

Submission on the Concept Development Application SSD-82899468 (1–5 Nelson Rd, Lindfield)

Contents

Overview	2
At Odds with Urban Planning Principles.....	2
Contravention of Longer Established Zoning and Controls	2
Undermining of Local and National Heritage.....	3
Government Policy-by-Press-Release Risking Irreversible Damage.....	3
Incompatibility with Visual and Heritage Context.....	3
Excessive Height and Insufficient Transition	5
Contravention and Perversion of Existing Zoning	6
Environmental and Infrastructure Impacts	7
Environmental Risks	7
Traffic and Parking Pressures	7
Flood and Riparian Zone Risks.....	10
Overshadowing, Privacy and Solar Access Impacts.....	10
Inadequate Infrastructure and Services.....	10
Conclusion.....	12

Overview

This submission discusses the proposed concept development at 1–5 Nelson Road, Lindfield, and **summarises many reasons for not approving**. These include concerns regarding planning processes, the inadequacy of consultation efforts so far, incoherence with existing built environment, impact on existing community cohesion, and lack of supporting infrastructure to accommodate a **5,500% increase in housing density** on the site, in the form of an unprecedentedly dense building mass for the area.

At Odds with Urban Planning Principles

The application proposes the construction of a high-rise, high-density apartment building in a historic, low-density suburban area designated as sensitive. The proposal is significantly **at odds with established urban planning principles, local planning controls, and the established goals for Lindfield's future development**. Concerns have already been raised regarding its misalignment with long-term planning processes, inadequacy of supporting infrastructure, and the impacts on Sydney's broader character, and historic suburbs which are supported by **an ageing rail system, and roads (e.g. Nelson road which is one the oldest roads in NSW) that are not able to support substantial increases in dense housing**. Additional **social issues** include possible effects on families and children if apartments are located in areas where infrastructure may not meet their needs due to limited long-term planning across Sydney, including opening up of more suitable land and transport links in locations more suited to longer-term development of housing.

Contravention of Longer Established Zoning and Controls

Specific to this development, it is worth noting that it **contravenes existing zoning set by the local council, and that the majority of the land is not even within the hastily implemented, poorly received and widely criticised TOD** program by the current NSW Government, which also contravenes existing zoning set by the local council. It is also extremely concerning that a Government-deemed state-significant development is then being assessed by the state planning department, introducing an inherent conflict of interest at a time when there is deep distrust in government, and concerns about closed-door agreement making by developers with government, and when past ICAC findings regarding developments remain fresh in the community's memory.

Undermining of Local and National Heritage

Nelson Road is historically significant for its **heritage-listed Victorian and Federation-era homes, its significance as a historic suburb** embodying a key part of Sydney's expansion north of the Harbour, and its association with Australia's 11th Prime Minister, William Morris (Billy) Hughes who lived there until his death in 1952. The development will destroy and undermine heritage value.

Government Policy-by-Press-Release Risking Irreversible Damage

The over-politicisation of housing by the current NSW Government should also be noted including attempts to paint concerns of existing communities as 'nimbies' in order to stifle meaningful and necessary debate on the need for more adequate planning for such significant developments which, **if not planned or executed well, will have extremely damaging and irreversible impacts on large (and historic) parts of Sydney**, just as demolition of the Rocks precinct would have had, if this has not have been debated and, as a result, stopped in the 1970s.

Incompatibility with Visual and Heritage Context

The proposed building's **massing and scale are fundamentally out of character with Nelson Road's established streetscape, which is defined by low-rise, detached homes and notable heritage properties, set far back from the street** and generally within established gardens and plantings, reflecting the historic character of the Nelson



Figure 1. Nelson Road in Lindfield, NSW is historically significant as part of the early suburban development of Sydney's North Shore. Many houses along Nelson Road are single-storey dwellings, with large precedence of Victorian and Federation houses, with several retaining heritage status and reflecting this era's modest domestic scale. The prevalence of **single-level homes, including registered heritage items**, demonstrates the suburb's enduring link to early nineteenth and twentieth-century urban housing.

