

**LATE SUBMISSION SUMMARY TABLE**  
**S14715-1 – TOD Housing Alternative Scenarios**  
**18 November 2024 to 17 February 2025**

<b>MATTERS RAISED IN THE LATE SUBMISSIONS</b>	
<b>Total Number of Late Submissions = 143</b>	
<b>Category 1: Submission points related to housing scenarios</b>	
<b>SUPPORT Scenario # 1 (TOD)</b>	
<ul style="list-style-type: none"> <li>Support for Scenario #1 (TOD) was expressed in 33 of the late submissions.</li> </ul>	
<b>AGAINST Scenario # 1 (TOD)</b>	
<ul style="list-style-type: none"> <li>Opposition to Scenario #1 (TOD) was expressed in 29 of the late submissions.</li> <li>A number of the submissions expressed the view that the TOD SEPP is a top-down initiative, established without any consultation.</li> </ul>	
<b>SUPPORT Scenario # 2a</b>	
<ul style="list-style-type: none"> <li>Support for Scenario # 2a was expressed in 1 of the late submissions.</li> </ul>	
<b>AGAINST Scenario # 2a</b>	
<ul style="list-style-type: none"> <li>Opposition to Scenario # 2a was expressed in 30 of the late submissions.</li> </ul>	
<b>SUPPORT Scenario # 2b</b>	
<ul style="list-style-type: none"> <li>Support for Scenario # 2b was expressed in 3 of the late submissions.</li> </ul>	
<b>AGAINST Scenario # 2b</b>	
<ul style="list-style-type: none"> <li>Opposition to Scenario # 2b was expressed in 5 of the late submissions.</li> </ul>	
<b>SUPPORT Scenario # 3a</b>	
<ul style="list-style-type: none"> <li>Support for Scenario # 3a was expressed in 2 of the late submissions.</li> </ul>	
<b>AGAINST Scenario # 3a</b>	
<ul style="list-style-type: none"> <li>Opposition to Scenario # 3a was expressed in 8 of the late submissions.</li> </ul>	
<b>SUPPORT Scenario # 3b</b>	
<ul style="list-style-type: none"> <li>Support for Scenario # 3b was expressed in 83 of the late submissions.</li> <li>The view was expressed in a number of the submissions that Scenario 3b provided a balance between meeting housing targets and maintaining the unique character and environment of Ku-ring-gai.</li> </ul>	
<b>AGAINST Scenario # 3b</b>	
<ul style="list-style-type: none"> <li>Opposition to Scenario # 3b was expressed in 3 of the late submissions.</li> <li>Concern was expressed about increasing housing density in streets subject to bushfire risk. The streets mentioned in the submissions are located in south-west Roseville - Alexander Parade, Kings Avenue, Pockley Avenue, Corona Avenue and Maclaurin Parade.</li> </ul>	
<b>SUPPORT an Alternate / Compromise Scheme</b>	
<p><i>Suggested amendments</i></p> <ul style="list-style-type: none"> <li>Expand Scenario 3b to include all residential areas within 800m of stations in order to evenly distribute development and reduce pressure on the environment, tree canopy and</li> </ul>	

