

Subject: Objection to State Significant Development Application SSD-75493483

I am writing as a resident of Larkin Street, Camperdown to object to the proposed Forest Lodge Integrated Seniors Living development at 2-32 Junction Street, Forest Lodge (SSD-75493483).

I recognise the importance of providing well-located accommodation for seniors, however the proposal in its current form presents a range of unacceptable impacts on the surrounding community, local environment, and neighbourhood character.

My concerns are outlined below.

1. Height, scale and bulk

The proposed development's six-storey height and overall built form are excessive and inconsistent with established planning principles for the area. The City of Sydney has previously undertaken urban design testing in relation to the site and identified "an opportunity for the site to act as a transition between high density development to the west and residential terrace houses to the east".¹ The Environmental Impact Statement (EIS) itself acknowledges at page 15 that the surrounding context transitions from one and two-storey terraces to mid-rise apartments of five to six storeys. However, rather than serving as a 'transition' between buildings to the west and east, the proposed structure will seemingly be higher than apartment buildings to the western side at 5-13 Larkin Street and 15-17 Larkin Street. On the Junction Street side, there will be a stark height difference between the proposed structure and the neighbouring terraces.

The effect of this excessive height is that the proposed roofline and massing will create a visually intrusive form when viewed from Larkin Street Park and the nearby residential blocks. The visual impact assessments in the EIS understate this impact by relying on oblique or distant views rather than the immediate visual experience of residents. The EIS also relies heavily on planning bonuses available under the Housing SEPP to justify the proposed height and floor space ratio, rather than demonstrating true compatibility with local conditions or sensitivity to the site's constraints.

Requested action: Require significant reduction in height and bulk, particularly to the upper two levels, to allow the site to act as a transition between structures to the west and east. Improved articulation should also be required to reduce the building's visual dominance.

2. Loss of trees and vegetation

The development proposes the removal of multiple mature trees identified in the Arboricultural Impact Assessment. These trees provide critical shade, visual screening, and habitat, and play a vital role in softening the interface between the built form and Larkin Street Park.

¹ City of Sydney, *Planning Proposal: Sydney Local Environmental Plan 2012 – 2-32 Junction Street, Forest Lodge* (September 2019), iii
<https://meetings.cityofsydney.nsw.gov.au/Data/Central%20Sydney%20Planning%20Committee/20171130/Agenda/171130_CSPC_ITEM13_ATTACHMENTA1.pdf>.

Although the proposal includes new landscaping, the replacement trees will take decades to mature and cannot compensate for the immediate and irreversible loss of canopy and biodiversity. The removal of large trees on the western and southern boundaries will also exacerbate the heat island effect and diminish the green buffer that currently protects the park from the adjoining industrial and commercial buildings.

Requested action: Require retention of all feasible mature trees, particularly along the Larkin Street interface, and enforce a tree replacement ratio that ensures no net loss of canopy area within 10 years.

3. Visual impact on Larkin Street residents

For residents along Larkin Street, the visual amenity will be severely affected. The proposed building's height, proximity, and reflective materials will impose a dominant, institutional presence across the park's outlook. The building's bulk will replace open sky and greenery with an unbroken façade extending the full width of the block.

Requested action: Reduce the overall height and enhanced landscaping along the western elevation to reduce bulk and visual intrusion into Larkin Street vistas.

4. Overshadowing of Larkin Street Park

The EIS downplays the extent of overshadowing that will occur to Larkin Street Park, particularly during the winter months. As the park lies to the west and south of the development, it will experience significant afternoon shadowing, especially from the upper levels of the proposed six-storey structure.

Larkin Street Park is a well-used open space for local families, dog walkers, and residents of nearby apartments. Its amenity depends on good sunlight access. Any reduction in sunlight during the afternoon will render the park noticeably colder and less inviting for much of the year.

Requested action: Require independent shadow modelling to confirm actual impacts and impose controls ensuring no additional overshadowing of the park between 9am and 3pm midwinter beyond existing conditions.

5. Traffic, access, and parking impacts on Larkin Street

The proposed vehicular access for service vehicles via Larkin Street is a serious concern. Larkin Street is a narrow residential street with limited capacity, and already experiences congestion due to local traffic, waste collection, and visitor parking associated with nearby apartment and commercial buildings. Introducing service vehicle movements, including waste trucks and deliveries, will significantly increase congestion and safety risks.

The Construction Traffic Management Plan included in the EIS also proposes temporary access and parking restrictions on Larkin Street during construction. This would cause prolonged

disruption for residents, limiting access to driveways and parking, and increasing noise and air pollution.

Once operational, the additional vehicular trips generated by staff, waste collection, and deliveries will place further pressure on Larkin Street and its already-congested intersection with Parramatta Road. The Transport Impact Assessment underestimates this cumulative effect.

Requested action: Require all vehicular and service access to occur solely from Junction Street, with Larkin Street reserved for emergency or pedestrian access only. A full construction staging and mitigation plan must be developed in consultation with affected residents.

6. Noise and vibration impacts during construction

The development's scale and 24-month construction timeframe will create sustained noise, dust, and vibration impacts for local residents. Properties along Larkin Street, which directly border the site and park, will be subjected to prolonged heavy vehicle movements, excavation, and concrete works.

The Noise and Vibration Assessment in the EIS identifies predicted exceedances of permissible limits at multiple receptors. While it recommends mitigation measures, these rely heavily on compliance monitoring rather than genuine avoidance. Residents will face unacceptable disruption, especially during early-morning and weekend construction periods.

Requested action: Impose strict conditions limiting construction hours, banning Saturday afternoon and Sunday work, and requiring acoustic screening and dust suppression measures before works commence.

8. Environmental and amenity concerns

Despite references to sustainability at page 30 of the EIS, the project represents a net loss of green space and canopy cover. Increased hard surfaces, building mass, and mechanical plant will intensify local heat and reduce air quality. The EIS does not adequately address stormwater management, given the site's slope toward Larkin Street and proximity to Johnstons Creek catchment.

Requested action: Mandate best-practice Water Sensitive Urban Design and require green roof and wall treatments to mitigate heat and improve runoff quality.

9. Positive aspects of the proposal

While strongly objecting to the proposal's current form, I acknowledge two commendable aspects:

- The expansion of Larkin Street Park provides a modest but meaningful enhancement to local open space.

- The proposed six-metre-wide pedestrian pathway connecting Larkin Street to St Johns Road will improve pedestrian permeability and access across the site.

However, these benefits do not outweigh the substantial adverse impacts outlined above. With appropriate redesign and reduction in scale, these public benefits could be retained within a more proportionate and contextually sensitive proposal.

Thank you for considering my submission. I would welcome the opportunity to provide further information or participate in any future consultation processes relating to this proposal.