

PLANNING FOR BETTER OUTCOMES ALTERNATIVE SCENARIOS TO THE TOD PROGRAM STAGE 2 REPORT - PREFERRED SCENARIO

Prepared by: Ku-ring-gai Council April 2025

Version History

VERSION NUMBER	VERSION START DATE	VERSION END DATE		DETAILS & COMMENTS
1	April 2025		Bill Royal	

Contents

GLOSSARY & DEFINITIONS	. 5
1. BACKGROUND	6
Introduction	7
Vision	8
Planning Principles	9
Community Preference	10
Refining Scenario 3b	15
2. PREFERRED SCENARIO	. 16
Description	18
Gordon	20
Killara	24
Lindfield	28
Roseville	32
Built Form Typologies	36
3. COMPARISON WITH TOD SEPP	40
TOD SEPP Areas Downzoned	42
TOD SEPP Areas Upzoned	44
4. EVALUATION	46
5 SUMMARY AND NEXT STEPS	54

Acknowledgement of Country

We acknowledge Aboriginal and Torres Strait Islander peoples as the First People and traditional custodians of the land and waters of this place. We express our gratitude in the sharing of this land, our sorrow for the personal, spiritual and cultural costs of that sharing and our hope that we may walk forward together in harmony and in the spirit of healing.

We acknowledge the importance of Aboriginal custodial and cultural connection to place which is embodied in the term 'Country'. We recognise and admire the ecological knowledge of Aboriginal people that has developed from thousands of generations of careful, sustainable land management practices.

We seek to integrate Aboriginal values around Country with scientific and mainstream land management approaches and to learn about complex indigenous knowledge systems and encourage greater understanding of Aboriginal cultural and spiritual connections to Country.

Glossary & Definitions

Glossary:

ADG: Apartment Design Guidlines **DCP:** Development Control Plan

DPHI: Department of Planning, Housing and Infrastructure

HCA: Heritage Conservation Areas

KLEP: Ku-ring-gai Local Environmental Plan 2015

LMR: Low and Mid-rise Housing

SEPP: State Environmental Planning Policy

TOD: Transport Oriented Development

TOD Stations: Transport hubs integrated with nearby mixed use development. In this report TOD Stations refer to the transport hubs of Gordon, Killara, Lindfield and Roseville centres.

TOD SEPP: NSW State Government's proposed Transit Oriented Development State Environmental Planning Policy

Definitions:

Affordable Housing: Affordable housing is rental housing that is subsidised and offered below market rents. The rent is charged at no more than 30% of the household income. This allows households to meet other basic living costs such as food, clothing, transport, medical care and education.

Affordable Housing Contributions: A requirement for developers to provide affordable housing, this contribution supports the creation of affordable living spaces for low- and moderate-income households in areas with easy access to public transportation. By integrating affordable housing into TODs, the council aims to promote sustainable, accessible, and inclusive communities, while reducing transportation costs and encouraging the use of public transit.

Apartment Design Guidelines: NSW Government publication that provides design criteria and general guidance about how development proposals can achieve the design quality principles identified in Schedule 9 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP).

Biodiversity Corridors: Vegetated pathways connecting habitat areas to facilitate wildlife movement and maintain ecological connectivity.

Bushfire Prone Vegetation: Vegetation types and structures with characteristics that make them susceptible to supporting and spreading bushfire.

Floor Space Ratio (FSR): indicates the permissible ratio of a building's total floor area to the size of land it occupies. Development standards for height and floor space ratios (FSR) are used to regulate the density and bulk of buildings and determine the allowable floor areas available for retail, commercial and residential activities.

Heritage Conservation Areas: a designated precinct that protects groups of buildings, streetscapes and landscapes with collective heritage significance.

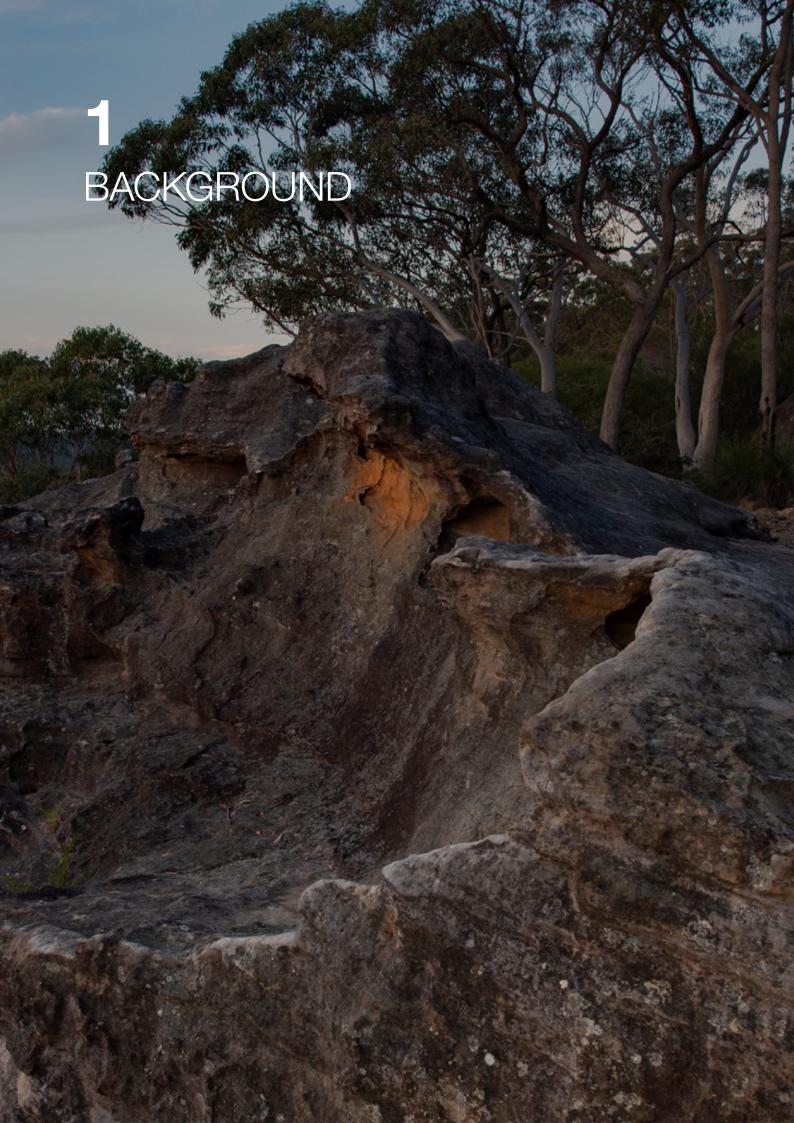
Landscape Remnants: Areas of original vegetation and landforms that persist within modified environments, representing historical ecological conditions.

Land use zoning: In NSW the activities and development permitted on land are governed by land use zoning.

Low and Mid-rise Housing SEPP: Across 2024 and 2025, the NSW Government has introduced planning changes to encourage building types including terraces, townhouses, multiunit dwellings and apartment buildings near stations and town centres. These are known as the Low and Mid-Rise reforms or SEPP (State Environmental Planning Policy).

Riparian Lands: Land alongside waterways and water bodies, including the banks and adjacent vegetation that influence water quality and habitat.

Urban Tree Canopy Coverage: the percentage of urban land area covered by tree crowns, generally more than 3 metres in height, when viewed from above.



Introduction

The New South Wales Government has introduced a series of major planning reforms in response to the ongoing housing crisis. Among these is the Transport-Oriented Development State Environmental Planning Policy (TOD SEPP), which came into effect in May 2024. The TOD SEPP introduced a uniform approach which involves construction of 6-7 storey high density buildings within 5 minutes distance of selected Sydney railway stations. The TOD SEPP overrides existing local planning controls.

In Ku-ring-gai, the TOD SEPP affected four town centres including Gordon, Killara, Lindfield, and Roseville. The NSW Government estimated that the TOD SEPP will facilitate the development of approximately 22,580 new dwellings in Kuring-gai over the next 15 years.

While the Government's goal to create more sustainable and connected communities by leveraging existing transport infrastructure is supported in principle, the uniform approach of the SEPP fails to account for local conditions, constraints, and opportunities.

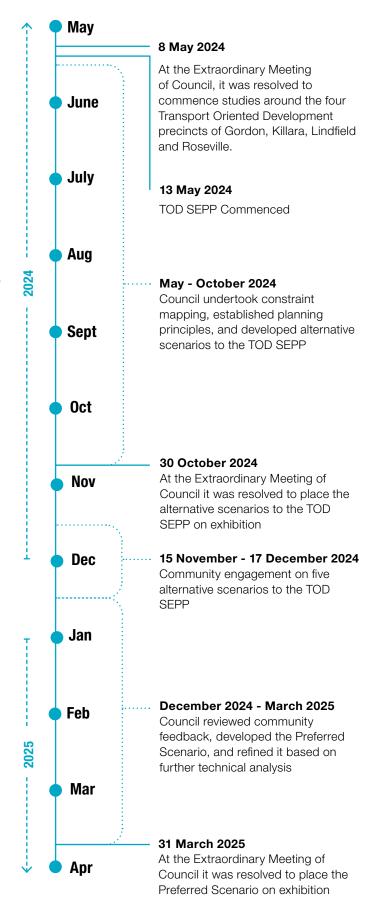
In response, Ku-ring-gai Council explored alternative ways to accommodate new housing while preserving the area's valued heritage and environmental assets. Drawing on local data, community aspirations, and a set of planning principles, the Council developed four alternative housing scenarios (Scenarios 2a, 2b, 3a, and 3b). These, along with the State Government's TOD SEPP (Scenario 1), were publicly exhibited between 15 November and 17 December 2024.

The exhibition process revealed a clear community preference among the five scenarios. Building on this feedback, Council has worked to refine the Preferred Scenario—drawing not only on input from the community but also on technical advice provided by consultants.

This urban design report presents the outcome of that process and presents the refined Preferred Scenario in detail. Based on Scenario 3b, the Preferred Scenario expands on community's preferences while building on the same planning principles which guided the development of previously exhibited scenarios. It maintains moderate building heights, extends the high density development catchment to approximately 800 metres of each station, and protects approximately 80% of existing Heritage Conservation Areas. Through careful refinement, the scenario balances the delivery of over 24,000 new dwellings with strong protections for tree canopy, heritage items, and environmentally sensitive areas.

This report outlines the urban design principles that underpin the Preferred Scenario, including place-based responses for each centre, strategies for managing scale and transition, protection of urban forests, activation of local centres, and the integration of sustainable infrastructure. The objective is to ensure that future growth delivers vibrant, liveable, and resilient communities that enhance the unique character and identity of Ku-ring-gai.

PROJECT TIMELINE



Vision

The Preferred Scenario provides a strategic and place-based response to managing future growth across the Gordon, Killara, Lindfield and Roseville town centres. It seeks to accommodate housing targets under the NSW Government's Transit-Oriented Development (TOD) Program while protecting Ku-ring-gai's heritage, character and significant natural environment. New development is concentrated within walkable, connected precincts that integrate sustainable built form, enhanced public domain, and a strong emphasis on liveability, resilience and community wellbeing.

In line with Ku-ring-gai's Local Strategic Planning Statement, the Preferred Scenario supports growth that is sustainable, well designed, respects the area's natural and built heritage, and reinforces the distinct identity of Ku-ring-gai's neighbourhoods. It ensures that change strengthens the existing qualities that make Ku-ring-gai unique while revitalising centres to provide new services, public spaces, housing diversity, and employment opportunities.

By balancing growth with the protection of local character and environmental assets, the Preferred Scenario sets a clear pathway for delivering vibrant, sustainable and resilient communities for future generations.

