

Selina Poyner
27 Rosalind Street
Cammeray NSW 2062
1 April 2026

Submission: Formal objection to the Cammeray Seniors Living development (SSD-96505456)

To the assessing officer,

I am writing to lodge a formal objection to the above proposed development. I am the owner-occupier of 27 Rosalind Street, a Federation-era semi-detached cottage (c. 1915) that adjoins the development site's eastern boundary for 39 m and has the most direct interface with Building A. Because my house is semi-detached to the east, it is long and narrow and almost all windows and primary living spaces face west toward the site. The house has only one north-facing bedroom window, so it relies on western sky exposure for sunlight, open sky views, and ambient daylight.

As currently designed, the proposal places its smallest setback along my boundary, creating a continuous five storey wall for the full length of my site. With Building A set only 3 m from my boundary, directly opposite my home set back 1.6 m, the resulting 4.6 m separation is inadequate and would overwhelm my single storey Federation home.

This bulk and height feel out of scale with Rosalind Street. My home, one of the oldest on the street, contributes positively to the heritage character and streetscape, yet it faces the most intensive and least sensitive interface with the proposal. Other boundaries benefit from materially greater setbacks and more considered transitions, in some cases improving on existing conditions experienced. This uneven treatment would have serious impacts on my residential amenity, privacy, structural safety, and the visual character of the street.

Throughout this submission, I have provided photographs to establish on-site context, illustrate the heritage nature and scale of my home, and address factual inaccuracies and omissions in the EIS, particularly in relation to sunlight, outlook, privacy, and existing boundary conditions.

My key concerns are summarised below (with further detail in the sections that follow):

1. **Overshadowing, loss of sky and privacy (excessive bulk and scale):** Building A would significantly reduce the sunlight and open sky views my home relies on and introduce close-range overlooking, with no meaningful transition in scale. The EIS understates these impacts due to limitations in the shadow analysis, misidentification of key living spaces, and selectively framed visual material.
2. **Retaining wall and excavation risk:** The EIS fails to explain how the deteriorated eastern boundary retaining wall will be managed, despite proposing new retaining walls elsewhere. Undertaking deep basement excavation immediately beside my 110-year-old, vibration-sensitive home presents serious and unresolved risks of ground movement, structural damage, and disruption to services near the boundary.
3. **Ramp siting and operational servicing:** Locating the basement ramp on the eastern edge intensifies noise and light-spill impacts beside my home, and the absence of a dedicated on-site ambulance and servicing bay appears to push in-house operations onto the street.
4. **Site isolation (Clause 6.12):** The proposal would isolate 27 Rosalind Street as an undersized remnant lot that cannot reasonably be redeveloped to the intended R4 outcome, contrary to Clause 6.12 under the North Sydney LEP.
5. **Seniors bonus justification:** The scale of bonuses sought is not matched by the care component proposed, creating concern that the incentives are being used to deliver a larger luxury apartment scheme rather than genuine integrated seniors care.

1. Excessive bulk, scale and amenity impacts (privacy, sunlight, sky access)

The EIS shadow analysis relies on assumptions and omissions that understate impacts on 27 Rosalind Street, the home directly adjoining the site's eastern boundary. It claims that *"27 Rosalind Street is generally sunken with limited windows directly facing the site... [and that] the proposal results in no discernible additional loss of daylight or amenity"* because an existing boundary hedge and wall already block sunlight.

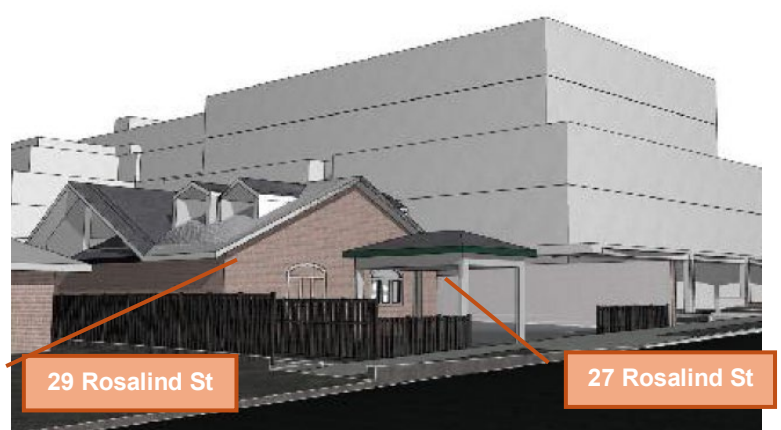
This is misleading. Nearly all of my primary windows face west toward the site, and in winter the house and rear courtyard currently receive direct sunlight from late morning to mid-afternoon. If the project proceeds as proposed, Building A would cast a continuous shadow from before 1 pm over all west-facing windows and the entire rear courtyard of my home, removing the only direct sunlight, open sky views, and much of the ambient daylight these spaces now enjoy. (See Appendix, Sections 1 and 2, for photographs.)

