

Ms Adela Murimba
 Planner
 NSW Department of Planning, Housing and Infrastructure
 Submitted via the NSW Major Projects Portal

26 June 2025

Dear Ms Murimba

Re: State Significant Development SSD – 81623209 9-21 Beaconsfield Parade Lindfield 2070 for 377 dwellings of which 56 will be ‘affordable’.

Thank you for the opportunity to provide a submission on the State Significant Development Application proposal at 9-21 Beaconsfield Parade Lindfield.

Friends of Ku-ring-gai Environment Inc (FOKE) object to the overdevelopment of four massed apartment buildings proposed by DEICORP Pty Ltd for 377 apartments and infill ‘affordable’ dwellings

The proposal described by Glyde includes the following works:

- Construction of a residential development varying in height up to 10 storeys;
- 377 residential units of which 56 will be affordable housing units comprising 11% to be retained as affordable for 15 years and 2% to be retained as affordable in perpetuity;
- Excavation for two basement levels with 523 car spaces and associated services;
- Removal of 169 existing trees on site; and
- Landscaping and a communal space network including rooftop gardens.

FOKE is not opposed to development or against appropriate infill proposals but wish to support development that is respectful in design, scale, consideration of heritage, the environment and biodiversity, infrastructure and liveability constraints of the area and adhere to the prescriptive standards and policies which apply to the site.

The development is submitted as a proposal under the NSW Government's TOD SEPP which is a blunt, top down ‘one size fits all’ instrument, which does not respect neighbourhood character, scale, heritage, environment or infrastructure constraints. There has been no consideration by the NSW Government of master planning of the TOD 2 areas, for which the government is providing for all TOD 1 areas.

Despite the proposed 23,200 additional dwellings (now 24,562 dwellings under the exhibited TOD Preferred Scenario) proposed for the four TOD in Ku-ring-gai, the NSW Government is not proposing to provide or fund any new or additional community services, or infrastructure such as schools or hospitals or, in providing new community facilities, additional rail services or in improving traffic or parking facilities in Ku-ring-gai, despite the predicted 50,000+ population increase in the TOD. The TOD SEPP does not support, promote or encourage ecologically sustainable development.

Council's strategic planning studies never envisaged such an abrupt urban vertical intrusion of nine to ten storeys such as the TOD SEPP allows (with the 30% bonus for affordable infill housing), particularly in impacting heritage conservation areas, heritage items, tree canopy, biodiversity and areas of high environmental sensitivity.

The TOD SEPP violates the principle of orderly development and the expectations of the community. The TOD SEPP overrides local planning controls particularly at a time when broader strategic planning has been well progressed in Ku-ring-gai.

We note that DEICORP Pty Ltd wishes to take advantage of the TOD SEPP savings clause whilst Ku-ring-gai Council submits the TOD Preferred Scenario KLEP amendments to the Minister for Planning in accordance with Land and Environment Court mediation agreement of November 2024.

Ku-ring-gai Council has lodged the exhibited TOD SEPP KLEP amendments with the Minister this month and waiting for the Minister's concurrence and gazettal.

We note that here are also two other State Significant development currently proposed for Beaconsfield Road such as 3 and 3a Beaconsfield Road for 88 apartments and 5,5a and 7 Beaconsfield Road for 80 apartments. With 9-21 Beaconsfield Road proposal of 377 apartments the number of dwellings in the street will increase from the current 12 dwellings to 545 new dwellings. The cumulative impact of the of new apartments must be practically considered particularly with the amount of traffic and parking that will be traversing Beaconsfield Road and narrow local roads and laneways to the Pacific Highway in particular. When assessing the number of car spaces proposed for 545 new dwellings the car spaces proposed in the new development will be totally inadequate considering the average car ownership per household in Lindfield is 2 cars per dwelling. Street parking will become impossible due to already parked out streets with commuter car parking in and around Lindfield Station and Lindfield shops.

