

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

MATTERS RAISED IN SUBMISSIONS		COMMENT
Category 1: Submission points related to housing scenarios		
SUPPORT Scenario # 1 (TOD)		
Supported for the following reasons:		During the exhibition period 514 written submissions were received and the following preferences were expressed: • 125 submissions expressed support for Scenario 1 (TOD). • 42 submissions expressed opposition to Scenario 1 (TOD). • 48 submissions expressed support for Scenario 2a. • 19 submissions expressed opposition to Scenario 2a. • 19 submissions expressed support for Scenario 2b. • 18 submissions expressed opposition to Scenario 2b. • 24 submissions expressed support for Scenario 3a. • 38 submissions expressed opposition to Scenario 3a. • 99 submissions expressed support for Scenario 3b. • 64 submissions expressed opposition to Scenario 3b. A number of submissions did not express a preference for any option. It should be noted that the written submissions are not a statistically valid sample that can be used to inform the selection of a preferred option.
<i>General</i> • Height is maximum 6-storeys. • Respects limitations of local infrastructure. • Aligns housing with existing transport infrastructure, minimises sprawl and reduces environmental disruptions. • Balance between development and preservation. • Maintains character of entire suburbs while meeting housing demand near stations. • Distributes housing fairly among suburbs supported by town centres, avoiding overburdening any single area e.g. Gordon. • Residents have consistently voiced their opposition to high-rise developments. • Sites have been purchased and commencement of design based on TOD provisions. • Provides opportunity for medium density housing to enjoy benefits of Ku-ring-gai – good schools, transport links and national parks. • Whilst it preserves less HCAs than the alternate scenarios, these HCAs won't become "islands" in a sea of high density. • Streamlined – Predicts that State Government will continue to roll out different initiatives to increase housing and creating individualized plans, which places Council in the laborious position of having to constantly create scenarios. <i>Gordon</i> • Reflects our community's values and respects the historical integrity of Gordon.		

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

<i>Roseville</i> - Victoria Street has already seen major development, and Roseville College will continue to add development. Is not within a HCA and is prime location for unit development. <i>Lindfield</i> - Lindfield cannot cope with 15+ storey developments.	The wide range of reasons for either supporting or not supporting the different scenarios are acknowledged. Ultimately the preferred scenario needs to be assessed against the seven principles Council developed to achieve better planning outcomes around Roseville, Lindfield, Killara and Gordon stations.
AGAINST Scenario # 1 (TOD) Not supported for the following reasons: - Blunt instrument and 'One size fits all' - Fails to preserve unique heritage and natural environment of Ku-ring-gai. - Allows development on environmentally sensitive land and will lead to destruction of critical habitats e.g. STIF and cause significant tree canopy loss. - Heritage items will be encircled by development. - Will result in unacceptable high-density development in with HCAs. - Will result in high-rise buildings adjacent with low rise buildings. - Does not support the revitalisation of our commercial centres – the development controls are not enough for renewal of centres, retail growth or new infrastructure. - Redevelopment of Gordon Centre is not feasible under this scenario. - Will detrimentally impact heritage item Eryldene and its HCA, as well as isolate historic houses within the HCAs. - Poor transition zones leading to privacy and overshadowing issues. - Uniform application of development controls fails to account for unique characteristics.	The seven principles are: <i>Principle 1 - Avoid environmentally sensitive areas</i> Avoid locating development in areas containing high-value biodiversity, natural watercourses or steeply sloping or bushfire affected land. <i>Principle 2 - Minimise heritage item impacts</i> Avoid locating development in areas with a high concentration of listed heritage items. Where this cannot be avoided, allowing heritage items similar development capacity as adjoining land. <i>Principle 3 - Preserve heritage conservation areas</i> Prioritise protection of heritage conservation areas by transferring the potential dwelling yield to suitable non-heritage areas. <i>Principle 4 - Minimise tree canopy impacts</i> Improve canopy protection and replenishment in new high-density residential areas by reducing densities of apartment buildings to provide for greater deep soil planting and tree replacement.
SUPPORT Scenario # 2a Supported for the following reasons: <i>Roseville</i> Support heights 12-14 storeys and FSR 6.1:1 or higher for Hill Street.	

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

<i>General</i> • Includes high percentage of HCA houses. • Good planning and most balanced approach. • Avoids environmentally sensitive areas. • Minimises impacts on heritage items and attempts to preserve HCAs. • Minimises tree canopy impacts. • Minimises transition impacts. • Appropriate building heights and limits height of buildings in commercial centre. • Supports local centre revitalisation. • Closest to ensuring that any new development is within walking distance of the station, with density increasing close to the stations to encourage reduced reliance on cars and minimise vehicle traffic. • Development is equally balanced on both sides of the railway to allow for an equal distribution of population and traffic. • It upzones entire blocks to allow for cohesive developments that will allow developers to create more green spaces. • Redevelopment of Gordon Centre is viable under this scenario. • More likely to be endorsed by the NSW Government as development is within 400m of the stations.	<i>Principle 5 - Manage transition impacts</i> Allow for an acceptable interface between areas of different density by avoiding changes that are 'mid-block' or along property boundaries. Where possible utilise existing roads, lanes or open space as the transition from high density to low density. <i>Principle 6 - Ensure appropriate building heights</i> Ensure building heights are appropriate to the regional, district and local context and reflect the hierarchy between the centres. Additionally, building heights are to be transitioned from tallest near the stations to lower where sites adjoin low density residential. <i>Principle 7 - Support local centre revitalisation</i> Promote viable urban renewal in commercial areas that include new retail facilities and helps deliver community infrastructure such as libraries, open space, and community centres.
AGAINST Scenario # 2a Not supported for the following reasons: <i>Roseville</i> • Building heights of 8-storeys on Lord and Victoria and 15-storeys on Hill Street are unacceptable. • Limiting the height of development on the east side of the Roseville and Lindfield Centre to 5-8 storeys with a FSR of 1.3-1.8 : 1 and 50 % deep soil will not be viable. • Lord/Bancroft HCA should be removed. • Impacts The Grove HCA significantly – bisects the length of the street with 5-8 storeys on western side and could result in the loss of 50% of properties within the current conservation zone.	

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

<i>Gordon</i> - Gordon disproportionately targeted for high density growth. Dense, high-rise development with building heights 15-45 storeys. - Significant change to Gordons appeal – liveability, green spaces, accessibility - Will result in destruction of HCA 39. <i>Killara</i> - The Marian Street HCA is not retained. - Northern side of Marian Street is cut in half, allowing high-rise developments on the southern side. Only 5 houses on the northern side will remain, resulting in a street of incohesive developments. - No transition zone (such as a road or open space) between existing houses and 8-storey developments. - Development is proposed on the high side of Marian Street which will overshadow neighbours. <i>General</i> - Concern with high rise developments - Concentrates development in commercial areas and doesn't allow for enough additional housing to be made available for those wishing to live in residential areas. - Excessive building heights, which can also be increased by 30% for affordable housing. - Does not meet Council's Planning Principles as it does not minimise impact on heritage items or preserve HCAs.	
SUPPORT Scenario # 2b Supported for the following reasons: - Balance between allowing additional building height in commercial centres and flexibility to achieve planning outcomes, not just those related to heritage conservation. - Protecting 100% of HCAs within the TOD SEPPP is not sustainable and results in imbalance of development around stations. Protecting 31% is a reasonable compromise. - Building heights of 15-storeys in E1 commercial zones is a reasonable compromise. - More likely to be endorsed by the NSW Government as development is within 400m of the stations.	

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

Development is equally balanced on both sides of the railway to allow for an equal distribution of population and traffic.	
AGAINST Scenario # 2b	
Not supported for the following reasons:	
<i>General</i> - Would result in the destruction of 70% of heritage items. - Concern with high rise developments - Excessive building heights, which can also be increased by 30% for affordable housing. - Does not meet Council's planning principles, particularly relating to minimising impacts on heritage items and preservation of HCAs. - Only provides 31% protection of HCAs.	
<i>Roseville</i> - Lord/Bancroft HCA should be removed. - Impacts The Grove HCA significantly – bisects the length of the street with 5-8 storeys on western side and could result in the loss of 50% of properties within the current conservation zone.	
<i>Gordon</i> - Gordon disproportionately targeted for high density growth. Dense, high-rise development with building heights 15-45 storeys. - Significant change to Gordons appeal – liveability, green spaces, accessibility - Redevelopment of Gordon Centre is not feasible under this scenario.	
<i>Killara</i> - Marian Street HCA has been wiped out. - Heritage value of heritage items will be lost if their setting (HCA) is removed. No value in heritage items if they are isolated, dominated and overshadowed by high-rise developments.	

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

SUPPORT Scenario # 3a Supported for the following reasons: • Sustainable as Ku-ring-gai continues to grow and expand. • 'Best of a bad lot' • Protects heritage items and HCAs	
AGAINST Scenario # 3a Not supported for the following reasons: <i>Roseville</i> • Building heights of 8-storeys on Lord and Victoria and 15-storeys on Hill Street are unacceptable. • Development on the west side of Roseville and up to 15-storeys in the small shopping centre will be adjacent to the 2-storey HCA on the eastern side which is inappropriate. • Does not manage the transition impacts at all. <i>Gordon</i> • Gordon disproportionately targeted for high density growth. Dense, high-rise development with building heights 15-45-storeys. • Significant change to Gordons appeal – liveability, green spaces, accessibility. • Gordon centre will be bigger than many in St Leonard's and twice the height of buildings in Epping. <i>Lindfield</i> • 35-storey high building at the centre of Lindfield would cause an unsatisfactory transition, uneven streetscape, and overshadowing/privacy issues. <i>General</i> • Concern with high rise developments • Affordable housing should not be located only in commercial hubs. There is no reason that Killara should be an enclave for expensive houses when urban development in modern cities demand extra housing across regions.	

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

• Building heights of 15–45-storey buildings are fundamentally inconsistent with the values the Council claims to defend and dramatically change the nature of these suburbs. • Not equitable. • Heights are not supported by infrastructure like Sydney Metro • Complete loss of character.	
SUPPORT Scenario # 3b Supported for the following reasons: • Expands HCA 39. • Balances heritage and environmental preservation with providing housing close to train station. • Protects 100% of the HCA – Vital to Ku-ring-gai identity. • Concentrates development density in the areas closest to the train station and mitigates traffic congestion by locating a greater number of residents closer to public transport. • Maximum building heights limited to suit the local and regional context. • Minimises loss of trees/ tree canopy and biodiversity impacts. • Increasing the radius to 800m means there is more scope to increase housing density in a way that takes into account local planning considerations, preserves HCAs and maintains the leafy landscape that characterises Ku-ring-gai. • Accommodates increased housing density in appropriate locations. • Thoughtful to preservation of natural environment – keeps development away from bushland steep slopes, bushfires. • Thoughtful consideration given to transitions between areas of varying density, with boundaries and buffer e.g. roads and parks. Ensures privacy and reduces overshadowing. • Minimises impact on heritage items. • Supports local centre revitalisation. • Spreads the density. <i>Gordon</i> • Higher density at Gordon required to make development viable.	

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

AGAINST Scenario # 3b	
Not supported for the following reasons:	<i>Roseville</i> • Building heights of 8-storeys on Lord and Victoria and 15-storeys on Hill Street are unacceptable. • Going beyond 400m on west side of Roseville and Lindfield results in disproportionate density of housing on this side • 6-8-storey developments would be disastrous for Alexander Parade. Result in traffic and overshadowing. • West side of Roseville is a high bushfire prone area. • Existing traffic congestion during peak times. • MacLaurin Parade steep gradient which limits accessibility to the train station. <i>Gordon</i> • Gordon disproportionately targeted for high density growth. Dense, high-rise development with building heights 15-45-storeys. • Significant change to Gordons– liveability, green spaces, accessibility and character • 5-8-storey apartments on south side Moree does not meet Planning Principle relating to preserving HCAs and managing transition impacts. Will lead to loss of privacy, overshadowing/solar access impacts to properties in St Johns HCA. • Highrise down Pearson Avenue and Burgoyne will set a precedent for future development to creep into surrounding areas. • Redevelopment of Gordon Centre is not feasible under this scenario. <i>Lindfield</i> • Disadvantages Lindfield in favour of Killara. • Misleading in relating to transition impacts – Council states it has an acceptable impact but will result in properties in Highgate adjoining directly behind Blenheim HCA being developed for 5-8-storey apartments. Worse than TOD and Scenarios 2 and 3a. • Half of properties in Treatts/Killara Avenue block will be zoned for residential flat buildings 5-8 storeys and half will be low density residential. Will result in significant amenity and streetscape

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

impacts, ad hoc development pattern. No buffer or transition zone is proposed. Principle of 'manage transition impacts' is not met. <i>General</i> • Conflicts with the 800-metre radius of the Low to Mid Rise policy stage 2. • Create substandard planning outcomes. • Shopping centre revitalisation may not be economically viable for developers. • Transition impacts are not addressed, 5-8-storey development adjacent to low rise. Misleading information from Council. • Results in a great number of homes located far away from the local centre; up to 800m away from the local railway stations. • Excessive building heights, which can also be increased by 30% for affordable housing. • Not equitable. • Underutilisation of Transport infrastructure. • Migration outside of 800m zone • Lack of infrastructure, particularly traffic • Overcrowding • Fails to reflect the balance between safety and growth. • TOD is not simply 23,200 dwellings but the creation of that number of dwellings within 400m of station. 3b departs from governments requirements of geographic location. Risk that if Council choses this option, then it could be rejected by State Government based on geographic spread i.e. going beyond the 400m TOD boundary.	
SUPPORT an Alternate/Compromise Scheme	
<i>Alternative Areas for housing</i> • Shopping areas of East Killara and East Lindfield for a low-rise housing option, with retail below. Areas are already established, have no heritage, and will take pressure off the areas surrounding the stations. • Expand the scenarios to include all stations along the trainline, ensuring all areas make some contribution to housing.	The suggestions for alternative areas for housing are noted. In developing alternatives to the TOD, Council is not able to consider any areas outside of the identified station precincts in the TOD SEPP – that is Gordon, Killara, Lindfield, and Roseville. The preference for a combination of scenarios is noted.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