Key facts – 27 Rosalind Street

Image 1: Current view 27 Rosalind Street



Image 2: 27 Rosalind Street engulfed by Building A



- **Federation-era semi-detached cottage (c. 1915):** single-storey, with an upper level in the roofline, retaining original brickwork, plaster ceilings and leadlight windows, and contributing positively to the Rosalind Street streetscape.
- **Long, narrow west-facing site** (8 m wide × 39 m deep), with a generous 10.5 m front setback. It adjoins No. 29 to the east and shares a 39 m boundary with the development site, with only a 1.6 m setback to the eastern boundary.
- **The home relies heavily on western sunlight and outlook.** 93% of windows, including all main living areas, face west toward the development site, with only one north-facing bedroom window.
- **Primary living spaces directly exposed to the site,** include the living area, rumpus room, home office, and kitchen/dining area, which connects to the rear courtyard via large glass bi-fold doors.
- **Existing solar access is strong, with direct sunlight reaching western-facing windows well into the afternoon.** Current buildings at 19–23 Rosalind Street are low (8 m) and set back ~18 m and do not affect sunlight or outlook.
- **The home enjoys open sky views** along the entire western boundary and strong ambient daylight during the day due to open sky and the absence of nearby obstructions.
- **Internal daylight** is supported by a rear skylight serving the stairwell and upper-level hallway.
- **Not “sunken”.** My home sits on the same ground plane as the street and 29A to the rear. The development site sits higher and rises toward the rear, 1.8 m higher at my rear boundary.

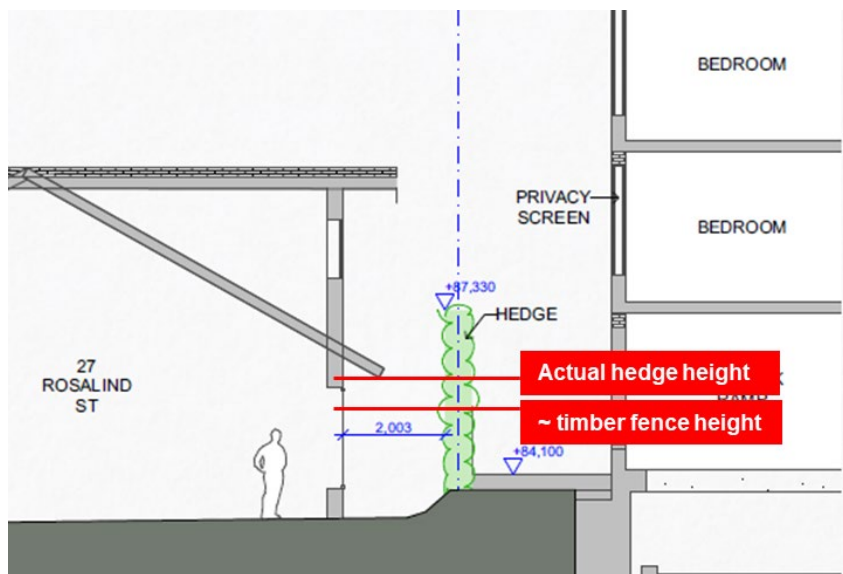
1.1 Reliance on vegetation for shadow masking

The EIS shadow analysis treats a boundary hedge on top of the eastern retaining wall as a fixed shadow-casting element. On that basis, it asserts my windows are already “significantly constrained” and the proposal would cause “no material worsening” of solar access.

This does not reflect accepted practice. Vegetation is not permanent and can be pruned, thinned or removed; including it in formal modelling reduces the apparent additional shadow attributable to the proposed building.

The EIS also misrepresents the hedge’s height and disregards the fixed timber fence beneath it (~ 0.5 m lower). Based on the section drawings, the hedge height assumed appears overstated by more than 75% when compared with the underlying timber fence. See Images 4 and 5 for the current height of the hedge and the underlying timber fence. The hedge does not extend almost to the bottom of the upper-level windows, as depicted in Image 3.

Image 3: EIS flawed solar analysis, highlighting correct height of hedge and underlying timber fence



The hedge is routinely cut back in winter to maximise sunlight and allowed to grow higher in summer for shade. It was at its maximum height when the solar assessment was prepared. It also sits on a failing retaining wall that requires replacement and is not addressed in the EIS, further undermining the assessment’s reliability.

Image 4: Hedge at maximum height



Image 5: Underlying timber fence without hedge



1.2 Narrow focus understates true impact

The EIS does not correctly identify the main living spaces in my home and overlooks or downplays those that it does identify. Its discussion of impacts on 27 Rosalind Street relies heavily on a single window to a “secondary living space”, said to be partially shaded by boundary vegetation, and then extrapolates from that limited reference point to conclude that overall amenity impacts are minor.

While the EIS identifies the kitchen and dining area as part of the home’s primary living environment, it provides no further analysis of this space or of the attached rear courtyard. The courtyard is integral to the amenity of the kitchen and dining area, as it is directly connected via full-height glass bi-fold doors and serves as the primary source of ambient and reflected daylight to that part of the home.

Image 6 illustrates the EIS’s limited identification of living spaces and does not show the proposed landscaped zone along the eastern boundary referenced elsewhere in the EIS documentation.

Separately, the EIS describes 27 Rosalind Street as “generally sunken.” This characterisation is incorrect. The home sits at a normal ground level relative to Rosalind Street and on the same level as 29A Rosalind Street to the rear. By contrast, the development site rises toward the rear due to sloping topography. This elevates the proposed built form relative to No. 27, increasing, the extent and reach of shadows cast over the property and exacerbating the overbearing scale of the building.

