

2/5 Hamilton Street
Rose Bay, NSW 2025
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1 December 2025

Dear Amy Watson

Re: SSD-86122958: 2-16 Spencer Street ROSE BAY NSW 2029

I am writing on behalf of my family and other concerned residents of Hamilton Street, Rose Bay, to formally object to residential development with in-fill affordable house proposed for 2-16 Spencer Street, Rose Bay (SSD-86122958). The proposed development raises significant issues related to zoning, traffic, parking, infrastructure, and overall amenity of the area and I urge Council to consider these issues.

Many of my concerns relate to broader issues than those covered by documents presented for consideration in SSD-86122958 but these issues are relevant because this is, to my knowledge, one of the first development approval being considered by Department of Planning, Housing and Infrastructure based on the new zoning. It is, therefore, imperative that these issues be considered to ensure sustainable development in Rose Bay and the greater Woollahra Council area.

Clarification and Compliance

SSD-86122958 has been submitted under the recently introduced Low and Mid-Rise Housing (LMR) provisions in Chapter 6 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) and for State significant development (SSD) under sections 4.12 and 4.36 of the *Environmental Planning and Assessment Act 1979*. This proposal substantially exceeds the development controls otherwise applicable to the site under the Woollahra Local Environmental Plan 2014 (WLEP 2014) and we have serious concerns about the adverse effects of the proposal, and similar future developments proposed under the LMR policy.

Woollahra Council is seeking clarification from the Minister regarding the zoning of Rose Bay for mid-rise development. Until this clarification is received and ratified, approval must not be given to construct a 9-storey residential flat building containing 54 units. The new low and mid-rise housing area is defined as surrounding a town centre that has a full line supermarket with at least one bus service per hour. According to Planning NSW ([Site selection | Planning](#)), Rose Bay town centre is on New South Head Road. There is, however, no full line supermarket (or equivalent) within the precinct on New South Head Road, Rose Bay.

Under *State Environmental Planning Policy (Housing) 2021*, Low and Mid-Rise Housing inner areas (0–400 m from a nominated station/centre) may be up to 6 storeys with an additional 2 storeys for infill affordable housing. This proposal exceeds the 8 storey limit and must be rejected for non-compliance with *SEPP (Housing) 2021*.

Infrastructure Constraints

Rose Bay's current infrastructure (water, sewer and roads) is already struggling to deliver adequate services.

During peak hours travelling by car between Dover Road, Rose Bay and Edgecliff Station takes on average 45 minutes; travelling by bus takes well over one hour. A test undertaken by *Wentworth Courier* several years ago, determined that it was faster to walk from Rose Bay to Edgecliff Station during peak hours than it was to drive. This has only deteriorated in recent years with multi-unit dwellings and additional car ownership.

Sewage from the area is currently pumped to outfalls in Dover Heights and Vaucluse. Sydney Water is currently diverting these flows to Parsley Bay ([Parsley Bay Pump Station](#)), and building a pumping station to direct this waste to Bondi. The diversion works are, however, are not due for completion until late 2026. Sydney Water has concerns that the capacity of the sewerage system may be inadequate to support the catchment's population during rainy periods due to storm water infiltration. This would be seriously exacerbated by the proposed residential growth.

Loss of Amenity

The height and scale of the proposed building will result in significant loss of amenity for existing residents

Given the height of proposed building, surrounding properties will experience a loss of privacy as many dwellings will overlook neighbouring properties.

The bulk of the building will significantly alter the streetscape, as it dwarfs adjacent buildings, reduces greenspace and increases shadowing on adjacent buildings and Spencer Street.

It will contribute to on-street parking shortages particularly during construction phase as tradespeople will use all available street parking. The area already experiences parking congestion due to nearby school, local businesses and cafes.

Flood Risk Management Report

A flood risk management analysis based on the current development proposal has not been conducted.

A Flood Risk Management Report dated 11 December 2024 was based on the original proposal submitted in December 2024. At that time the proposal was for 6 units with 1 parking level below ground. The current submission is for 12 units with 2 parking levels, both of which are below ground. The site has been classified as a medium flood-risk precinct.

This significant increase in excavation depth requires a revised flood hazard assessment. The existing report is no longer applicable and cannot be relied upon.

Transport Impact Statement (TIS)

Outdated Data

Before considering the TPA, it must be noted that:

- The Land Use Trip Generation analysis that informs the medium density residential summary was undertaken in 2013 and is seriously outdated.
- The Land Use Trip Generation analysis that informs the low density residential summary was undertaken in 2022.

- The number of cars per household (Woollahra LGA) increased by almost 10.5% (based on ABS Census of Population and Housing 2011 and 2021).
- The proposed dwelling is in Woollahra LGA, where car ownership is considerably higher than the State average (Motor Vehicles, Australia, January 2022, ABS).

Guide to Transport Impact Assessment V1.1 (GTIA) states that “Mode shares were found to vary widely across the sites surveyed, and any mode share estimate should be site specific, considering the site characteristics and network context.”