• High rise on Pacific Highway and Hill Street Roseville. • Increase density and heights between Gordon and Lindfield. New “intense density” connecting Gordon and Lindfield along the Pacific Highway at Killara. Roseville to be excluded from the TOD and remain at village scale. • Expand into Pymble and Pymble Business Park • Increase height and density within Turramurra, Wahroonga, and St Ives Centre • Underutilised commercial zones (Pacific Highway Gordon and Lindfield – particularly western side) are well suited for residential development. • Masterplan should be developed for whole LGA. • Excavate a sunken Pacific Highway from Boundary Street up to Clanville intersection. The elevated ground level over the highway could serve as a precinct for housing development and community and public space. The area could be extended over the train line, and addition of overpass or underpass would assist traffic flow issues. <i>Combination of Scenarios</i> • Compromise of 2a and 3b. Gordon and Lindfield should not be taking extra dwellings from Killara and Roseville. • Combination of 2A and 2B. Building heights in the shopping strip were increased to 12-storeys, the scenario 2A height limit of unit development of 5-8 (perhaps increased to 10) storeys, but with equivalent of TOD controls of FSR of 2.5 :1 on the eastern side and no 50% deep soil condition. • Combination of 2a and 3b – consist of up-zoning (at Gordon only) as per 2A, and a degree of medium density upzoning (at Gordon only) outside of the 400m zone as per 3b for Gordon only (nowhere else). No medium or higher density outside of the 400m boundaries would be supported. • Combination of 2a and 3b, but with HCA relaxed to 50-75%, Turramurra added, Roseville + Killara at 8-storeys, Lindfield + Turramurra at 8-15 storeys, Gordon at 10-25-storeys, expansion into the 400–800m areas. <i>Suggested amendments</i> • Scenario 1 – allow Heritage listed items to benefit from uplift of TOD and preserve street front curtilage to maintain heritage significance.	The suggested amendments to specific scenarios are noted. The request to provide for alternate housing typologies is noted. The State Government’s Low and Mid-Rise (LMR) policy came into effect on 28 February 2025 and is focused on delivering housing diversity such as dual occupancies, town houses, terraces, and low-rise apartment buildings. The LMR controls apply up to 800m around the TOD precincts in Ku-ring-gai to ensure housing diversity is achieved.
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SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

• Scenario 1 – but extending the boundaries of TOD to 800m, including heritage sites as developable areas, uplift for mixed use sites. • Scenarios 2a, 3a and 3b – both sides of Balfour Street Lindfield should be permitted for high rise development (like in Scenarios 1 and 2b) • Scenario 2a - all Shirley Road properties and adjacent properties (as per 3b) were included, it would be possible to save a lot more of HCAs located on the East side of Roseville station. • Scenario 2a – place greatest density on Pacific Highway in urban centres close to stations, no more than 5-8-storeys on East Side and only between South Park Avenue and Robert Street and no high rise north of Park Avenue (including none in Pearson and Burgoyne). No 15-25 storeys on commuter car park, preschool site retained. • Scenario 2a – high rise to the east of the rail line in Gordon should be limited to 8-Storeys. Open space and community centres must be expanded to cater for a larger population. • Scenario 2a – extending development zones to 600-800m from the station to achieve target yield whilst keeping heights acceptable. • Scenario 2a – modify to include 10 properties which are currently in TOD SEPP (2 Nelson, 1a Valley, 63 Trafalgar, 4 Nelson, 1 Valley, 65 Trafalgar, 61 Trafalgar, 6 Nelson, 1b Valley, 59 Trafalgar). A new laneway buffer could be provided by joining battleaxe driveways of 1a and 1b Valley Road • Scenario 2a and 2b – both sides of The Grove to have the same height. • Scenario 2b – allowing moderate development on the northern side of Balfour Road. • Scenario 2b – Mandatory generous setbacks and tree canopies to properties in HCAs/Items. • Scenario 2b – incorporate heritage items into developments via adaptive use or transferable development rights. • Scenario 2b – incorporate gradual transition in heights and allow delisting or redevelopment of isolated heritage items. • Scenario 3a – Roseville does not have any building height more than 15-storeys on the west side of the railway line. • Scenario 3a – amendment so all heights are limited to existing zoning heights and identify more sites in the Gordon and Lindfield commercial areas which have the potential for 6-8 storeys. • Scenario 3a and 3b – no increase in density east of the railway line at Gordon, Killara and Roseville.	
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SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

- Scenario 3b – too many 'blue' areas – high rise should be concentrated along the Pacific Highway (50m back) to not encroach in residential areas. Extend high rise along the Pacific Highway, this would reduce need for majority of 5-8-storey buildings on western side of Roseville. - Scenario 3b – expanded to 800m to all 4 train stations. - Scenario 3b – remove proposed development in Burgoyne Lane, Gordon (behind Park Avenue). - Scenario 3b – include part of Gordon Golf Course in Scenario 3b, opportunity for 2000 dwellings and currently not financially viable. Should be repurposed. Will create revenue for Council to fund shortfall in Long Term Financial Plan for projects and minimise rate increases. - Scenario 3b – remove development from Burgoyne Lane (i.e. directly behind 16 Park Avenue and HCA). Development can be shifted to vacant/underutilised sites on Pacific Highway. - Scenario 3b – developments less than 400m from station have a 10-storey limit, and those further away have a 6-8-storey limit. Provides better interface with residential areas. - Scenario 3b – extend additional 5-8-storey zonings across the entire area bound by Werona Avenue, McIntosh, Rosedale Road, and Park Avenue. - Scenario 3b – high density residential zoning should be extended to the entire Treatts/Killara Avenue block. - Gordon – greater density on Pacific Highway, no high rise on northern side of Park Avenue (including Pearson, Carlotta, and Burgoyne) and limit development on commuter carpark to 8-storeys and preserve pre-school on corner of Park and Pearson - Killara – convert some of the old low-rise apartments along Mariam Street Killara to higher density development to accommodate the housing shortage. - Spread the density across multiple stations (in addition to the 4 TOD stations), retain 100% HCA, extend areas of 5-8-storeys along the State Highway, maximum 8-storeys in Killara and Roseville, 10-storeys in Lindfield, 15-storeys in Gordon, 6-storeys for all other stations. 6-storey buildings to the western side of Pacific Highway. Sprinkle maximum 6-storey apartment buildings throughout the neighbourhoods amongst 1-2 storey houses. Maintain new development to 400m from train stations. - Gordon – west of Pacific Highway (Cecil and Dumaresq Street) can have higher development levels (beyond 6-storeys) - Killara – carpark adjacent to station could take several storeys without becoming dominant. - Robert Street Gordon could increase density (6-8-storeys)	
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SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

• Lindfield – both sides of Nelson Road are either to be included or excluded. <i>Alternative housing typologies</i> • Should include duplexes, granny flats, townhouses, terraces and low-rise apartments of less than 4-storeys. • Increase low rise solutions so that tall towers are not required. Allow duplexes to be 2-3 storeys. Allow granny flats. • Minimum subdivision sizes should be 400sqm and encourage battleaxe blocks.	
SUPPORT development area being restricted to 400m radius around railway stations	
• Oppose to high rise development outside of the 400m zone from Gordon preschool down Pearson Avenue to the depot site. Sets a precedent and reduces tree coverage. • Sprawling out 800m creates additional impacts in parts of LGA outside of TOD boundaries that should be protected for heritage and environmental reasons	The support for development being restricted to a 400m radius around railway stations is noted. The Department of Planning, Housing, and Infrastructure <i>Transport Oriented Development – Guide to Strategic Planning</i> outlines that Councils may choose to extend the application of provisions beyond the State's 400m radius where this will deliver a better outcome. The extension of the TOD beyond the 400m radius in some areas will assist in protecting important heritage conservation areas (HCAs) in Ku-ring-gai.
SUPPORT development area extending to 800m radius around railway stations	
• Sensible to consider alternative approaches that spread density beyond the 400m radius where appropriate. • Increasing the radius to 800m means there is more scope to increase housing density in a way that takes into account local planning considerations, preserves HCAs and maintains the leafy landscape that characterises Ku-ring-gai.	The support for development extending to 800m radius around the railways stations as in Scenario 3b is noted. The Department of Planning, Housing, and Infrastructure <i>Transport Oriented Development – Guide to Strategic Planning</i> outlines that Councils may choose to extend the application of

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

Extend beyond 400m for new and increased development to accommodate more housing that are not dwellings or apartments.	provisions beyond the State's 400m radius where this will deliver a better outcome.
SUPPORT development heights extending above 6-7 Storeys	
- Increased heights are supported on the basis that heritage and tree canopy are preserved and ailing centres are revitalised. - Scenarios that cover a greater footprint and with a lower uniform height are less conducive to liveable neighbourhoods and will result impacts on the HCAs, tree canopy, and traffic. - Buildings along the highway interface can be 6, 8, 12 or 25-storeys does not matter as with good urban design these heights can be accommodated. - Support general principle of greater heights along the Pacific Highway in return for less penetration of development into the surrounding streets. - Sensible to consider alternative approaches that consider greater height and density than 7 storeys on sites like Lindfield Hub, sites close to Pacific Highway and train line. - Increased heights and FSRs of 6:1:1 are required for development feasibility. - Higher-density projects can fund roads, parks, and public amenities through developer contributions, enhancing the area without straining existing infrastructure. - Heights of more than 8-storeys should be restricted to commercial centres, with a maximum of 20-storeys.	The support for development which has height greater than 6-7 storeys is noted. Council alternative scenarios included heights greater than the 6-7-storeys proposed by the TOD so that heritage conservation areas can be protected and limit the need for spreading development further than 400m from the rail station.
SUPPORT TOD heights (Limit to 6-7 Storeys)	
10-15 storeys will be visible from private homes in Gordon, altering the suburban and landscape character significantly. - Heights 25-45 storeys (scenarios 2a and 3a) are excessive and will result in long construction times and tall buildings are not attractive. - Concern that heights established in Gordon and Roseville will set precedent for other centres further north such as Turramurra. - Aim of TOD is to deliver more mid-rise residential buildings (6-storeys) which are appropriately scaled and compatible with the surrounding character – Council's alternatives with 45-storeys are dramatic shift in character.	Support for height limited to 6-7 storeys is noted. Council's alternative scenarios included heights greater than the 6-7 storeys proposed by the TOD so that heritage conservation areas can be protected and limit the need for spreading development further than 400m from the rail station.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

• New buildings should be a maximum of 6-storeys. • Smaller-scale dwellings fosters a stronger sense of community than high rise. • Although Gordon is commercial heart of Ku-ring-gai, heights above 6-storeys are inappropriate to load development from other suburbs.	AGAINST Council Alternative Scenarios • Scenarios create inequity between areas north and south of Mona Vale Road - majority of development is concentrated around Gordon and Lindfield, creating increased traffic and density. • Inequitable concentration of apartments in Gordon – scenarios aim to preserve Killara and Roseville, at the expense of Gordon. • Council has wasted so much time and money on these alternatives. • Fail to adequately consider key environmental impacts and community priorities. • Extending beyond the boundaries of the TOD and introducing significantly taller building is inconsistent and to the values Council claims to defend. • Concern the alternative scenarios will impact Gordon's and Lindfield's unique, longstanding character. • Fails to align with sustainable planning principles and contradicts the long-term interests of community. • Confused how Council which has historically opposed high density development can then propose 15+ storey buildings in a suburban neighbourhood like Lindfield. • Alternative scenarios are premature with insufficient data and evidence – developed without consideration of traffic, safety, and infrastructure constraints. • Council alternatives relocate density away from residential HCAs to existing commercial zoned land, but as these sites are small, narrow, and held in separate ownership there is a time-consuming process to consolidate the land to achieve large enough development sites. • Council scenarios will not deliver housing in the short to medium term e.g. development in Gordon on sites with long leases Woolworths and Harvey Norman. No development will occur for 10+years which is too long. • Not convinced Council alternatives deliver sympathetic development. The comments regarding the lack of support for Council's alternative scenarios are noted.
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SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

- Do not support any scenarios for Gordon – will lead to impacts on traffic, environment, open space, and community infrastructure. Dissatisfaction with the high-rise developments. - Too much weight to opinions of developers and too little consideration of environment and infrastructure - All scenarios are unfair. Council has made skewed decisions in each scenario with some groups getting what they want, and others don't. - Inconsistencies throughout the scenarios. HCAs are saved, but one scenario proposes 45 storeys over a heritage listed item. - Council scenarios downzone sites approved for high density under TOD SEPP	
AGAINST any options (Council Scenarios or TOD) - Unable to support any Options (TOD or Council alternatives). None of scenarios will deliver ecologically sustainable development. Alternate scenarios are not fit for purpose in the face of the climate and biodiversity crisis. - TOD and the alternate scenarios lack a comprehensive assessment of their cumulative impact. - All options will mean more traffic on the Pacific Highway. - Do not support increased heights in Lindfield. - TOD and all Council's alternatives will result in destruction of Ku-ring-gai's character and tree canopy. - All scenarios compromise the visual impact, either through high-rise development or loss of canopy, and adverse consequences for our heritage items / conservation areas. - Do not support any scenario. Gordon has been unfairly asked to accept the greatest uplift. - Sprawl will not stop at 800m. - All scenarios result in poor urban design transitions with single storey houses next to apartment blocks. - Not convinced that either TOD or Council's alternate scenarios support appropriate and sympathetic development.	There were 72 submissions received that did not support any options – TOD or Council's alternatives. The TOD planning controls were introduced by the NSW Government in May 2024. Council's alternate scenarios seek to deliver around the same level of housing while retaining and protecting heritage and improving urban tree canopy outcomes. If Council does not develop an alternative planning outcome, then the current TOD will remain in place with its poor planning outcomes, particularly regarding impacts on heritage and the environment.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

SUPPORT Alternative Scenarios	
• Appreciate Council's work on preparing alternative scenarios to deliver the same amount of housing as the TOD while being sensitive to local considerations of heritage and environment. • Support Council approach to developing alternative planning options and further density uplifts for TOD precincts.	Support noted.
Category 2: Submission points related to Environmental/Amenity impacts	
Environmental Impacts (biodiversity, slope, bushfire, flooding, riparian lands)	
• Environmental impact of high-density developments like bushfire analysis, wind tunnel effects, and the broader disruption to local wildlife habitats is completely overlooked in scenarios 2, 2b, 3a, and 3b. <i>Soil and Terrain</i> • Soil compositions and terrain in Gordon does not support intensive construction (15-45 storeys). Will need significant engineering work. <i>Biodiversity</i> • Alternative scenarios will disrupt existing green corridors, fragment habitats for wildlife movements. Will lead to decline in local fauna. • Building heights from alternative scenarios will affect growth and health of surrounding trees and vegetation. • Alternative scenarios will result in increased artificial lighting from high rise which will impact on nocturnal wildlife, and compound negative impacts of habitat fragmentation. • 23,200 apartments will lead to environmental damage and tree damage. • All scenarios pose significant risks to Ku-ring-gai's tree canopy, biodiversity, and will lead to further degradation of Blue Gum High Forest and the Sydney Turpentine Ironbark Forest both critically endangered ecological communities.	Council's alternatives and Preferred Scenario are governed by a set of planning principles, one of which is 'avoid areas that are environmentally sensitive' and the following criteria were used to locate high density housing: - Properties with core biodiversity have no potential for additional housing. - Properties with 20% or more of the land area with Support for Core, Landscape Remnants and/or Biodiversity Corridors are constrained with some potential for additional housing subject to detailed analysis and ground-truthing. - Properties with more than 25% of the land area affected by Category 1 or 2 Riparian Lands are heavily constrained with no potential for additional housing. - Properties with less than 25% of the land area affected by Category 1 or 2 Riparian Lands are constrained with some potential for additional housing subject to detailed analysis and ground-truthing. - Properties with more than 25% of the land area with a slope greater than 18% have no potential for additional housing.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