Image 6: EIS assessment of neighbouring primary living space and landscape zones

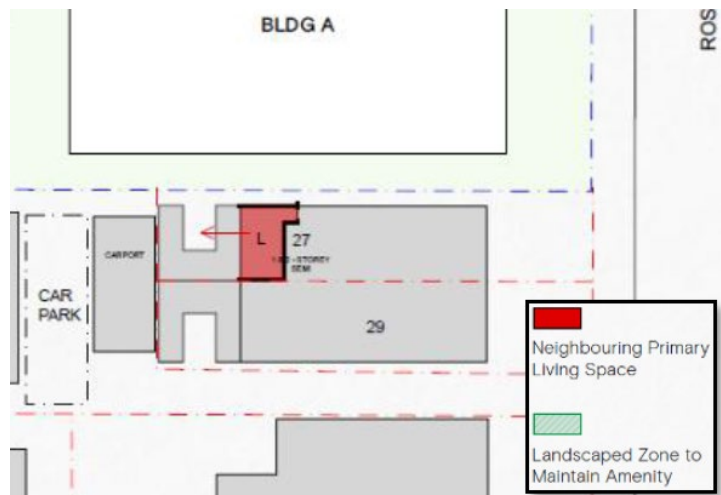
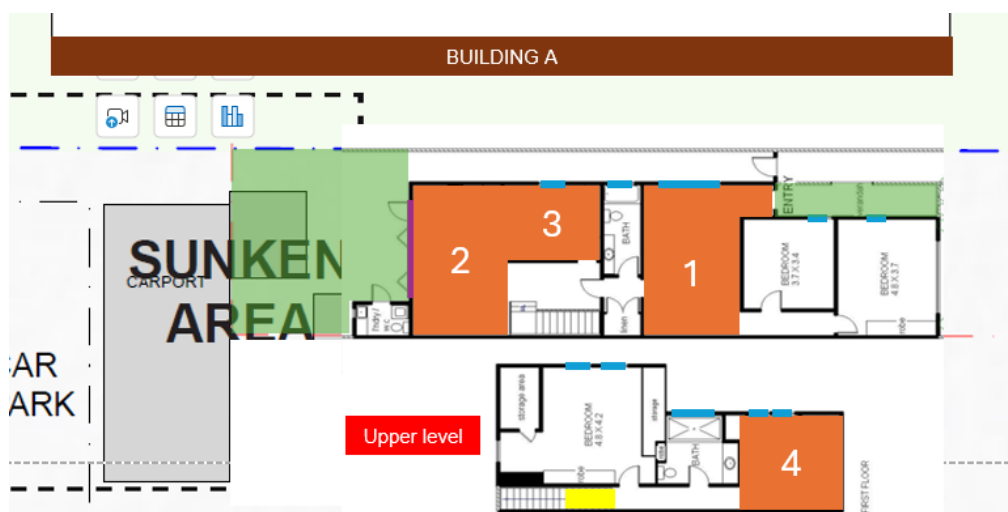


Image 7: Actual floorplan of our house (including the upper level) and their interface with Building A



Orange denotes living spaces

1. Lounge room
2. Kitchen / dining
3. Children's rumpus room
4. Home office

Blue denotes 10 windows facing west toward the development site

Purple the rear full-width glass bifold doors connecting the kitchen and dining area to the courtyard

Green denotes the outdoor living space, which is actively used for meals and dining as an extension of the indoor living areas

Yellow the skylight, which provides important daylight to the rear of the house

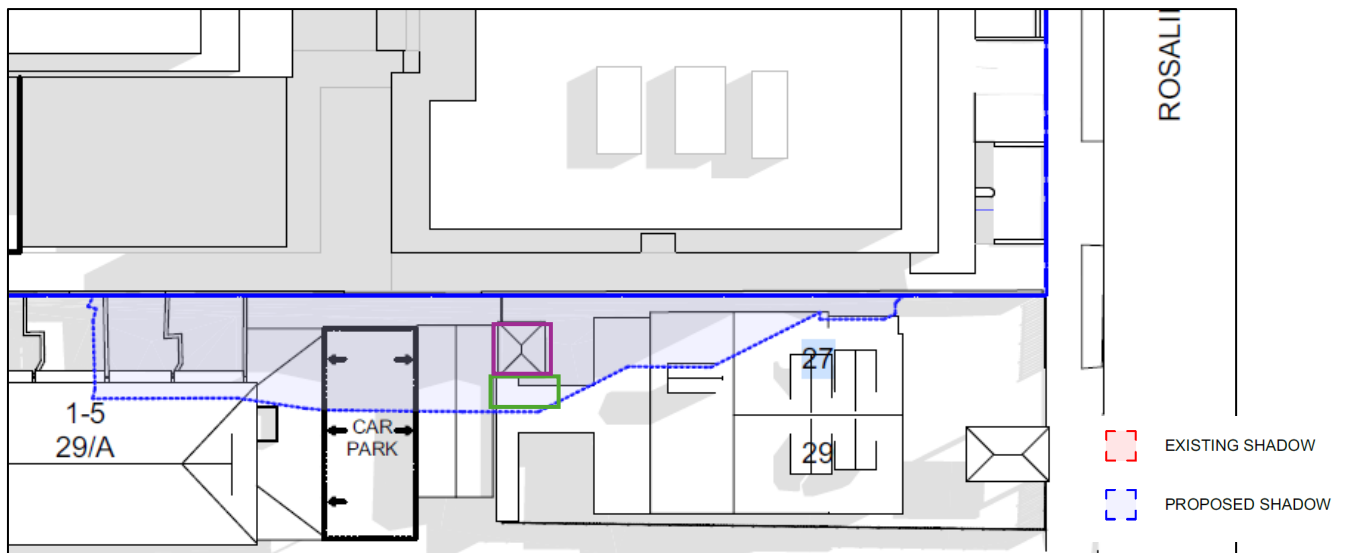
1.3 Discrepancy with actual sunlight

Photographic evidence from mid-winter shows 27 Rosalind Street receives direct sunlight until mid-afternoon across its west-facing façade. This directly contradicts the EIS implication that the house is already in shadow. The proposed Building A would remove sunlight that currently exists.