Notably, it Nelson Road is **associated** with **William Morris (Billy) Hughes, Australia's 11th Prime Minister**, who owned 14 Nelson Road (immediately opposite the proposed development) from 1924 and later lived in 43 Nelson Road until his death in 1952 (https://www.khs.org.au/pdfs/news_oct09.pdf). This connection, alongside the street's architectural heritage, underscores Nelson Road's **national historical significance**, which the development will undermine and destroy.

Road precinct. Planning principles stress the importance of neighbourhood identity and a 'contextual fit' in urban design, and developments that disregard these qualities introduce oversized structures that break established sightlines and diminish local character.

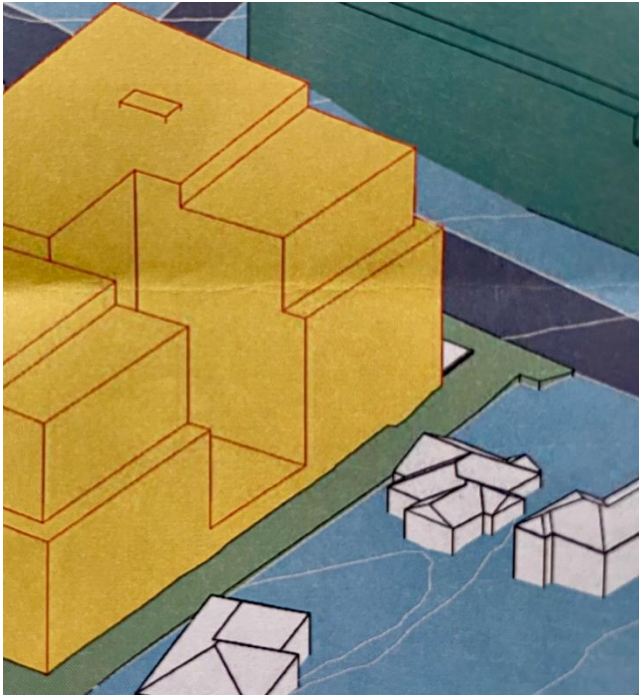


Figure 2. This extreme disparity proposed, with incongruent bulk and height plus minimal setback and insufficient landscaping will further accentuate its incompatibility with the surrounding environment - evoking the unsettling “Up” house effect, where established communities find themselves dwarfed and overwhelmed by an outsized and insensitive structure, built with little regard for local character or community wellbeing and cohesion.

Nelson Road is itself historically important, embodying Lindfield’s early suburban growth and distinguished by a collection of Victorian and Federation-era houses widely recognised for their architectural and heritage worth. **Many of these homes, modest in scale and exemplary of late nineteenth and early twentieth-century styles, underpin the suburb’s heritage identity.**

The road also holds national relevance—**Australia’s 11th Prime Minister, William Morris (Billy) Hughes, owned and lived at two properties on Nelson Road,** marking its place in the nation’s story. This architectural and historic context would be seriously compromised by the proposed development, which threatens the enduring character and significance of Nelson Road and its community (https://www.khs.org.au/pdfs/news_oct09.pdf).

In addition to concerns about incongruent bulk and height, the proposed development's minimal setback and insufficient landscaping will further accentuate its incompatibility with the surrounding environment. The stark contrast of a nine-storey, 35-metre high complex positioned uphill and looming over neighbouring single-storey homes will create a visually jarring and oppressive atmosphere. **This disparity evokes the unsettling "Up" house effect—where established residents and communities find themselves dwarfed and overwhelmed by an outsized and insensitive structure, built with little regard for local character or community wellbeing.** The development risks not only disrupting the established historic and visual character of Nelson Road, but also undermining the prospect of neighbourhood and community cohesion.

