

31 March 2026

Minister for Planning and Public Spaces
The Department of Planning, Housing and Infrastructure
4 Parramatta Square
12 Darcey Street
Parramatta NSW 2150

**Formal Objection to State Significant Development SSD 96505456 – Cammeray Seniors
Living 19–23 Rosalind Street, Cammeray NSW 2062**

Attention: Najeeb Kobeissi
Senior Planning Officer, Social and Diverse Housing Assessments

We object to the above State Significant Development on the grounds of unreasonable amenity impacts on adjoining residential properties.

Our daughter, son-in-law, and grandchildren are residents and owners of 5/199 West Street, Crows Nest, a two-storey townhouse immediately adjacent to the western boundary of Building B. The proposed development will materially diminish the quiet enjoyment, privacy, and amenity of their home and courtyard.

Key Impacts

The proposal results in the following unacceptable impacts:

1. Overshadowing and loss of sunlight
2. Excessive height, bulk, and scale
3. Noise and exhaust emissions from the Building B plant and garage
4. Loss of privacy
5. Misuse of SSD Provisions and Housing Outcomes
6. Fire Safety Concerns

1. & 2. Excessive Height and Bulk / Overshadowing

Building B has a proposed height of **18.36 metres**, exceeding the **15.8 metre** maximum height limit by **2.56 metres**, with the roof and lift/stair overruns reaching approximately **19.34 metres**. The argument that lift and stair structures should be excluded from height calculations is inconsistent with the intent of maximum height controls.

The introduction of a **sixth floor** effectively adds an additional storey to maximise development yield and attain harbour and district views. The position in Building B at the rear of the site does not negate its impact, it just shifts it to neighbouring homes on the Western and Southern Boundaries including 5/199 West Street. This floor should be **removed entirely**, and additional setbacks applied to levels 4 and 5 along the Western boundary.

The developer have promoted the idea that that a 2.58m setback was applied to building A facing Rosalind Street, effecting **sightlines** from the footpath. The same principle should be applied to sightlines on the 199 West Street boundary to maintain consistency with their arguments on Overshadowing/Bulk.

While the developer has applied setbacks and massing controls to the Rosalind Street frontage to protect sightlines, these principles have **not been applied to the West Street boundary**. Building B is only **6 metres from the western boundary from the ground floor to level 4 (5th**

storey), resulting in excessive bulk, visual impact, reduced sunlight (particularly morning sunlight), and altered wind and cooling patterns.

To mitigate this impact, an **additional 3-metre setback** should be applied along the western boundary to provide a more appropriate scale transition to adjoining low-density development and reduce privacy impacts, as per Apartment Design Guidelines between different zones properties.

3. Noise and Exhaust Impacts (Plant Room)

A plant room is located at the lower level of Building B adjacent to 199 West Street. Plant rooms are a known source of continuous noise and exhaust emissions.

All mechanical exhaust and plant noise should be **vented at roof level**, well away from neighbouring dwellings, consistent with best-practice design. As proposed, noise and vehicle fumes from the garage and plant will directly impact the bedrooms and living areas of **the adjoining townhouses**, creating an unacceptable acoustic and air quality environment.

4. Loss of Privacy

The six-storey height of Building B, with windows and balconies facing directly into the townhouse's **courtyard, living areas, kitchen, and bedrooms**, will significantly compromise privacy and reasonable residential amenity.

Permanent privacy screens, increased setbacks, and revised window placement are required to mitigate these impacts.

5. Misuse of SSD Provisions and Housing Outcomes

The application is both materially misleading and materially incomplete in its reliance on SSD provisions intended to increase housing supply and affordability.

The proposal replaces **54 existing apartments** (predominantly 1- and 2-bedroom dwellings) with **49 dwellings**, comprising **18 two-bedroom and 31 three-bedroom units**, plus a nominal **two-bed aged care facility** located on the lower ground floor.

The aged care component receives **no winter sunlight**, as demonstrated in the applicant's solar diagrams, and is not fit for purpose, and could imply an elderly abuse housing care situation.

Its inclusion appears designed solely to trigger the **25% additional floor space allowance** under Section 87(2)(iii), rather than to deliver a viable or humane residential care facility.

The approval of an aged care facility in an underground environment will set a precedent for future developments in the state, not a welcomed situation.

This redevelopment removes a significant number of **affordable and smaller dwellings** suitable for essential workers and results in a **net reduction in residential capacity**, undermining the stated objectives of the SSD pathway.

The new 49 largely 3-bedroom ILU's will only house 1 or 2 people. North Sydney Council NSCP has identified a shortfall of approximately 7,800 studio & one-bedroom dwellings, making this reduction significant and in contradiction to the NSW Government Housing Policy principles, which is focussed on increasing, not reducing supply.

The claim by the developers that one-bedroom ILU's are not what the market wants is also contradicted by recent SSD Senior Housing developments. These include the Pathways Cremorne and United Belrose Seniors Housing, which both include one-bedroom ILU's.

6. Fire Safety Concerns

The six-storey height of Building B presents heightened fire safety risks due to limited Fire and Rescue access, particularly for ladder trucks.

This risk is exacerbated by the **age and mobility limitations of senior residents**, with the prohibition on lift use during fires, and reliance on stair evacuation under emergency conditions. N.b. Lift notices "not to be used in case of a fire".

Conclusion

The proposed development should be denied without making the following changes-

Removal of 6th floor on building B to comply with maximum allowed height of 15.8 metres and, additional setbacks applied on the western boundary to protect amenity impacts and allow a transition in scale with lower density neighbours.

Appropriate changes to the plant room on the lower ground floor of building B.

Care beds relocated out of the basement to the ground floor to ensure genuine design for 'aging in place'.

Yours Sincerely

Peter & Neva Dalla