Images 9, 10 and 11 are real photographs of my home taken under comparable solar conditions as the EIS shadow image 8 below. They show that existing shadowing on my home is materially less than represented in the EIS. If modelled at the height of the underlying timber fence (versus the hedge in place in this photos), existing shadow would be reduced further by up to a 1 m. These time-matched photographs accurately depict the extent of existing sunlight reaching the house and courtyard and demonstrate that the EIS fundamentally overstates existing shadow conditions and understates the additional shadow impacts that would result from Building A.

When compared with the proposed shadow extent shown in Image 8 from the EIS, these photographs illustrate that the development would place all west-facing windows into complete shadow before 1 pm, well before the times currently experienced. This would result in a substantial and unjustified loss of solar access post-development.

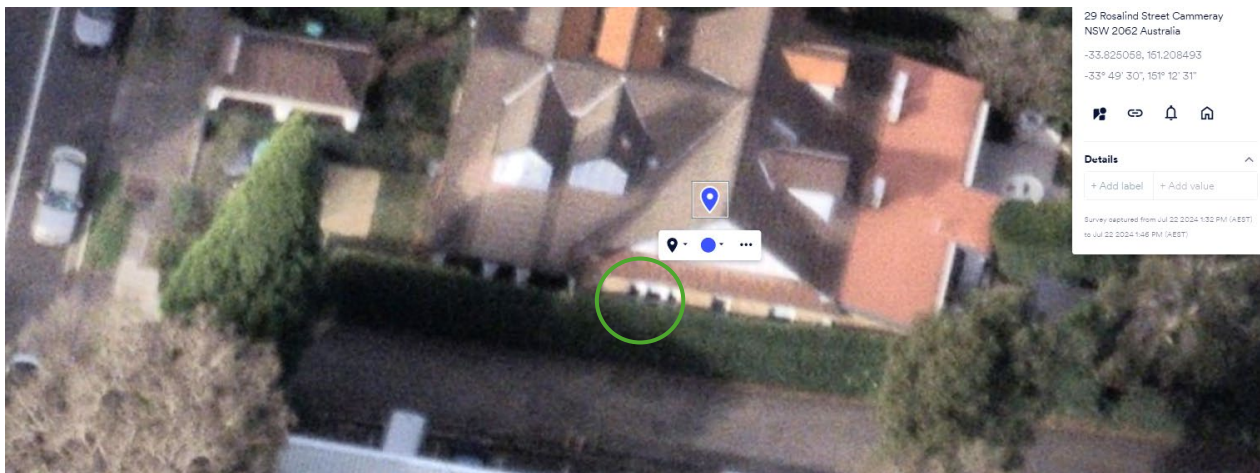
Image 8: Shadow diagrams 1/2 (Appendix A, EIS), showing assessed solar impact on 27R at 1 pm



Observations on Image 8:

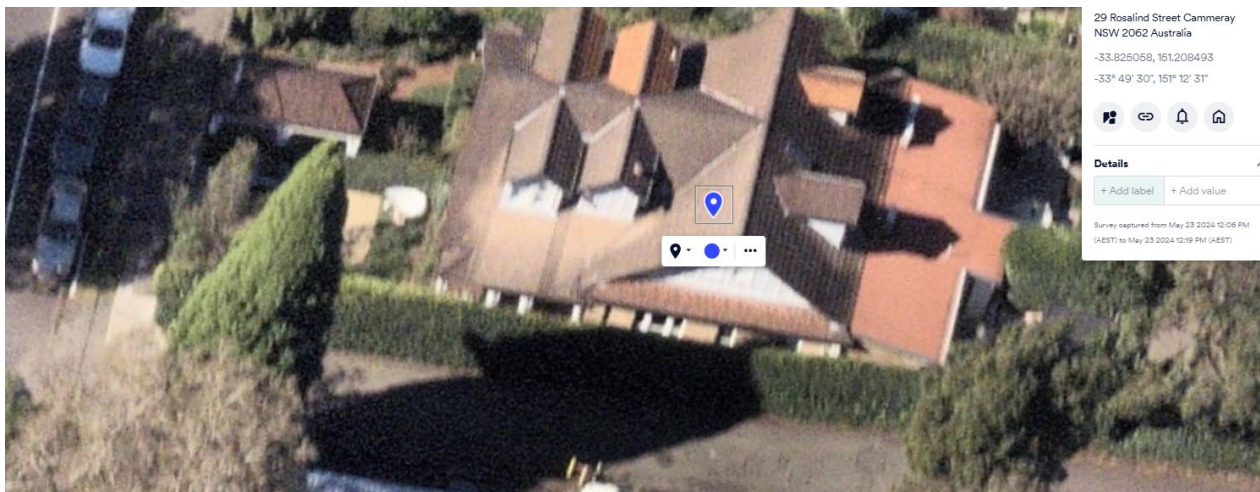
- The image does not include a pink dashed line on my property to denote existing shadow. On this basis, it appears the grey shading represents the proponent's assessment of existing shadow extent.
- The structure shown in purple is an outdoor cabana or sunroom. It is a well-used private outdoor space that currently receives direct sunlight until late afternoon.
- The EIS appears to overstate built structures within my rear courtyard along the eastern boundary, as marked by the green rectangle. This area is garden space, not built form.