Ku-ring-gai Local Planning Priorities Relevant to Preferred Scenario				
LOCAL INFRASTRUCTURE	K1. Providing well-planned and sustainable local infrastructure to support growth and change			
COLLABORATION	K2. Collaborating with State Government Agencies and the community to deliver infrastructure projects			
	K3. Providing housing close to transport, services and facilities to meet the existing and future requirements of a growing and changing community			
HOUSING	K4. Providing a range of diverse housing to accommodate the changing structure of families and households and enable ageing in place			
	K5. Providing affordable housing that retains and strengthens the local residential and business community			
LOCAL AND NEIGHBOURHOOD CENTRES	K6. Revitalising and growing a network of centres that offer unique character and lifestyle for local residents			

Planning Principles

The following set of principles were adopted based on Kuring-gai's Strategic Vision and local policies. These principles guided the preparation of TOD alternative housing scenarios, and have been used to guide the development of the preferred scenario.

- PRINCIPLE 1 Avoid environmentally sensitive areas
- PRINCIPLE 2 Minimise impact on Heritage Items
- PRINCIPLE 3 Preserve Heritage Conservation Areas
- PRINCIPLE 4 Minimise fimpacts on the tree canopy
- PRINCIPLE 5 Manage transition impacts
- PRINCIPLE 6 Ensure appropriate building heights
- PRINCIPLE 7 Support Local Centre Revitalisation

Community Preference

Council held a 4-week public exhibition on Council's Alternative TOD Scenarios from 15 November 2024 to 17 December 2024. Council sought feedback on five housing scenarios and residents were offered a variety of ways to get involved and provide feedback.

OVERVIEW OF SCENARIOS

Scenario 3a -Scenario 1 -Scenario 2a -Scenario 2b -Scenario 3b -Safeguard and **Existing NSW** Minor Amendments Preserve and Preserve, Intensify & Government Controls Intensify to Existing NSW Intensify Expand Retained Government Controls 6 storeys 5-8 storeys 6-15 storeys 5-45 storeys 5-20 storeys 400m 400m 400m 800m 400m 0% HCA Protection 78% HCA 31% HCA 100% HCA 100% HCA

Protection

Methods of engagement:

Protection

- Community surveys
- Recruited workshops
- Written submissions

PARTICIPATION BREAKDOWN

Protection



2,946 ONLINE SURVEYS COMPLETED

Protection



877 PAPER SURVEYS COMPLETED



193 CATI PHONE SURVEYS COMPLETED



65 PARTICIPANTS IN 2 RANDOMLY RECRUITED IN-PERSON WORKSHOPS



51 ATTENDED IN-PERSON DROP-IN SESSIONS

Community Surveys

Taverner Research Group (Taverner) were engaged to prepare a survey that would assist Council to understand the community preferences for housing options around the four train stations of Gordon, Killara, Lindfield and Roseville.

The survey involved a two-tier approach involving:

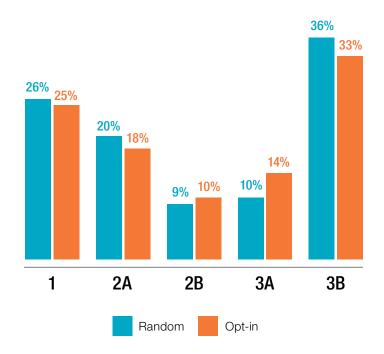
- a self-selecting online and paper survey, able to be completed by any Ku-ring-gai Council resident who had read the background materials supplied by Council; and
- a randomly selected, representative survey of residents living in the Gordon and Roseville wards and who had read the background materials.

The final sample size was over 3,000 people including 2,946 residents for the opt-in survey and 193 residents for the representative survey. The large sample size can give Council a high degree of confidence that the results would replicate the views of the Ku-ring-gai adult community (to within +/- 1.8% at the 95% confidence level).

SURVEY KEY FINDINGS

- Based on the results of the survey the community's preferred alternative is Scenario 3b.
- The concept of an extended development area is unique to Scenario 3b therefore it may be interpreted that the community is willing to trade-off additional spread of development to maintain moderate building heights.
- The overall preference for Scenario 3b is consistent with the survey results showing the communities top three outcomes to support more housing are: managing transition impacts, avoiding environmentally sensitive areas and minimising impacts on tree canopy – all which 3b manages appropriately.
- Scenario 1 was the second most preferred option however it was also the least preferred by residents across both surveys.
- Scenario 2a was the third preference in both surveys indicating that this option provided the right balance between heritage protection and other considerations.

SURVEY RESULTS - MOST PREFERRED



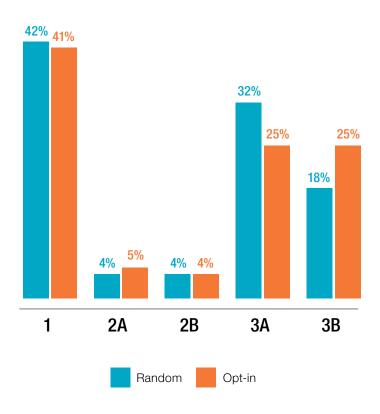
The results of the survey are as follows:

- Scenario 3b was the preferred scenario in both surveys (36% random, 33% opt-in);
- Scenario 1 was the second preference in both surveys (26% and 25%);
- Scenario 2a was the third preference in both surveys (20% and 18%); and
- Scenarios 2b and 3a gathered relatively little support (9-10% & 10-14% respectively).

Council's alternative scenarios (2a, 2b, 3a & 3b) considered together were preferred by approximately ¾ of all respondents across both surveys, whereas Scenario 1 was preferred by only ¼ of respondents across both surveys.

Residents living within a 400-metre proximity of any of the four train stations were more likely to prefer Scenario 1 to Scenario 3b by a margin of 5% (31% against 26%). This was particularly notable for those living within a 400-metre radius of Lindfield Station, 40% of whom supported Scenario 1 against just 8% for Scenario 3b (difference of 32%). Those living within 400 metres of Roseville and Gordon Stations supported both Scenarios equally, while those living within 400 metres of Killara Station strongly preferred Scenario 3b by a margin of 25% (47% against 22% for Scenario 1).

SURVEY RESULTS - LEAST PREFERRED



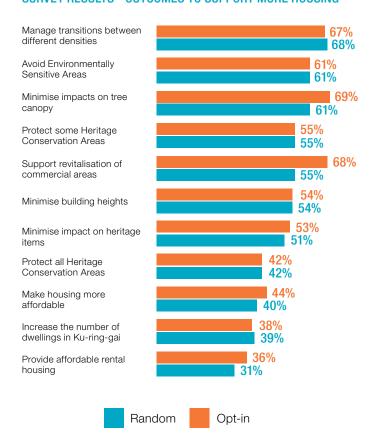
Residents were asked which of the Scenarios are least preferred, the results of the survey are as follows:

- Scenario 1 was the least preferred by about 41% of residents across both surveys;
- Scenario 3a was the second least liked alternative (32% random, 25% opt-in);
- Scenario 3b the third least liked (18% random, 25% opt-in);
 and
- Scenarios 2a and 2b had negligible opposition.

When the opt-in results for the three "least desirable" Scenarios are broken down by proximity to specific train stations Scenario 1 had the highest "least preferred" rating across each station radius. However, for those living within 400 metres of Lindfield Station, Scenario 3b was significantly more likely to be rated as "least preferred" than Scenario 1 (36% and 22% respectively). Conversely, those living in proximity to Killara and Gordon Stations were significantly more likely to oppose Scenario 1. These results are broadly consistent with the most preferred.

When the most and least preferred Scenarios are netted out, the results for both surveys show Scenarios 1 and 3a were the most polarising among Ku-ring-gai residents. Scenario 2a appears to be the least controversial scenario.

SURVEY RESULTS - OUTCOMES TO SUPPORT MORE HOUSING



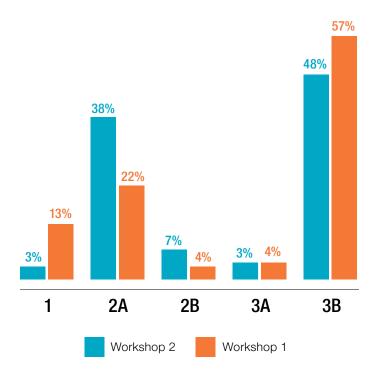
Respondents were asked which 11 specific outcomes they felt were most important in delivering additional housing to the Ku-rung-gai LGA. The responses are ranked below from (opt-in survey) most to least important.

The top result was 'manage transitions between different densities to avoid impacts such as overshadowing and loss of privacy on neighbours'. This was closely followed by 'avoid environmentally sensitive areas' and 'minimise impacts on tree canopies'.

Recruited Workshops

Council engaged consultants (Becscomm) to manage two recruited in-person community workshops held at the Kuring-gai Council Chambers in Gordon. The workshops were independently recruited by Taverner Research and independently facilitated by Becscomm. Attendees were recruited residents or business owners from the suburbs of Roseville, Killara, Lindfield, or Gordon. There were 65 attendees over two nights representing a spread of demographics including age and gender and qualification metrics. All attendees live in, or own a business in Roseville, Killara, Lindfield, or Gordon.

WORKSHOP RESULTS



BECSCOMM NOTE IN RELATION TO OPTION 3B

"[t]he overall sentiment for Option 3b was overwhelmingly positive, with participants seeing it as the best compromise between development and preservation. It was considered sensitive to the local environment and heritage, practical in meeting housing targets, and aligned with council's planning principles. While concerns about excessive building heights persist, the option was viewed as the most effective in balancing growth with maintaining the character of Ku-ring-qai".

BECSCOMM NOTE IN RELATION TO OPTION 2A

"The overall sentiment for Option 2a was positive, with participants recognising it as a well-balanced, practical, and moderate approach to development. Its focus on preserving the area's character, heritage, and environmental appeal while enabling sensible density makes it an appealing compromise. However, there remains strong resistance to overly tall buildings, reinforcing the desire for controlled and thoughtful urban growth".

WORKSHOP KEY FINDINGS

- Option 3b ("Preserve, intensify, and expand")
 emerged as the preferred choice by participants
 in both workshops, with its support increasing
 dramatically in Workshop 2.
- Option 2a also performed well in Workshop 1 but lost some traction in Workshop 2.
- Options 1, 2b, and 3a were consistently less favoured, suggesting a strong preference for more expansive and transformative scenarios among participants.

Written Submissions

Council received 514 written submissions. Of these, 316 indicated a preferred option, seen below. In addition, 72 submissions were received that did not support the TOD or any of the exhibited Council alternative scenarios. A further 57 submissions came in the form of a circulated form letter, which provided space for submitters to write their name, address, signature and date and then provided a standard letter the content of which objected to the exhibited alternative scenarios and requested the current TOD provisions remain in place.

The written submissions are not a statistically valid sample that can be used to inform the selection of a preferred option, it is also highly likely that there is significant overlap between the pool of submissions and the pool of surveys. However, it is interesting to note that the scenarios that received the most attention are options are 1, 3b and 2a and the least 2b and 3a, this outcome is consistent with both the survey and workshops results.

WRITTEN SUBMISSION RESILTS



WRITTEN SUBMISSION THEMES

1. Amendments to Scenarios / Alternative Areas for Housing

Submissions suggested alternative areas that were thought to be suitable for housing, such as the centres of Turramurra, St lves, Wahroonga and Pymble.

2. Environmental such as biodiversity, tree canopy, flooding, bushfire

Submissions raised concern that development arising from the alternative scenarios would result in negative impacts to Ku-ring-gai's significant tree canopy and biodiversity. Concerns were also raised regarding the bushfire and evacuation risk, as well as existing and worsening flooding.