<i>Bushfire – particularly West Roseville Alexander Parade/Findlay/Maclaurin</i> - Concern that Council's alternative scenarios have not adequately assessed bushfire impacts, traffic impacts, limitations of access road and evacuation capacity. - Council should not be exhibiting alternative scenarios (e.g. 3b) that expand development into areas such as Roseville without understanding the traffic and bushfire evacuation implications. - Reference to 1994 Bushfires in Roseville near Findlay Avenue and Maclaurin Parade - Reference to Council's Sim Table video simulation shared by Council which illustrates the risks of bushfire evacuation. - Evacuation will become more difficult with additional residents from unit developments currently under construction plus the additional residents of the development resulting from scenario 3b. - Road access out of West Roseville is already compromised it cannot support more development. - Independent studies on bushfire risks and evacuation modelling are require to account for developments already approved. - All scenarios should be reassessed with a focus on bushfire evacuation risks. - All high-risk bushfire zone and areas deemed at high risk for bushfire evacuation safety should be exempt from further development. - Concern that all of Alexander Parade is subject to ember spread. - Access is restricted (Corona Avenue, Maclaurin Parade at Highway Intersection, Kings Avenue at Blue Gum High Forest) making evacuation difficult. <i>Flooding</i> - Concern with existing flooding in from storm events in Gordon and for this reason Gordon is not suitable for additional development. - Concern with existing stormwater runoff into and flooding of Blue Gum Creek Roseville because of development, and concern this will worsen with additional development.	- Properties mapped as Bushfire Prone Vegetation Category 1 and 2 lands have no potential for additional housing; and - Properties immediately adjoining Bushfire Prone Vegetation Category 1 or 2 lands have no potential for additional housing. It should be noted that endangered ecological communities will remain protected under the <i>Biodiversity Conservation Act 2016</i> No areas on the west side of Roseville identified for potential development uplift in any of the scenarios is mapped as bushfire prone land or bushfire evacuation risk. No are any of the areas immediately adjoining Bushfire Prone Vegetation Category 1 or 2 lands. However, the bushfire history in the Alexander Parade/Findlay Avenue area and its connectivity to the broader Land Cove National Park is noted. It is acknowledged that the proposed development uplift in Alexander Parade in option 3b does put greater density closer to bushfire prone vegetation. Regarding issues raised in relation to evacuation during bushfire events, it should be noted that evacuation routes are not set, are dependent on the specific event, and are usually managed by emergency services according to conditions. Nevertheless, further road network improvements within the Maclaurin Parade precinct that would assist egress from the area should be investigated and modelled. Refer to further comments in this table that relate to Traffic/Road capacity. Any new development will need to specifically consider flooding in areas mapped as Overland Flow or Mainstream Flow Flood
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SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	Planning Area. New development will also need to specifically consider Council's water management DCP controls, including requirements for rainwater re-use and on-site detention systems.
Heritage Conservation Areas	
<i>Support for Heritage Conservation Areas</i> • Retain HCAs – they should be protected regardless of distance from rail. • Majority of Ku-ring-gai's high quality intact HCAs are located within 800 metres from the railway. • Ku-ring-gai HCAs and heritage items are of National significance by the National Trust of Australia (NSW), • HCAs are worth preserving for future generations – community asset. <i>Concern of impact of High Density on HCAs</i> • High density adjacent to HCAs destroys the character that makes these areas desirable and worthy of preservation. • Protection of HCAs needs to consider not just proximity but impact of buildings 25-45 storeys on the skyline. • Transition from high density to HCAs needs to be carefully managed. <i>Lord Street/Bancroft Avenue HCA</i> • Historical and aesthetic significance and needs to be protected. Federation style housing, which represents an intact portion of the 1903 Clanville Estate subdivision and characterised by garden settings and 1 or 2-storey buildings. <i>Middle Harbour Road HCA</i> • High value HCA due to home and tree canopy • Environmental significant due to one of the Two Creeks running between Valley Road and Middle Harbour Road <i>St Johns, Nelson, and Edward Streets Gordon</i> • Contain housing of significant character which should not be displaced by high rise. • St Johns and Nelson Street are good examples of HCAs.	Support for Heritage Conservation Areas, and particular HCAs is noted. Council's recent independent heritage review by TKD Architects confirmed these conservation areas retain an overall moderate or high integrity, a high aesthetic quality, are highly significant for documenting the history and development of the municipality, and they all satisfy the NSW Heritage Council's criteria of local heritage significance for listing as a conservation area. Council's comparative study further found that Ku-ring-gai's conservation areas have distinct qualities not found in other Sydney conservation areas.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

<i>Pockley Avenue HCA</i> • Pockley Avenue HCA should not be included for development	<i>Opposition to Heritage Conservation Areas</i> <i>Oppose HCA extension – McIntosh.</i> • Reason for extension is 'ease' rather than any valid justification. • Object to 21 and 23 McIntosh Street being included in HCA extension. Properties have little conservation value and will undermine HCA. Current designs are modern and 21 McIntosh has been significantly expanded. • Oppose expanding heritage listing to more homes near Gordon's transport and amenities. • Need to reconsider the HCA status of McIntosh Street as this it is a poor example. Contains modern houses built in 2000s. <i>Opposition to HCAs</i> • Heritage has held back development. • Council should not misuse HCAs to avoid housing delivery. HCAs do not mean no development. • Many modern homes that have been built after 2000 fall within HCAs which undermines the integrity. • Protect some HCAs, but do not protect them all – focus on saving only the best HCAs. • Irrational to attempt to preserve all HCAs as this outcome can only be achieved by massive overdevelopment. • Some existing HCAs are of little heritage value (e.g. the Blenheim Road conservation area). • It is not correct that all HCAs are of equal merit and value, and refusing to give up any HCA on principle will not provide the best outcomes for residents. • For every HCA home protected in the TOD zone, the opportunity for 15 homes is lost. • Where HCAs are going to be detrimentally impacted by high rise, the HCAs should be removed. The opposition to Heritage Conservation Areas is noted. Council's recent independent heritage review by TKD Architects confirmed these conservation areas retain an overall moderate or high integrity, a high aesthetic quality, are highly significant for documenting the history and development of the municipality, and they all satisfy the NSW Heritage Council criteria of local heritage significance for listing as a conservation area. Council's comparative study further found that Ku-ring-gai's conservation areas have distinct qualities not found in other Sydney conservation areas. Council has not proposed any changes to heritage listings as a conservation area or heritage item in the exhibited scenarios for community feedback or Council consideration at this stage. The conservation area revisions recommended in this review will be considered by Council and the public consulted at a separate stage, if or when Council adopts a planning proposal containing these changes for public exhibition.
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SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

<i>St Johns Avenue HCA</i> • If high density housing is permitted on southern side of Moree, then low density townhouses should be permitted on northern side of St Johns Avenue. • Housing stock is not unique, and the streetscape of trees and concrete roading does warrant preservation. <i>Trafalgar Avenue Conservation Area (C31)</i> • Integrity rating of 'High' but this is not supported by specific comments in the heritage report.	
<i>Other comments regarding Heritage Conservation Areas Transition Requirements</i> • Critical how to transition from HCA properties to medium/high density. Don't have apartment blocks directly next to or in the backyard of the HCA. • Need to provide transition areas/buffer between proposed high and medium density areas and the low scale HCAs. <i>TOD and HCA Protection</i> • HCAs are already protected under the TOD SEPP through established approval processes, setbacks, and spacing requirements.	Council's alternatives and preferred scenario are guided by a set of planning principles, one of which is '<i>Manage transition impacts</i>' which seek to ensure: - An acceptable interface between areas of different density or use - Avoiding changes mid-block or along property boundaries and instead using existing roads, lane, or open space as the transition and if required the creation of new roads, lanes, walkways, or open space as a transition boundary.
Heritage Items <i>Support Protection of Heritage Items</i> • Heritage properties significantly contribute to the desirability of the local real estate market. • Adaptive reuse and sensitive infill development that can meet housing needs without sacrificing heritage. • Should protect heritage items – history of Australia for future generations. • Encourage public access to heritage items so that they are more accessible, and more people can enjoy them. • Need to protect heritage items from being overpowered e.g. Old Gordon School precinct, • Additional work is required to ensure local heritage items are not left isolated by future developments.	Support for heritage items is noted.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

- Where future development is near heritage items there needs to be controls to ensure privacy, setbacks, orientation. - High value high integrity heritage should be protected. - Eryldene should be considered one of our local significant heritage items and an appropriate master planned solution provided to see this item maintained.	
<i>No Support for Protection of Heritage Items / Delisting of Heritage Items</i> - Allow delisting of heritage items that are surrounded by high density or support owners to have the same rights to develop as non-heritage listed properties. - If HCAs are destroyed, then the only items that should remain are state or federal heritage items – local heritage loses its relevance. - Needs to be provision for heritage items to be delisted where they are unlikely to be incorporated into development sites e.g. eastern side of Nelson Road - Heritage preservation is undermined by heritage items that have low status, while other better examples are not listed. Examples given are 10, 12 and 16 Roseville Avenue that should not be listed. - Heritage-listed items are currently located near or opposite low-rise apartments, demonstrating that careful development can coexist with heritage preservation. - Heritage items within the 200m radius from the train stations be considered for removal to allow for more density near stations. - Support reviewing and re-evaluating heritage items, especially in context of being surrounded by development	Council's proposal seeks to minimise the impacts of additional housing on heritage conservation areas and heritage items through changes to the planning and development framework rather than changes to heritage listing. Arguments involving heritage item settings are not supported by any identified NSW heritage policy as justification to remove heritage item listings. Surrounding apartment development does not alter the significant features or site of the subject heritage item to the extent of the listed curtilage. The amenity or context issue from surrounding development is considered through the planning and development process rather than the listing. Development that is proposed in the vicinity of a heritage item needs to consider the impact on the significance of the heritage item at the development application stage. The local heritage significance of existing heritage items and conservation areas were established and reviewed by Council through the completed planning process at the time of listing, in most cases more than 10 years ago, as set out by planning law and NSW Government standards. This process included a heritage consultant's heritage assessment, community consultation, public exhibition, Council's consideration of submissions, NSW Government approval, and other required planning steps completed over a number of years.

SUBMISSION SUMMARY TABLE

S14715-1 – TOD Housing Alternative Scenarios

15 November 2024 to 17 December 2024

<i>General Comments/Suggestions Regarding Heritage Items</i> • 50-100 residents of heritage items in TOD areas that are at very high risk of isolation. • Heritage items are only of value if they are surrounded by an area of similar character. • Infill around heritage items, ought only to be developed to 2-storeys. • TOD does provide protection for Heritage items through setbacks. • Needs to be a way of delisting heritage items. • High value, high-integrity houses be protected, low-value, low-integrity heritage be de-listed and freed up for responsible development. • Heritage conservation should not be limited to preserving single-family homes and their associated streetscapes. Instead, it should consider how core design principles and meaningful architectural elements can be thoughtfully integrated into new developments. Simply maintaining expensive, low-density properties in an area poised for more efficient land use undermines the potential for equitable, community-focused growth. • Needs to be a LGA wide review of HCAs and Items. There are many items and areas listed which if independently assessed would not meet threshold for listing. <i>Alternative Scenarios</i> • Council is inconsistent with protection of heritage – scenarios propose 45-storeys on heritage item but won't allow development in HCAs. • Alternative scenarios fail to consider the reality of high-rise development next to heritage properties within the commercial centres. • No guarantee that there will be the capacity to properly evaluate and mitigate heritage impacts. • Questionable if Council's scenarios do minimise impact on heritage items. Council is proposing higher heights (5, 6, 8 storeys) across street from items (e.g. Nelson Road Lindfield) no assurance there will be adequate transition zones, leading to loss of privacy, overshadowing and loss of property value. • Needs to be a better transition / interface with heritage items, such as lower storeys towards the interface side, higher setbacks from the street, tall trees and green space at the interface, sympathetic designs, limitations on balconies. • Feasibility analysis has not considered the impact of heritage listings on development potential.	Council's alternative and preferred scenario are guided by a set of planning principles, one of which is '<i>minimise impacts on heritage items</i>'. Where heritage items are included within high density residential areas they are to be integrated within future development by: - Being allocated the same or similar development rights as adjoining properties. - Being required to be amalgamated with adjoining development sites to ensure they do not become isolated. Arguments involving heritage item settings are not supported by any identified NSW heritage policy as justification to remove heritage item listings. Surrounding apartment development does not alter the significant features or site of the subject heritage item to the extent of the listed curtilage. The amenity or context issue from surrounding development is considered through the planning and development process rather than the listing. Development that is proposed in the vicinity of a heritage item needs to consider the impact on the significance of the heritage item at the development application stage. The Heritage Council policies 'Assessing Heritage Significance' (years) and 'Levels of Heritage Significance' (2008) dismisses the unrecognised terms like "low value heritage" and 'low integrity heritage'. Council's current proposal seeks to minimise the impacts of additional housing on heritage conservation areas and heritage items through changes to the planning and development framework rather than changes to heritage listing.
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SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

Development and heritage can co-exist. Council should not exclude heritage items or HCAs from the same development opportunities for renewal.	
<i>Heritage Items and Transferable Development Rights</i> - Transferable Development Rights must apply to all local heritage items under all scenarios including TOD, - Scenarios 2a and 3a will include Transferable Development Rights. Uncertain whether 3b will. - Heritage items should also be afforded greater height and FSR to make the transaction attractive to developers. - Statutory requirement needed to ensure developers purchase adjoining heritage properties at equivalent land rate as neighbouring non-residential houses to ensure items are incorporated into development and not left isolated. - Incentives adaptive reuse	Councils' alternative and preferred scenario are guided by a set of planning principles, one of which is '<i>minimise impacts on heritage items</i>'. Where heritage items are included within high density residential areas they are to be integrated within future development by: - Being allocated the same or similar development rights as adjoining properties. - Being required to be amalgamated with adjoining development sites to ensure they do not become isolated.
Tree Canopy Cover	
- Tree canopy is community long term asset and should be conserved. - Deep excavations for underground parking 'mines' critically endangered tree seed stock, putting at risk the regeneration of ecological communities. - Potential for significant canopy loss with the alternate scenarios. - Green spaces and forested areas should be protected as they mitigated climate change and provide respite for residents. - Requests Council amend all scenarios to show land containing Blue Gum High Forest from 'unlikely to redevelop' to 'exempt to high density development.'	Councils Urban Forest Strategy 2022 aims to increase canopy cover from 45% up to 49% across the LGA. Councils' alternative and preferred scenario are guided by a set of planning principles, one of which is '<i>Minimise impacts on the tree canopy</i>' which seeks to improve canopy retention and replenishment in new high density residential areas by: - Reducing densities of apartment buildings (compared to TOD SEPP). - Inclusion of controls similar to current DCP which require 40-50% deep soil, max 30% site coverage and tree replacement and planting.
Deep Soil	
<i>Support Provision of Deep Soil</i> Existing low density deep soil requirements be maintained whilst allowing additional dwellings. e.g. manor home.	Support noted.

