

To NSW Department of Planning, Housing and Infrastructure,

Subject: Objection to the Forest Lodge Integrated Seniors Living Development (SSD-75493483)

Address: 2–32 Junction Street, Forest Lodge, NSW 2037

Application Number: SSD-75493483

I wish to object to the proposed Forest Lodge Integrated Seniors Living development at 2–32 Junction Street, Forest Lodge, on architectural, planning and urban-design grounds.

While I support well-designed seniors housing, the current scheme breaches the height and floor-space controls established under the Sydney LEP 2012 (Amendment No 39) and would significantly diminish the light, human scale and safety of the surrounding area and Larkin Street Reserve.

1. Non-Compliance with Height Controls

Amendment No 39 establishes a graduated height pattern across the site:

Site area	LEP height limit (m RL)	Faces / adjoins	Purpose
North-west (near 1 Larkin Street)	35.5 m (RL)	Existing apartment buildings	Allow compatible higher form
Central portion	29.5 m (RL)	Internal site	Transition zone
South-west (facing Larkin Street Reserve)	17 m (RL)	Public open space	Maintain sunlight and human scale

The EIS proposes:

- Building A (north): 36.3 m (RL) → above the 35.5 m RL limit;
- Buildings B–D (central): 33.2 m (RL) → above the 29.5 m RL limit;
- Built form extends bulk into the 17 m RL zone toward the reserve.

The result is a near-uniform six-storey mass that ignores the mandated step-down from north to south and visually dominates the reserve where the LEP intended the lowest, most open edge.

2. Excessive Floor-Space Ratio

The proposal seeks an FSR of 1.95:1, well above the 1.56:1 control set by Amendment No 39, a 25% density increase that undermines the balance between development and open-space amenity achieved in the 2019 rezoning.

3. Loss of Human Scale, Daylight and Safety

By allowing the tallest and bulkiest forms to press against the reserve edge, the development would:

- Cast deeper, longer shadows over Larkin Street Reserve, particularly in winter;
- Make the park feel dark, enclosed and glum, rather than open and inviting; and
- Reduce passive surveillance, contrary to Crime Prevention Through Environmental Design principles, increasing perceived and potential safety risks.

Such an outcome discourages use of the reserve and contradicts the LEP's objective of maintaining light, visibility and community safety along open-space interfaces.

4. Absence of a Design Excellence Review

Despite significant departures from planning controls, the project has not undergone a Design Excellence process under Clause 6.21 of SLEP 2012. Independent design scrutiny is essential to ensure contextual quality, especially given the scale of the proposed variations.

5. Impact on Local Character and Public Domain

The excessive height and bulk would:

- Overwhelm Junction Street's fine grain;
- Overshadow Larkin Street Reserve; and
- Erase the intended transition from the existing 1 Larkin Street apartments down to the park.

This conflicts with SDCP 2012 Section 6.3.12, which calls for a context-responsive, human-scaled built form on this site.

6. Requested Actions

I respectfully request that the Department:

1. Refuse the height and FSR variations sought under Clause 4.6 and the Housing SEPP;
2. Require the proponent to redesign within the LEP's 17 m – 29.5 m – 35.5 m (RL) envelope;
3. Mandate an independent Design Excellence Review; and
4. Ensure the revised proposal preserves light, safety and human scale to Larkin Street Reserve and surrounding streets.

Thank you,

Resident of Larkin Street, Camperdown