3. Heritage Items and Heritage Conservation Areas

Submissions reflected mixed views, with some supporting heritage protection and expressing concerns about high-density development impacts, while others opposed heritage listings or requested delisting, and some heritage item owners sought transferable development rights.

4. Traffic and Parking

Submissions raised concerns about existing traffic congestion—particularly on the Pacific Highway—and the potential for further strain from new development, highlighting issues with the West Roseville road network and existing parking shortages near stations.

5. Infrastructure

Submissions expressed concern that existing infrastructure—including transport, schools, and utilities—is already at capacity and questioned how additional infrastructure needed for further development would be funded.

6. Affordable Housing

Submissions argued that the proposed 2% affordable housing contribution was insufficient, supported affordable housing being retained in perpetuity, and opposed the 30% height bonus under the Housing SEPP due to concerns it would revert to market housing after 15 years.

7. Development uptake and viability

Submissions questioned development feasibility, citing no testing of proposed controls like FSR, deep soil, amalgamations, strata, and heritage.

8. Planning and Consultation Process

Submissions raised concerns about the consultation process, noted mixed views on legal action against the NSW Government, and questioned potential conflicts of interest relating to Council-owned land and proposed uplift.

Refining Scenario 3b

FROM SCENARIO 3B TO THE PREFERRED SCENARIO

The Preferred Scenario is based closely on Scenario 3b, which was identified as the community's most preferred option during the previous round of engagement (November - December 2024). Similar to Scenario 3b, it focuses on spreading development fruther from train stations (up to 800 metres) to allow for lower building heights while protecting a large portion (80%) of Heritage Conservation Areas previously impacted by TOD.

The Preferred Scenario is a refined version of Scenario 3b and maintains the overall ideas behind it including:

- · Appropriate Building Heights
- Sensitive Height Transitions
- · Greater protection of heritage conservation areas
- Greater protection of environmentally sensitive land

The refinement process further included exclusion of some areas from high density development. Meanwhile, new areas were added and building heights and densities increased to compensate for the areas removed. This iterative process was supported by consultants SJB Urban through detailed built form modelling to ensure compliance with Council's DCP, the Apartment Design Guide (ADG), and to minimise overshadowing and interface impacts.

COMPARISON OF SCENARIO 3B AND THE PREFERRED SCENARIO

Areas removed:

Some areas proposed as high-density in Scenario 3b have been retained as low-density residential to manage transition impacts, protect heritage values, and avoid development on environmentally sensitive land. These include Alexander Parade in Roseville, Kenilworth Road in Lindfield, and Burgoyne Lane in Gordon.

Areas rezoned:

Some areas originally proposed as high-density are now proposed as RE1 (Public Recreation) or SP2 (Infrastructure) zones. These include Newark Crescent in Lindfield, and land between Shirley Road and Pockley Avenue in Roseville.

Areas included:

To offset reduced yield in other locations, new areas have been added and zoned for higher density (R4, E1 or MU1). These include:

- Land between Park Avenue and Robert Street in Gordon
- Land on the western side of the Pacific Highway in Killara, between Essex Street and Buckingham Road
- Land at the corner of Marian Street and Culworth Avenue in Killara
- Land bounded by Pacific Highway, Treatts Road and Wolseley Road in Lindfield

Areas with reduced heights:

Some areas proposed for 5–8 storeys in Scenario 3b have been reduced to 3 storeys in the Preferred Scenario to better manage transition impacts. These areas include:

- Southern side of Moree Street, Gordon
- Killara Avenue, Killara
- Land between Stanhope Road and Marian Street, Killara
- Highgate Road, Lindfield
- · Lindel Place and Newark Crescent, Lindfield
- Area between Highfield Road and Bent Street, Lindfield

Victoria Avenue, Roseville

Changes to key centres:

- Building height at Lindfield Village Hub has increased from 15 to 18 storeys, based on built form modelling.
- Building height at Gordon Centre has increased from 25 to 28 storeys, informed by built form modelling and feasibility analysis.





Scenario Description

The Preferred Scenario is a refined version of Scenario 3b that incorporates community preferences and planning analysis into a coherent corridor-wide plan. Similar to Scenario 3b, it expands the areas of change to 800 metre walking distance from each station, allowing a more graduated transition from taller buildings clustered near commercial and employment zones to lower density apartments at the fringes, with most heritage areas being protected.

KEY STATISTICS:

- Building heights ranging from 3 to 28 storeys
- Floor Space Ratios (FSR) between 0.85:1 and 8.0:1
- A total of 24,562 additional dwellings (based on SJB Consultants estimates)
- Development focused within 800 metres of train stations
- 80% of Heritage Conservation Areas (HCAs) protected
- Dwelling numbers are distributed to reflect the strategic centre hierarchy, with 9,012 in Gordon, 9,419 dwellings in Lindfield, 2,778 in Killara, and 3,353 in Roseville (*Final yields subject to DPHI verification.)

Revised TOD Boundary:

The preferred scenario proposes a completely new boundary around each of the centres. Initially, the State Government's TOD SEPP defined precincts roughly within a 400m radius of each station. Under Scenario 3b and carried into the Preferred Scenario, Council chose to expand that radius to approximately 800m in certain directions, and conversely to contract or exclude some areas even within the 400m if they were unsuitable for high density development. This was to achieve a balanced and gradual transition of height and densities across the four centres. The new boundary utilises roads or HCA boundaries and includes whole HCAs where possible.

KEY FEATURES:

APPROPRIATE BUILDING HEIGHTS: Building heights range from 3 storeys to 28 storeys at key sites. The tallest buildings (15 storeys and above) are located around centre cores in Gordon and Lindfield, while low-rise residential buildings (3–5 storeys) are used as buffers next to heritage or low-density neighbourhoods. This spectrum of heights is similar to Scenario 3b, and in line with the community's preference for moderate building heights.

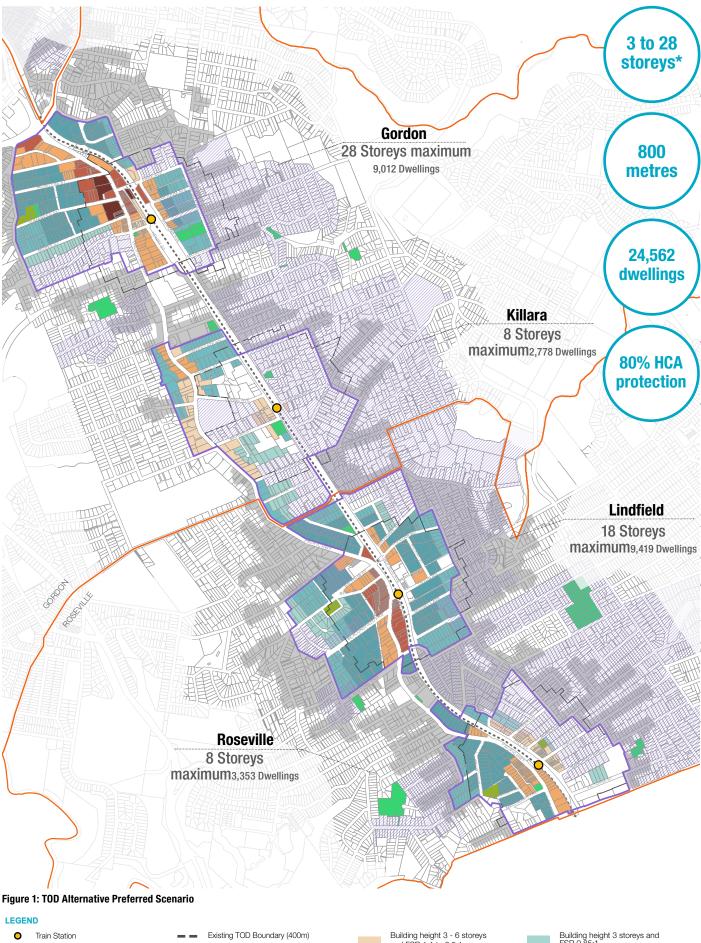
DENSITY AND BUILT FORM: Proposed floor space ratios (FSRs) range between 0.85:1 to up to 8:1. Higher FSRs (5.0:1 and above) in Gordon and Lindfield correlate with high-rise buildings, whereas much of the area is proposed to mid-rise densities (e.g. 1:1 to 3:1 for 4-6 storey apartments). These densities ensure that development potential is tailored to the context of each site and precinct.

DWELLING YIELD AND CAPACITY: The scenario provides an additional capacity of approximately 24,562 dwellings across the four centres. This figure is based on detailed modelling by consultants SJB Urban and will be subject to final verification by the NSW Department of Planning, Housing and Infrastructure. It meets the State's housing target for these precincts (around 23,000 new dwellings), ensuring alignment with local strategic priorities. To distribute this growth sensibly, dwelling numbers have been balanced across the centres based on centres hierarchy. This graduated distribution helps ensure each locality grows in proportion to its infrastructure and community services while minimising impact on heritage conservation areas.

HERITAGE AND CHARACTER OUTCOMES: A cornerstone of the Preferred Scenario is the protection of a large portion of Heritage Conservation Areas across the corridor. About 80% of HCA land is proposed to be kept under current low-density zoning (R2), effectively removing those areas from the TOD upzoning.

CENTRE REVITALISATION: By concentrating redevelopment in and around the town centres, the Preferred Scenario creates opportunities to enhance these centres. Council will seek outcomes such as new public open spaces (local parks or plazas as part of large projects), improved pedestrian links, and community facilities (e.g. a library expansion or community hub subject to development contributions).

The following pages provide a brief description of the proposed changes for each of the four centres – Gordon, Killara, Lindfield, and Roseville – under the Preferred Scenario.





Gordon

The Preferred Scenario envisions Gordon as a thriving centre with significant new housing and employment, anchored by landmark developments near the station, and balanced by the protection of heritage conservation areas on its fringes. This approach aligns with the community vision (Local Strategic Planning Statement, 2020, p. 44) for Gordon as a primary centre and proposes improved amenities and infrastructure upgrades to support the larger population.

KEY FEATURES:

- Gordon Centre the redevelopment is planned for up to 28 storeys - an increase from the 25 storeys previously considered for this site under Scenario 3b. This landmark redevelopment would accommodated the tallest building in the corridor and a significant feature of Gordon town centre. It would provide a range of retail outlets including a new supermarket.
- Areas excluded the plan deliberately excludes or downzones several sites from Scenario 3b to protect tree canopy and integrity of heritage conservation areas, and manage transition impacts. These areas include but are not limited to 3 storeys buildings on Moree Street to protect the St Johns Avenue HCA, and Burgoyne Lane,

- removed entirely to safeguard the Gordondale Estate Conservation Area.
- Areas included To compensate for areas where development is reduced, the Preferred Scenario includes some additional sites including the area between Merriwa St and Ryde Road proposed for Mixed Use development.
- Public domain improvements including wider footpaths, improved lighting, street furniture, powerline bundling, and new trees along some of the local streets. New pedestrian accessways and traffic calming measures will improve walkability and safety throughout the centre. The concept includes expansion of open space such as conversion of the former Gordon Bowling Club land into a new park and a larger local park on the corner of Vale Street and Dumaresq Street.
- To support circulation, new pedestrian accessways are proposed including one linking Johns Avenue to Moree Street, and another connecting Moree Street to Dumaresq Street behind the Gordon Centre. Additional upgrades include intersection improvements along the Pacific Highway between Ravenswood Ave and Park Ave, and a signalised pedestrian crossing at Merriwa Street.