TOD Preferred Alternative Scenario

In response to the blunt top down 'one size fits all' NSW Government TOD SEPP, Ku-ring-gai Council planned an alternate scenario for the four TOD suburbs, Roseville, Lindfield, Killara and Gordon based on seven planning principles in order to:

- Avoid environmentally sensitive areas
- Minimise impacts on heritage items
- Preserves heritage conservation areas
- Minimise tree canopy impacts
- Manages transition impacts
- Ensures appropriate building heights and
- Supports local centre revitalisation

Ku-ring-gai Council adopted the council's exhibited TOD Preferred Scenario at the Extraordinary Meeting on 5th June 2025 and is now lawfully considered as a draft environmental planning instrument. The preferred scenario proposes to amend the Ku-ring-gai Local Environmental Plan to create new development standards for the four TOD areas of Ku-ring-gai and create a self-repealing SEPP to amend SEPP (Housing). The DEICORP Pty Ltd development proposals do not consider the prevailing exhibited draft planning instrument in accordance with Divisions 3.3 and 3.4 of the EP&A Act 1997.

The type of building typology being proposed by DEICORP Pty Ltd is not consistent with Ku-ring-gai's draft planning instrument, the Housing SEPP or the Apartment Design Guidelines (ADG).

The current KLEP 2015 planning controls for this site are as follows:

- Land use zone – R2 Low Density Residential
- Minimum Lot size – 930m²
- Maximum FSR – 0.3:1 and
- Maximum building height – 9.5m

The proposed new R4 zoning and FSR and Height standards in the exhibited draft planning instrument before the Minister for Planning for this consolidated site varies from FSR 1.8:1 to 1.3: 1 and heights from 29m to 18.5m. The plans make no reference to the council's exhibited draft instrument and the statutory proposed controls for 9-21 Beaconsfield Parade.

We object to the proposals on the following grounds:

Excessive building and Height - non-compliant

The proposal for 9-21 Beaconsfield Road is an overdevelopment of the site. The height is breached by between ½ -1 storey across the northern rear elevation which impact the Newark Crescent properties but also across the site.

This proposal seeks a maximum building height of 29.9m measured along the norther elevation which exceeds the maximum building height control by 1.3m. The proposal needs to be amended to comply but still represents a gross over development in terms of height scale and bulk in stark contrast to the adjoining 1-2 storey residences, heritage items and heritage conservation area.

Contrary to the arguments advanced in the Clause 4.6 request the proposal:

- the request does not fully justify why compliance with the development standard is 'unreasonable or unnecessary'.
- the proposal does not have a satisfactory relationship with neighbouring properties.
- is not of an appropriate height bulk and scale.
- the proposal will not provide apartments of high amenity due to deficient levels of solar access and cross flow ventilation in a significant number of the proposed dwellings.
- does not provide and appropriate height transition to the surrounding lower density land and therefore is not compatible with the desired streetscape character
- provides insufficient landscaping which is not in keeping with the landscaped character of the area.

Considering the above, the applicants Clause 4.6 request is not considered to be well founded and does not provide sufficient environment planning ground for the consent authority to support the variation.

Bulk and Scale - non-compliant

- The proposal does not address or provide and specific assessment of the issue of boundary massing.
- The degree of inadequate building separation is inadequate to provide good amenity and liveability particularly to the surrounding lower density development.
- The proposed street frontage setbacks are inconsistent with the existing surrounding developments and will result in visually dominant development that detracts from the character and streetscape and amenity of surrounding properties both fronting Beaconsfield Parade, Frances Street, Newark Crescent and Lindel Place.

Potential Site Isolation of 25 Beaconsfield Road

- The resulting adjacent development if built to the plans provided by the proponent would be sighted adjacent to a 9-10 multi-storey massed development with resultant impacts of overshadowing, loss of privacy, solar access and amenity. 25 Beaconsfield Road although mapped for TOD preferred scenario zoning of R4 and FSR of 1.3:1 and a height of 18.5m is not guaranteed to be a site suitable for development to the amended SEPP zoning unless amalgamated with other properties.
- The minimum setback proposed on the western elevation of just 9m to provide solar access to a future development of four storeys on 25 Beaconsfield will be minimised with the deep soil landscape screening component along the boundary perimeter for growing mature trees. Whilst the trees will provide some screening for privacy but will importantly potentially reduce solar access to 25 Beaconsfield Road.