Indeed, locating such an intensive apartment building inside a recognised Heritage Conservation Area **undermines both the intent and effectiveness of heritage listings, detracting from them and failing to 'protect or enhance' this valued cultural landscapes,** as well as individual heritage items nearby.



Figure 3. This proposed development's incoherence with the local community, excessive height differential with nearby single-level houses, lack of landscaping and minimal setbacks, evokes the "Up" house effect, now firmly entrenched in popular culture as shorthand for poor planning and excessive developer influence in politics, which rides over individual citizens' concerns, interests and needs.

Excessive Height and Insufficient Transition

The **proposed building's height (>32m over nine storeys) significantly exceeds established height controls** for this locality. A planning system is effective only if its development standards are respected and enforced. Allowing this precedent—in the face of community and expert opposition—**will undermine the integrity of the zoning system, encourage further speculative over-height proposals, and ultimately destabilise the planning framework's ability to deliver fair, orderly, and predictable development outcomes.**

Good **design principles call for careful modulation and step-downs to manage transitions between built forms of markedly different scale.** The abrupt nine-storey shift alongside single or double-storey homes is poor practice, unnecessarily eroding neighbour amenity, overshadowing rear yards, and creating an overbearing visual impact. **Instead of a step down, it creates a perverse, one-off 'step-up' in height** as the viewer moves his/or her line of sight away from the station and commercial precinct of Lindfield, including the Pacific Highway.

Contravention and Perversion of Existing Zoning

The site's current and proposed zoning (R2 Low Density Residential in parts, outside the original Town Centre TOD boundary) offers no strategic justification for the proposal's scale and intensity. Robust plan-led systems rely on adherence to the strategic intent of zoning controls. Approval of this concept would signal a disregard for hard-won community-led planning exercises and create significant community distrust in the planning system's objectivity and fairness.



Figure 4. Existing controls in the area have established transition zones with higher rise close to the station, tapering down to single dwelling houses (dotted line in lefthand side picture), suited to the historic nature of the surrounding suburb. **These long-established planning provisions will be completely undermined by placing a 35m high structure in the area currently preserved for low density, which is also a conservation area.** The proposed development will be 200m to the right of the house in the lefthand side picture, meaning that **instead of heights tapering down from the commercial area near the station, they will taper down and then suddenly rise again with the 32m, nine-storey apartment complex** which is a completion inversion of local height controls.

Environmental and Infrastructure Impacts

Environmental Risks

Given Lindfield’s established green canopy and biodiversity value, **loss of mature trees and the reduction in urban greening to accommodate such a large footprint contradicts both local and state planning policy** (such as the Greater Sydney Green Grid, and Biodiversity Conservation Strategy). Increased hard surfaces and loss of tree canopy are associated with elevated heat island effects, stormwater runoff, and long-term reductions in urban wildlife corridors.

Traffic and Parking Pressures

With 167 apartments and 251 car spaces, the **anticipated traffic generation is well beyond the capacity of local roads, which were not designed for such levels of vehicle movement**. Research repeatedly identifies that excessive car parking entices greater car dependency, compounding **peak-hour congestion, local air and noise pollution, and undermining public transport** initiatives. **Lindfield’s existing street network is ill-equipped to absorb additional traffic volumes without significant infrastructure upgrades**, not proposed in the application.

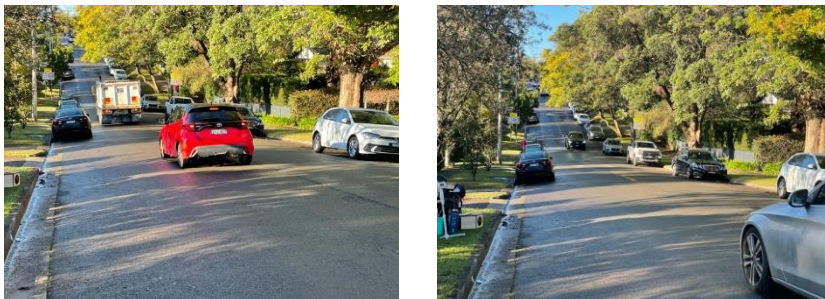


Figure 5. Nelson Road was originally farmland and timber land before residential development began in the late 19th century, resulting in a **narrow street shaped by early suburban growth and modest housing**. Its limited width reflects its historic origins and is **inadequate for servicing high-density developments**, which require greater infrastructure capacity and road space. In the right-hand picture, a car waits for another to pass in the opposite direction.



