

Dr Matthew and Mrs Rebecca Sladescu  
21 Alexander Parade  
Roseville NSW 2069

**17 June 2025**

**via the NSW Planning Portal**

The Hon Paul Scully MP  
Minister for Planning and Public Spaces  
GPO Box 5341  
Sydney NSW 2001

Dear Minister Scully

**Objection to State Significant Development Application No SSD-77829461**

We wish to formally object to State Significant Development Application No SSD-77829461, which seeks consent for a nine-storey apartment building containing 111 dwellings and 150 car spaces at 2–4 Larkin Street and 1, 3 & 5 Pockley Avenue, Roseville.

This proposal is lodged by the same applicant as parallel Application No SSD-77825469 (178 dwellings, 285 car spaces at 2–16 Pockley Avenue). Considered together, the two schemes would insert 289 apartments, approximately 650 new residents and 435 car spaces into a closed-circuit, environmentally sensitive valley presently typified by one- and two-storey housing. The combined and individual impacts demonstrably fail to satisfy the Planning Secretary's Environmental Assessment Requirements (SEARs) issued on 15 November 2024 and the development must therefore be refused.

As nearby residents and parents of a one year old child, we are very concerned about the impact of this development on the safety and amenity of our family and community as well as on the local environment. Our main grounds of objection are summarised below by reference to the relevant SEARs items; identical concerns arise under the parallel application.

**1 Failure to Avoid or Adequately Mitigate Impacts on Environmentally Sensitive Land (SEARs 8, 9, 11, 13, 14 & 15)**

- The site drains directly into a creek that traverses our property and forms part of a bush-fire-prone ecological corridor to Lane Cove National Park. This has foreseeable erosion, sedimentation and flooding risks. The EIS lacks a compliant Integrated Water Management Plan demonstrating that post-development flows will match pre-development conditions or protect downstream aquatic habitat.
- Desktop biodiversity analysis substitutes for robust field survey work. Mature eucalypts, integral to canopy connectivity and urban-heat-island mitigation, are slated for removal without genuine avoidance or offset strategy.
- When the losses from both SSD proposals are aggregated, more than 350 mature trees and substantial under-storey habitat will be destroyed, directly conflicting with Ku-ring-gai Council's Urban Forest Policy, Greener Places guidelines and SEARs 8 & 11.

**2 Unacceptable Bush-Fire Hazard and Evacuation Risk (SEARs 22)**

- Pockley Avenue, Larkin Street, Alexander Parade and feeder streets form a cul-de-sac system with just two constrained exits to the Pacific Highway, already congested in peak periods. Adding 435 additional private vehicles (150 from this application alone) would severely impede – and effectively prevent – evacuation in a fast-moving bush-fire event, especially for young families and elderly residents who cannot evacuate on foot.

- The Bush-Fire Assessment relies on untested (and inaccurate) “shelter-in-place” assumptions and ignores cumulative population loading from SSD-77825469. No credible timed evacuation modelling has been provided.

### **3 Inadequate Transport, Traffic and Accessibility Assessment (SEARs 10)**

The transport and traffic infrastructure in this closed-circuit part of Roseville is already very strained. It cannot cope with the development as proposed, noting the following specific points:

- Traffic counts were undertaken during school holidays and pre-date other approved developments, resulting in gross underestimation of baseline congestion.
- Mode-split assumptions are unrealistic given the absence of continuous, pram-accessible footpaths to the station and shops and the steep incline. This currently makes most residents, especially young families and the elderly, dependent on cars to access local schools and shops and the need for private car travel in this area is reflected in the high number of proposed car parking spaces for these buildings.
- No funded or enforceable mitigation—intersection upgrades, footpaths, pedestrian crossings or public-transport improvements—is identified, contrary to SEARs 10(c).

### **4 Non-Compliance with Design Excellence, Built-Form and Environmental Amenity Objectives (SEARs 3-7)**

- The nine-storey bulk dramatically exceeds local two-storey character and prescribed LEP height limits, with no competitive design process or State Design Review Panel endorsement.
- Solar-access diagrams reveal adjoining dwellings and private gardens will receive less than two hours of mid-winter sunlight; privacy separations fall below Apartment Design Guide thresholds; key eye-level viewpoints from Alexander Parade are omitted from the Visual Impact Assessment and would show significant impacts including sky view loss if included.
- Façade articulation and landscape transition do not achieve the “good design” principles in Better Placed or SEARs 4 & 5.

### **5 Limited Public Benefit Relative to Scale of Incentives (SEARs 25)**

- Only 29 of 111 units (26%) are to be retained as affordable housing, and only for 15 years, yet the application seeks the full height and floor-space bonuses under the Housing SEPP.
- The proposal therefore fails the planning intent that additional bulk be justified by commensurate, enduring public benefit.

### **6 Cumulative Social Infrastructure Deficits (SEARs 20 & 21)**

- No parks, childcare centres or community halls exist within walking distance and school catchments are already over-capacity (our property is no longer within the catchment for Lindfield Public School which is the closest public primary school).
- The Social Impact Assessment ignores the aggregated demand created by both SSD applications – i.e. adding 289 apartments and 435 car spaces to this infrastructure-poor area – and proposes no guaranteed infrastructure delivery or funding.

### **7 Construction Amenity and Safety (SEARs 12)**

- Continuous excavation for two basement levels will generate vibration risks for heritage fabric in the valley; baseline monitoring is absent.

- Heavy-vehicle movements, dust, noise and road closures are assessed for this application in isolation, disregarding the overlapping timetable of SSD-77825469 and other local projects. There are currently two apartment blocks under construction in the near vicinity that are already having very significant adverse impacts on the local neighbourhood.
- During the construction, it would effectively be necessary for pedestrians to use Maclaurin Parade to access the shops and station and there is currently no step-free footpath on this street.

For all of the above reasons, the proposal manifestly fails to comply with mandatory SEARs, poses unacceptable and irreversible environmental, safety and social impacts, and should be refused.

Please let us know if we can provide any further information or assistance.

Yours sincerely

*Sladescu*

Matthew and Rebecca Sladescu

Owners of 21 Alexander Parade, Roseville NSW 2069