Statutory Context

- The layout, height, bulk, scale, separation, setbacks, interface and articulation fail to address and respond to the context, site characteristics, streetscape and existing heritage character and desired future character of Lindfield.
- It is inappropriate that this SSD proceed when the community has participated in a statutory consultation process regarding an amendment to Ku-ring-gai's draft Local Environment Plan

2015 (LEP) with the recommendation that Ku-ring-gai Council adopt the amendments as attached to its Council Report of 22 May 2024 and forward the documents to the Minister for Planning for gazettal.

- Ku-ring-gai Council has undertaken strategic planning for an alternative Transport Oriented Development (TOD) to cater for approximately 9,400 dwellings in the Lindfield Transport Oriented Development area. The decision was as a result of a mediation agreement between Ku-ring-gai Council and the NSW Government following the commencement of the TOD SEPP legal challenge in the Land & Environment Court.
- The development proposals undermine Ku-ring-gai Council's imminent draft LEP amendments to KLEP 2015, by the NSW Government allowing ill-prepared SSDs to 'pop up' anywhere is not only grievous but disingenuous considering the mediation agreement of November 2024. If this SSD is approved, it effectively "pulls the rug" from Ku-ring-gai Council's mediation agreement and exhibited draft planning instrument. The Ku-ring-gai community has diligently made submissions, often at great personal and family cost, as they have often occurred during Christmas 2024 and Easter holiday periods in 2025. If the SSDs are approved (there are currently 37 SSDs registered in Ku-ring-gai as of 25.6.25) and ignore Ku-ring-gai Council's draft Ku-ring-gai's Local Environment Plan (LEP) they will have no social licence, as the community will feel betrayed by a NSW planning system that prioritises over development and developer profit over community and public interest.
- The affordable housing bonus fails to compensate for the additional impact that the development will have on the community in perpetuity. The proposal only provides affordable housing for a 15-year period. This clearly will not contribute to long term housing affordability in the area.
- The level of density and bulk presented in this development is NOT the 'desired future character' of Lindfield particularly when the development is more appropriate for the Lindfield commercial zones not residential zones.

Design Quality

- The proposed future building envelope provides extremely poor solar access (generally only two hours) and will negatively overshadow residential properties in the vicinity of the site.
- The proposed massed buildings will negatively impact on the privacy of neighbouring residents.
- The interface between the 10 storey SSD and neighbouring 1-2 storey homes and the Frances Street Heritage Conservation Area and Newark Crescent and Lindel Place is excessive, incompatible and unacceptable.
- The design is completely out of context with local heritage items and the predominantly Inter-War designed neighbouring homes of the area.
- The design team has failed to provide adequate consideration regarding the interface with adjacent homes in Beaconsfield Road, Newark Crescent, Lindel Place and Frances Street and in particular the site isolation of 25 Beaconsfield Road Lindfield.

Built Form and Urban Design

- The SSD proposal is an overdevelopment of the site and totally out of proportion to the existing and future desired amenity of Lindfield, for a residential area which contains a consistent pattern of intact Inter-War and Federation 1-2 storey residential housing.
- The layout, height, bulk, scale, separation, setbacks, interface and articulation fail to adequately address and respond to the context, site characteristics, streetscape and existing and future character of the locality.
- The proponent has shown no genuine commitment to respond to neighbours' concerns over the impact of the SSD on *their* privacy, amenity, heritage, neighbourhood character and how the SSD proposal will drastically diminish their property values.
- The SSD proposal devalues the visual amenity of neighbouring properties who will lose their solar access, natural cross-ventilation and outlook.
- The SSD proposal is incompatible with the Frances Street Heritage Conservation Area and heritage listed property at 31 Beaconsfield Road and 1,2,3,4,5,6,7,8,10,12,14 and 21 Frances Street and 3 & 4 Lindel Place Lindfield.
- The SSD proposal will have negative impacts on heritage items including on neighbouring properties which have been maintained and renovated to be in keeping with the heritage character and significance of the Frances Street HCA.