Figure 2: TOD Alternative Preferred Scenario - Gordon

 Community infrastructure includes a new, larger community and cultural facility as part of a proposed community hub, to create a stronger focal point in the centre. 3 to 28 storeys*

9,012 dwellings

88% HCA protection

Figure 3: Artist impression of Gordon (source: SJB Urban)

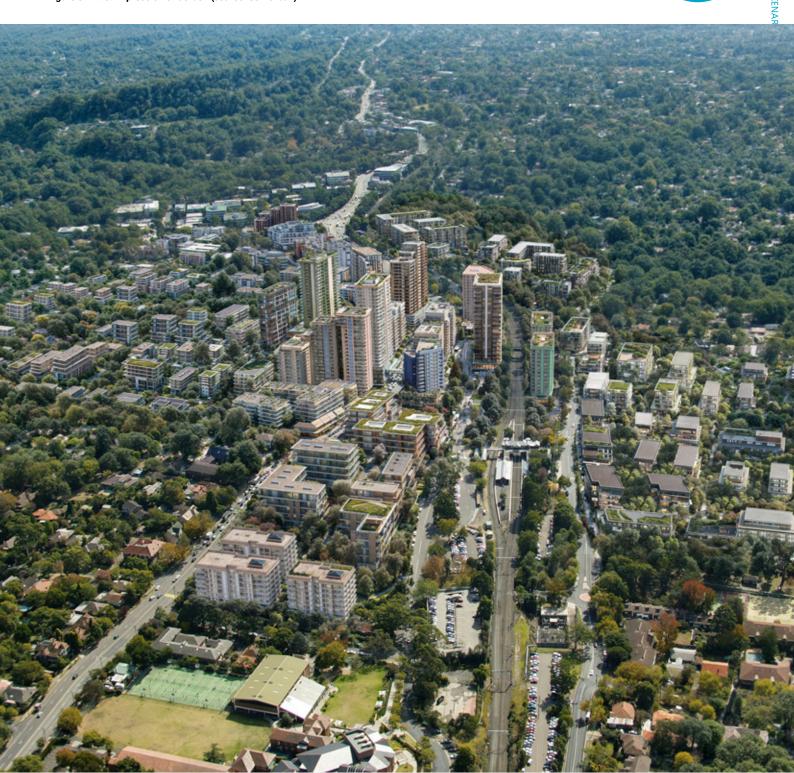


Figure 4: Public Domain Strategy



Figure 5: Traffic and Active Transport Strategy



Figure 6: Open Space and Community Facilities Strategy

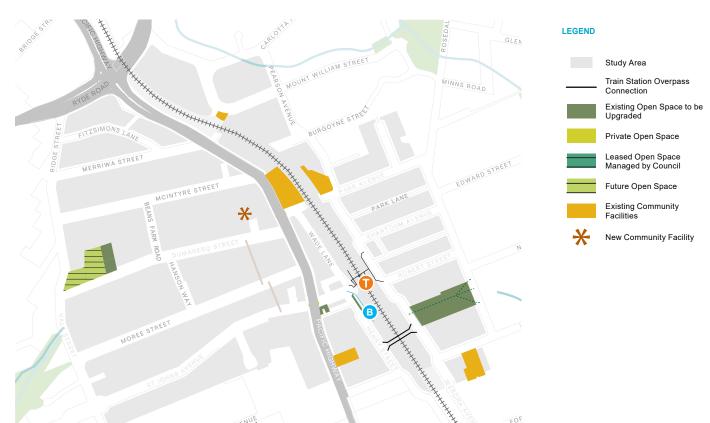
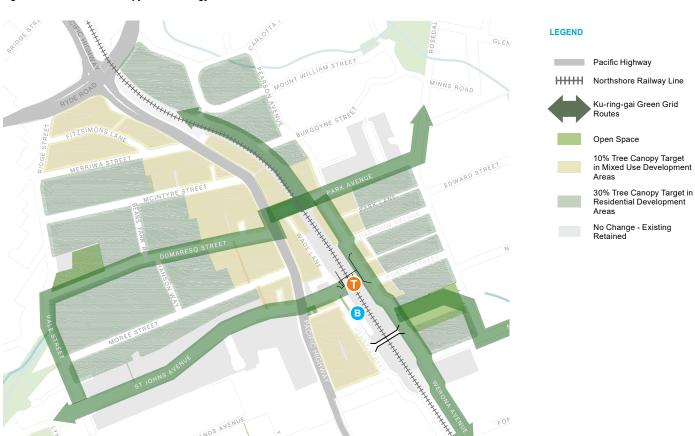


Figure 7: Green Grid and Canopy Cover Strategy



Killara

Killara's growth under the Preferred Scenario is the smallest of the four centres – about 2,778 additional dwellings in capacity. These new homes will mostly be in the form of 3 to 5 storey apartment buildings that suit downsizers or small families, adding to the diversity of housing.

KEY FEATURES:

- The precinct will accommodate approximately 2,778 new dwellings, with building heights ranging from 3 to 8 storeys. Higher-density development is focused along the Pacific Highway, while surrounding residential areas are kept at a lower scale to preserve local character and heritage values.
- Areas previously earmarked for 5–8 storeys in Scenario 3b are further refined under the Preferred Scenario to ensure a gentle transition to Heritage Conservation Areas. For instance, on Killara Avenue and Stanhope Road, 3 storey buildings are introduced adjacent to low density heritage conservation areas to manage interface impacts.
- Killara contains large and contiguous Conservation areas with high concentration of Heritage Items. The majority of these areas are protected under the Preferred Scenario. No development is proposed on the eastern side of the railway line, with the exception of the Post Office site,

- which is earmarked for a 4 storey development to support small-scale retail and activate Werona Avenue streetscape beween Gordon and Lindfield stations.
- To make up for any potential loss of dwelling capacity from the scaled-back areas, a new area on the western side of Killara is added. The blocks between Essex Street and Buckingham Road west of Pacific Highway are proposed for 5 to 8 storey mixed use and residential buildings.
- Public domain and streetscape upgrades are proposed throughout the centre, including widened footpaths, improved lighting, overhead powerline bundling, and the addition of new trees along local roads.
- Traffic and transport improvements include intersection and crossing upgrades on Culworth Avenue and Werona Avenue, traffic calming in key local streets to improve pedestrian accessibility and safety, new separated cycleways along Werona Avenue and Stanhope Road.
- Open space upgrades will be carried out at Abbotsholme Glen and Selkirk Park, with continued public access and recreation use at Regimental Park, managed under a lease from Sydney Water.



Figure 8: TOD Alternative Preferred Scenario - Killara

 The Marian Street Theatre is proposed to be upgraded and expanded, enhancing local access to community and cultural facilities. 3 to 8 storeys*

2,778 dwellings

98% HCA protection

Figure 9: Artist impression of Killara (source: SJB Urban)



Figure 10: Public Domain Strategy



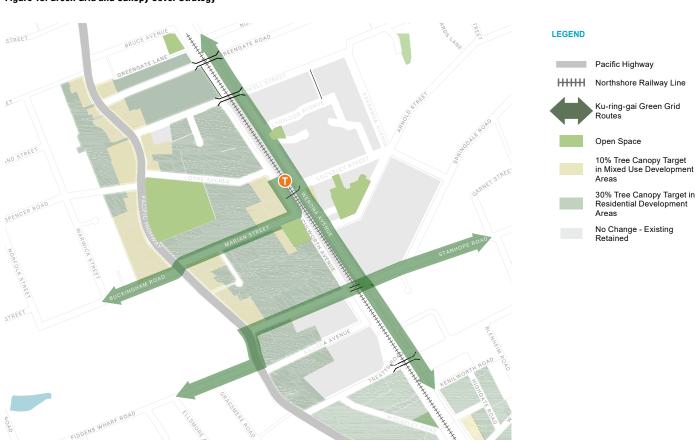
Figure 11: Traffic and Active Transport Strategy



Figure 12: Open Space and Community Facilities Strategy



Figure 13: Green Grid and Canopy Cover Strategy



Lindfield

The vision for Lindfield is a thriving centre that combines retail, community facilities, open space and a large component of new housing. Lindfield is proposed to accommodate the highest number of new dwellings among the four centres - 9,419 dwellings. With higher density developments in the core gradually transitioning to 3 storey residential buildings along the edges, Lindfield's transformation as envisioned by the Preferred Scenario has the potential to position this centre as a sustainable urban centre which balances growth with local character.

KEY FEATURES:

- Building heights will range from 3 to 18 storeys, with the tallest buildings located at the Lindfield Village Hub. Lower building heights are applied at the edges of the precinct to manage transitions and minimise impacts on low-density heritage conservation areas.
- Areas excluded: compared to other centres, a smaller portion of properties are excluded from high density development in Lindfield. This includes three properties located on the eastern side of Nelson Road and 12 properties located between Valley Road, Russell Lane, Trafalgar Avenue and Middle Harbour Road.

- Areas included: To compensate for areas where development is reduced, new areas have been added including the area east of Pacific Highway between Wolseley and Treatts Roads proposed for R4 High Density development zone.
- The Lindfield Village Hub will include community infrastructure such as a park, civic plaza, a library, a childcare centre and a community centre, under LEP requirements.
- Streetscape improvements will include widened footpaths, upgraded lighting and street furniture, overhead powerline bundling, and the planting of new street trees to enhance public amenity. Intersection upgrades are planned along Pacific Highway and Lindfield Avenue, alongside traffic calming measures and new pedestrian accessways.
- Separated cycleways are proposed along Lindfield Avenue, Havilah Road, Balfour Street, Drovers Way, and Gladstone Parade, supporting active transport connections across the centre. An optional upgrade to widen the road between Trafalgar Avenue and Nelson Road (via Russell and Tryon Lanes) is under consideration to allow two-way traffic and pedestrian footpaths.

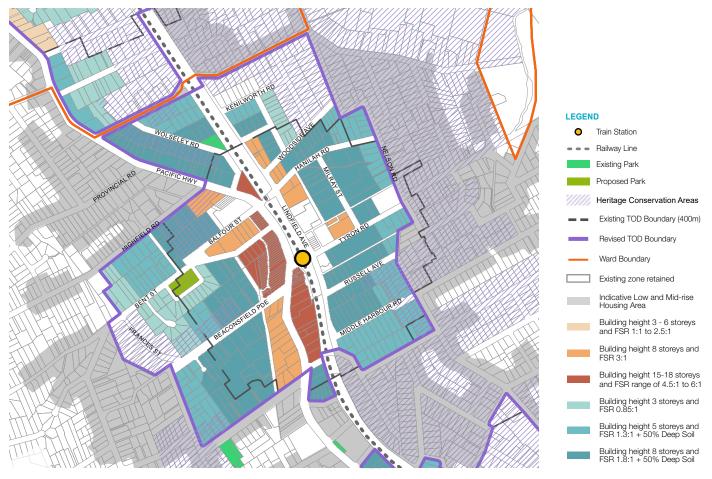


Figure 14: TOD Alternative Preferred Scenario - Lindfield

3 to 18 storeys*

9,419 dwellings

33% HCA protection

Figure 15: Artist impression of Lindfield (source: SJB Urban)



Figure 16: Public Domain Strategy



Figure 17: Traffic and Active Transport Strategy

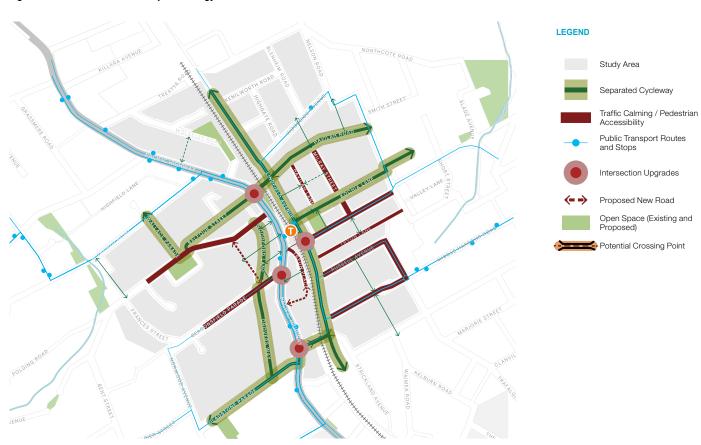
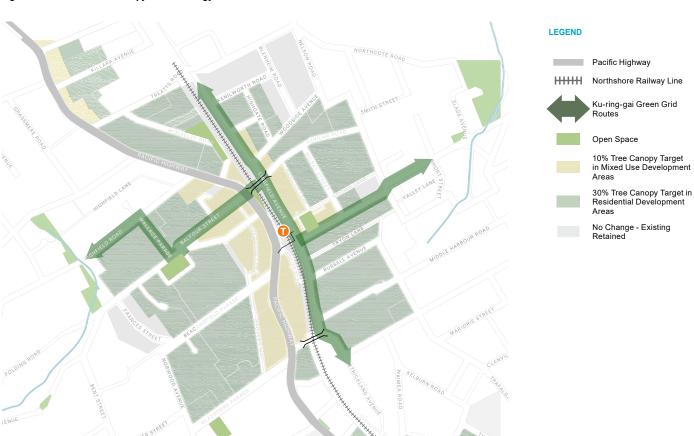


Figure 18: Open Space and Community Facilities Strategy



Figure 19: Green Grid and Canopy Cover Strategy



Roseville

New high density development in Roseville is proposed to be centred along Pacific Highway and Hill Street with building heights not exceeding 8 storeys. Roseville's additional housing capacity is relatively small compared to other centres, consistent with its position as a secondary local centre.

