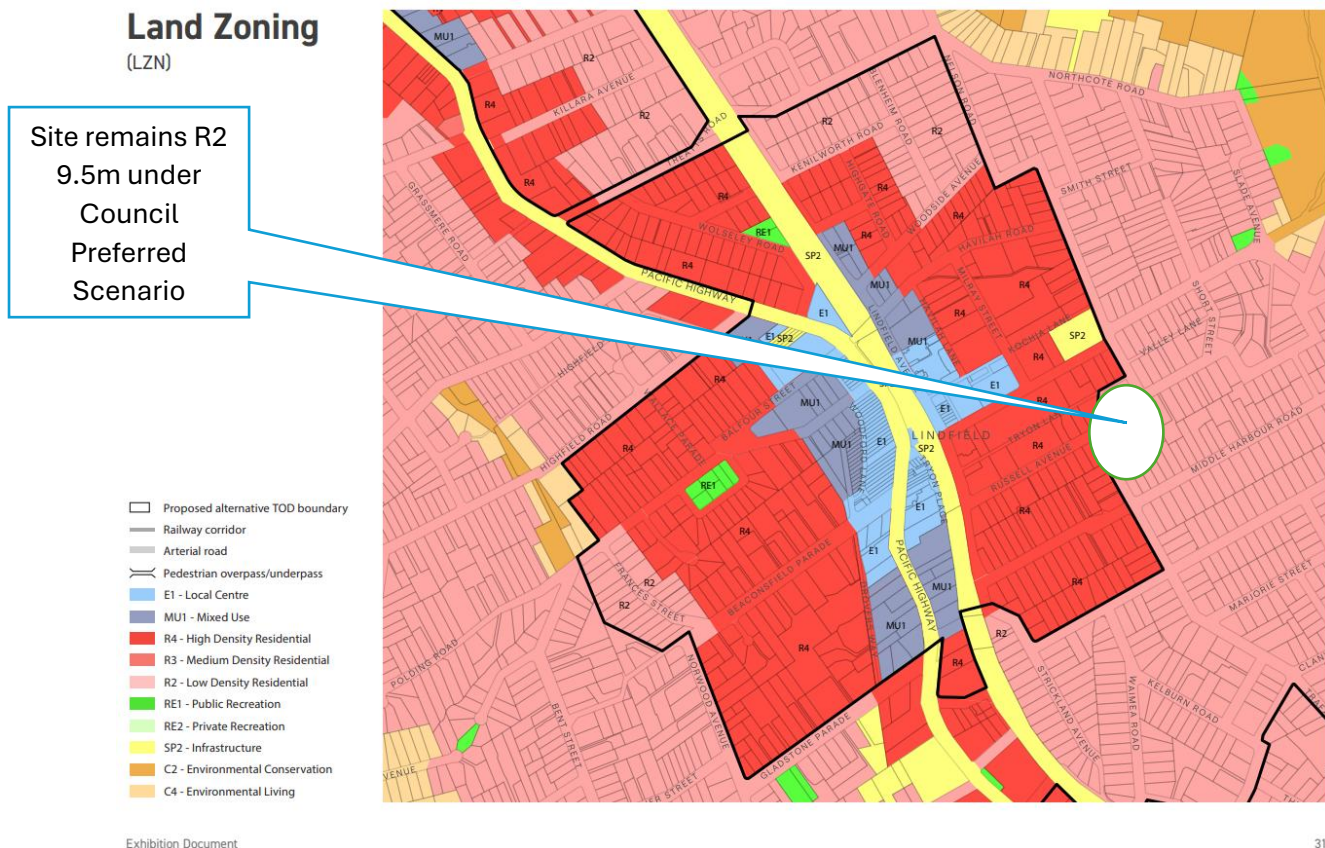
The [State Significant Development Guidelines](#) emphasize that "Community participation is integral to assessing the merits of SSD projects" (p. 14). Similarly, the [Revised Community Consultative Committee Guidelines for State Significant Projects](#) highlight the importance of open discussions between companies, communities, and local councils.

We live less than one kilometre from the proposed development and were not aware of the plan to build a 9-storey construction offering 220 units with 176 marketable units available upon completion.

The proposal appears to be a thinly veiled ill-conceived land grab by developers designed to maximise profit by constructing a poor-quality structure masquerading as affordable housing that is not sympathetic to surrounding architecture or environment to exploit government desperation to achieve better housing construction goals without providing adequate infrastructure.

## Proposed SSD does not fall within the Bounds of the Council Preferred Alternative for Lindfield

The designated project site remains R2 under the Councils preferred alternative – see page 31 below:



## Building Location, Height & Bulk Inappropriate and Tree Loss

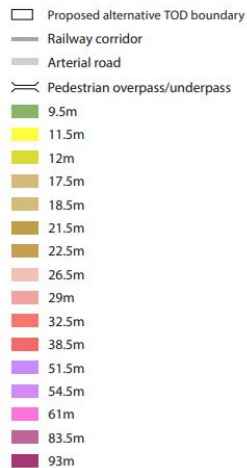
The height of the proposed building at around thirty-three meters together with its bulk adversely impacts items such as loss of tree canopy, privacy, overshadowing, solar access for surrounding homes in what is currently a Heritage Conservation Area. The building on Lindfield Avenue opposite the station, in a far busier area, housing IGA and Harris Farm does not rise to thirty-three meters.

The Council Preferred Alternative for Lindfield offers a more sympathetic approach to height (see page 32 extract below) with the site remaining zoned at 9.5m and bounded by 18.5m to the north & west thereby offering a better transition to higher density.



## Height of Building (HOB)

Site has better transition to higher density @ 18.5m to North & West



Exhibition Document

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## Conclusion

SSD-79276958 proposal is incompatible with Lindfield's low-density character and there has been inadequate community consultation on the proposal. The rushed approach suggests an attempt to bypass due process, community input and the Ku-ring-gai Council's Preferred Alternative Scenario, which better balances housing needs with environmental and community considerations.

I urge the NSW Government to reject this proposal and adopt the Council's Preferred Alternative Scenario for a more sustainable outcome.