Image 9: Aerial panorama photograph, 22 July at 1:46 pm (shadow conditions are effectively equivalent to those on 21 June at 1:00 pm, with the shadow length an immaterial ~1% longer in this image)



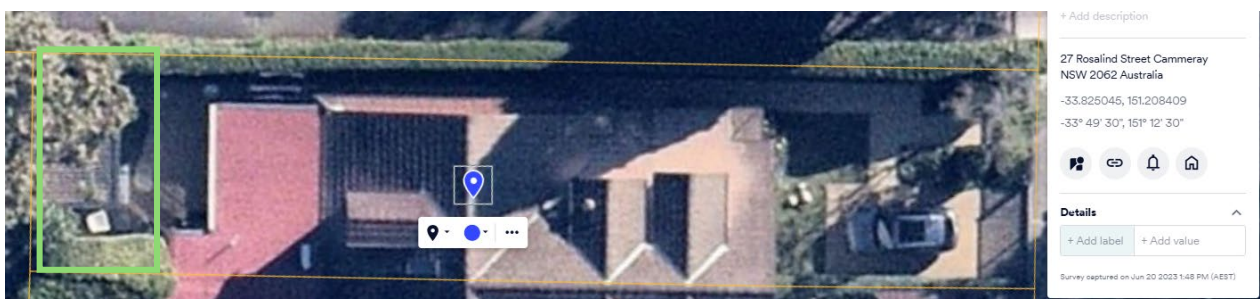
- **Both house levels currently receive direct sunlight.** The upper level is sunlit, as is the lower level from the front door through to the rear, including the living area identified in the EIS as a “secondary” space (shown by the green circle). See Image 11 for sunlight conditions in the rear courtyard.

Image 10: Aerial panorama photograph showing existing solar conditions, 23 May at 12:19 pm



- The image above further confirms that the entire home, including both upper and lower levels, currently receive direct sunlight.

Image 11: Aerial photograph showing existing solar conditions, 20 June at 1:48 pm (48 mins later than EIS)



- The image above, taken almost an hour later than the EIS solar assessment, demonstrates that existing solar access is materially greater than represented in the EIS, with more than 50% of the rear courtyard remaining in direct sunlight.

1.4 Privacy and overlooking

West facing windows, floor to ceiling glazing, and protruding balconies located only 3 m from my boundary would result in direct overlooking of all internal rooms, as well as private outdoor spaces including the front yard, porch, and rear courtyard. Because Building A extends beyond my rear boundary, it would also enable direct views into my south facing kitchen and dining area. As a result, the proposed development would cause pervasive overlooking of the house, including bathrooms, leading to a very serious loss of privacy throughout the home.

The plans provide limited privacy mitigation along Building A's eastern façade. The measures shown appear minimal and rely largely on privacy fins rather than fixed screening, which is insufficient given the proximity, height, and extent of overlooking. The EIS documentation is also inconsistent as to the placement and extent of these privacy fins.

The Level 4 wrap around balcony is of particular concern. It undermines the already minimal upper level setback and enables wide and direct views into my property. This balcony should be removed to prevent unacceptable overlooking.

In Image 12 below, the areas highlighted in yellow identify locations where no privacy measures are proposed, further demonstrating the lack of effective mitigation to protect my privacy. The area marked in blue identifies the car park entry, which also requires appropriate acoustic treatment and light spill mitigation to address impacts on my home.

Image 12: EIS image outlining privacy measures, yellow highlighting areas where no measures provided



1.5 Misleading visual impact assessment

The Visual Impact Assessment is limited and appears selectively framed. While multiple photomontages are provided, none show the most affected viewpoints, including Rosalind Street looking toward the eastern façade. Instead, the selected views rely on foreground trees and buildings that materially understate the bulk and scale of Building A.

From Rosalind Street, the proposal would present as a continuous five-storey wall along the eastern edge of the site. Given my single-storey home is set back 10.5 m from the street, there is a clear and uninterrupted sightline to the boundary, resulting in a visually dominant façade with no meaningful transition.

A comparable visual assessment from directly outside 27 and 29 Rosalind Street is required. Although the proponent's marketing material appears to depict this viewpoint, it includes a large foreground tree that does not exist and significantly obscures the building mass. This does not represent real street conditions and cannot be relied upon in place of a proper visual impact assessment.

Image 13: Shown during the post-EIS lodgement community consultation session, 23 March 2026



Overall, the EIS understates impacts on 27 Rosalind Street through flawed assumptions, errors, and selective analysis. It overstates the shading effect of the boundary hedge, exaggerates the hedge height, fails to correctly identify key living spaces, does not properly assess those spaces it does identify, and does not accurately assess existing sunlight to west facing windows and the rear courtyard under real on-site conditions.

My house receives meaningful direct winter sunlight and enjoys expansive open sky views, as demonstrated in this objection. Building A would eliminate this sunlight well before 1 pm on 21 June and entirely remove sky views, resulting in a substantial loss of direct sunlight and ambient daylight to all rooms and private open space, including my home office, which I use daily. This would materially alter the day to day functioning of the home. The dwelling would become heavily reliant on artificial lighting and heating during winter, and simple domestic activities such as drying washing outdoors would become difficult or impractical due to the loss of sunlight. This impact would be compounded by close range overlooking, leading to a significant overall loss of residential amenity.