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<p>heritage conservation areas. This would also reduce potential for abrupt transitions. The heights recommended were as follows: residential 5-8 storeys, commercial 15-20 storeys, residential along the Pacific Highway 8 storeys.</p> <ul style="list-style-type: none"> <li>• Expand Scenario 3b to include a broader range of housing types and provide better infrastructure to support liveability at Gordon e.g. increased public spaces.</li> <li>• The density of the area between the Pacific Highway and rail line could be increased.</li> </ul> <p><i>Alternative locations for housing</i></p> <ul style="list-style-type: none"> <li>• The commercial zones between Pymble and Wahroonga, were suggested as alternate housing locations as it was considered environmental impacts in these areas would be less.</li> <li>• The commercial zones between Roseville and Gordon which have good access to buses were also suggested as alternate locations for increased housing.</li> </ul> <p><i>Alternative Scenarios</i></p> <ul style="list-style-type: none"> <li>• The Gordon Solution requests the delisting of seven, heritage items on the east side of the Pacific Highway in Gordon. The author of the submission states releasing these will add over 20,000m<sup>2</sup> for development under the TOD framework.</li> <li>• The Park Avenue proposal requests TOD development rights be extended to all properties in the area bounded by Garden Square, Park Avenue and Rosedale Road.</li> </ul>
<p><b>Do not support any options (Council Scenarios or TOD)</b></p> <ul style="list-style-type: none"> <li>• The increase in housing and population will have negative impacts on infrastructure, the environment and Ku-ring-gai's heritage assets.</li> </ul>
<p><b>Category 2: Submission points related to Environmental/Amenity impacts</b></p>
<p><b>Environmental Impacts (biodiversity, slope, bushfire, flooding, riparian lands)</b></p>
<p><i>General</i></p> <ul style="list-style-type: none"> <li>• A strong theme expressed in the late submissions was concern for Ku-ring-gai's tree canopy and environment.</li> </ul> <p><i>Bushfire</i></p> <ul style="list-style-type: none"> <li>• A number of late submissions were lodged by residents of South-west Roseville who raised concerns about increasing housing density in bushfire risk areas, with existing ingress/egress issues: <ul style="list-style-type: none"> <li>- The three road exits onto the Pacific highway from the subject area are already congested.</li> <li>- Increased traffic from TOD or alternate scenario development will impact the feasibility of bushfire evacuation.</li> <li>- The Ku-ring-gai Principal LEP Background Study March 2012 (Managing Bushfire Risk Now and into the Future) was referenced as showing the subject area to have an extreme risk rating.</li> <li>- The relevant submission referenced a report by Thomas J. Cova published in 2005 (Setting Wildfire Evacuation Trigger Points Using Fire Spread Modelling and GIS) which specifies the desired ratio of households to exit roads.</li> <li>- The submissions included a request for an independent study on bushfire evacuation and traffic congestion, prior to any increase in housing density.</li> </ul> </li> </ul>

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<p><i>Flooding</i></p> <ul style="list-style-type: none"> <li>Concern was expressed that the scenarios proposed increase housing within the flood prone areas of Lindfield such as Highgate Road, Reid Street and Wolseley Road. The author of the submission stated that these areas are subject to mainstream and overland flooding and are classified as a high hazard area.</li> <li>Concern was expressed about properties burdened by easements for Council's Trunk Drainage systems. The easements fragment the lots complicating development options.</li> <li>Existing drainage infrastructure can't manage current flows.</li> <li>The rail line compromises safe evacuation routes during floods.</li> </ul>
<p><b>Local Character</b></p>
<ul style="list-style-type: none"> <li>Tall buildings (25-45 stories) tend to be built with standardised templates, which leads to a monotonous, uninspired cityscape.</li> </ul>
<p><b>Amenity</b></p>
<p><i>Wind</i></p> <ul style="list-style-type: none"> <li>Large buildings can create wind tunnels that make outdoor spaces unpleasant.</li> </ul> <p><i>Health</i></p> <ul style="list-style-type: none"> <li>Living in tall apartment buildings can negatively impact physical and mental health.</li> </ul>
<p><b>Housing Typology</b></p>
<ul style="list-style-type: none"> <li>Smaller minimum lots sizes recommended to enable subdivision with smaller dwellings.</li> <li>A new medium density building code targeted at young families should be prepared with the housing only made available to those aged 45 and under.</li> </ul>
<p><b>Affordable Housing</b></p>
<ul style="list-style-type: none"> <li>Encourage expanding the affordable housing contribution framework to include non-residential zones.</li> <li>Ensure that affordable housing is delivered with State Significant Development applications.</li> <li>Affordable housing should include 2-3 bedroom apartments to cater for working families.</li> <li>Recommends audit of council owned sites that have potential to be developed with affordable housing.</li> <li>Negotiate with the State government and seek an increase to the low TOD affordable housing contribution rate of 2%.</li> </ul>
<p><b>Development Controls</b></p>
<p><i>Sustainable Design Standards</i></p> <ul style="list-style-type: none"> <li>Any new development must prioritise sustainability, particularly when it comes to units and high-rise buildings. Incorporating renewable energy sources, such as solar panels, community batteries, and tri-generation systems, should be a requirement for all developments. In addition, sustainable practices like providing spaces for drying clothes naturally, composting, and establishing community gardens should be encouraged to promote a sustainable lifestyle. The ability to charge electric vehicles in unit developments and the inclusion of rainwater capture systems are essential components of sustainable living.</li> </ul>