Figure 6. Surrounding roads and laneways, many of which connect Lindfield to Roseville are narrow and already ill-suited to existing volumes of traffic bypassing congestion on the Pacific Highway when using these lanes as ‘rat runs’, in addition to local traffic. This creates friction and risk points with pedestrians now, especially where these thoroughfares are narrow and have no footpaths. On the map is depicted nearby single-direction laneways immediately near the site, some of which are used as one such ‘rat run’ to Nelson Road from Roseville.



Figure 7. The narrow rail bridge on Havilah Lane, under which is Nelson Road's most direct route to the Pacific Highway, creates a choke point causing delay and friction at the nearby intersection, and further problems at a nearby intersection, resulting in road users experiencing significant delays and some breaking road rules to get around the traffic chaos this creates at peak times. The intersections and the rail bridge are an example of inadequate infrastructure servicing current traffic volumes, which will be exacerbated by the addition of 167 apartments and 251 car spaces proposed in close proximity.

Flood and Riparian Zone Risks

Development within or near designated flood zones and riparian corridors poses substantial downstream risks, especially with intensification and loss of on-site permeability. The current concept lacks rigorous evidence of how stormwater will be attenuated on-site, **increasing the likelihood of adverse impacts on local waterways, worsened flooding, and environmental degradation—a practice at odds with contemporary water-sensitive urban design principles.**

Overshadowing, Privacy and Solar Access Impacts

The height and siting of the proposal risks creating **extensive overshadowing of neighbouring properties, severely reducing winter sunlight availability** and undermining both occupant comfort and passive solar design outcomes. Furthermore, the scale of potential balconies and habitable windows at elevated positions creates direct **privacy and overlooking impacts into neighbouring homes and gardens**, violating established residential amenity principles set out in SEPP 65 and local DCPs.

Inadequate Infrastructure and Services

There is **no clear evidence that the existing stormwater, school, health, open space or public transport infrastructure has the capacity to accommodate an additional 167 dwellings.** Best practice calls for infrastructure capacity assessments as part of, not after, concept approval. Permitting density up front, with studies only to follow, **contravenes basic principles of infrastructure-led planning and risk management.**

Stormwater issues in the proposed development's vicinity highlight both the **ageing nature of infrastructure in the surrounding area**, and the inability of such infrastructure to handle 167 new dwellings build on land currently occupied by 3 dwellings – a **5,500% increase in housing density on this part of Nelson Road, with no investment in additional supporting infrastructure.**



Figure 8. Overflowing stormwater drains are a common sight in the location, including immediately across from the proposed site, reflecting the ageing infrastructure, that is not able to cope with high density, including the 5,500% in dwelling density on the site in question. Other infrastructure not able to cope include roads, parking, and the ageing North Shore state rail line, which today experiences substantial delays and low frequency of trains compared to the newly built Metro system servicing newer suburbs across Sydney.

Conclusion

The proposed development at 1-5 Nelson does not meet key planning or urban design criteria. It conflicts with local and regional spatial strategies, risks setting a negative precedent, and would significantly harm the environment, heritage, and neighbourhood character. Additionally, the substantial increase in density—from 3 to 167 dwellings—would severely strain ageing infrastructure in this older suburb, creating congestion and risk including on local roads and shared-mode pedestrian thoroughfares. Overall, the development fails to align with good planning principles or deliver net community benefit.

Approval should be refused.