SUBMISSION SUMMARY TABLE

S14715-1 – TOD Housing Alternative Scenarios

15 November 2024 to 17 December 2024

<i>Opposition to Council Deep Soil Requirements</i> • ADG required 7% deep soil, Council alternatives 50% deep soil. This is likely to render project unviable and will lead to unusual building typologies i.e. tower in the park with poor safety outcomes, inactive street frontages and dead/leftover spaces. • Reduction in TOD FSR and requirement for 50% deep soil planning will be unacceptable to developers and State Government • A blanket 50% seems inappropriate when there has been no significant native canopy over much of this area for 100 years. It is understood that KRG wants to increase this, but it would be done in a more targeted way. • 50% deep soil requirement is excessive and would unnecessarily restrict development feasibility and take-up of new housing. ADG recommends 15%. Suggestion of 20 - 25% or 40%-50% would be reasonable.	Opposition noted.
Traffic/Road Capacity <i>General</i> • Increase of 23,200 apartments will lead to traffic congestion. • Concentrated density as close as possible to our train stations and Pacific Highway (e.g. Scenarios 2a and 3a) will lessen vehicular traffic and make traffic more manageable. • Additional 50,000 residents along the rain corridor will use cars and not just rely on public transport. • Roads, and particularly Pacific Highway are already congested at peak times. • Condition of our roads cannot cope with existing numbers (e.g. potholes). • Traffic report isn't due until Feb - no time to understand the traffic implications. • Ride sharing is a band aid approach and no part of longer-term infrastructure planning. • <i>Gordon</i> • Roads and parking in Gordon not designed to support the population that the alternative scenarios would bring. Require costly upgrades.	<i>General</i> The NSW Government's TOD SEPP is currently in force, which is based on the premise that there is "enabling infrastructure capacity" in the TOD Precincts. As a result, no specific transport upgrades have been proposed by the NSW Government. Council is undertaking its own assessment of the transport impacts of the TOD SEPP as well as Council's alternative and preferred scenario, to better understand any transport infrastructure requirements to accommodate additional dwellings in the four TOD Precincts, with a focus on encouraging active transport access from TOD developments to the station and shops. Analysis of household vehicle ownership from the 2021 Census shows that in parts of the TOD precincts of Gordon, Lindfield, Killara, and Gordon where apartments are prevalent, an average

SUBMISSION SUMMARY TABLE

S14715-1 – TOD Housing Alternative Scenarios

15 November 2024 to 17 December 2024

<i>Lindfield</i> - Lindel Place is a small, narrow cul-de-sac that is not suited to increased cars and traffic. Council scenarios show increased development in this area. <i>Roseville – Macclairin / Corona / Findlay/ Pockley/ Alexander</i> - Concern with cumulative impacts of new developments in Roseville TOD area, and additional development under Council Scenario 3b. - Road exits from this area are limited to the Pacific Highway only via Findlay Avenue, Corona Avenue, and Macclairin Parade - Concern that increases in density in this area, the roads will not cope. - Changes are needed to the road access in and out of the precinct to accommodate growth. - Council is pushing development to western side of Pacific Highway - Suggestion to: - Corona Avenue - Restrict parking to one side in Corona Avenue and change traffic lights to allow cars to go straight across to Boundary Street (or alternatively a right turn) - Macclairin Parade – Mark yellow cross hatching on Pacific Highway so cars leave space and don't que across intersection. - Council needs to consider the impacts of existing development under construction (traffic, access to Pacific Highway, noise, and general amenity) before allowing any more development to proceed. <i>Roseville – Shirley / Ontario / Bromborough</i> - Congestion at lights at Shirley Road/Pacific Highway is very bad and intersection is dangerous. Concern about adding further development to this area. - Suggestion to install right turn green arrow on northbound Pacific Highway at Shirley Road. <i>Killara</i> - Existing roads around Killara centre are limited. - Plans should include the widening of Culworth Avenue.	of 72% of households own no cars or 1 car. This indicates that households around stations are not heavily reliant on private cars for their travel needs, and therefore generate low amounts of vehicle traffic. <i>Gordon</i> Discussions with Transport for NSW regarding proposed road and transport upgrades in Gordon have been ongoing since 2023, and Council's own analysis of the NSW Government's TOD SEPP in Gordon as well as Council's alternative and preferred scenario will help to progress and refine those proposals as well as advance planning for active transport improvements identified in the Gordon Public Domain Plan. <i>Lindfield</i> Lindel Place is an interface area, and any uplift would be limited in height and density to ensure an appropriate transition to the Frances Street Conservation Area. <i>Roseville</i> As part of Council's assessment of the transport impacts of the Roseville TOD precinct (as well as Council's alternative and preferred scenario), discussions are being held with Transport for NSW regarding improvements to the intersection of Pacific Highway and Macclairin Parade, and other locations on Pacific Highway and Boundary Street, but these are subject to Transport for NSW approval. To provide additional connectivity for the West Roseville area and to reduce demand at the intersection of Pacific Highway and
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SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	Maclaurin Parade, consideration is being given to the provision of a new limited access local road connection between the curve in Pockley Avenue and the curve in Shirley Road. The 5-8 storey buildings on the southern side of Alexander Parade as part of Scenario 3B are being considered for removal, to reduce demand on the intersection of Pacific Highway and Maclaurin Parade. <i>Killara</i> Council is undertaking its own analysis of the NSW Government's TOD SEPP in Killara, as well as Council's alternative and preferred scenario. Conditions in Culworth Avenue will be considered as part of the analysis.
Parking • Council carpark at Lindfield required to take pressure off street parking. • More high-rise development will only make parking more difficult. Need to ensure that there are plenty of parking for all the owners and tenants. • Should be an audit of street parking within reasonable walking distance of the TOD stations. The impact on commuter parking as it exists in 2024 should be included in the evaluation of the options. • Residential car parking at the centres should be restricted to less than one space per apartment. • Parking issues around stations.	Analysis of household vehicle ownership from the 2021 Census shows that in parts of the TOD precincts of Gordon, Lindfield, Killara, and Gordon where apartments are prevalent, an average of 13% of households own no cars and 59% own 1 car. This indicates that households around stations are not heavily reliant on private cars for their travel needs. This also suggests that parking requirements for new developments could be revised down (and supported by public car share availability) to encourage the continuation of this behaviour, and to improve housing affordability. New TOD developments would be located within easy walking distance from TOD stations and would therefore be unlikely to increase commuter parking demand around stations.

SUBMISSION SUMMARY TABLE

S14715-1 – TOD Housing Alternative Scenarios

15 November 2024 to 17 December 2024

Local Centre Revitalisation	- Need for shops in Roseville to be redeveloped to provide services and facilities – current shops are not fit for purpose. - Increasing the height to 12-storeys in the Roseville/Lindfield shopping zone may make revitalisation viable. - Council has failed to adopt effective planning controls to encourage revitalisation of town centres, especially Gordon. - Lindfield Hub site should be for residential only. No need for additional supermarket - Revitalisation of existing town centres along Pacific Highway is needed regardless of the scenario chosen. - TOD does a good job promoting the improvement of the Gordon Centre. Council's scenarios should explore this opportunity and prepare principles and strategies for revitalising Gordon. - Use this opportunity to plan long-term for our commercial centres. The argument that certain centres lack facilities and therefore cannot support them in the future is short-sighted. - Final preferred option should continue to recognise Gordon as the higher order centre and functions to support more services for the benefit of the community	Feasibility advice finds that the sites within the E1 Local Centres (typically two-storey buildings along the retail strip and low-rise commercial buildings) are unlikely to redevelop under the TOD, as they require higher densities to be feasible. Council's alternative and preferred scenario is based on a set of planning principles, one of which is '<i>Support local centre revitalisation</i>' which will be supported by: - Promoting mixed use development (including retail) within the local centres. - Supporting redevelopment of key sites within the local centres through sufficient height and floor space ratio. - Utilising Council owned land as a catalyst for revitalisation and delivery of community infrastructure such as libraries, open space, and community centres.
Local Character	<i>Gordon</i> - increase in heights will set a long-term precedence. - Threaten the integrity of Gordons heritage and will alter the character of the suburb. <i>View Corridor and Skyline</i> - Alternative scenarios will introduce dense high-rise development which will obstruct iconic views and disrupt skyline. Diminish suburb aesthetic and detract from cultural and heritage value. <i>General</i> - Character of Ku-ring-gai is unique and worth protecting – housing. Heritage and trees - Landscape character under pressure from tree removal.	Comments noted. The interplay between Ku-ring-gai's historic built environment and its natural environment, and the conservation of extensive mature canopy trees form the foundation of Ku-ring-gai's local character.

SUBMISSION SUMMARY TABLE

S14715-1 – TOD Housing Alternative Scenarios

15 November 2024 to 17 December 2024

- Urban planning should avoid creating a “two-class” suburb. High-rise developments in one area and expensive, low-density heritage homes in another fosters inequality, dividing residents into “haves” and “have-nots.” - New buildings should have a masonry character with neutral and earthy tones.	
Infrastructure (Parks, Water/Sewer, Services, Public Transport, Schools, Health)	
<i>Roseville</i> - New development should not be approved until improvements to infrastructure, particularly traffic management and bushfire exits and entrances for emergency services, are planned and implemented. - Wheelchair and pram access to the highway and station are required – suggestion for elevated walkway. - A public park is also needed for West Roseville.	The planning controls for the Transport Oriented Development areas are already in effect, applications are being lodged with the NSW State Government as State Significant Development, and with Council, and all must be assessed on their merits. There is no capacity to prevent or delay the determination of validly made development applications. The NSW State Government, prior to giving effect to the upzoning in the TOD areas, would have been in a situation to fully consult with the state agencies concerning the provision and/or upgrade of state infrastructure arising from the anticipated development. Ku-ring-gai's alternative options each provide for the same total number of dwellings/population. Ku-ring-gai has an existing s7.11 local infrastructure contributions plan which levies for the provision of new open space on a per capita basis which will continue to provide contributions for new parks. The need identified for West Roseville and additional open space in Gordon is noted for further investigation during the review of the current contributions plan. Greengate Park in Bruce Avenue (specifically mentioned) is an example of a local park delivered by this mechanism (in addition to several other parks).
<i>Gordon</i> - Alternative scenarios will result in pressure on Gordons infrastructure – roads, public transport, water, sewage, footpaths, schools and health care are already at capacity. - Concern that alternative scenarios do not take into consideration maximum capacity of basic infrastructure.	
<i>Killara</i> - Alternative scenarios will increase congestion and urbanisation. - Killara is unsuitable for the inclusion due to absence of a commercial centre.	
<i>Lindfield</i> Lindfield has fewer parks per resident than any other suburb in Ku-ring-gai.	
<i>General</i> - Council should progress local infrastructure to ensure new development is supported. - Community will need open space, community infrastructure, performance spaces, libraries and sports facilities.	

SUBMISSION SUMMARY TABLE

S14715-1 – TOD Housing Alternative Scenarios

15 November 2024 to 17 December 2024

- Existing community land should be retained and allocated for public use rather than for high density development. - Alternative scenarios will significantly increase the pressure on local infrastructure, transport, and Pacific Highway. - Need to consider infrastructure for schools, childcare, open space, sports grounds, shopping centres, traffic, parking, electricity, stormwater, water, gas, sewage, internet and mobile for an increased population. - No long-term infrastructure planning has been done to increase capacity of the North Shore line. Trains already overcrowded at peak times. - Concern regarding spillover effects from Hornsby LGA - Questions how the required infrastructure will be paid for. - The following infrastructure is needed to support TOD numbers: - New road tunnel needed under Pacific Highway. - New commuter parking to replace lost street parking. - Duplication of Fullers Bridge over the Lane Cove River and duplication of Fullers Rd, Millwood Avenue, and Delhi Road. - Duplication of Lady Game Drive - New flyover or underpass at Boundary Road intersection with Archbold Rd and Penshurst Street. - New Metro from Northern Beaches to Macquarie Park and from Epping to Parramatta. - Undercover, safe, and well-lit kiss and ride near stations. - Secure parking for bikes, e-bikes and motorbikes. - Pedestrian bridges over the Pacific Highway. <i>Open Space</i> - Importance of access to open space when living in apartments - Gordon is lacking open space and consideration should be given to creation of parks like Bruce Avenue to cater for increased density. - Disappointed that no proposed additional parkland	Ku-ring-gai Council is undertaking traffic studies for all four TOD areas that will inform the review of the current s7.11 Local Infrastructure contributions plan. Water and sewerage, schools and health care are state infrastructure provided by the NSW State Government. It is noted that redevelopment in the Greater Sydney Area, including Ku-ring-gai, also attracts state infrastructure contributions (called the Housing and Productivity Contributions or HAPs) and it is a matter for the State Government to determine expenditure on infrastructure delivery for these contributions. The Pacific Highway is also a State Road however it is anticipated that the traffic & transport studies that council is undertaking (supported by expert consultants) will identify road upgrades and intersection improvements required. More extensive State Infrastructure, such as a new metro, are matters for the State Government as are the flow-on effects on roads outside of the Ku-ring-gai Local Government Area such as Millwood, Fullers and Delhi. Lady Game Drive adjoins Crown Land on both sides. Upgrades to railways stations are also a matter for the NSW State Government. Killara has been selected as a Transport Oriented Development Area by the State Government. Ku-ring-gai Council can plan for local supporting infrastructure, including pedestrian facilities, to support the possibility of mixed-use development near the station and along the Pacific Highway frontages, linked by improved pedestrian and cycle access between them.
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SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

<i>State Government Authorities and Infrastructure</i> • Questions the mechanism to coordinate the planning with NSW State Roads, NSW State Education, NSW SES, etc. There must be coordination with other services and infrastructure prior to voting on the scenarios. • NSW government should increase funding for basic infrastructure for roads, school, parks to support increased population from TOD SEPP.	
Transition • Council needs to carefully consider the impact of development on existing residential areas, especially those adjacent to high-rise buildings. • It is inconsistent with Principle 5 to have a boundary between different zonings mid-block. • Some scenarios are better at managing transitions than others. E.g. Scenario 3b is good for Killara East, but not so good for Killara West nor for Lindfield. • No mention of impacts of the scenarios around or next to HCAs, only within them.	Council's alternatives and preferred scenario are guided by a set of planning principles, one of which is '<i>Manage transition impacts</i>' which seek to ensure: - An acceptable interface between areas of different density or use. - Avoiding changes mid-block or along property boundaries and instead using existing roads, lane, or open space as the transition and if required the creation of new roads, lanes, walkways, or open space as a transition boundary.
Amenity <i>General</i> • Quality of life of the population should be the first consideration. <i>Loss of privacy</i> • Concern of loss of privacy from high rise development <i>Construction</i> • Concern that alternative scenarios will lead to prolonged construction in Gordon – noise, disruption, and traffic congestions.	Comments regarding amenity impacts are noted. Ensuring appropriate interfaces between higher-density developments and low-density housing is a key consideration and principle for the development of the alternative and preferred scenario.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

<i>Solar Access and Overshadowing</i> • high rise developments will cast significant shadows over neighbouring properties and public spaces, reducing natural light and efficiency of solar energy systems. <i>Noise</i> • Noise pollution resulting from high rise development. <i>Air quality</i> • Concern regarding degraded air quality from high rise development <i>Urban Heat Island Effect</i> • Alternative scenarios reliance on large scale developments will contribute to urban heat islands and disrupt airflow patterns, negatively impacting on microclimate. <i>Poor Construction Quality</i> • No guarantee on quality of building of apartments. Bad building can lead to expensive remedial work and financial burden on occupants. • Increase in building defects for high rise developments. <i>Visual outlook</i> • Lost visual outlook.	
Population Increase	
• Additional 23,200 dwellings will equate to an additional 46,400 an increase of 33% of our current population (assuming 2 occupants per house). If three occupants per home, then that is over 55% population increase. • Number of immigrants is unsustainable. Needs to be a moratorium on immigration, if the current and proposed immigration continues the housing crisis will never be solved. • Ku-ring-gai has a higher number of children per household (1.8) than the NSW average, so the number of additional children could be 41,760. Need significantly more pre-schools, primary and secondary schools, libraries, sports fields, open spaces, and community facilities.	Noted. The Department of Planning, Housing and Infrastructure <i>Transport Oriented Development – Guide to Strategic Planning</i> outlines that where Councils are developing alternatives to the TOD they are required to provide 'equal or greater housing outcomes'.