2. Structural risk (retaining wall and vibration)

2.1 Deteriorated boundary retaining wall (See Appendix, Section 3, for photographs.)

The development involves a deep two-level basement excavation beside an ageing concrete block retaining wall on the site's eastern boundary. This wall retains the higher ground of 19–23 Rosalind Street and currently leans substantially into my property, with visible cracking and displacement. Its instability has previously been counteracted by a brick “sub wall” constructed on my land, extending roughly 8 m into adjacent Lot 29A, to prop the failing structure. In its current condition, the wall presents a real risk of further movement or collapse into my property, particularly if undermined by excavation.

While the EIS and architectural documentation contemplate new retaining walls and excavation support measures along other site boundaries, they do not acknowledge the condition of the existing eastern boundary retaining wall or propose its replacement. Instead, the drawings appear to indicate a new fence or screen positioned in front of the existing wall, rather than a structural solution. Despite the architectural drawings identifying the eastern retaining wall as an “existing retaining wall on the subject site”, its ongoing stability, treatment during excavation, and long term performance are not addressed.

2.2 Deep excavation

Excavating a two-level basement alongside an unreinforced, deteriorated retaining wall creates a serious risk of ground movement or collapse, threatening the safety and structural integrity of my home. The EIS also does not address the pronounced level change between my property and 29A to the rear, where the development site drops sharply to near the roof level of 29A, increasing the need for a robust excavation-support strategy. The EIS should commit to specific shoring, excavation support, and retaining wall replacement measures to protect adjoining properties.

Assuming the existing wall and hedge can remain during construction does not seem realistic or safe; this boundary needs a new engineered solution.

The retaining wall is topped by a timber fence and a mature hedge, both located on the development site. Close deep excavation is likely to sever hedge roots and further destabilise the wall, increasing the risk of failure if left unaddressed. Piecemeal or temporary measures are not acceptable.

There is also evidence suggesting the presence of a potential watercourse or subsurface drainage line beneath or adjacent to the site. Given the scale of excavation proposed, including deep basement levels and extensive site disturbance, this raises serious concerns regarding groundwater movement, hydrology, and potential impacts on adjoining properties, including 27 Rosalind Street. The EIS does not appear to have adequately investigated or addressed these issues. See Appendix, Section 4, for a map of this potential watercourse to assist further investigations.

2.3 Vibration sensitivity

The EIS confirms sandstone across the site will require heavy ripping and rock-breaking. It proposes that excavation would only pause if vibration in adjoining structures exceeds recommended thresholds or appears excessive, at which point the project geotechnical engineer would review conditions and propose countermeasures. This approach is reactive and relies on judgement during construction rather than clear, enforceable limits set in advance.

My 1915 home contains fragile original features (including old brick masonry, tuckpointing, decorative plaster ceilings, and leadlight windows) and is highly vulnerable to vibration and settlement. Basement excavation immediately adjoining my boundary presents a real risk of vibration-related damage (cracking and settlement), affecting both structural integrity and my ability to work from home.

More detailed investigation should be required before consent, rather than deferring assessment until vibrations are already occurring. Clear vibration limits, construction methods, monitoring locations, and response protocols should be defined now to properly assess and manage risks to my home; relying on stopping works only once vibration appears excessive is not sufficient.

2.4 Groundwater & stability

Groundwater flow and stormwater runoff must be carefully managed during and after construction to avoid impacts on neighbouring properties. My house sits lower than the development site, a fact acknowledged in the EIS, which increases the risk of water flowing or being redirected towards my property. I have a paved walkway running the full length of the eastern boundary, with no capacity to absorb excess water. My house is set back only 1.6 metres from the boundary, and I am particularly concerned about water entering the subfloor area and causing dampness, mould, or long-term structural issues.

Any increase in groundwater pressure, redirection of flows, or failure to manage runoff could result in water ingress, erosion, or ponding along this boundary. In addition, my sewer and stormwater lines run roughly 1 metre from the shared boundary, in close proximity to the proposed excavation. Conditions of consent should require comprehensive geotechnical and hydrological safeguards to prevent water ingress, erosion, or soil movement that could undermine my footings, damage the paved boundary path, or disrupt utility connections. These risks must be addressed through detailed design and construction-phase controls, not left to be resolved reactively once excavation is underway.

2.5 Dilapidation surveys

Independent pre- and post-construction dilapidation surveys of my property should be conducted by a qualified structural engineer *not engaged by the developer*, with costs borne by the developer. This will provide a baseline record. If damage occurs as a result of excavation or construction (including cracks, subsidence, or other structural impacts), the developer must promptly carry out full repairs at their expense.

3. Car park, traffic noise and access impacts

3.1 Vehicle entrance placement

The basement ramp is close to the eastern boundary, concentrating noise and light impacts (engine noise, tyre squeal, headlights and roller door movements) beside my home. This is unnecessary given the site's street frontage. Relocating the driveway further from the eastern boundary (e.g., toward the centre) would reduce noise/light spill and improve sightlines on the pedestrian route to Anzac Park Public School (which is located ~250 m from the site). If relocation is not required, conditions should require effective buffering, including a solid 2.4 m acoustic barrier along the ramp's eastern side and baffles/hooding to ramp and driveway lighting to prevent headlight glare toward No. 27.

3.2 Lack of on-site servicing provisions

The design provides no on-site bay for ambulances or service vehicles and appears to rely on kerbside servicing. For a development of this scale, it does not seem reasonable to expect ambulances, trades and maintenance vehicles, and removalist vans to service the site from Rosalind Street. Without a dedicated loading/servicing area, emergency and routine vehicles may idle on-street, with attendant noise, lights and disruption.