KEY FEATURES:

- Approximately 3,353 new dwellings are proposed, with building heights ranging from 3 to 8 storeys. Development is focused around the station precinct while maintaining lower-scale edges to protect the established character of the suburb.
- Roseville contains large portions of heritage conservation areas, particularly to the east. The Preferred Scenario protects majority of these areas to manage transition impacts and protect integrity of large areas of Heritage Conservation land.
- The plan deliberately excludes or downzones several sites which were included under Scenario 3b or the TOD SEPP. These areas include but are not limited to large portions of residential blocks between Bancroft Avenue to Clanville Road on the east of train station and Alexander Parade and Maclaurin Parade to the west of the train station.

- Areas included: to compensate for areas where development is reduced, new areas have been added including but not limited to the properties within the block defined by Clanville Road, The Grove, Oliver Road and Hill Street. In other areas 3 storey apartment buildings are proposed to manage transition between new high density development and existing low density residential buildings.
- The scenario introduces a notable land use change for the area between Shirley Road and Pockley Avenue, for provision of a new park.
- A new local road is proposed between Pockley Avenue and Shirley Road, providing alternative vehicle access to the Pacific Highway and improved pedestrian connectivity.
- Streetscape upgrades will enhance the local centre, including widened footpaths, new lighting, overhead powerline bundling, and street tree planting, focusing on creating a more walkable and visually appealing environment.
- Traffic and active transport improvements include intersection upgrades at Maclaurin Parade and Corona Avenue, upgrade works to The Rifleway to enhance

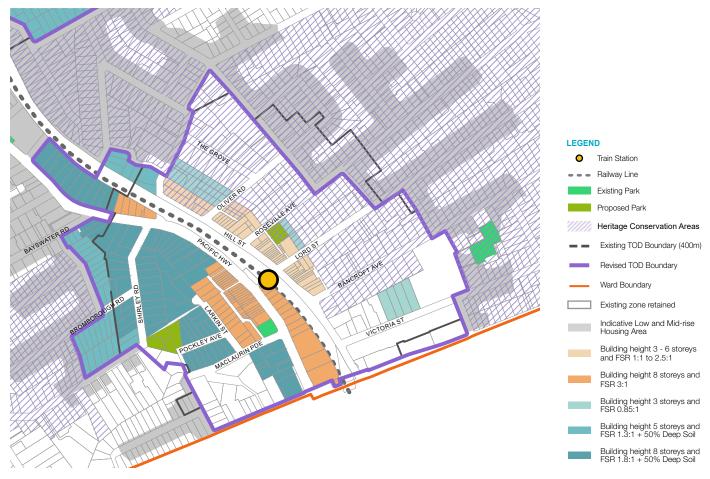


Figure 20: TOD Alternative Preferred Scenario - Rosevile

pedestrian and cycling access, separated cycleways along Shirley Road, Clanville Road, Hill Street, and Roseville Avenue, and traffic calming measures on local streets to improve safety and walkability.

 Open space improvements include upgrades to Roseville Memorial Park and Bancroft Park, further enhancing public access to quality green space across the precinct.

Figure 21: Artist impression of Roseville (source: SJB Urban)

3 to 8 storeys*

3,353 dwellings

84% HCA protection



Figure 22: Public Domain Strategy

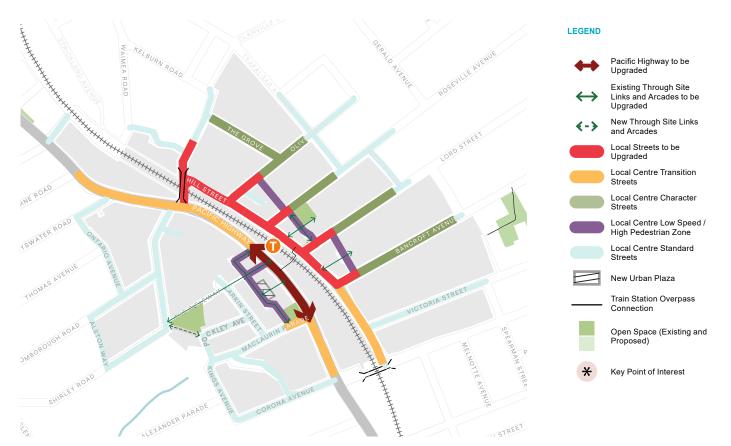


Figure 23: Traffic and Active Transport Strategy



Figure 24: Open Space and Community Facilities Strategy



Figure 25: Green Grid and Canopy Cover Strategy



Built Form Typologies

The Preferred Scenario masterplan takes a more contextsensitive approach compared to the uniform six-storey built form prescribed by the TOD SEPP. Rather than applying a single blanket height, the Preferred Scenario introduces a graduated density that responds to local character. This approach ensures that growth is strategically distributed, allowing for higher densities in key centres while maintaining appropriate transitions to surrounding areas.

To guide built form outcomes, the Preferred Scenario defines seven broad built form typologies. Providing a variety of built form typologies delivers greater housing diversity, economic activation, and sustainability benefits. A mix of low, medium, and high-density residential options ensures that different household types and income levels are accommodated. Mixed-use precincts support local businesses, enhance street-level activity, and encourage public transport use, reducing reliance on private vehicles and creating more vibrant, walkable centres.

The Preferred Scenario carefully manages built form transitions, both between and within centres. Gordon, as the key centre, features landmark buildings of 25-28 storeys, reinforcing its role as a district hub. Lindfield, a large centre, accommodates buildings up to 18 storeys, ensuring a balanced urban scale. Killara and Roseville, being smaller centres, have a maximum height of 8 storeys, maintaining their existing character while allowing for moderate intensification. Within the centres, transitions are managed through stepped height reductions and streets acting as interface boundaries, ensuring a smoother transition to surrounding low-rise areas and minimising overshadowing and visual impact.

LOW TO MEDIUM DENSITY RESIDENTIAL



Tubbs View + Hamilton Corner, Lindfield NSW



Putney Hill, Ryde NSW



The Grounds, Ivanhoe East VIC

KEY CHARACTERISTICS		
Zoning	R4 - High Density Residential	
FSR	0.85:1 - 1:1	
нов	3 storeys	
Typologies	Terraces, mid-rise apartments	
Deep Soil	40-50%	

MEDIUM TO HIGH DENSITY RESIDENTIAL



Crimson Hill, Lindfield NSW



Urbain Residences, Crows Nest NSW



Urbain Residences, Jannali NSW

Zoning R4 - High Density Residential FSR 1.3:1 HOB 5 storeys Typologies Mid-rise apartments Deep Soil 50%

HIGH DENSITY RESIDENTIAL



Nine, Willoughby NSW



The Ashford, Castle Hill NSW

KEY CHARACTERISTICS		
Zoning	R4 - High Density Residential	
FSR	1.8:1	
нов	8 storeys	
Typologies	Apartments	
Deep Soil	50%	

SMALL CENTRES

The Bowery, Willoughby NSW



Maison Deux, Hunters Hill NSW



The Albany, Crows Nest NSW



SMALL - MEDIUM CENTRES



East Brunswick Village, East Brunswick NSW



Lindfield Village, Lindfield NSW



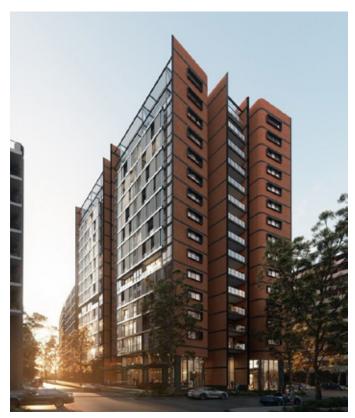
Seymours Residence, Roseville NSW

KEY CHARACTERISTICS		
Zoning	E1 / MU1	
FSR	3:1	
нов	8 storeys	
Typologies	Shop-top housing, apartments, mixed use buildings	

MEDIUM - LARGE CENTRES



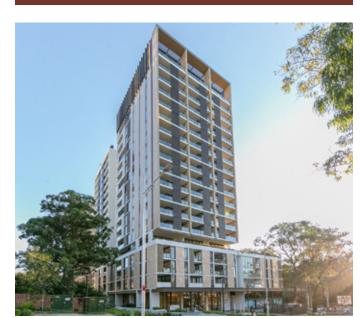
Luna Apartments, Green Square NSW



Alba Apartments, Green Square NSW



LANDMARKS



Natura, Macquarie Park NSW



Baia, Rhodes NSW

KEY CHARACTERISTICS		
Zoning	E1 / MU1	
FSR	5:1 - 8:1	
НОВ	25-28 storeys	
Typologies	Apartments, mixed use buildings	



Comparison

The TOD SEPP sets a standardised approach to zoning within 400 metres of train stations, allowing for up to 6-storey development with a 2.5:1 floor space ratio (FSR).

The Preferred Scenario varies the TOD SEPP development controls considerably. This chapter outlines the proposed targeted variations to the standard TOD SEPP controls—including both upzoning and downzoning—in response to the local context and in alignment with the adopted planning principles.

KEY CHANGES:

- 351 HCA properties and 83 non-HCA properties have been removed from the TOD SEPP controls. These areas were excluded to protect heritage character, avoid fragmented or transitional development, minimise impacts on biodiversity and riparian lands, and allow for the delivery of local infrastructure such as new parks and roads.
- 76 HCA properties and 358 non-HCA properties have been downzoned from the standard TOD SEPP controls (typically 6 storeys and 2.5:1 FSR). These changes aim to protect existing trees, achieve a 30% canopy cover, manage long-term environmental impacts, and improve transitions through setbacks, deep soil requirements, and reduced building heights and densities.
- 566 non-HCA properties and 47 HCA properties have been added to the TOD SEPP area. Non-HCA areas were selected for their proximity to services, logical street boundaries, and development capacity. The HCA inclusions are limited and based on planning considerations such as low heritage item density, proximity to transport, and distinct boundaries that support appropriate transitions.
- 295 non-HCA properties and 1 HCA property have been upzoned beyond standard TOD SEPP controls, primarily within existing and new E1 Local Centre and MU1 Mixed Use zones. These areas will accommodate greater heights (up to 28 storeys) and higher FSRs (up to 8:1) to support local centre revitalisation, respond to market conditions, and meet future housing and employment prodes.