SUBMISSION SUMMARY TABLE

S14715-1 – TOD Housing Alternative Scenarios

15 November 2024 to 17 December 2024

Sydney currently houses at least 61% of the population of NSW and we cannot increase our population without it having detrimental effects to our way of life.	
Housing Typology	
- TOD is only providing one type of living – high rise – majority of people in Sydney do not want to live in high rise once they are in the family formation stages of their lives. - Liveable cities need to provide housing choice. - Secondary benefit of maintaining HCAs (e.g. Options 3a and 3b) is that it also maintains housing diversity. - New developments should be a mix of units, townhouses, duplexes and shop top housing. - Council failed to see demand of downsizers wishing to remain in community. <i>Ownership</i> - All new dwellings should be owned by Australian citizens, who live in the dwellings and contribute to community.	Noted. The aim of the TOD SEPP is to deliver mid-rise residential flat buildings (6-storeys). The NSW Government is implementing further planning for housing diversity through the Low and Mid-rise Housing reforms, which seek to expand the permissibility of low and mid-rise housing options such as dual occupancy, terraces, town houses, low and mid-rise apartments. These reforms came into effect on 28 February 2025.
Affordable Housing	
- Affordable housing should not be all in one single apartment block but spread out within standard residential apartment blocks. - Proposed 2% affordable housing contribution is totally inadequate. - Should be in perpetuity. - No point to TOD if it just delivers luxury units that remain unaffordable. - Planning controls need to ensure developers provide at least around 20% -25% affordable housing, including some social housing. - Suggestion that developments 400-800m from station could have more affordable housing and those closer not have affordable housing (or not as much) - Need to develop areas close to stations e.g. Lindfield to provide housing for essential workers such as teachers, nurses and tradesmen who could never afford to live in area otherwise. - Does not appear that Council scenarios include requirement to provide affordable housing as per TOD.	At OMC 17 December 2024 Council resolved to advance Ku-ring-gai's affordable housing objectives. Council was to pursue the implementation of an: - Affordable Housing Policy, and; - Affordable Housing Contribution Scheme. The Draft Ku-ring-gai Affordable Housing Policy was on exhibition from 3 February to 3 March 2025, and proposes: - Affordable housing to be in perpetuity. - A 10% affordable housing target for rezonings arising from private planning proposals. - An Affordable Housing Contribution Scheme developed alongside any strategic rezoning of areas within Ku-ring-gai by council.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

• Questions regarding who decides on suitability of residents, what happens after 15-year period and do normal building standards apply? • Should be consistent with Council's draft affordable housing policy which seeks 10% affordable housing in new residential and mixed-use developments as a result on private planning proposals. • Do not agree with bonus height – affordable housing should be included in the 6-storey height limit. • Concern that affordable housing linked to bonus height will revert to developer after 15-years. • Council should progress affordable housing scheme to ensure delivery of new affordable housing options. • Sites further from station are less valuable, and therefore could have higher proportion of affordable housing. • Lobby the government that any uplift in height due to the Affordable Housing provisions must be in perpetuity.	- Both in-kind contributions (proponent dedicates land or dwellings to Council for the use of affordable housing in perpetuity), and monetary contributions. - Council will engage a registered Community Housing Provider (CHP) to lease and manage affordable housing on Councils behalf; and - priority target groups for Council owned affordable housing will be key workers working in Ku-ring-gai, Ku-ring-gai residents in housing stress, women older than 65 and those with a close connection to Ku-ring-gai, including long term residents and people with a social or economic association with the local government area. The Department of Planning, Housing, and Infrastructure <i>Transport Oriented Development – Guide to Strategic Planning</i> outlines that in terms of strategic planning for alternatives for the TOD SEPP, 'In the first instance the prescribed affordable housing rate within the Housing SEPP will apply (2%). In the event that a council takes a different rate or approach, we expect that councils will prepare an affordable housing contribution scheme that prescribes the rate and mechanism for delivering affordable housing'. The Housing SEPP affordable housing 20-30% bonus height and FSR apply to all land in Greater Sydney, and it is unlikely that the Department of Planning, Housing, and Infrastructure will allow an exemption to these provisions.
Development Uptake and Viability • What percentage of areas proposed for high density development under each of proposals is expected to be developed in next 15yrs?	Comments noted.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

- Feasibility advice regarding viable development in commercial areas is due on inflated sales based on speculation that development of properties can include residential. - Housing supply will be delivered with greater certainty by lots of developers with mid-rise, rather than concentrating on a few high-rise sites. - Councils' feasibility analysis has not factored in the impact of heritage items on the development potential of the land identified for uplift. - Council has not done its due diligence on likely amalgamated scenarios. - Questioned whether an FSR of less than 1.8 with 50% deep soil will be commercially viable for development. - Dwelling numbers stated in Councils Scenarios will not be delivered due to significant strata titled land ownership, unequitable uplift. - No feasibility testing to assess the scenarios. Unclear how Council and State Government can be certain that the scenarios will deliver the same or similar dwellings as TOD has not been substantiated. - Disparity between development standards proposed on the Pacific Highway in comparison to other areas said to be based on tipping point analysis. The value of commercial sites has diminished due to popularity of shopping centre e.g. St Ives and difficulty of parking on highway. Sales that have taken place based on speculation have created a misleading understanding of the value of commercial sites. - Many of land identified for uplift is Council land – questions how quickly this is likely to be developed.	Preliminary feasibility was undertaken by Atlas Economics to inform preferred options and SJB Urban's built form modelling. More detailed feasibility analysis will be completed to inform final development standards and planning controls.
Development Controls <i>Setbacks</i> - Questions whether the setback requirements will result in good planning? E.g. Larger setbacks for developments (including corner blocks) <i>Site Amalgamation</i> - Questions whether the minimum lot size for high rise development will be sufficient to require the amalgamations of smaller sites on Pacific Highway - A minimum development site area of 3,000sqm.	Comments and questions are noted. The exhibited alternative scenarios were based on high level scenario planning only. Detailed built form modelling was carried out post-exhibition by SJB Urban to ensure the Preferred Scenario will be consistent with Council's DCP, minimise overshadowing and address interface impacts as well as comply with the Apartment Design Guide (ADG).

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

<i>Building Heights</i> • Council has not provided any rationale regarding the different building heights – factors such as distance from station, visual prominence, impact on surrounding area and viability should be considered. <i>Floor Space Ratio</i> • Question regarding how and why there are different FSRs in the different scenarios. <i>Roads</i> • Proposed development should be located on roads that are greater than 20m wide. <i>Deep soil</i> • 50% deep soil is unnecessarily restrictive and will limit the number of residential units that can be achieved. <i>General</i> • Overly burdensome design rules add cost, complexity, and time, pushing developers would minimise quality to make projects viable. • Require architectural innovation.	
Topography • North Shore train line and the Pacific Highway follow a ridgeline, with significant topographical drops to the east and west in. Older-than-average population may struggle with the steep gradients when walking to facilities such as shops and train stations. • Taller buildings should be placed further down the slope, especially at Gordon, to be visually less intrusive.	Comments noted.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

Category 3: Submission Points related to general impacts		
Financial		
<i>Property values</i> - Construction of 23,200 apartments will significantly lower house values. - Unfair economically that residents in TOD can sell properties for substantial amounts while other residents are left with devalued properties. <i>Council Financial</i> - Council's decision to spend significant time and resources opposing the TOD SEPP, despite its widespread support at state and federal levels, has been both costly and inefficient. - Long term financial plan removes \$46m from potential asset sales and plans to raise rates. No evidence of examination of alternative sources of revenue.	Comments noted. Strategic planning for a better result while delivering the same overall number of dwellings as the TOD SEPP, supports community feedback received in respect of Council's Local Strategic Planning Statement, Local Character Study and Community Plan. Strategic planning for supporting local infrastructure delivery is still required to be undertaken whether the current TOD SEPP remains in place, or an alternative is developed.	
Resident Certainty		
- Council needs to decide on this matter and not defer it given the State provisions are in force and creating poor land use and transport outcomes in the intervening period. - A quick resolution of the uncertainty is more important than anything. - Certainty and clarity for landowners and stakeholders are vital to ensuring the timely progression of development to meet housing needs.	Comments noted. The timeline for finalisation of Council's Preferred Alternative is May 2025.	
Legal		
<i>Support for Council undertaking Legal Action</i> - Support Council's legal action against TOD. <i>Court Case and Timing of Alternative Scenarios</i> - Alternative scenario exhibition was premature. Council should have waited for the results of the court case. Weakens Council's position to negotiate. - Mediation agreement includes another four suburbs north along the train line, which none of the scenarios consider.	Support noted. A mediation agreement was reached between Council and the NSW State Government on 21 November 2024 (and approved at OMC 26 November 2024). The mediation agreement sets out that: - Council will continue the public consultation on the alternative scenarios, and if a preferred option is adopted Council, and the Department will work towards implementation by May 2025	

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	- Legal proceedings will remain in place and mediation will be left open, with a hearing date set for June 2025.
<i>Do not support legal action taken by Council.</i> • Potential for legal action being taken against Council should one of the alternative scenarios be adopted, and what is Councils budget. • Withdraw the lawsuit and work collaboratively with the government. • Legal action is a waste of time and money.	Opposition noted. A mediation agreement was reached between Council and the NSW State Government on 21 November 2024 (and approved at OMC 26 November 2024). The mediation agreement sets out that: - Council will continue the public consultation on the alternative scenarios, and if a preferred option is adopted Council, and the Department will work towards implementation by May 2025 - Legal proceedings and mediation remain open, with a hearing date set for June 2025.
<i>Legal Action Arising from Council Alternative Scenarios</i> • Resident threatening to legal action against Council should Council adopt Scenarios 2a, 3a or 3b. • Will result in further litigation costs to Council if Council adopts one of the alternative scenarios.	Comments noted.
Category 4: Submission Points related to process	
Background Studies	
• NSW Government only assessed 'water and wastewater capacity' in developing the TOD. • Need for feasibility study to justify reduction in TOD FSR • All scenarios are unsupported by detailed studies. • Need for independent studies to assess bushfire risk and evacuation modelling with current and proposed residential densities. • Canopy mapping analysis needs to be included.	The purpose of the alternative scenarios is to identify whether the community are prepared to trade off height and density for protection of HCAs and other best practice planning outcomes such as canopy protection. The alternative scenarios have been developed using Council's extensive evidence base included in its strategies, studies,

SUBMISSION SUMMARY TABLE

S14715-1 – TOD Housing Alternative Scenarios

15 November 2024 to 17 December 2024

- Scenarios appear to lack an evidence-based approach which compromises the value of the exhibition. Will result in residents being ill-informed. - The alternative housing scenarios needs to be developed based on sound planning evidence such as traffic and car parking studies, infrastructure and public service assessment, recreation and facilities assessment, and environmental considerations such as bushfires. - Evidence based approach is needed for negotiating with State Government - Traffic studies should have been completed before exhibiting scenarios.	plans, and policies relating to environment, heritage, social and economic considerations. Should Council adopt a preferred scenario, then further detailed assessment, modelling, and studies will be undertaken.
Conflict of Interest	
- Council has a clear conflict of interest in all the alternative scenarios. - Value of Councils land increases if an alternative scenario is adopted. - Concern that alternative scenarios place significant additional density on Council owned assets (e.g. Council Chambers, Lindfield Living). Will result in Council controlling the pace of housing delivered and concern that Council will have the ability to prevent the delivery of housing. - Council owned sites benefit from the greatest development uplifts. Risk Council will sell these sites for significant profit or 'sit on' these sites and prevent development. - Conflict of interest as certain Councillors could benefit 3x market value for their properties based on which option is approved. - A third party (separate to Councillors and Council) should make the determination. - Council has a conflict of interest in that it owns a large portion of Killara Town Centre, and this should be removed.	Council is a significant landowner in all four of the TOD centres. Council is required to undertake strategic planning for Ku-ring-gai which includes Council owned land, under the relevant NSW Planning legislation and Council policies including the Ku-ring-gai Local Strategic Planning Statement 2020. Conflicts of interest are managed by the Ku-ring-gai Council Code of Conduct, issued by the Office of Local Government-s440 of the Local Government Act 1993 and Regulations 2005. Council's land holdings under the TOD scenarios are also managed under the provisions of the NSW Local Government Act, including the principles of sound financial management.
Exhibition Material	
- Lack of clarity and inadequate transparency on Council planning and assumptions - Traffic studies won't be completed until late February 2025, which is way past the deadline for the Scenario submissions. - Inconsistencies in the Council's scoring, which may unduly influence responders to a certain outcome. - Concern that the Scenarios make misleading assumptions about development capacity, mistakes, and misinformation.	The study - <i>Planning for Better Outcomes Alternative Scenarios to TOD</i> was made available during the public exhibition and included a list of assumptions and limitations involved in making the alternative scenarios.