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<p><i>Universal Design Principles</i></p> <ul style="list-style-type: none"> <li>• Important to ensure that all homes are accessible and adaptable for people of all ages and abilities.</li> </ul> <p><i>Floor Space Ratio</i></p> <ul style="list-style-type: none"> <li>• A minimum FSR of 2:1 is needed for development feasibility.</li> <li>• A minimum FSR of 1.5:1 is needed to ensure amalgamations are financially viable.</li> </ul> <p><i>Height</i></p> <ul style="list-style-type: none"> <li>• A minimum building height of 6 storeys was recommended.</li> </ul>
<b>Category 5: Submission Points related to Specific Sites (grouped by Suburb)</b>
<b>Roseville</b>
<p><i>2-4 Larkin Street and 1- 5 Pockley Avenue</i></p> <ul style="list-style-type: none"> <li>• Two State Significant Development Applications (SSDA) are progressing.</li> <li>• Three Council Scenarios (2a, 3a and 3b) reduce the currently permitted FSR of 2.5:1 considerably to between 1.2-1.7:1. This reduction would result in a net loss of yield equivalent to 120 dwellings and constrain development unnecessarily in a location that is well suited to increased density.</li> <li>• Down zoning of sites within the TOD catchment is contradictory to the State's planning direction and policy.</li> <li>• The existing 2.5:1 FSR and 22m height provisions available under the TOD SEPP are suitable.</li> <li>• Council needs to be mindful of projects that have progressed, and any amendments to the TOD need to address active DAs and include transitional provisions.</li> </ul>
<p><i>Boundary Street</i></p> <ul style="list-style-type: none"> <li>• Allow the portion of Boundary Street, Roseville between Spearman Street and Wandella Avenue to include buildings of 5-6 storeys. The Heritage Conservation Area (HCA) impacting this land is not justified.</li> <li>• Removing the HCA listing from the subject area would enable conservation of the Lord Street/ Bancroft Avenue HCA which has greater significance.</li> </ul>
<b>Lindfield</b>
<p><i>Lindel Place</i></p> <ul style="list-style-type: none"> <li>• Council's scenarios undermine the principle of minimising impacts on heritage items. Lindel Place is outside the 400-metre radius from Lindfield Station; therefore, TOD creates less impact on the heritage in Lindel Place.</li> <li>• Request Lindel Place and the area of Bent Street between Lindel Place and Newark Crescent (as per Scenario 1) be excluded from all Scenarios that allow for increased housing density.</li> </ul>
<p><i>Lower Side of Nelson Road (between Tryon Road, Havilah Road and Smith Street):</i></p> <ul style="list-style-type: none"> <li>• Scenarios 2-5 focus development on the east side of the Lindfield town precinct and include the upper side of Nelson Road. This will mean the lower side of Nelson Road will be shadowed by 8-25-storey apartment buildings.</li> <li>• Request that both sides of Nelson Road be included in any development plans or entirely excluded to ensure fairness.</li> </ul>

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<p><i>15 Treatts Road – North Shore Synagogue</i></p> <ul style="list-style-type: none"> <li>It is inappropriate to place high-rise next to the Synagogue. This is disrespectful to the Jewish community and will damage the cultural and religious significance of the Synagogue.</li> </ul>
<p><i>59-63 Trafalgar Avenue and 1a and 1b Valley Road</i></p> <ul style="list-style-type: none"> <li>Acquisition of sites based on TOD SEPP provisions</li> <li>SSD Application for infill affordable housing is progressing.</li> <li>The scenarios propose to reduce the existing permissible FSR of 2.5:1.</li> <li>Down zoning of sites within the TOD catchment is contradictory to the intentions of planning direction and policy. The existing 2.5:1 FSR and 22m height are suitable.</li> <li>Council needs to be mindful of projects that have progressed, and any amendments to the TOD need to address active DAs and include transitional provisions.</li> </ul>
<p><i>25 - 35 Gladstone Parade and 9 Norwood Avenue</i></p> <ul style="list-style-type: none"> <li>A request was made that these properties be included in Scenario 3b. They have been excluded because they are included in C45-Lindfield West Conservation Area, but the submission authors consider this HCA should be reduced in size.</li> </ul>
<b>Killara</b>
<p><i>20 Powell Street</i></p> <ul style="list-style-type: none"> <li>Request Council maintain TOD development standards and R4 zone.</li> </ul>
<b>Gordon</b>
<p><i>77-87 Werona Avenue</i></p> <ul style="list-style-type: none"> <li>A sale was negotiated for the consolidated group of properties in 2020. It was accompanied by a 2018 Draft Urban Design Report which recommended 8 storeys and an FSR of 2.25 – 2.75:1 for ground floor retail and shop top housing.</li> </ul>
<p><i>18 Bushlands Avenue</i></p> <ul style="list-style-type: none"> <li>The concern was expressed that the property would be left isolated surrounded by 5-8 storey buildings. The property is not a heritage item.</li> </ul>