The waste strategy appears to require bins to be wheeled to the kerb, obstructing the footpath on a route used by schoolchildren. I request conditions to internalise servicing as far as practicable, including an on-site ambulance/loading bay and an internal basement waste collection point with caretaker management, rather than shifting servicing impacts to the public domain.

3.3 Excessive on-site parking

The proposal provides 82 car spaces, equating to 1.7 spaces per unit, which is the highest parking ratio of any seniors SSD to date and is significantly above typical seniors housing provision. This level of parking is unnecessary given the site's well located inner urban context in Cammeray, with convenient access to shops, services, and public transport. Rather than reflecting a genuine seniors housing outcome, this level of parking appears oversized and should be reduced. The oversupply directly drives a deeper and more extensive basement excavation, increasing construction impacts, structural risk, and disruption to adjoining properties, without a clear need case

4. Site isolation (Clause 6.12 of NSLEP 2013)

Clause 6.12 – non-compliance: The **North Sydney Local Environmental Plan 2013, Clause 6.12** ("Site isolation in Zone R4 High Density Residential"), prohibits approval of a development that would leave an **adjoining dwelling house**, dual occupancy, or semi-detached dwelling isolated (i.e., as a solitary lot that cannot reasonably be redeveloped to the zone's intended density), unless strict conditions are met. Consent should not be granted unless:

- a) The isolated lot has an area of at least 900 m² (so it could be developed on its own to a high-density form); or
- b) The consent authority is satisfied that the isolated lot can still be developed independently, consistent with the residential flat building form intended in the zone.

Here, the proposal would effectively isolate my property as a leftover site. My lot is 329 m². The only other adjacent residential parcel not included in the development is 29 Rosalind Street (311 m²). Even if amalgamated, the combined area would be about 640 m²—*still well below the 900 m² minimum* in Clause 6.12. (The proponent's site amalgamator owns 29 Rosalind Street, so an objection from that lot is unlikely.)

The EIS "Site Isolation" discussion (Section 6.3) provides only a cursory assertion that redevelopment of the remnant land would be feasible. It does not demonstrate how 27 (and 29) Rosalind Street could be redeveloped to a compliant standard. The indicative scheme included is clearly non-compliant, relying on substandard setbacks, zero on-site parking, and missing required deep soil and communal open space, while producing a building envelope smaller and lower in amenity than intended by R4 zoning. The applicant has not met the burden of Clause 6.12(3)(b): there is no convincing evidence that my property, if isolated, can reasonably and feasibly be developed as a residential flat building.

Approval would strand my property as an under-utilised, isolated site with no realistic path to R4-level development. This would be contrary to the LEP's objectives and sound planning practice, which seek to avoid piecemeal development and promote orderly, economic land use.

5. Misuse of seniors housing bonus (height and FSR)

The proposal's RCF component is minimal and appears tokenistic. Only two short-term care rooms (100 m² GLA) are provided, seemingly to access the maximum incentives under the Housing SEPP. To be approved, it must include a genuine RCF providing 24-hour care. This proposal does not meet that threshold, as it includes no permanent care residents, no nurse's station, and care is described as being provided only "as needed."

Despite this, the applicant seeks the full height and FSR bonuses, equating to more than 1,500 m² of additional GLA, resulting in an RCF-to-ILU ratio of just 1:25, the lowest of any seniors SSD in NSW to date. To me, the development appears more like a luxury apartment scheme benefiting from seniors housing concessions than a genuinely integrated care facility.

The proponent has no aged-care operating experience and has confirmed that no operator has been secured for the two-bed RCF, creating a real risk that the space could be repurposed post-approval while the community bears the permanent impacts of over-scaling. The Department should therefore closely scrutinise the legitimacy of the Housing SEPP bonuses. If the aged-care component cannot be demonstrated to be genuine, ongoing, and supported by a clear operational plan, the additional 3.8 m height and 25% FSR should not be granted, or the application should be fundamentally reconsidered.

Requested design amendments:

I request that the Department require the following design amendments and enforceable conditions to achieve an acceptable outcome for 27 Rosalind Street and to reduce construction and operational risks.

1. **Reduce the height and overall bulk of Building A** to align more closely with the prevailing 1 to 3-storey built form of Rosalind Street, and to reduce overshadowing, visual dominance, and loss of open sky views at 27 Rosalind Street.
2. **Increase the eastern side setback of Building A** to provide meaningful separation from the boundary, improve transition to the low-rise context, and reduce overlooking. This could be achieved by shifting Building A westward towards No. 15, which benefits from a substantially greater setback.
3. **Recess upper levels and remove the Level 4 wrap-around balcony**, including pulling back or removing any north-facing balconies within the eastern setback, to reduce massing, improve solar access, and eliminate direct overlooking into my home and rear courtyard.
4. **Increase the front setback of Building A** so it aligns more closely with my home's 10.5 m setback and reinforces the established rhythm of the street.
5. **Replace the deteriorated eastern boundary retaining wall** supporting the higher ground at 19–23. The wall must be independently assessed, then removed and replaced with a new wall capable of safely supporting the proposed excavation and retained ground levels.
6. **Do not rely on existing vegetation or fencing for stability or protection.** The boundary hedge and timber fence must not be assumed to remain during excavation. Vegetation is not a fixed element and may be damaged or removed. Temporary or piecemeal measures are not acceptable for this safety-critical interface.
7. **Use low-vibration construction methods along the eastern boundary.** Excavation and rock-breaking techniques must be selected to minimise vibration impacts on adjoining structures.
8. **Set enforceable vibration criteria and monitoring prior to determination.** Clear vibration thresholds, monitoring locations, and response protocols must be specified in advance, with works required to cease immediately if limits are exceeded.
9. **Protect existing water and sewer services near the boundary.** Excavation and shoring works must ensure that stormwater and sewer lines near the eastern boundary are not damaged, displaced, or undermined. Any damage must be repaired immediately at the proponent's cost.

