

Dear Liam Spinks,

I write to formally object to SSD-101842729 - Residential Development with Infill Affordable Housing 2–6 Conway Avenue, 15–15A Fernleigh Avenue & 38–40 Carlisle Street, Rose Bay.

This objection is not rooted in resistance to housing supply, nor is it an attempt to prevent change. It is grounded in concerns about environmental responsibility, infrastructure capacity, cumulative impact, and adherence to orderly planning principles. Properly planned growth is necessary and appropriate. Growth detached from infrastructure reality and local context is not.

The proposal seeks to introduce 70 apartments into a suburb that is demonstrably constrained in both transport capacity and supporting infrastructure. Rose Bay has no train line, no dedicated bus lanes, no protected cycling network and no meaningful commuter parking at the ferry terminal. Peak-hour congestion along New South Head Road and its feeder streets is already chronic and well documented. These are structural limitations, not temporary inconveniences.

The development's provision of substantial on-site parking is itself an acknowledgment that residents will be car-dependent. Yet no commensurate transport upgrade accompanies the density uplift. The State Environmental Planning Policy (Housing) provisions facilitating infill affordable housing were not intended to override basic questions of site suitability. Increased density must be aligned with infrastructure capacity. That alignment is absent here.

The Environmental Planning and Assessment Act requires consideration of cumulative impacts and the public interest. This proposal cannot be assessed in isolation. Within the immediate locality there is another substantial development proposed under SSD-86122958 on Spencer Street, a further 49 dwellings proposed on Dover Road under SSD-86017721, and 11 three-bedroom apartments recently introduced on Ian Lane following demolition of two original character homes. The issue is not "70 apartments." It is the aggregated impact of sequential density increases within a small, infrastructure-limited coastal catchment.

When viewed cumulatively, the scale of uplift becomes untenable. Traffic volumes, school capacity, stormwater systems, pedestrian safety, retail amenity and local road networks will all be affected. Planning decisions that disregard cumulative intensity risk creating an irreversible shift in neighbourhood function without the infrastructure required to sustain it.

The proposal is also inconsistent with the established planning framework and local character objectives of Woollahra Municipal Council. Rose Bay is characterised by a low- to mid-rise coastal built form, landscaped setbacks, and a defined village scale. The scale and bulk enabled through the State Significant Development pathway materially exceed the prevailing and planned character controls. While State policies may permit variation in certain circumstances, they do not extinguish the obligation to

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consider context, streetscape harmony, and the preservation of local character. Once that character is eroded through repeated exceptions, it cannot be restored.

This is not a NIMBY position. It is a principled position that housing growth must be environmentally responsible, infrastructure-supported, and strategically sequenced. Locating high-density, car-dependent housing in an area without rail access, bus priority corridors or active transport infrastructure is inconsistent with sustainable planning objectives and broader metropolitan planning intent.

If the Department is minded to approve this proposal notwithstanding these constraints, it must clearly articulate how such approval satisfies statutory obligations relating to site suitability, infrastructure adequacy, cumulative impact assessment and the public interest.

In the absence of a demonstrably rigorous and legally sound assessment addressing these matters, any approval would invite close scrutiny and may warrant review before the Land and Environment Court of New South Wales. It is in the interests of all parties that the decision-making process be transparent, evidence-based and defensible.

For the reasons outlined above, SSD-101842729 should be refused.

Sincerely,  
Caroline Plante

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