The outdated data underpinning the current TPA further diminishes its reliability. The significant escalation in the scale of the development, coupled with demonstrable rises in local car ownership, necessitates a more robust and site-specific traffic analysis that accurately reflects present-day realities. Any assessment must recognise the unique transport patterns within Woollahra LGA and the clear upward trajectory in vehicle reliance per household. The methodology used for estimating travel demand must therefore be updated to ensure an honest reflection of the likely transport impacts associated with this intensification of use.

Traffic

The mode share estimate quoted in TPA does not consider the location of the development, an area known for its high vehicle usage.

According to the TPA, current trip generation during peak hours is estimated at 2 vehicle trips per hour—based on the GTIA peak period traffic generation rates of 0.95 and 0.99 vehicle trips per dwelling per hour. Applying these rates to the proposed 54-unit development yields a minimum estimated traffic generation of 51 vehicle trips per hour (one per dwelling), representing a net increase of 48 additional trips per hour. This figure is more than three times higher than what is stated in the TPA.

Furthermore, the projected traffic volumes assumption of one trip per household is unrealistic and underestimates the probable impact. All proposed units are multi-bedroom dwellings, which are likely to generate multiple daily trips during peak hours (commuting, school drop-offs, etc).

Turning out of Hamilton Street onto Old South Head Road currently takes up to 15 minutes during peak hours. The addition of a minimum 15 (using number contained in the TPA) more vehicles will exacerbate delays and safety concerns.

According to the Traffic and Parking Assessment (TPA) provided, which is modelled on mid-density housing rather than the correct model of high-density housing, increased traffic will add 1 additional car to each 2-minute traffic light cycle. As the TPA indicates that there will be an additional 15 cars using roads during peak hours, the additional traffic from this development and given the number of traffic lights between Dover Road and Edgecliff Station will increase this time by at least 30 minutes.

Further, there is no continuous, dedicated bicycle lanes on either New South Head or Old South Head Roads, which further worsens the congestion and increases the delays and risks to both motorists and cyclists.

TPA notes that most of the smaller roads, including Hamilton Street have one lane of traffic each way. While this is technically correct, with cars parked on both sides of the street, most streets are reduced to one lane of traffic with drivers often waiting to proceed because a car is

moving in the opposite direction. The additional traffic on these streets will reduce road safety, especially around schools such as McCauley Catholic Primary School.

Crash History

Crash history only reports on the “current” crash history between 2019 and 2023. It does not include crashes that occurred in 2024, nor does it include ambulance, or paramedic, calls to the area in response to pedestrian accidents and/or near misses. While the intersection may not be eligible for Black Spot funding, the intersection of Old South Head Road and Hamilton Street together with the pedestrian crossing on Old South Head Road are known locally as dangerous sites. It is my understanding that Transport for NSW is reviewing both the intersection and pedestrian crossing to determine whether additional safety measures are required.

Overdevelopment of area

It is alarming that LMR reforms allow intensive development and deep excavation in this high-risk zone. My understanding is that high-risk areas identified in Rose Bay area may be excluded under Refinement 7 of the planning guidelines.

I know of four proposed developments currently being considered that amount to over 200 new dwellings. Spencer Street, Dover Road, Conroy Avenue and Wilberforce Avenue are all mooted for development under State significant development (SSD) under sections 4.12 and 4.36 of the *Environmental Planning and Assessment Act 1979*. This is a significant development concentration within a small area with narrow roads that do not allow two cars to pass simultaneously, shallow water table and a history of flooding, subsidence and structural failures linked to excavation and overdevelopment in recent years.

Woollahra Council commissioned a GHD geotechnical study in 2024 that clearly identifies various vulnerabilities. Council is aware that the current planning controls are ineffective in managing the cumulative effect of excavation in these areas. This study, together with other reports commissioned by them, confirm a clear foreseeable risk of damage to existing buildings and facilities by subsidence and/or flooding and/or acidification of soils arising from cumulative excavation and development on and in the shallow water table. Accumulating insults to the aquifer by successive excavations and developments, exacerbated by the inevitable increase in the sea levels at the coast adjoining Rose Bay may result in significant damage to the underlying infrastructure of roads, water and sewerage.

Grounds for Objection

I formally object to **SSD-86122958** on the following grounds:

- Failure to meet SEPP (Housing) 2021 criteria
- Increased traffic and safety risks not properly addressed
- Already strained infrastructure that is unable to support additional population
- Use of outdated transport data
- Overdevelopment of an area with shallow water table and a history of flooding, subsidence and structural failures

Conclusion

This development sets a precedent. It is critical that the decision made by Department of Planning, Housing and Infrastructure considers the long-term impact on Rose Bay's livability, infrastructure, and character.

I realise that there may be some inconsistencies in my submission, but I'm writing it from Prince of Wales Hospital Palliative Care Unit while I look after my terminally ill husband. This development proposal is too important to ignore despite my current personal situation.

Thank you for your consideration. I look forward to your response.

Regards

Kathy Meyer