- The SSD proposal does not respect the early subdivision pattern of the Cadby's original grant in 1831 which was historically known as 'Gordon Park'.

Heritage

- Lindfield historic character is defined by its Federation and Inter-War architecture and garden suburb layout, risks being eroded by overshadowing, visual intrusion, by the SSD proposal by 4 x 9-10 storey buildings which will clash with Lindfield's low-density aesthetic.
- Increased density will irreversibly degrade the heritage significance of both the heritage conservation areas and heritage items in the Frances Street HCA.
- The proponent has significantly downplayed the heritage significance of the Frances Street HCA. The sight lines and visual amenity of the properties in the Frances Street HCA will be significantly impacted by the massed proposals being upslope from the HCA.
- The proposed bulk and scale of the 9-10 storey buildings will visually dominate and detract from the setting of the heritage items and Frances Street conservation area. The heritage listed properties which are of significance to the locality are Nos. 1,2,3,4,5,6,7,8,10,12,14 and 21 Frances Street Lindfield, 14 & 31 Beaconsfield Road Lindfield and 3 and 4 Lindel Place Lindfield.
- The SSD proposals will potentially lower the property values of the HCA and the properties adjacent in having 9- 10 storey proposals towering and dominating the 1-2 storey residential streetscapes of Beaconsfield Parade, Frances Street, Lindel Place and Newark Crescent and will face the loss of privacy, solar access and overshadowing.

Environmental and Amenity Loss

- The SSD proposal fails to demonstrate a **"high level of environmental amenity for any surrounding residential or other sensitive land use"**.
- The extent of the overshadowing is exacerbated by the additional temporary (not in perpetuity) affordable housing bonus. This will significantly reduce the liveability of residents living in the 'affordable' units.

Visual Impact

- The height of the proposed buildings will be the tallest buildings in Lindfield and not the desired future character of Lindfield.
- The height will have a significant negative impact on visual amenity for the neighbouring streets, including the homes in Frances Street, Newark Crescent and Lindel Place. The Frances HCA is situated as such that all properties sight lines and privacy will be impacted by the 9 -10 storey proposals which towers over the 1-2 storey residences. It will negatively impact on the privacy and solar access of neighbouring properties.
- The 'box type' facade of the residential flat building is unsympathetic to the surrounding local heritage context and streetscape. Its architecture is completely out of context and will be a negative visual blight.

Traffic Parking and Transport

- The proposal will exacerbate the impact on the existing significant traffic congestion at Grosvenor Road and on Balfour Street intersections with the Pacific Highway.
- There is no right turn onto the Pacific Highway from Beaconsfield Road and hence why traffic from the site will need to wind through narrow local streets such as Larool Avenue to reach right turn at the Grosvenor Road traffic lights and Drover's Way and Wade Lane to reach the right turn at the Balfour Street traffic lights.
- The traffic generated from this development and the two other SSD proposals for Beaconsfield Road will further endanger pedestrians walking to and from the station.
- The SSD proposal completely underestimates the cumulative effects of all the vehicle movements not only of the three current SSDs being 3 and 3a; 5,5a and 7; and 9-21 Beaconsfield Parade (totalling 545 apartments) but does not take into account the SSD development proposed for 2- 4 Drover's Way and 9a Gladstone Parade (119 apartments) 19-25 Balfour Road (71 apartments) and 12-16 Bent Street (115 apartments) Lindfield which the Major Projects teams or Sydney North Planning Panel are currently assessing. All six SSD proposals

will require access to the right turn on the Pacific Highway from either Grosvenor Road or Balfour Street traffic light intersections. Wade Lane is a narrow single lane due to vehicles parking in the laneway the back of the shops.