SUBMISSION SUMMARY TABLE

S14715-1 – TOD Housing Alternative Scenarios

15 November 2024 to 17 December 2024

- Example Scenario 2b Killara shows redevelopment of existing 3-4 storey apartments which is unlikely, Telstra exchange, Marian Street theatre and Council carpark are shown as redevelopment site, half blocks are included in Lorne Avenue and battle axe sites the driveways are included in HCA and dwelling shown as development site. • Information on number of storeys is presented in a misleading manner. • Lindfield Map contained in the Council report GB.1/46 and GB.1/47 is not the subject of public exhibition restricting the ability of residents to make informed submissions.	
Consultation • Consultation process is flawed and not representative of the community. • Vocal minorities are loud and self-interested. Much of the community will not put forward their views and Council should not base their decision on the small percentage who do provide feedback. • Many residents are not aware of the alternative scenarios. • Comparison of alternative scenarios exhibition vs Council announcements of the TOD e.g. newspaper, tv, radio and Council election messages – not a fair comparison. • Scenario 3b shows a green circle next to every constraint which isn't true and is designed to influence survey voters into thinking this is the best option. • A 4-page form letter with a pre-paid envelope from an anonymous person was dropped in numerous letter boxes which could skew perspectives. • Residents are being asked to comment with no transparency on how many estimated new people there will be per suburb. • Would like further consultation examining site-specific zoning. • Many properties are listed as "development unlikely to occur" but without much explanation. • Process has not been transparent and has led to much confusion in the community. • NSW Government has done a deal with Council to support an alternate scenario to be progressed through the SEPP process. Concern the government has pre-empted an outcome without properly or fairly evaluating all proposed outcomes. • Residents of neighbouring LGAs (e.g. Willoughby) that are left out of this process even though it affects them.	Comments noted. Council's public exhibition engagement program included a range of activities to ensure Council received balanced and useful input that is both reflective of the community and enabled any person to raise issues which are important to them. Besides the traditional opt-in submissions and survey, the engagement program also included: - A representative survey with randomly selected community members from Roseville and Gordon wards (statistically significant and representative of age, and gender of population) - Workshops with randomly selected participants from Roseville and Gordon wards.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

- Disappointed Council pursued consultation on Scenarios that impact each property individually as this has resulted in scenarios being chosen/preferred based on personal impact. - The current presentation of mixed development scenarios is confusing, and it is unclear which scenario is Council's preferred or agreed-upon approach.	
Time Frames - Questions raised as to why this process is being rushed so close to Christmas. - Period of community feedback is too short and runs into school holiday and lead up to Christmas.	Council's 8 May 2024 resolution which required the preparation of the alternative scenarios, also required that the studies, scenario analysis and community engagement be presented to Council by February 2025. To meet this timeframe, the exhibition of the draft scenarios needed to occur in late 2024.
Savings Provision – TOD Controls - TOD controls should remain in place to provide a level of continued certainty for developers. - Any change in controls such that they are no longer applicable should be afforded a savings provision in the LEP to allow current DAs to progress.	The Department of Planning, Housing, and Infrastructure <i>Transport Oriented Development – Guide to Strategic Planning</i> outlines that 'These planning provisions will remain in place until Councils have finalised strategic planning work to deliver suitable alternative local planning controls.'
Process – Finalising Preferred Scenario - Unclear on specific steps to occur after exhibition of scenarios, with Councils alternative to be implemented by May 2025 - Recommends Council work with key landowners to develop preferred scheme and translate broad heights and FSRs into concrete. - Recommended Council seek support from DPHI to progress rezoning under a SEPP to amend the LEP.	The Department of Planning, Housing and Infrastructure have advised that the mechanism will be through a SEPP to amend the LEP, and not a planning proposal.

SUBMISSION SUMMARY TABLE

S14715-1 – TOD Housing Alternative Scenarios

15 November 2024 to 17 December 2024

State Government	
<i>Process</i> - Essential Council provide the State Government with sufficient incentives to gain its approval. - Drop legal action. - Expand the TOD radius to 800m – aligns with Productivity Commissioners recommendation. - Exceed State Government housing targets. - Need a masterplan for the whole LGA.	Comments noted.
<i>Support State Government Changes</i> - Support NSW government for implementing TOD policy. - Council has resisted providing housing, and State Government acted.	Support noted.
<i>Oppose State Government Changes</i> - Presenting scenarios for discussion clearly must weaken our negotiation power with NSW government. - The way in which DPHI and State Government have progressed the TOD planning provisions is unprofessional and reckless. - Council should think about how to remove the state government / dismiss the government. - Imposition of TODs is attack on local democracy. - No confidence in the NSW Department of Planning, and/or Minns' government in delivering a viable and acceptable plan due to politics.	Opposition noted.
Survey	
- Online survey can be completed many times by the same person. - Results of the survey need to be ignored by Council as it is only representative of those groups or people with an agenda. - Voting is not limited to residents in Ku-ring-gai, and therefore may be interested developers.	Council undertook two separate surveys to ensure comprehensive and accurate community feedback: Open Community Survey (Opt-in) – While this survey is anonymous and open to all, Taverner employs various

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	safeguards to prevent manipulation and duplicate responses. These include IP address monitoring, pattern analysis, and manual verification tools. While not completely foolproof, these measures effectively prevent significant data skewing. 2. Randomised statistical survey – This survey, conducted by Taverner on Council's behalf, is designed to be statistically significant with a 95% confidence level. It provides an accurate representation of community sentiment, for consideration alongside the opt-in survey results. Using the results of both surveys, provides confidence that final results accurately reflect community's views, and are protected from potential bias introduced by special interest groups or other parties.
Other Housing Planning Reforms – Low and Mid Rise • What impact will the Low- and Mid-Rise Housing reforms have on achieving the Ku-ring-gai's housing targets? • Need to consider both the impacts of Scenarios/TOD and Low and Mid Rise at the same time.	The NSW Governments Low and Mid-rise (LMR) reforms commenced on 28 February 2025 and apply to areas around the existing TOD precincts. The Low and Mid-Rise reforms are focussed on delivering housing diversity as well as additional homes. DPHI have advised that the housing delivered under the LMR will be in addition to housing delivered under the TODs. Council will be carefully considering the integration of the preferred scenario and the Low and Mid-rise Reforms.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

Category 5: Submission Points related to Specific Sites (grouped by Suburb)		
Roseville		
<i>37 Lord Street</i> - Request that property be zoned the same as immediate neighbours in Scenario 1 and Scenario 2b to avoid being stranded/isolated. - Property is isolated under TOD (scenario 1) but other houses currently isolated under TOD are upzoned under Scenario 2b.	The Preferred Scenarios propose to protect the C36 -Lord Street/Bancroft Avenue HCA. High density development around the subject property previously included in Council's exhibited scenarios 1 and 2b, are now excluded from the Preferred Scenario. Therefore, the property will no longer be isolated.	
<i>14 Roseville Avenue</i> - Property could be developed under TOD but adjoining houses 10, 12 and 16 Roseville Avenue are heritage items and excluded. - If TOD remains requests Council remove heritage listing from 10, 12 and 16 Roseville Avenue and ensure they become subject to TOD. Request the same if TOD approvals are given to sites on other side of Roseville Avenue or Oliver Road before Councils can put in place a better scenario.	The Preferred Scenario proposes to protect most of the C32 Clanville HCA including the three heritage items surrounding the subject property and is consistent with Principle 2 – Minimise impacts on Heritage Items, and Principle 3 – Preserve Heritage Conservation Areas. NOTE: Council's proposal seeks to minimise the impacts of additional housing on heritage conservation areas and heritage items through changes to the planning and development framework rather than changes to heritage listing. Council has not proposed any changes to heritage listings in the exhibited scenarios for community feedback or Council consideration. To seek an amendment to a heritage listing a separate planning proposal and supporting heritage assessment is required. The proponent's heritage assessment would need to justify the amendment by demonstrating that the NSW Heritage Council criteria of local heritage significance are no longer met.	

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

<i>Hill Street</i> - Support heights and FSR above TOD along Hill Street in Roseville. <i>21 Hill Street</i> - Requests FSR closer to 6:1:1 to maximise development potential and economic return for landowners. - Requests Height of 12-14 storeys. - Requests flexibility in planning controls to allow minor variations in building height density.	Support for increased height and FSR above TOD along Hill Street Roseville is noted. The Preferred Scenario proposes to increase height and FSR at the front section of the block between Oliver Road and Roseville Avenue along Hill Street. However, the height and FSR proposed in the submission do not align with the centre's hierarchy and its development capacity. This approach is consistent with Principle 6 – Ensure appropriate building heights and Principle 7 – Support Local Centre Revitalisation.
<i>1 MacLaurin and 3 Larkin</i> 3 Larkin Street owner concerned that the proposed management of transition impacts to heritage items i.e. properties adjoining heritage listed items may be zoned to have lower FSR (1.3-1.8:1) and lower building height will result in loss of land value. 1 MacLaurin is on corner of two roads, and has a car park to rear, and open space adjoining Larkin Lane. It is not in danger of being surrounding by high rise development – this is only possible on side boundary which adjoins 3 Larkin. - Requests that Council consider this heritage item context specifically and not part of blanket policy of management of heritage items.	Under the Preferred Scenario this site and its surroundings will be included in the high-density E1 and MU1 zones. The area provides an excellent opportunity due to its proximity to the train station and its unconstrained land. It will contribute to the revitalisation of the Roseville local centre, aligning with Principle 7 – Support Local Centre Revitalisation. More generous setbacks and height transitions will be introduced in the new development control plans to retain visual prominence of heritage items such as the property in question.
<i>3-15 Bancroft Avenue</i> - Concerned about the upzoning of properties directly south of them (along Victoria Street). - Seeking one of two outcomes: either remove the upzoning on Victoria Street, or upzone the southern side of Bancroft Avenue which would be consistent with the overall approach of having a street between higher density and residential areas.	The C36 Lord Street/Bancroft Avenue HCA is proposed to be excluded from the Preferred Scenario to protect this HCA (and its high concentration of heritage items) in its entirety. However, due to suitability of the land, its proximity to the train station and its unconstrained location, the area in Victoria Street remains included in the Preferred Scenario. However, the building heights and densities are proposed to be reduced to ensure that there is an appropriate interface/transition with the conservation area.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	This is consistent with Principle 2 – Minimise impacts on Heritage Items, Principle 3 – Preserve Heritage Conservation Areas, and Principle 5 – Manage Transition Impacts.
69-83 <i>Pacific Highway</i> - Significant land holding next to Roseville Station – Four titles under one ownership, with a frontage to the highway of 60m and a site area of 1,924sqm. - Corner building is heritage listed, and owners think this can be successfully integrated into a future development. - Seeking a height of 20-storeys and an FSR of 7:1.	Under the Preferred Scenario, these properties and the adjacent blocks are proposed for higher density E1 /MU1 zoning.
2-8 <i>Trafalgar Avenue + 1-9 The Grove</i> - Included within Scenario 1, but none of Council's alternate scenarios. Seek to be included. - Scenarios 2a and 2b have this site removed from TOD, but immediately adjacent to its which is the worst outcome. - Scenarios 3a and 3b remove the site and it's surrounds. If TOD zoning isn't possible, they seek this outcome.	The Preferred Scenario proposes to protect a significant portion of C35 The Grove Conservation Area and its heritage items. As a result, these properties are not identified for development uplift. This is consistent with Principle 2 – Minimise impacts on Heritage Items, and Principle 3 – Preserve Heritage Conservation Areas.
180 <i>Pacific Highway</i> - Seeking inclusion in TOD. - Block size is 2,000sqm and have direct north-south access to Pacific Highway, and 400m to Roseville.	Under the Preferred Scenario, this property and its surrounding land are proposed to be included in higher density residential areas.
"Roseville Block" - Bound by Lord St, St Martin's Lane, Roseville Avenue, Trafalgar Avenue, Oliver Road, The Grove, Clanville Road, and Hill Street. - Allowing development of those sites to their full potential will clearly result in significant numbers of dwellings to count towards the Council's target in as rapid a timeframe as is possible.	The Roseville block is partially included in the Preferred Scenario with proposed development consisting of high density E1 and MU1 zoning along Lord Street facing Hill Street and a lower scale R4 zone to provide an interface with the adjoining land in the HCAs. This approach protects a large portion of C32 Clanville and a section of C35 The Grove Conservation area while utilising the land fronting Hill Street to revitalise the Roseville centre and invite foot traffic. This is consistent with

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	Principle 2 – Minimise impacts on Heritage Items, and Principle 3 – Preserve Heritage Conservation Areas, Principle 5 – Manage Transition Impacts, and Principle 7 – Support Local Centre Revitalisation.
<i>16 Victoria Street</i> • Isolated heritage item. Requests delisting • Increased density should be allowed on northern side of Victoria Street.	The north of Victoria Street is included as an area marked for increased height and FSR controls as part of the Preferred Scenario. However, the building heights and density are proposed to be reduced to ensure that there is an appropriate interface/transition with the conservation area. This will help facilitate the integration of the heritage item at 16 Victoria Street within future development as: - It will be allocated the same or similar development rights as adjoining properties. - Amalgamation with adjoining development sites will be required so it does not become isolated. - It will be further protected by mandatory masterplans for affected areas. NOTE: Council's proposal seeks to minimise the impacts of additional housing on heritage conservation areas and heritage items through changes to the planning and development framework rather than changes to heritage listing. Council has not proposed any changes to heritage listings in the exhibited scenarios for community feedback or Council consideration. To seek an amendment to a heritage listing a separate planning proposal and supporting heritage assessment is required. The proponent's heritage assessment would need to justify the

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	amendment by demonstrating that the NSW Heritage Council criteria of local heritage significance are no longer met.
3 Shirley Road Site should be classified as 'likely to be redeveloped' under each of Council's alternative scenarios with proposed high-density development standards.	Under the Preferred Scenario, this property and its surrounding land are proposed for high density residential development.
Lindfield	
<i>Precinct around Woodside Avenue</i> 1-3 Woodside increase density beyond TOD SEPP 5-storey apartments at western boundary of 11 Woodside and 2a Havilah and continuing eastward would blend with existing development and not overshadow. - Eastward to 21 Woodside + Havilah has scope for 5-storey apartment development subject to controls regarding setbacks, tress and design and would not overshadow adjacent heritage properties. - Area between Woodside and Havilah Road are suitable for R3/townhouse development (exception being those houses facing Nelson Road)	Under the Preferred Scenario, these properties are included for upzoning to E1/MU1. The adjoining site and the remainder of the block continuing eastward to Nelson Road is proposed for high density residential development.
9 Balfour Street and surrounding area - Properties around 9 Balfour Street Lindfield which are included in the TOD precinct are well suited to higher density development. - Council scenarios let the south side of Balfour Street be potential for 15-storeys but no development on the north side (e.g. 9 Balfour) - Balfour Street should be re-zoned for development. Balfour Street should not be an HCA. There is not heritage value on the northern side of Balfour Street. - Under Council's alternate scenarios (except 2b) eight houses on the northern side of Balfour will be left isolated. To the rear of the dwellings on the northern side of Balfour a biodiversity zone would provide a transition between high and lower density development.	Under the Preferred Scenario, this property and its surrounding block is proposed to be zoned for higher density residential development.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