The proposed changes reflect a place-based approach that maintains the overall intent of the SEPP while refining its application to better manage impacts, support centre revitalisation, and deliver more sustainable urban outcomes.

TOD SEPP Areas Downzoned

HCA AREAS REMOVED FROM TOD

The Preferred Scenario aims to protect as many properties within the Heritage Conservation Areas as feasible, whilst still achieving the overall yield targets.

The Preferred Scenario removes the TOD SEPP controls from 351 HCA properties, and instead retains the existing zone. This represents a reduction in development potential from 6-storeys and 2.5:1 to 2-storeys and 0.3:1.

Several factors contribute to the exclusion of HCAs from the Preferred Scenario, generally falling into the following categories:

- Adjusting the TOD boundary to the nearest local road when it affects only a few properties within a larger, unaffected HCA to ensure the entire HCA is protected.
- Protecting the entire HCA when a TOD impacts part of it and lacks a clear boundary with an adjacent, unaffected HCA to prevent splitting and transition issues.
- Managing extensive interface challenges where a TOD affects part of an HCA.
- Avoiding fragmented development by considering heritage-rich HCAs or those with irregular street and block patterns that limit development potential.

NON-HCA AREAS REMOVED FROM TOD

The Preferred Scenario, consistent with Scenario 3b, proposes to remove certain non-HCA areas currently within the TOD boundary and retaining the existing zone. This affects 83 properties.

Several factors contribute to the exclusion of non-HCA areas from the Preferred Scenario, generally falling into the following categories:

- Avoiding high-density residential development in environmentally sensitive areas, including biodiversity and riparian lands, as per Principle 1.
- Minimising impacts on heritage items, consistent with Principle 2.
- Enhancing canopy protection, consistent with Principle 2.
 Managing transition impacts by adjusting the development boundary, as per Principle 5.
- Providing new local parks and roads in strategic locations to meet infrastructure needs from population growth.

HCA AREAS DOWNZONED FROM TOD CONTROLS

The Preferred Scenario proposes to incorporate approximately 76 HCA properties within high density residential areas. It is proposed to replace the TOD controls with a R4-High Density Residential zone. This represents a downzoning from 6-storeys and 2.5:1 to 5 to 8-storeys and 1.3:1 to 1.8:1.

Selection of HCAs for inclusion acknowledges that all HCAs are assumed to be of equal value and worthy of protection under NSW Heritage Council criteria for local heritage significance, and the decision not to protect all or part of an HCA is based on planning considerations rather than heritage considerations.

The Preferred Scenario includes some HCAs within the development area for broad strategic reasons, including:

- Meeting dwelling targets.
- Addressing interface impacts.
- Minimizing development spread.
- Maintaining acceptable building heights, as per Scenarios 2a and 3b.
- Supporting the revitalization of centres.

NON-HCA AREAS DOWNZONED FROM TOD CONTROLS

The Preferred Scenario, consistent with Scenario 3b, proposes a range of building heights and FSRs in high-density residential zones to better protect existing trees and minimise long-term impacts on canopy cover. This affects 358 non-HCA properties.

In these areas, the TOD controls (2.5:1 FSR and 6 storeys) are replaced with reduced densities (FSR 0.85 to 1.8:1 and heights of 3 to 8 storeys).

The down-zoning of TOD areas in the Preferred Scenario is based on the following considerations:

- Protecting existing trees and minimising long-term canopy impacts, consistent with Principle 3 – Improve canopy protection.
- Achieving a 30% canopy cover target in R4 High Density Residential areas.
- Incorporating deep soil requirements (40-50% of site area), site coverage limits (30%), and increased tree planting, in line with Council's DCP controls.
- Introducing landscape setbacks and upper-level building setbacks to improve building separation and transition of building heights, consistent with Principle 5 – Managing transition impacts.

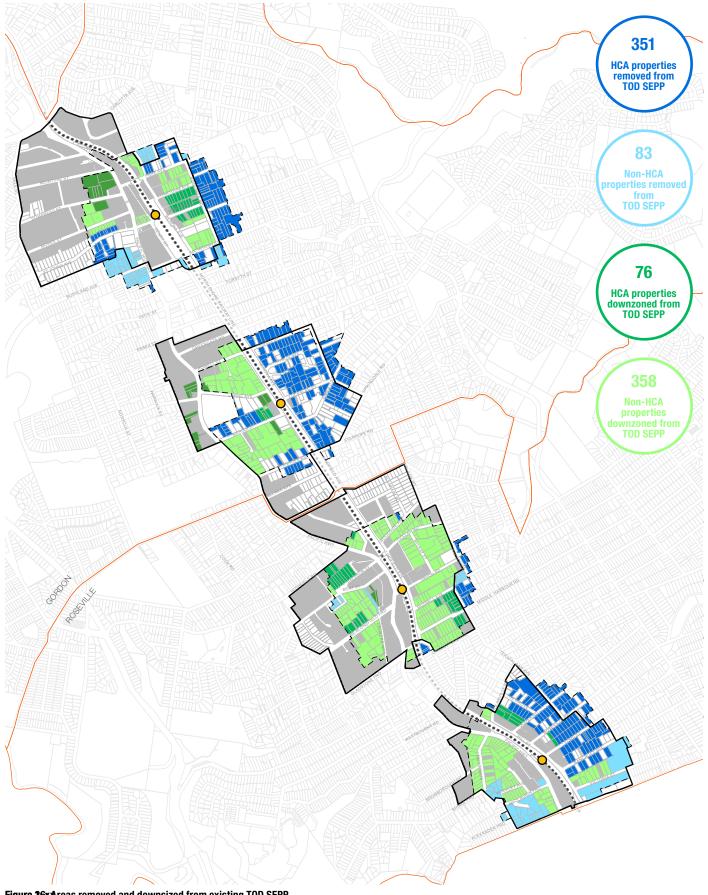
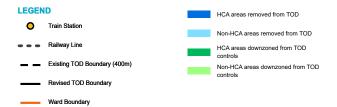


Figure 26xAreas removed and downsized from existing TOD SEPP



TOD SEPP Areas Upzoned

HCA AREAS ADDED TOD

The Preferred Scenario proposes the inclusion of some HCA areas outside the current TOD boundary, primarily to address interface and transition impacts. While the focus remains on protecting heritage, certain parts of HCAs have been identified for higher density where their characteristics support a more balanced planning outcome. This affects 47 HCA properties.

HCAs included in the development area are generally characterised by:

- A low concentration or absence of heritage items
- Proximity to the rail station
- A spatially discrete boundary, such as a local road or open space
- Limited continuity with adjoining HCAs

NON-HCA AREAS ADDED TO TOD

The Preferred Scenario proposes the inclusion of non-HCA areas outside the TOD boundary to help meet overall housing targets. While the focus was on upzoning within the TOD, it was also necessary to identify additional areas beyond the TOD boundary. The first priority was to include areas outside of HCAs to minimise heritage impacts, and affect 566 non-HCA properties.

The inclusion of these non-HCA areas in the Preferred Scenario was guided by the following considerations:

- Expanding into areas already serviced by existing retail
- Extending development within blocks to logical boundaries, such as surrounding roads
- Expanding along the Pacific Highway corridor, which benefits from strong existing connectivity

HCA AND NON-HCA AREAS UPZONED FROM TOD CONTROLS

The Preferred Scenario, aligned with Scenario 3b, proposes significantly increased building heights and densities in existing E1 – Local Centre zones to support centre revitalisation and concentrate growth near the rail station. Additionally, it introduces new MU1 and E1 areas to expand retail and commercial capacity, catering to future population growth. These changes represent a major upzoning (increased FSR and building heights) compared to the TOD controls, and affect 295 non-HCA properties and 1 HCA property.

The upzoning of non-HCA areas in the Preferred Scenario is driven by:

- Encouraging redevelopment in existing E1 zones, where the TOD FSR of 2.5:1 is often insufficient and, in some cases, lower than current KLEP provisions. The Preferred Scenario increases FSR to between 3.0:1 and 8.0:1 to support revitalisation, consistent with Principle 7 – Support Local Centre Revitalisation.
- Facilitating revitalisation in new E1 or MU1 zones, where a higher FSR is needed, in line with Principle 7.
- Increasing building heights from 6 to 7 storeys under the TOD to a range of 8 to 28 storeys in the Preferred Scenario to accommodate greater density and growth.

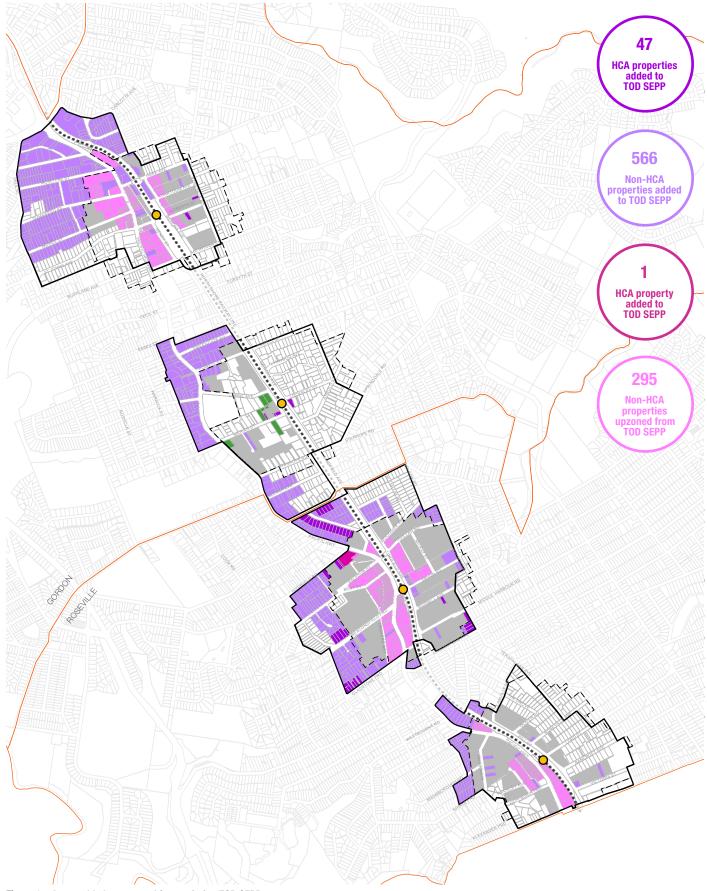
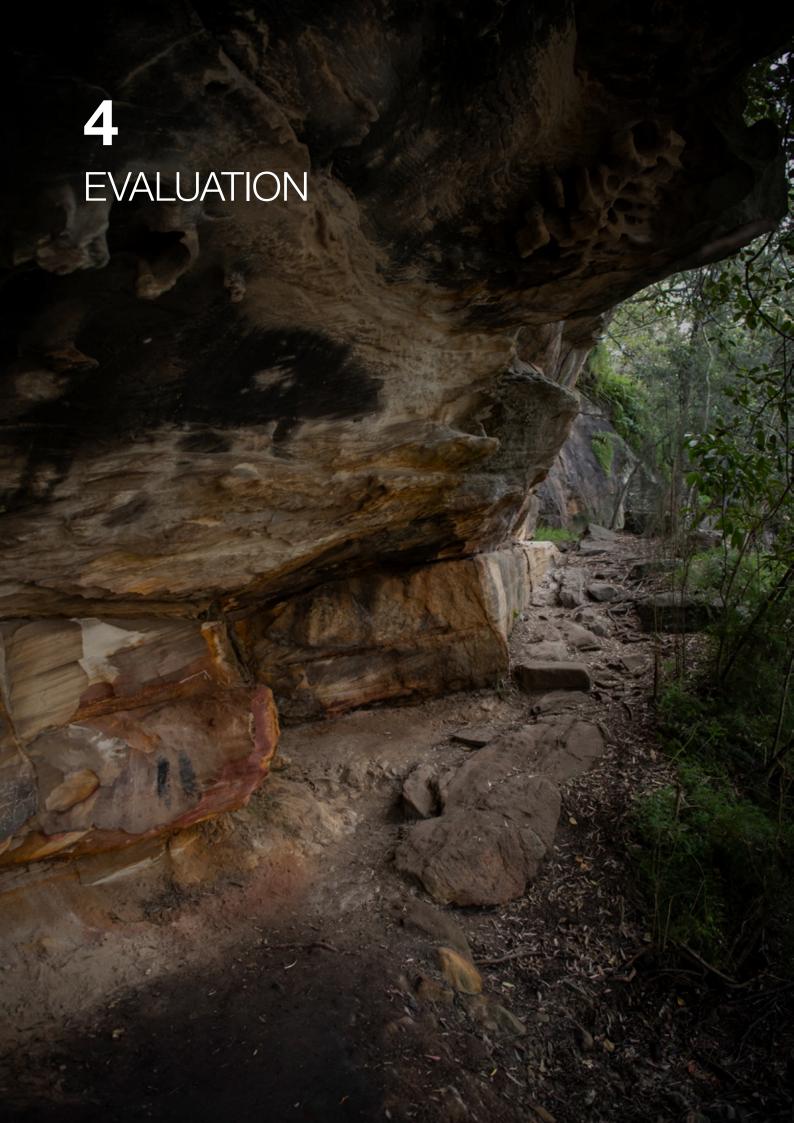