- The traffic report fails to appreciate the poor standards of neighbouring interconnected roads and laneways. Lindfield's roads such as Drover's Way, Wade Lane and Larool Avenue are narrow and poorly surfaced. During the construction period, trucks will only be able to turn left from the Pacific Highway into Beaconsfield Parade and will need to traverse all the narrow lane ways and local streets to make an exit or right turn at either Grosvenor or Balfour Street intersections with the Pacific Highway. Trucks and other traffic will be competing with three local primary school drop off and collection periods in and around the same streets and lane ways e.g. Lindfield Public School (bound by Grosvenor Road, Pacific highway and Gladstone Parade), Holy Family School (bound by Balfour Road, Pacific Highway and Highfields Road) and Highfields primary school.
- The argument that residents living close to the railway line will travel by bus or train to work and other day to day activities is not realistic or practical for many residents. Most of the families in Lindfield area have at least two cars per residence and in most cases, workers do not travel to work by train but by car.
- The North Shore Rail Line is experiencing major interruptions to services and has been reported in the Sydney Morning Herald that the North Shore Line is one of the worst performing lines on average for the past five years. The report indicated that 20% of the T1 North shoreline services did not arrive on time in the 2024 -2025 financial year. There was a blackout report on the rail line in recent weeks. There are regular interruptions on weekends for rail maintenance.
- In case of an emergency vehicles (ambulance, fire, police) will not be able to exit quickly from Beaconsfield Road to the Pacific Highway except for only turning left but will have to navigate the narrow local roads and laneways to either Grosvenor Road or Balfour Street traffic lights which is not ideal in an emergency.
- Local roads and street parking are at this point unable to accommodate the resulting increase in cars due to the congestion in and around the Pacific Highway and Lindfield Rail Station.

Noise and Vibration

- The noise and vibration during construction will create high levels of noise pollution and negatively impact on the liveability of residents living in neighbouring streets.
- Noise and vibration will have a negative impact on the abundance of local birdlife in and around the locality of the development.
- The traffic plan for trucks while construction will have to be reconsidered due to the poor egress from the site through narrow local roads and laneways.

Ground and Groundwater Conditions

- The massive excavation for 2-3 levels of underground carparking will remove the soil and seed bank and thus sterilise the site of future remnant regrowth of tall endemic canopy trees. The single Sydney Turpentine Ironbark Tree which is said to remain in the plans is unlikely to survive the deep excavation of the site and change in ground water conditions.

Trees and Landscaping

- The SSD proposal plans to remove mature trees and established gardens and reduce area for deep soil planting of canopy trees.
- The lack of deep soil landscape areas to just 19% fails to maintain established landscape character with the planning of suitable tall mature trees.
- Ku-ring-gai LGA's character is its iconic majestic trees. This tree canopy contributes significantly to the liveability of Lindfield. It provides protection from over-exposure to UV radiation, improves air quality, cools local environments and supports wildlife habitat.
- The SSD proposal will remove 169 trees resulting in habitat and canopy loss. This will severely impact on nesting, food and shelter for birds, possums and other wildlife, fungi and insects, the proposed new trees often take years to establish and grow in providing suitable habitat.
- The removal of 169 trees will undermine the Ku-ring-gai's Urban Forest Strategy that aims to increase canopy cover percentage in residential zoned areas up to 40%.

- The current controls for the SSD proposal will result in the significant loss of mature tree canopy - at a time of biodiversity extinction and increasing heat waves. On environmental grounds the proposed SSDs should be rejected.
- Ku-ring-gai's tree target is based on the NSW Government's target that recognises the importance of canopy in improving the liveability and amenity in residential areas. The proposed development setbacks of 6m to adjacent properties in Frances Street, Lindel Place and Newark Crescent are insufficient and do not enable planting of large canopy trees which are the characteristic of the landscape setting of the local streets.

Ecologically Sustainable Development (ESD)

- The World Meteorological Organization (WMO) confirmed that 2024 was the warmest year on record, as has the past ten years 2015-2024.
- We are now going beyond the global mean temperature of more than 1.5°C meaning that we need high quality net zero buildings.
- The development fails as a net zero buildings.
- Construction is one of the biggest contributors to global warming. To reduce embodied carbon, we need new ways of design, construction, use and reuse of buildings. This is not evident in the SSD proposal.