<i>Lindel Place</i> • Council's scenarios undermine the principle of minimising impacts on heritage items. • Request Lindel Place and area of Bent Street between Lindel Place and Newark Crescent (as per Scenario 1) are excluded from development proposals. • 5-8 storey development would affect character of street and amenity. • Narrow cul-de-sac that cannot support increased traffic or parking.	Under the Preferred Scenario, proposed development densities transition from high-density residential on the eastern portion of the block to medium-density residential on the southern portion to ensure an appropriate transition to Frances Street Conservation Area and minimise traffic impacts. This is consistent with Principle 2 – Minimise impacts on Heritage Items, and Principle 3 – Preserve Heritage Conservation Areas, Principle 5 – Manage Transition Impacts.
<i>Middle Harbour Conservation Area</i> • Council's housing scenarios should permit development in the Middle Harbour Road Heritage Conservation Area (MHR HCA) that overlaps with the relevant TOD SEPP area in Lindfield. • Lindfield's HCAs do not warrant the same level of protection from potential TOD SEPP impacts as higher quality HCAs elsewhere. The relevant section of the MHR HCA contains only one Heritage Item and significant development is already occurring in the area. • 61 Trafalgar and adjoining properties should be included in Council's proposed Scenario 2.	The TOD SEPP applies to properties that fall wholly or partially within a 400-meter radius of designated train stations. This blanket approach would have affected eight properties in C42 Middle Harbour HCA (including the subject property), potentially creating significant interface impacts for the adjoining properties. As illustrated on page 16 of Planning for Better Outcomes – Alternative Scenarios to The TOD Program (Ku-ring-gai Council, November 2024), Council's refined catchment boundaries based on actual walking distances along existing streets and paths, considering topography and landscape features. These boundaries follow established street patterns rather than bisecting properties minimising interface issues and transition impacts. As a result, C42 Middle Harbour Conservation Area is excluded from the upzoning provisions in the Preferred Scenario to protect the entirety of this HCA and prevent mid-block transitions and interface issues. NOTE: Council's recent independent heritage review by TKD Architects confirmed that the Ku-ring-gai conservation areas still

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	warrant listing under the NSW heritage standards. This review found these conservation areas retain an overall moderate or high integrity, a high aesthetic quality, are highly significant for documenting the history and development of the municipality, and that all satisfy the NSW Heritage Council's criteria of local heritage significance for listing as a conservation area.
<i>4 and 4a Beaconsfield Parade</i> • Submission is supported by comprehensive Urban Design Study which undertakes a comparative study of the scenario and find that larger lots within the TOD boundary have redevelopment potential but not included in Council's scenarios – 2a Beaconsfield, 280-286 Pacific Highway, 4&4a Beaconsfield, 12 Beaconsfield, 20a Beaconsfield, 23 Bent, 1 Wallace, 365 and 367 A1, 1a Highgate, 6, 8 & 10 Woodside and 2,4 and 6 Nelson • Recommend inclusion of 'transitional height zone' to bridge height gaps and ensure smooth transition: - Scenario 2a recommends sites have heights of 10-12 storeys. - Scenario 2b recommends sites have heights of 10-12 storeys. - Scenario 3a recommends sites have heights of 15-25 storeys. - Scenario 3b recommends sites have heights of 10-12 storeys. • Requests 4 & 4a Beaconsfield Parade be included in all scenarios for TOD area.	The subject properties are proposed for upzoning under the Preferred Scenario.
<i>8-10 Reid Street + 7-9 Kenilworth Road</i> • Council has already undertaken extensive strategic planning work to identify suitable areas for the delivery of new housing in Lindfield. This work has identified that the subject site (and the immediate surrounding area) has the potential to be rezoned to accommodate additional housing, potentially up to 6-storeys, due to it being unconstrained by factors such as heritage, and in close proximity to Lindfield Station.	Under the Preferred Scenario, the subject properties are proposed to be upzoned to R4 with increased building heights and floor space ratios.
<i>345 Pacific Highway</i>	Under the Preferred Scenario, the subject property is proposed for E1 zoning with increased building heights and floor space

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

Appropriate development standards for the subject site are Height 21-storeys, FSR 6:1 (including a minimum non-residential of 1:1). Refer to submission for alternate FSRs if different heights are adopted.	ratios consistent with Principle 6 – ensure appropriate building heights.
<i>367 Pacific Highway – Palm Court</i> 365, 367, 375 Pacific Highway and 12-14 Wolseley Road is suited to high density development, however Council's four alternate scenarios exclude this land. - Development controls for Wolseley Road must be consistent with the adjoining R4 zoned Pacific Highway land. - Remove the HCA from Wolseley Road (C28) – there is no heritage items. <i>12 Wolseley Road</i> - Included in Scenario 1 (along with 365, 367, 375 Pacific Hwy Lindfield) but are left out of the alternate 4 scenarios. - It should be included in Council's Scenarios - Request uplifting the FSR of the properties 12, 14, 16 Wolseley Road & 365, 367, 365 Pacific Hwy Lindfield to match FSR of 345 Pacific Hwy, Lindfield, that's building height 8-15 storeys and FSR 3.0:1 to 6.1:1. <i>Against: Wolseley Road Heritage Conservation Area (HCA)</i> - Seeking removal of the HCA designation and uplift. - Does not have any heritage items within it. - Topography between Wolseley Road and Pacific Highway places Wolseley Road properties as a significantly lower elevation, meaning high rise along Pacific Highway would appear to loom over low rise development here. - Upzoning would create a continuous development along Pacific Highway. - Walk to station is a relatively flat 800m walk to Lindfield. - Want specifically to develop 365, 367, 375 Pacific Highway and 12-14 Wolseley Road, Lindfield. The site has two road frontages, no heritage items, is underutilised, identified for growth in scenario 1, it is located along Pacific Highway. - There are already high-density developments at 8-10 Wolseley Road.	The Preferred Scenario proposes the subject block of Wolseley Road for upzoning to high density residential development. Under the Preferred Scenario, the development boundary is extended to include the whole of C28 Wolseley Road Heritage Conservation Area as subject to high density residential. This is based on the areas geographical potential and surrounding context as well as the following planning criteria: - absence of heritage items - proximity to the rail station - discrete boundaries formed by roads will minimise interface impacts. - adjoining proposed high-density zone fronting Pacific Highway and on the opposite side of Wolseley Road - assist with meeting dwelling targets. NOTE: Council's recent independent heritage review by TKD Architects confirmed that all Ku-ring-gai conservation areas still warrant listing under the NSW heritage standards. This review found these conservation areas retain an overall moderate or high integrity, a high aesthetic quality, are highly significant for documenting the history and development of the municipality, and that all satisfy the NSW Heritage Council's criteria of local heritage significance for listing as a conservation area.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

<i>For: Wolseley Road Heritage Conservation Area (HCA)</i> • HCA's overall integrity is high, and that neighbouring development manages the transition. • The argument that dwellings in this HCA have been heavily renovated and modernised and no longer reflect the character is incorrect. • Development creep is not a reason to remove the HCA. If anything, it needs to reinforce it. • State government targets can be achieved whilst still protecting the HCA.	In the preferred scenario, careful consideration has been given to minimise impact of development over Heritage Conservation Areas (HCAs). However, in the case of C28 Wolseley Road HCA, the development boundary is extended to include the whole of C28 as subject to high density residential. This is based on the areas geographical potential and surrounding context as well as the following planning criteria:: - absence of heritage items - proximity to the rail station - discrete boundaries formed by roads will minimise interface impacts. - adjoining proposed high-density zone fronting Pacific Highway and on the opposite side of Wolseley Road - assist with meeting dwelling targets. Multiple resident submissions supported this proposal. NOTE: Council's recent independent heritage review by TKD Architects confirmed that all Ku-ring-gai conservation areas still warrant listing under the NSW heritage standards. This review found these conservation areas retain an overall moderate or high integrity, a high aesthetic quality, are highly significant for documenting the history and development of the municipality, and that all satisfy the NSW Heritage Council's criteria of local heritage significance for listing as a conservation area.
5-7 Beaconsfield • The proposed heights and FSRs in Council's scenarios (5-8 storeys) are not a realistic reflection of the highest and best use of site. • Requests Council consider site as opportunity for high density development.	This subject site and adjacent properties to the west are incorporated in the Preferred Scenario for high density residential development. Building height controls will establish a graduated transition, stepping down from Lindfield Village Hub to lower heights west of Beaconsfield Parade.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

Killara 10, 14 and 14a Stanhope Road - Is a highly accessible site that has the potential to make a notable contribution to housing affordability. - Support the retention of TOD controls for this site.	There is a high concentration of heritage items to the east, west and south of these properties. The properties at 10 and 14A Stanhope sit on the northern edge of the C25 Stanhope Road HCA, while 14 Stanhope Road is within the HCA. The C25 Stanhope Road HCA is to be excluded from the Preferred Scenario to protect this HCA (and its high concentration of heritage items) in its entirety. However, due to suitability of the land, its proximity to the train station, the sites at 10 and 14A Stanhope Road remain included in the Preferred Scenario. However, the building heights and densities are proposed to be reduced to ensure that there is an appropriate interface/transition with the conservation area. This is consistent with Principle 2 – Minimise impacts on Heritage Items, Principle 3 – Preserve Heritage Conservation Areas, and Principle 5 – Manage Transition Impacts.
24 Marian Street - All Council scenarios surround property with apartments without giving property ability to be redeveloped. - Request delisting of heritage item	This property and its surrounding sites are proposed for mid-density residential development under the Preferred Scenario. The heritage property is to be integrated within future development by: - being allocated the same or similar development rights as adjoining properties. - required to be amalgamated with adjoining development sites such that it does not become isolated. - and further protected by mandatory masterplans for affected areas. NOTE: Council's proposal seeks to minimise the impacts of additional housing on heritage conservation areas and heritage

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	items through changes to the planning and development framework rather than changes to heritage listing. Council has not proposed any changes to heritage listings in the exhibited scenarios for community feedback or Council's consideration. To seek an amendment to a heritage listing a separate planning proposal and supporting heritage assessment is required. The proponent's heritage assessment would need to justify the amendment by demonstrating that the NSW Heritage Council criteria of local heritage significance are no longer met.
Gordon	
<i>9 Burgoyne Street</i> • Should be coloured and not left white on the 3b option. It is a heritage item. • Development should not be permitted near heritage items. • Council is to refer to the submitted heritage assessment prepared by Architectural Projects which concludes that the property does not meet the threshold for listing as a heritage item due to the low-level heritage significance, its condition and comparative examples of other dwellings in the LGA which have more integrity.	Council's exhibited Scenarios 1, 2b and 3b, included development potential for sites adjacent to 9 Burgoyne Street. However, under the Preferred Scenario, the adjacent block is proposed to be excluded from rezoning to protect the integrity of C12 Gordondale Estate Conservation Area and its significant concentration of heritage items. This is consistent with Principle 2 – Minimise impacts on Heritage Items and Principle 3 – Preserve Heritage Conservation Areas. NOTE: Council's proposal seeks to minimise the impacts of additional housing on heritage items through changes to the planning and development framework rather than changes to heritage listing. Council has not proposed any changes to heritage listings in the exhibited scenarios for community feedback or Council consideration.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	The submitted heritage assessment is noted, however this does not provide sufficient justification for the recommended delisting under the Heritage Council standards, as set out by the Heritage Council criteria and NSW policy 'Assessing Heritage Significance.' The assessment does not demonstrate that the heritage item no longer has local significance under any of the seven Heritage Council criteria. No substantive new information or evidence has been provided under these criteria to support delisting.
<i>15 Bushland Avenue</i> - Concerned about the 'critically endangered Blue Gum Forest' surrounding 15 Bushland Avenue Gordon. - The critically endangered Blue Gum Forest near 15 Bushland Avenue must be included as EXEMPT to high density development in all four (4) of Council's housing scenarios.	Under the Preferred Scenario, the north side of Bushlands Avenue is excluded from rezoning and higher-density development. The area between St John Avenue and Cecil Street west of Pacific Highway has limited housing potential due to environmental constraints, heritage overlays, and tree canopy coverage exceeding 30%. As a result, this area is excluded from higher-density development under the Preferred Scenario. This is consistent with Principle 1 – Avoid Environmentally Sensitive Areas, Principle 2 – Minimise impacts on Heritage Items, and Principle 3 – Preserve Heritage Conservation Areas, Principle 4 – Minimise Impact on tree canopy.
<i>East Side Gordon – 11 Park, 23 Park, 26 Park, 16-18 Rosedale, 2 Garden, 16 Khartoum, 35 Rosedale, portion of Gordondale Estate HCA – 'The Gordon Solution'.</i> - Request delisting of seven heritage items (local) located on the east side of the Pacific Highway in Gordon. - Request delisting of portion of the Gordondale Estate HCA, east side of Garden Square - Delist houses that are low value and or not architecturally significant. - The properties are in the TOD precinct and will free up additional land for residential flat buildings. Without this change the properties will be stranded amongst higher density development.	Council's proposal seeks to minimise the impacts of additional housing on heritage conservation areas and heritage items through changes to the planning and development framework rather than changes to heritage listing. Council has not proposed any changes to heritage listings in the exhibited scenarios for community feedback or Council consideration.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	To seek an amendment to a heritage listing a separate planning proposal and supporting heritage assessment is required. The proponent's heritage assessment would need to justify the amendment by demonstrating that the NSW Heritage Council criteria of local heritage significance are no longer met. Under the Preferred Scenario, the C12 Gordondale Estate Conservation Area is proposed to be excluded from rezoning to protect the integrity of the HCA and its significant concentration of heritage items. This is consistent with Principle 2 – Minimise impacts on Heritage Items and Principle 3 – Preserve Heritage Conservation Areas.
<i>19 Yarabah</i> Should be included within the TOD precinct. Otherwise, the site will be isolated as TOD is allowed on its northern boundary and a heritage item and HCA about its southern boundary.	Under the Preferred Scenario, this site and its surrounding block are proposed to be excluded from rezoning and increased density. The property directly interfaces with two Heritage Items along its southern and eastern boundaries and is adjacent to a third Heritage Item. The Yarabah Avenue block has tree canopy coverage exceeding 30%. To protect the Heritage Items, the C18 Yarabah Avenue Conservation Area, and the existing tree canopy, this block is proposed to be excluded from the Preferred Scenario. This is consistent with Principle 2 – Minimise impacts on Heritage Items, and Principle 3 – Preserve Heritage Conservation Areas, and Principle 4 – Minimise Impact on tree canopy.
<i>3-9 Park Avenue</i> - Sites purchased and design has commenced based on TOD. - All the alternative scenarios proposed by Council would have severe impact on development potential of the land and are not supported.	Under the Preferred Scenario, the properties on the south of Park Avenue, including the four properties in question are proposed for rezoning to high density residential development.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