Figure 27xAreas added or upzoned from existing TOD SEPP





Evaluation

The Preferred Scenario has been assessed against the TOD SEPP using the seven principles to ensure it delivers stronger outcomes in the areas Council considers most important.

This evaluation has confirmed that the Preferred Scenario successfully achieves its intended objectives and outperforms the TOD SEPP in key areas. A summary of how Council's alternative Preferred Scenario comapres to the TOD SEPP is detailed in the table below.

	PRINCIPLE	SUMMARY OF IMPROVEMENT
1	Avoid environmentally sensitive lands	 The Preferred Scenario would result in a 68% improvement when compared to the TOD Area of impact reduced from 18.4ha under TOD to approximately 5.9ha under Preferred Scenario
2	Minimise impacts on heritage items	 The Preferred Scenario would result in a 69% improvement when compared to the TOD Number of heritage items impacted reduced from 136 under the TOD to 54 heritage items under Preferred Scenario
3	Preserve Heritage Conservation Areas	 The Preferred Scenario would result in an 80% improvement when compared to the TOD Area of HCAs impacted reduced from 67ha under the TOD to 14.3ha under Preferred Scenario
4	Minimise impacts on tree canopy	 The Preferred Scenario would result in a 76% improvement when compared to the TOD Area of impact reduced from 74ha under the TOD to 17.5ha under Preferred Scenario
5	Manage transition impacts	 The Preferred Scenario would result in a 93% improvement when compared to the TOD Number of properties impacted reduced from 287 properties under the TOD to 21 properties under the Preferred Scenario
6	Ensure appropriate building heights	No comparable metric
7	Support local centre revitalisation	 The Preferred Scenario would result in an 85% improvement when compared to the TOD Area of land increased from 6.6ha under the TOD to 43.4ha under the Preferred Scenario

Principle 1 - Avoid Environmentally Sensitive Lands (ESL)

Principle 1 is to avoid locating high density residential and mixed use in environmentally sensitive areas. Environmentally sensitive areas have been classified as:

- properties which contain core biodiversity;
- properties with 20% or more of the land area containing biodiversity that supports core biodiversity, contains landscape remnants or is a biodiversity corridor;
- properties with 25% or more of the land area affected by category 1 or 2 riparian lands; and
- properties that contain category 1 or 2 bushfire prone vegetation.

Under the TOD SEPP, all environmentally sensitive sites within a 400-metre radius of the stations would be eligible for

redevelopment. With a minimum deep soil requirement of 7% (as per the ADG), most vegetation that qualifies these sites as environmentally sensitive would likely be impacted. As a result, it has been estimated that the TOD could lead to the loss of approximately 18.4 hectares of environmentally sensitive land.

The Preferred Scenario aims to preserve as much environmentally sensitive land as possible. This is done by avoiding locating new development within environmentally sensitive sites where feasible, and by increasing the minimum deep soil requirement to 50% for residential zones, ensuring the retention of biodiversity and riparian areas.

Across the four centres, this approach could result in only 5.9 hectares of environmentally sensitive land potentially impacted, which is a reduction of 12.5 hectares compared with TOD.



Figure 28: Existing TOD SEPP - Evaluation of Principle 1

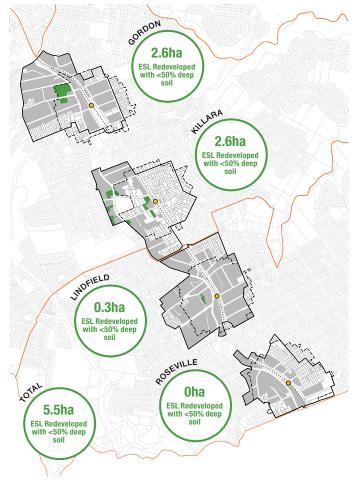


Figure 29: Preferred Scenario - Evaluation of Principle 1



Principle 2 - Minimise impact on heritage items

The TOD SEPP excludes heritage items entirely and offers no incentives for their inclusion within future development sites. Surrounding properties, however, are permitted to seek approval for up to six-storey apartment buildings, increasing the risk that heritage items will be overshadowed, overlooked, and left out of context. As a result, these heritage properties become effectively isolated or 'stranded' within a high-density residential setting. Under the TOD, 136 heritage items are at risk of being isolated within high-density zones.

In contrast, the Preferred Scenario prioritises the protection of heritage items through two key strategies:

 first, by directing development away from areas with high concentrations of heritage items, such as Heritage Conservation Areas, and second, by granting heritage properties located within high-density areas the same development rights as neighbouring sites.

Using this approach, the Preferred Scenario will protect 120 heritage items, meaning they will be located within low-density residential zones, preserving their existing setting. Alternatively, where this is not possible, 54 heritage items have been situated within high-density areas, which is a significant reduction compared with TOD SEPP which leaves 136 heritage items in high density zones.

Under the Preferred Scenario those properties in high density zones will receive the same development rights as adjacent sites, allowing them to be integrated into larger projects through adaptive reuse, with potential impacts managed through thoughtful redesign.



Figure 30: Existing TOD SEPP - Evaluation of Principle 2

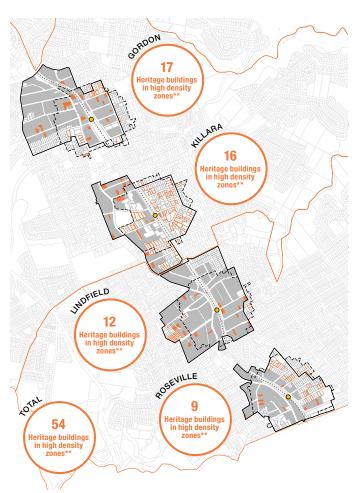


Figure 31: Preferred Scenario - Evaluation of Principle 2



Heritage items that are protected

Principle 3 - Preserve Heritage Conservation Areas (HCAs)

As a result of Ku-ring-gai's historic pattern of development being concentrated along the northern railway line, the TOD disproportionally impact the HCAs. Under the TOD, HCAs are not considered a constraint to development. There is a total of 67 hectares of HCAs within a 400-metre radius of Gordon, Killara, Lindfield, and Roseville stations that are potentially impacted. This impacts Killara the most, with 28.7 hectares of HCA land at risk.

The Preferred Scenario aims to avoid development in HCAs wherever possible. To ensure their preservation, the Council commissioned an independent review of 28 existing HCAs to validate their listings and boundaries in accordance with NSW heritage standards. This review, conducted by TKD Architects, confirmed that all HCAs meet the NSW Heritage Council's threshold for local heritage significance. Where avoidance

is not feasible, planning principles—rather than heritage principles—have guided redevelopment decisions. The Preferred Scenario prioritises the protection of HCAs that:

- Contain a high concentration of heritage items
- Are located more than 200 metres from a railway station
- Are continuous with adjoining HCAs outside the 800-metre study boundary

The Preferred Scenario proposes to incorporate approximately 14.3 hectares of HCA land within high density residential areas which is a reduction of 52.7 hectares compared with TOD SEPP.

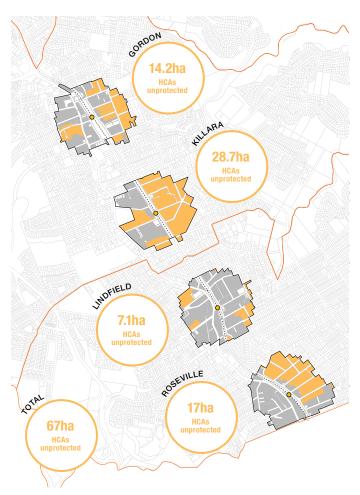


Figure 32: Existing TOD SEPP - Evaluation of Principle 3



Figure 33: Preferred Scenario - Evaluation of Principle 3



Principle 4 - Minimise impacts on tree canopy

The TOD SEPP is expected to have a significant impact on canopy cover, as it permits high-density redevelopment in areas with existing high tree canopy coverage (over 30%). It includes minimal provisions for protecting existing trees or requiring new plantings. Under this scenario, all rezoned sites designated for redevelopment would be subject to a minimum 7% deep soil requirement, as outlined in the ADG, meaning it would not be feasible to replace the existing canopy on site. As a result, redevelopment could lead to significant tree canopy loss across approximately 75 hectares of land.

The Preferred Scenario prioritises the protection of existing tree canopy cover while also creating opportunities for its expansion. All high-density residential areas are subject to a minimum 50% deep soil requirement, which will result in no net loss of canopy. The primary area where canopy protection is limited is along the highway corridor, within employment lands, where retail and commercial developments typically have larger building footprints and active frontages extending to the street. As a result, redevelopment in these areas is expected to result in canopy loss across approximately 17.5 hectares, which is a reduction of 57.5 hectares compared with TOD SEPP.

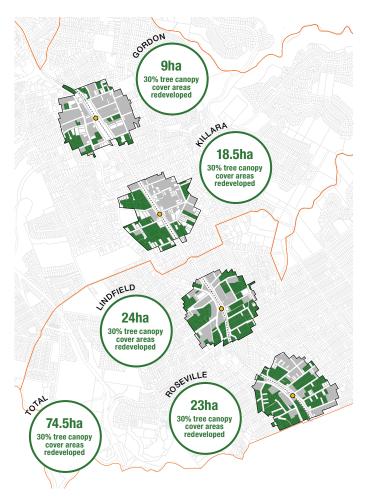


Figure 34: Existing TOD SEPP - Evaluation of Principle 4

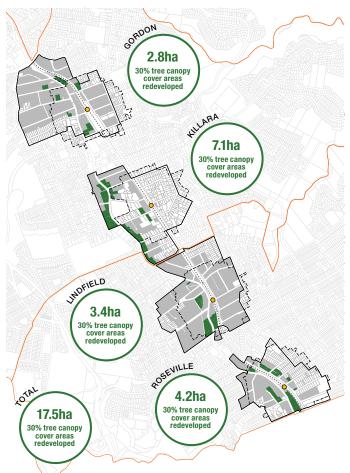


Figure 35: Preferred Scenario - Evaluation of Principle 4



Principle 5 - Manage transition impacts

Interface issues occur when there are significant changes in building scale, often leading to excessive privacy loss or overshadowing. To assess potential interface challenges across a large site area, a height transition threshold of 1:2 is considered appropriate for neighbouring properties that share a boundary. This means that a four-storey building adjacent to a two-storey dwelling is acceptable (1:2), whereas a six-storey building next to a two-storey dwelling (1:3) would create an imbalance and be deemed inappropriate.