Biodiversity

- 169 trees are proposed to be removed across the consolidated site. Trees provide critical wildlife corridors to the neighbouring bushland reserves. The removal of these tree fails to protect, maintain and preserve the tree canopy and established landscape character.
- There has been no environmental impact statement about the impact of the development on the Grey-headed Flying-fox (*Pteropus poliocephalus*; GHFF) for which there is a large colony in Gordon and Powerful Owl (*Ninox strenua*) and other wildlife. The grey headed flying fox colony fly directly over Lindfield each night to trees they forage.
- The applicant has not provided a comprehensive ecological report for this development despite the wildlife that exists in the locality.
- Ku-ring-gai is described as an "environmentally sensitive area" for migratory species who utilise the vegetated ridgeline such as Lindfield as they migrate north to south. The loss of the vegetation from TOD SSDs impact on migratory species through loss of foraging and sheltering resources. Many protected, and declining obligatory migratory birds such as Yellow-faced Honeyeater (*Caligavis chrysops*) and White-naped Honeyeater (*Melithreptus lunatus lunatus*) rely on the canopy that spans this north-south corridor to navigate, rest and forage. The biannual honeyeater migration and also, occasionally the Critically Endangered Regent Honeyeater (*Anthochaera phrygia*) follows this vegetated belt. Koel specifically the Eastern Koel, is a migratory bird that travels from Southeast Asia to Australia breeds annually in canopy trees along the Pacific Highway/ rail corridor.

Water Management

- Lindfield is renowned for having old and poor sewerage pipes. The additional population from this development will place an unacceptable level of pressure on the existing sewerage system and should not proceed until the sewerage network is upgraded.
- It is unclear in the proposals what measures are to be implemented to manage, reuse, recycle and safely dispose of waste, including in accordance with any council waste management requirements.
- The water pressure has been significantly reduced over the past few years due to the increase of development in Lindfield. Additional dwellings will only exacerbate pressure issues in Ku-ring-gai unless upgraded.

Social Impact

- The development will negatively impact on the sense of community and what residents value about living in Lindfield which is losing its village feel.
- Already many residents feel a sense of 'grief' that their home and neighbourhood will significantly and irreversibly change due to the TOD SSD proposals.

- If forced to move out due to loss of privacy and liveability due to overbearing development residents are facing the dilemma of where to move or live in Sydney due to the NSW Government's housing policies. People are very reluctant to live in poorly built apartments and to pay the high cost of strata management and quarterly fees. A recent Lindfield example being \$3000 per quarter.
- It is reported that 60% of new apartments have recertification issues and why so many people are reluctant to buy into new apartments.
- Local residents feel high levels of emotional distress about the loss of trees and tree canopy and the consequence of this for the survival of Ku-ring-gai's rich fauna and flora species. Ku-ring-gai environmental studies have established that Ku-ring-gai LGA contains more flora and fauna species than the entire British Isles.
- The term 'solastalgia' perhaps may describe the feelings of many Lindfield residents, a scientific term that describes the emotional distress felt when existing residents witness the destruction and degradation of their local environment as proposed by SSD proposals.
- There is still a question as to the accountability of affordable housing dwellings under the management of registered Community Housing Providers. Will this be another service industry which is not accountable such as private certification? Who will be responsible for monitoring and managing the Community Housing Provider and ensuring there are no mismanagement?
- Currently it is very difficult for a renter to make a complaint about a Community Housing Provider. If a complaint is unresolved, the only remedy is for the renter to contact the Department of Communities and Justice (DCJ) or the NSW Ombudsman or complaint to the Registrar of Community Housing. A stressful and time-consuming process for already under resourced members of the community.

Flood and Weather Risks

- Ku-ring-gai being has experienced extreme climate-driven weather events including wild storms in recent years (2020) that have brought down trees and led to electricity blackouts and reports of local flooding.
- Blackouts in Lindfield have been more prevalent in recent years.