65/65A <i>Werona Avenue</i> • In the TOD precincts but excluded from Council's alternate scenarios. • Requested the properties be included as developable land in all five housing scenarios. • FSR of 4.5:1 or higher • The sites are located within 100m of one heritage property, not located in a HCA, little tree canopy.	Under the Preferred Scenario, the subject site and its adjacent land will be included for high density residential development.
16 <i>Park Avenue</i> • All proposals will have detrimental impact to property. • Exclusion zone is required to protect historically significant areas. • Scenario 3b – remove development from Burgoyne Lane (i.e. directly behind 16 Park Avenue and HCA). Development can be shifted to vacant/underutilised sites on Pacific Highway.	This site and the properties north of Park Avenue and south of Burgoyne Street are no longer included for high density development under the Preferred Scenario. Under the Preferred Scenario, the C12 Gordondale Estate Conservation Area is proposed to be excluded from rezoning to protect the integrity of the HCA and its significant concentration of heritage items. This is consistent with Principle 2 – Minimise impacts on Heritage Items and Principle 3 – Preserve Heritage Conservation Areas.
15 <i>McIntyre, 17 McIntyre, 17a McIntyre, 19 McIntyre and 21 McIntyre</i> • Currently zoned R4, excluded from TOD and have no constraints. • Requests to be included in the 400m TOD precinct development as sites have potential for higher building heights and higher FSR and meet Council's planning principles.	The Preferred Scenario proposes rezoning of these properties for E1 and MU1 zoning with increased building heights and floor space ratios.
51 <i>Werona Avenue</i> • Located within 400m of the train station and is outside a HCA, but excluded from all 5 scenarios, and is seeking clarification as to why this site isn't included. • The exclusion will cause sunlight concerns and will impact privacy.	This heritage item adjoins another heritage item and has proximity to the State Heritage-listed property on McIntosh Street and its surrounding Heritage Conservation Area. Under the Preferred Scenario, the property is located approximately 120 meters south of the nearest 5-storey buildings on McIntosh Street and 190 meters diagonally southeast of 8-storey buildings across the rail corridor on Ravenswood Avenue and Henry Street. Given these distances, it is unlikely that the proposed high-density development to the north and northwest of the site create overshadowing impacts on this property, even during winter solstice when shadows are longest.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

35 <i>Rosedale Gordon</i> A heritage item that is seeking inclusion via adaptive use or transferable development rights.	The previously exhibited Alternative Scenarios and the Preferred Scenario have been guided by a set of planning principles, one of which is '<i>minimise impacts on heritage items</i>'. Where heritage items are included within high density residential areas they are to be integrated within future development by: - Being allocated the same or similar development rights as adjoining properties - Being required to be amalgamated with adjoining development sites to ensure they do not become isolated. This property is in the C13 Roberts Grant Conservation area which contains a high concentration of heritage items. Under the Preferred Scenario, this heritage item and the C13 Conservation area is excluded from high density development to protect the heritage significance of this HCA.
1 <i>Khartoum Avenue to 67 Werona Avenue</i> Concern that development will remove the interwar garden flats that should be heritage listed.	The recent independent heritage review by TKD Architects identified 81 Werona Avenue to be investigated to determine whether it reaches the threshold for heritage listing. No other sites were identified in the area between Khartoum Avenue and 67 Werona Avenue. Council has not proposed any changes to include or remove any heritage listings (conservation area or heritage item) at this stage. The Preferred Scenario proposes rezoning of properties along Werona Avenue.
1, 3, 5, 7, 9, 11, 13, 15, 17 <i>Bushlands Avenue, 22 St. Johns Avenue and 8 Oberon Crescent</i> - Council's scenarios 'downzone' the site, meaning that development is not feasible. - Request Scenario 1 zoning for this land	Under the Preferred Scenario, the north side of Bushlands Avenue is excluded from upzoning and higher-density development. The area between St John Avenue and Cecil Street west of Pacific Highway has limited housing potential due

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	to environmental constraints, heritage overlays, and tree canopy coverage exceeding 30%. As a result, this area is excluded from higher-density development under the Preferred Scenario. This is consistent with Principle 1 – Avoid Environmentally Sensitive Areas, Principle 2 – Minimise impacts on Heritage Items, and Principle 3 – Preserve Heritage Conservation Areas, Principle 4 – Minimise Impact on tree canopy.
<i>25 Macintosh Street</i> Seeking property to be removed from HCA.	Under the Preferred Scenario, McIntosh Street is the most southern boundary for high density development in Gordon, with high density residential development restricted to the northern side between Werona Avenue and Rosedale Road. As such, the proposed property is not included for high density development under the Preferred Scenario. The property is located within C15 Gordon Park Estate, McIntosh Street and Ansell Conservation Area. The exclusion of this site and its surrounding area from the Preferred Scenario contributes to protecting the integrity of C15 HCA. This is consistent with Planning Principle 3 – Preserve Heritage Conservation Areas. NOTE: Council's recent independent heritage review by TKD Architects confirmed that the Ku-ring-gai conservation areas still warrant listing under the NSW heritage standards. This review found that these conservation areas retain an overall moderate or high integrity, a high aesthetic quality, are highly significant for documenting the history and development of the municipality, and that all satisfy the NSW Heritage Council's criteria of local heritage significance for listing as a conservation area. To seek an amendment to a heritage listing as either a heritage item or heritage conservation area, a separate planning proposal

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	and supporting heritage assessment is required by planning law and NSW Government standards. The proponent's heritage assessment would need to justify the amendment by demonstrating that the NSW Heritage Council's criteria of local heritage significance are no longer met.
<i>8 Pearson Avenue</i> Heritage item, seeking same treatment as non-heritage owners (either Transferable Development Rights or de-listing)	Council's proposal seeks to minimise the impacts of additional housing on heritage conservation areas and heritage items through changes to the planning and development framework rather than changes to heritage listing. The previously exhibited Alternative Scenarios and the Preferred Scenario are guided by a set of planning principles, one of which is '<i>minimise impacts on heritage items</i>'. Where heritage items are included within high density residential areas they are to be integrated within future development by: - Being allocated the same or similar development rights as adjoining properties - Being required to be amalgamated with adjoining development sites to ensure they do not become isolated. - Council has not proposed any changes to heritage listings in the exhibited scenarios for community feedback or Council consideration. To seek an amendment to a heritage listing a separate planning proposal and supporting heritage assessment is required. The proponent's heritage assessment would need to justify the amendment by demonstrating that the NSW Heritage Council criteria of local heritage significance are no longer met.

SUBMISSION SUMMARY TABLE

S14715-1 – TOD Housing Alternative Scenarios

15 November 2024 to 17 December 2024

<i>East Side Gordon – Pearson Avenue / Park Avenue / Burgoyne Street</i> • No rezoning of the Gordon Preschool. • No high-rise development outside the 400m zone from Gordon Preschool down to the depot site (development creep, decimate tree canopies, traffic gridlock) • No high-rise development along Burgoyne Street (development creep, no transition, unacceptable lack of privacy, undermine heritage conversation streetscape of Park Avenue directly behind). • No high rise on the northern side of Park Avenue (keep low rise streetscape from the corner of Pearson Avenue to North side of Park Avenue for heritage reasons) • Keep the proposed 5-8 storeys east of the station between the southern side of Park Avenue to Robert Street as per Scenario 1 and 2a. • No buildings above 5-8 storeys east of the railway. • Commuter car park no greater than 5-8 storeys. • Commercial centre no greater than 20-storeys. • A section of the HCA east of Gordon acceptable for development, but no greater than 5-8 storeys. The homes on the northern side of Park Avenue, Nelson Street and Edward Street with Rosedale Road as the divider. • Concerned about increased in density in areas adjacent to Highlands Avenue as outlined in 3b. Set a precedent and foreshadow further, creeping development. • High rise development along Pearson Avenue would lead to the loss of trees and vegetation. Exacerbate existing traffic congestion.	• The Gordon preschool is currently zoned, under the Ku-ring-gai LEP, for R4 – High Density Residential allowing 5-storey apartment buildings. These controls have been reviewed as part of the process of preparing alternative TOD scenarios. The site is currently protected by being community classified and heritage listed, and no change is proposed to this status. • The Preferred Scenario proposes development within the 400m range of the train station but extends to the 800m radius to the north and west of the station to protect environmentally sensitive land, preserve heritage conservation areas, while ensuring appropriate building heights. • Under the Preferred Scenario only the front section of the Burgoyne St between the railway and Pearson Avenue is included for high density development. This will have little to no impact on C12 Gordondale Heritage Conservation Area. • In the Preferred Scenario development on northern side of Park Avenue is proposed for the area between the railway and Pearson Avenue and does not exceed beyond Pearson Avenue. • The Preferred Scenario designates the eastern blocks between Park Avenue and Robert Street for E1, MU1 and R4 zoning to achieve increased building heights and floor space ratios. This approach will allow for distribution of foot traffic, and active frontages on both sides of the railway. • In the Preferred Scenario the commuter carpark is proposed for E1 zoning with increased building heights and FSR to maximise development opportunities in Council owned land. • In the Preferred Scenario, the height provisions proposed for Gordon Centre exceed the figures suggested in this submission. These higher rise buildings serve as landmarks
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SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

	and are located mainly around the rail line and along Pacific Highway contributing to greater housing numbers and increased commercial space while enhancing legibility and wayfinding across the precinct. • The Preferred Scenario proposes to fully protect the Heritage Conservation Areas of C12 Gordondale Estate Conservation Area and C13 Robert Grant Conservation Area. • Neither Scenario 3b nor the Preferred Scenario have proposed high density development on or in areas adjacent to Highland Avenue. The furthest extent of the proposed areas for change north of Gordon as per the preferred scenario is Carlotta Avenue on the east and Ryde Road on the west of the railway. • The preferred scenario aims to minimise impacts of TOD on the environment, tree canopy and road traffic. Rather than allowing unrestricted high-rise development, it provides a transitional density approach where building heights and floor space ratios gradually decrease toward lower density housing areas.
<i>Gordon Centre</i> • Require a minimum FSR of 8.5:1 for the Gordon Centre site, and 5.5:1 on the Gordon Village Arcade site for a viable redevelopment. • Quantum of non-residential floor space – a high percentage of non-residential floor space has a significant impact on project feasibility. Multi-level retail, with the exception of a below grade supermarket, is not viable; plus, demand for commercial office space will be limited.	Submission noted. Detailed built form modelling for the Gordon Centre has been undertaken and the preferred scenario recommends an FSR that can be achieved within a height plane of 25-28 storeys and meets the Apartment Design guidelines (ADG).
<i>Eryldene (17 McIntosh Street)</i> • The heritage listed house must be protected for its historical and architectural significance. • It's also a unique community asset used for social, cultural and educational gatherings and events.	The concerns raised in this submission are noted. The Preferred Scenario excluded the areas directly adjacent to this heritage item from high density development. As a result, the Heritage

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

Seeks the avoidance of planning policies that will result in a development that isolates Eryldene from its existing context, being single storey detached residences within a streetscape of similar houses.	Conservation areas of C15 and C17 are now fully protected to maximise retention of heritage fabric around the property while accommodating dwelling targets in the 400m – 800m radius of the train station.
<i>Gordon Community Preschool</i> Preschool should be retained on its current site in its current form.	The Gordon preschool is currently zoned, under the Ku-ring-gai LEP, for R4 – High Density Residential allowing 5-storey apartment buildings. These controls have been reviewed as part of the process of preparing alternative TOD scenarios. The site is currently protected by being community classified land and heritage listed and no change is proposed to this status.
<i>55 Werona Avenue</i> 55 Werona Avenue along with 3 adjoining landowners in McIntosh Street have put their property up for sale. - In all Council's scenarios the land is considered "land considered unlikely to redevelop" despite not being in a HCA / or being a heritage item. - Seeking same zoning as neighbours.	Under the Preferred Scenario this property is proposed to be included in and R4 High density residential zone with the same height and floor space ratios as the adjoining sites.
<i>747-759 Pacific Highway, Gordon</i> - Seeking 26+ storeys and FSR range 7.1:1 to 10.0:1 as per the Gordon Centre across the road. 2,500sqm site with a 53m Pacific Highway frontage located in the middle of the Gordon CBD.	The Preferred Scenario proposes E1 and MU1 zoning with increased height and floor space ratios for these properties. Detailed built form modelling has been undertaken for this precinct which is outlined in the Gordon TOD structure plan and reflected in the proposed Height of Building and Floor Space Ratio maps.
<i>26 Park Avenue</i> - Heritage listing is erroneous. - Requests delisting. If not delisted, then requests development rights to enable inclusion in development site to prevent being isolated.	Council's proposal seeks to minimise the impacts of additional housing on heritage conservation areas and heritage items through changes to the planning and development framework rather than changes to heritage listing.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

• Suggestions that Council consider 'The Gordon Solution' where low value, low integrity heritage houses on the east side of the railway line are delisted. • Suggestion of alternative 'The Park Avenue Peninsular' - Comprises properties bounded by Park Avenue, Garden Square and Rosedale Road, totalling 9500sqm. - Requests this area be zoned for development with 5-8 storey fronting Park Avenue and then transition to 2-storeys at the rear. - Remove HCA from land to the east of Garden Square and delist heritage items or enable heritage items development uplift. - Could be extended further down Rosedale Road	Council has not proposed any changes to heritage listings in the exhibited scenarios for community feedback or Council consideration. To seek an amendment to a heritage listing a separate planning proposal and supporting heritage assessment is required. The proponent's heritage assessment would need to justify the amendment by demonstrating that the NSW Heritage Council's criteria of local heritage significance are no longer met.
<i>3a Burgoyne Street, 3b Burgoyne Street, 5a Burgoyne Street, 7 Burgoyne Street, 3 Pearson Avenue, 1 Pearson Avenue, 4 Burgoyne Lane</i> • Property group has interests in the properties for a consolidated land holding. • Minimal constraints and within 400m of Gordon Station • Recommend building height of 8-15 storeys and FSR of 3:1-6:1:1	Under the Preferred Scenario, the identified sites are proposed to be excluded from rezoning to protect the integrity of the adjacent C12 Gordondale Estate Conservation Area and its significant concentration of heritage items. This is consistent with Principle 2 – Minimise impacts on Heritage Items and Principle 3 – Preserve Heritage Conservation Areas and Principle 5 – Manage Transition Impacts.
<i>836-842 Pacific Highway and 1 McIntyre Street</i> • Significant well-located landholding at the northern end of Gordon Local Centre, 400m to Station and close to retail and services. • Property is suited to higher density development as it meets Council's 7 planning principles. • Recommend a height of 20-storeys and FSR of 7:1	The Preferred Scenario proposes E1 and MU1 zoning with increased height and floor space ratios for these properties.
<i>19-21 Dumaresq Street</i> • Supports Scenario 2a, 3a or 3b with height of 25-storeys and FSR of 8:1 • Recommends Council collaborate with landowners and developers to masterplan Gordon to support delivery of Cultural and Civic Hub. • Recommends increased density and heights for remaining sites in Dumaresq Street and McIntyre Street block to allow for suitable built form transition from east to west.	The Preferred Scenario proposes E1 and MU1 zoning with increased height and floor space ratios for these properties. Areas on Dumaresq Street and McIntyre Street block are now included for rezoning and increased height and FSR.

SUBMISSION SUMMARY TABLE
S14715-1 – TOD Housing Alternative Scenarios
15 November 2024 to 17 December 2024

Pymble	
<i>Bridge Street Precinct</i> • 1.3ha parcel of land on Bridge Street Pymble Business Park • Recommends that mixed use residential be considered in the Bridge Street Precinct given its strategic location within 800m of Pymble station and consistency with Council's planning principles • Could deliver significant quantity of housing, which would ease pressure on other areas to deliver housing targets	Noted. In developing alternatives to the TOD, Council is not able to consider any areas outside of the station precincts identified in the NSW Government's TOD SEPP – that is Gordon, Killara, Lindfield, and Roseville.