The Low and Mid Rise (LMR) policy came into effect on 28 February 2025. Under this policy, R3 and R4 zones within an 800m walking distance of stations are eligible for mid-rise development, while R2 zones within the same distance are eligible for low-rise development. The areas surrounding the TOD SEPP precincts in Gordon, Killara, Lindfield, and Roseville are predominantly zoned R2. As the LMR policy does not

alter the existing height of building standard, development in these areas is expected to remain largely two-storey dwellings, although at a higher density, such as two-storey townhouses.

The TOD SEPP applies to residential and employment land within 400 metres of the four railway stations, excluding heritage sites. In many cases, upzoning is not defined by roads, a common approach for managing height and land use transitions. As a result, significant transition impacts may occur mid-block along the TOD boundary. Under the TOD, 287 properties could experience interface impacts.

The Preferred Scenario addresses transition impacts primarily by rezoning high-density areas to cover entire blocks or by stepping down building heights mid-block (e.g., transitioning from 8 storeys to 5 storeys). The Preferred Scenario may impact on only 21 properties. It is anticipated that these impacts will be managed through site-specific DCP controls.

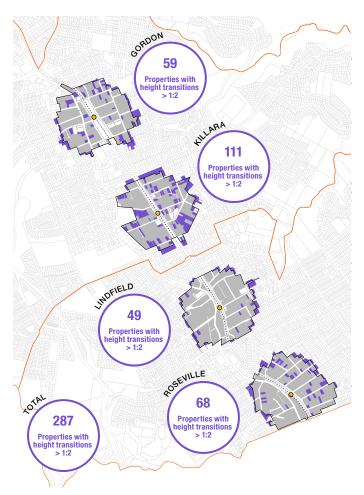


Figure 36: Existing TOD SEPP - Evaluation of Principle 5

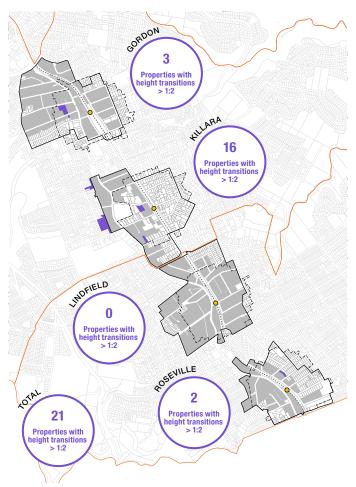
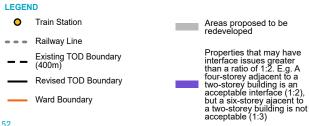


Figure 37: Preferred Scenario - Evaluation of Principle 5



Principle 7 - Support local centre revitalisation

The TOD program is not a centres policy and does not include incentives or initiatives to expand commercial or community facilities within the TOD station precincts. Under the TOD SEPP, existing sites within E1 centres are proposed to increase to a 2.5:1 FSR. However, many sites within the four station precincts already have an FSR at or above this level, providing little incentive for redevelopment. For example, in Gordon, only 4,100 sqm of E1 land would receive an uplift under the TOD program. Overall, approximately 6.6 hectares of E1 land would be rezoned for increased density.

Feasibility studies commissioned by the Council indicate that many of these E1 sites are unlikely to be viable for redevelopment under the TOD framework. As a result, the TOD scenario may create a 'doughnut' effect, where high-density residential development surrounds the retail and commercial centre, while the core itself remains largely unchanged.

Unlike the TODD SEPP, the Preferred Scenario identifies additional land for E1 and MU1 uses, providing greater opportunities for mixed-use development. This expansion supports urban renewal in commercial centres alongside residential growth, enabling the development of retail facilities such as supermarkets, commercial spaces, and community amenities like libraries and community centres. Under the Preferred Scenario, 43.4 hectares of employment land would experience uplift, with the majority concentrated in Gordon, the area's primary centre.

Feasibility studies on key sites within the centres confirm that increased retail, commercial, and community infrastructure is achievable, ensuring redevelopment effectively supports population growth.

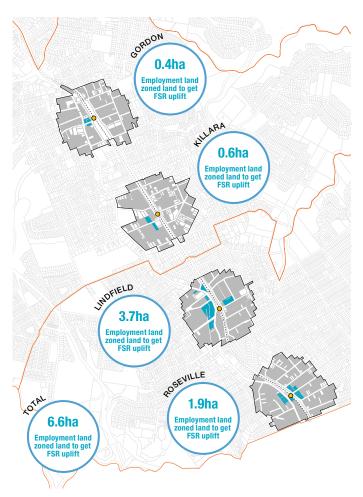


Figure 38: Existing TOD SEPP - Evaluation of Principle 7

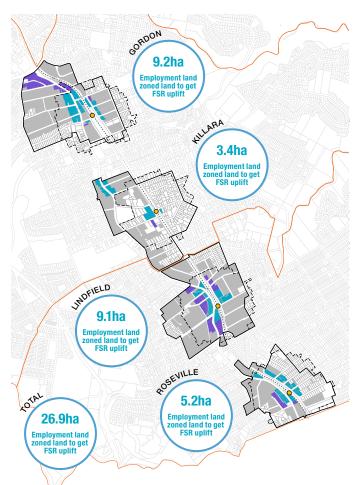
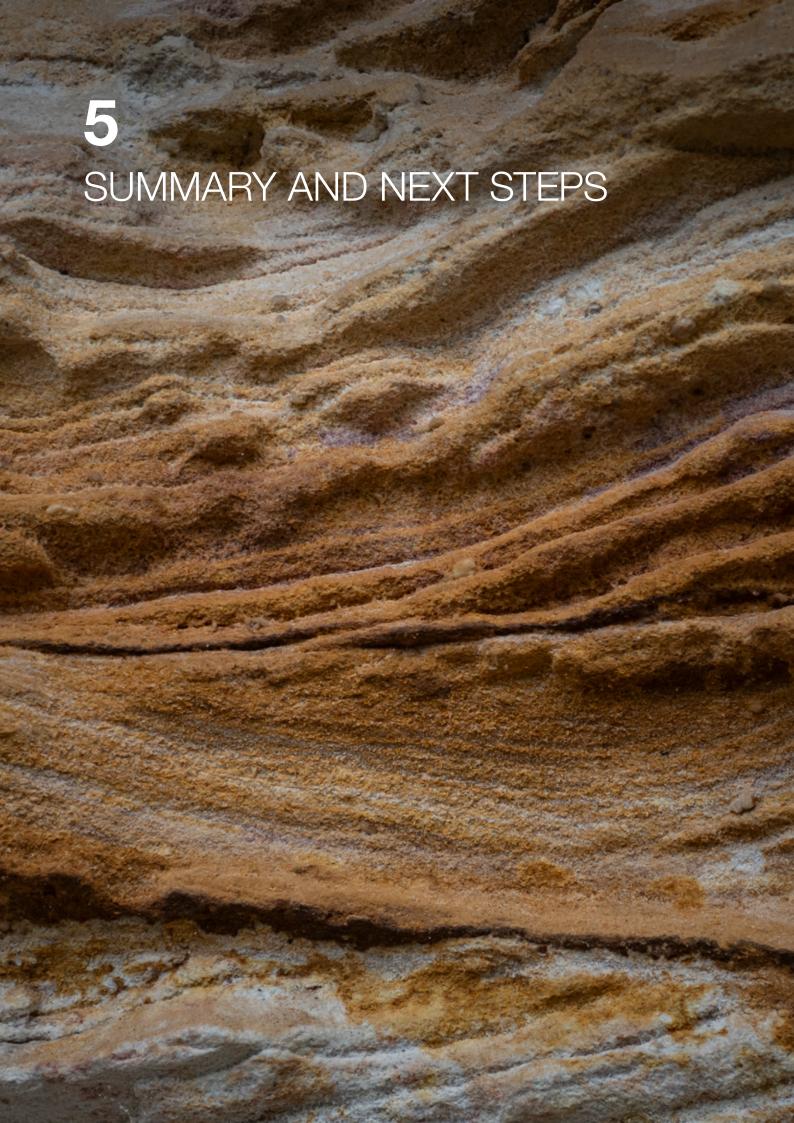


Figure 39: Preferred Scenario - Evaluation of Principle 6





Summary

The Preferred Scenario presented in this report has been developed from Option 3b as exhibited by Council in late 2024. The Preferred Scenario considers the results of public consultation and the overarching requirement to meet quite challenging State Government dwelling targets.

Where there are deviations from the exhibited option, these are discussed in detail in this report. In large measure, the preferred scenario could be said to reflect the community's expectations in relation to more appropriate development around railway stations than reflected in the initial TOD controls. The preferred option seeks to preserve and retain the core elements of Ku-ring-gai's unique urban character within the challenging requirements established by the State Government

The preferred option has been developed with the original set of principles established by Council to guide the preparation of alternative TOD scenarios:

- Principle 1 Avoid environmentally sensitive areas
- Principle 2 Minimise impacts on Heritage Items
- Principle 3 Preserve Heritage Conservation Areas
- Principle 4 Minimise impacts on the tree canopy
- Principle 5 Manage transition impacts
- Principle 6 Ensure appropriate building heights
- Principle 7 Support Local Centre Revitalisation

There is little doubt that implementation of the TOD controls, and to a lesser extent the Preferred Scenario presented in this report, will have a profound and fundamental impact on the character of Ku-ring-gai.

By testing alternate scenarios, the original TOD controls, and the preferred option against the seven principles established by Council at the commencement of this master planning process, it can be demonstrated that the Preferred Scenario would mitigate some of the most significant negative outcomes embodied in the original TOD controls.

Next Steps

- 1. Upon endorsement by Council, the final draft document package would be provided to the DPHI to commence their final review of Council's Preferred Scenario.
- 2. A three-week exhibition period would commence shortly after Council's Extraordinary meeting scheduled for 31 March; public exhibition would likely conclude in the week commencing 22 April 2025.
- 3. It is anticipated that engagement consultants Taverner would require 10 working days to prepare a report on survey responses, expected delivery week commencing 5 May 2025. This material would be reviewed and incorporated in a report to Council, likely to be held in the last week of May 2025.
- 4. Once adopted by Council, the final document package would be provided to the Department of Planning, Housing and Infrastructure to complete their review, then to be implemented through amendments to the Ku-ring-gai Local Environmental Plan 2015 (KLEP). It is intended that the KLEP amendments will be made by the Minister for Planning via a self-repealing SEPP.
- 5. The requisite amendments to the Ku-ring-gai Development Control Plans will be made by Council.

References:

The following documents were originally included as attachment to the Ku-ring-gai Council Extraordinary Meeting - 31 March 2025 (TOD Alternative - Post-Exhibition - Preferred Scenario, Masterplan and Implementation Strategy report) and are referenced throughout this document:

- A1 TOD scenarios-engagement outcomes report-Becscomm-final
- A2 Submission Summary Table
- A3 Late submission Summary Table
- A4 Ku-ring-gai Centres Technical Study, March 2025
- A5 TOD Alternative Preferred Scenario
- A6 Preferred Scenario Justification for TOD Areas Removed and Added Heritage Conservation Areas
- A7 Justification for TOD Areas Removed from Preferred Scenario Non Heritage Areas
- A8 Evaluation of Preferred Scenario
- A9 Preferred Scenario Infrastructure Strategies
- A10 Affordable Housing Feasibility Analysis March 2025