Bushfire Risk

- Ku-ring-gai is one of the most fire prone local government areas in Sydney being surrounded by three National Parks.
- Lindfield is bushfire prone with its proximity to bushland valleys that connect to the Lane Cove National Park.
- Bushfire considerations are dismissed and there is no consideration by DECORP Pty Ltd of local bushfire hazard within the locality, despite being so close to the Lane Cove National Park.
- The most significant bushfire event in recent memory that affected West Lindfield and resulted in the loss of several homes occurred in January 1994, during which approximately 20 homes were lost in the West Lindfield/Killara areas due to the Eastern Seaboard Bushfires.
- Little Blue Gum Creek and Sir Phillip Game Reserve approximately 1km as the crow flies from Beaconsfield Parade.

Public Space

- There is no sports field, playground or park with playground facilities within an easy walking distance from the proposal. The closest sports fields, parks or playground is approximately 1-2 km walking distance to the Charles Bean Sportsfield at the end of Eton Road or the Lindfield Green on the opposite side of the Lindfield Station or Primula oval approximately 1-2 kms away.
- The Village Green behind the Lindfield Avenue shops is predominantly green open space, with limited seating and no playground facilities. The Green is primarily green open space for the benefit for the residents who reside in the units above the shops or visitors to the centre with an outlook from the businesses/cafes surrounding it.
- The limited provision of communal open space between the 9-10 storey buildings or on the rooftop garden and will not offer good recreational spaces for children to play or enable playground equipment. With the proposed number of 3 and 4 bedroom apartments typically designed for families, the provision of open to the air play and recreation spaces will be very

important for social interaction and physical exercise. The landscape plans only propose passive and respite spaces.

Community Benefit

- The SSD proposal offers no benefit to the existing community and will exacerbate and overwhelm existing infrastructure and community services particularly the local schools and community services.
- Affordable housing should be held in perpetuity and not for just 15 years.

Insufficient Environmental and Infrastructure Studies

- The SSD risks unsustainable development, straining local infrastructure and exacerbating environmental and biodiversity decline.

Conclusion

The State Significant Development Application proposal is not compliant with bulk and scale, height, internal amenity, traffic and parking and inconsistent with Ku-ring-gai's Draft LEP and Housing SEPP. Combined they will have a negative impact on heritage, environment, traffic, parking, urban design, neighbourhood character, visual amenity, liveability, tree canopy, biodiversity, open space, infrastructure and community benefit.

As such the SSD development application should be rejected as it neither adequately addresses the SEARS requirements and fails to consider the exhibited draft amendments to the KLEP 2015 and SEPP (Housing 2021).

The resulting TOD SSD development will negatively impact the net zero emissions target that council is proposing to achieve by 2040.

The proposed developments are not in the public interest as they do not demonstrate any public benefit or strategic merit but designed for significant profit for the developer. The use of the TOD SSD pathway appears to be a deliberate tactic to circumvent local and state planning controls to add additional high-density housing which will be more than the current demand for luxury apartments in Ku-ring-gai. Whilst there is a need for affordable housing we do not understand how any of the luxury apartments proposed for Ku-ring-gai based on current prices will be affordable for those wish to purchase a home in Ku-ring-gai.

At the time of writing there are already 716 apartments in Ku-ring-gai ready to buy off the plan or built and 411 apartments available for rental in Lindfield alone. There is no shortage of apartments to purchase in Ku-ring-gai. The luxury apartments proposed for 9-21 Beaconsfield Road will not solve or assist with the housing or affordability crisis but likely to keep the cost of housing high and unaffordable.

Thank you for considering the submission. It is to be hoped that the NSW DPIH will take on board our concerns and reject the proposal.

Yours faithfully,

Kathy Cowley

Kathy Cowley

PRESIDENT

cc Ku-ring-gai Council Mayor and councillors

cc Matt Cross MP Member for Davidson

cc The Hon Scott Farlow MLC shadow Minister for Planning