

I object to the proposal as exhibited (part nine/part ten storeys, 121 dwellings including 28 affordable units) and request the consent authority:

- 1) Refuse the application; or, if refusal is not adopted,**
- 2) Require a fundamental redesign that materially reduces height and bulk and demonstrates—using transparent, conservative and independently verifiable evidence—that impacts on neighbours, pedestrians, the local street network and the local environment have been avoided and minimised to the greatest extent practicable, not merely described as “acceptable”.**

This is not a submission against housing. It is a submission against a scale and operational footprint that is not demonstrated to be reasonable for a constrained local-street setting adjacent to a high-activity centre.

Key grounds and what should be required before any approval:

A. Built form is out-of-scale and risks a wall-like outcome

A 9–10 storey outcome in this local-street context risks a permanent wall-like built form/canyon effect, domination of the public domain, and irreversible amenity impacts. The consent authority should require (i) a comparative built-form analysis and publicly verifiable photomontages from multiple local street viewpoints demonstrating a reasonable transition in scale; and (ii) a redesign with a materially smaller upper-level floorplate achieved through genuine setbacks, not cosmetic façade treatments. If that transition cannot be demonstrated, refusal or a material reduction in height/bulk is the appropriate outcome.

B. Neighbour amenity impacts are irreversible and must be tested conservatively

At this height and proximity, impacts on outlook/sky view, daylight access and overshadowing are not minor and are irreversible once built. The exhibited material does not clearly demonstrate impacts on 1 Balfour Street, including from a rooftop perspective, and some visualisations appear inconsistent (some show no blocking while others show significant impacts). I request conservative solar/daylight modelling for affected receptors with clear assumptions, and independent peer review where impacts are contested.

C. Traffic assessment is too narrow; school-peak conditions and the wider network must be modelled

The traffic assessment appears to understate existing congestion—especially during school drop-off/pick-up—and relies on behavioural assumptions (e.g., residents changing travel times) rather than genuine mitigation. Existing Balfour Street conditions during school hours are already particularly busy and it is difficult to exit from 1 Balfour Street at these times. Congestion is not confined to the Pacific Highway/Balfour intersection; it also materially affects the connected local network via Wallace Parade and Bent Street. The assessment appears too narrowly focused on one intersection, applies an overly limited cumulative impact approach, and references modelling from other proposals rather than providing targeted school-peak testing for this development’s scale (121 dwellings, 9 storeys) and access arrangements. I request updated modelling that explicitly tests school-peak conditions across Balfour/Wallace/Bent, a broader cumulative impact assessment, and practical mitigation measures including demand management.

D. Cumulative impacts must be assessed (not “site-only”)

Given the constrained local network and existing peak pressure, a standalone “site-only” assessment is not credible. A cumulative assessment should account for baseline local-centre traffic and servicing activity, any nearby approved/exhibited developments, construction staging overlaps and cumulative disruption, and cumulative parking/kerbside demand and pedestrian movement. If combined loads cannot be shown to function safely and fairly, the proposal should not proceed at this scale.

E. Environment and BDAR uncertainties require stronger scrutiny and enforceable conditions

The BDAR includes uncertainties that warrant stronger scrutiny and enforceable consent conditions. It notes indicators suggesting possible Blue Gum High Forest (PCT 3136) but assesses as STIF (PCT 3262) for BAM purposes without sufficient justification. It also records microbat activity with a high proportion of calls not confidently identifiable while recommending targeted pre-demolition hollow/roof-cavity surveys—supporting the need for explicit consent conditions (targeted surveys, clear stop-work and relocation protocols if roosts are found) and transparent substantiation of SAI conclusions and impact mapping assumptions (including edge effects).

More broadly, removal of mature canopy and soil systems in this area risks worsening local heat and amenity (increased hard surfaces and reduced tree cover). Further environmental assessment is needed; a brief snapshot does not capture the animals and bird life that may be impacted.

Conclusion

The exhibited material to date appears general and does not yet demonstrate that a 9–10 storey, 121-dwelling scheme can operate safely and fairly in this constrained local-street/local-centre context, nor that irreversible amenity and environmental impacts have been minimised to the greatest extent practicable. I request refusal, or a materially reduced-height redesign supported by conservative, independently verifiable evidence and enforceable conditions.