10. **Require effective groundwater and stormwater controls** to prevent water ingress or erosion affecting neighbouring properties. My house sits lower than the site, just 1.6 m from the boundary, with a paved eastern walkway and no capacity to absorb runoff. Conditions must prevent water from entering the subfloor, where it could cause damp, mould, or structural damage.
11. **Investigate and address the potential presence of a subsurface watercourse** beneath or adjacent to the site. The EIS should be updated to confirm whether such a feature exists and assess the implications of deep excavation on groundwater flow, soil stability, and water ingress to neighbouring properties.
12. **Provide enforceable privacy measures** for all east-facing windows and balconies, including minimum sill heights and fixed screening. These must be clearly shown on elevations and window schedules, and supported by a consistent landscape buffer along the eastern boundary.
13. **Provide a comparable visual impact assessment from Rosalind Street**, taken from outside 27 and 29 Rosalind Street, showing the eastern façade and full boundary interface under existing streetscape conditions, without inserted or non-existent screening.

Conclusion

I am deeply concerned that the proposal would cause unacceptable and irreversible impacts on my family home, including its amenity, privacy, solar access, and structural safety. These impacts would fundamentally change how the house functions and is experienced on a day to day basis. In particular, the loss of winter sunlight, open sky outlook and privacy, together with construction vibration risk, would materially reduce the overall liveability and usability of the home, including spaces that are used for daily activities such as study and work.

In my view, the proposal also fails to adequately address key planning requirements, including Clause 6.12 site isolation, and accepted design principles relating to transitions, solar access, and privacy. I respectfully request a substantial redesign and the imposition of clear, enforceable conditions of consent to protect adjoining properties.

Thank you for considering my submission. If helpful, I would welcome Department representatives to visit 27 Rosalind Street to see the likely impacts firsthand.

Yours faithfully,

Selina Poyner
Owner and resident, 27 Rosalind Street, Cammeray NSW 2062

Appendix: Photographs and context

(Photographs are provided to document existing conditions, structural issues, and the likely impacts of the proposed development on 27 Rosalind Street. For each set of images, the location and what is demonstrated is noted below.)

1. Solar access, sky view and privacy impacts on 27 Rosalind Street

The photographs below demonstrate existing solar access, sky views, and outlook at 27 Rosalind Street and contradict the EIS claim that impacts are immaterial due to boundary vegetation. They confirm that my home currently receives direct sunlight and open sky views, even with the hedge at its maximum height, and that existing buildings set back 18 m do not cast shadow. This illustrates the amenity that would be lost if a five storey built form were constructed close to my boundary.



Side of 27 Rosalind Street (eastern boundary) – 22 March 1.30 pm

- The entire eastern side of the house, at both lower and upper levels, is receiving full direct sunlight, despite the hedge being at a relatively high position.
- The window circled in red identifies the room described in the EIS as a secondary living space, which is clearly shown to receive direct sunlight under existing conditions.



Side of 27 Rosalind Street (eastern boundary) – 22 March 3.30 pm

- The eastern façade of the house continues to receive direct sunlight at 3.30 pm, from windowsill height upwards.
- Under the proposed development, this façade would be in full shadow at this time.



Side of 27 Rosalind Street (eastern boundary) – 23 March 4.30 pm

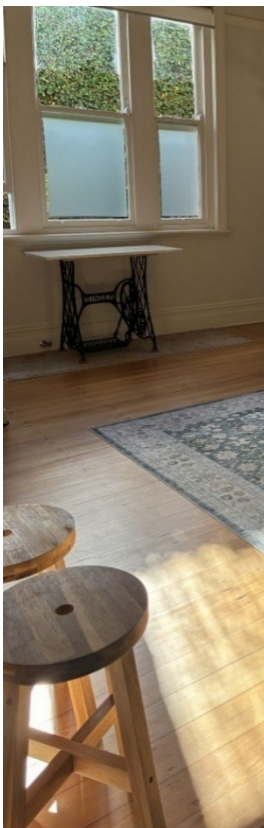
- Upper level remains in full sun; north façade is still partly sunlit.
- Under the proposal, this would be in full shadow.
- Western façade still enjoying sunlight including front balcony
- Under the proposal, northern solar access would also reduce because Building A extends further north than my house

The photographs below demonstrate existing solar access, sky views, outlook, and privacy at 27 Rosalind Street and contradict the EIS claim that the dwelling has limited windows and no meaningful outlook due to the boundary hedge. They show the open-sky aspect that provides important ambient daylight and illustrate the substantial loss of sky view, daylight, and privacy that would result if a tall built form were constructed close to the boundary.



Rear courtyard sky view (looking west in all directions)

- Currently: open sky and trees; existing site buildings not visible.
- Proposed: this outlook would be replaced by Building A running along the boundary.



West-facing windows, internal outlook – 23 March 4.30 pm

- Late-afternoon sunlight penetrates deep into the living space, even with the boundary hedge at its maximum height.
- Under the proposed development, this sunlight would be entirely lost and the room would be in permanent shadow.



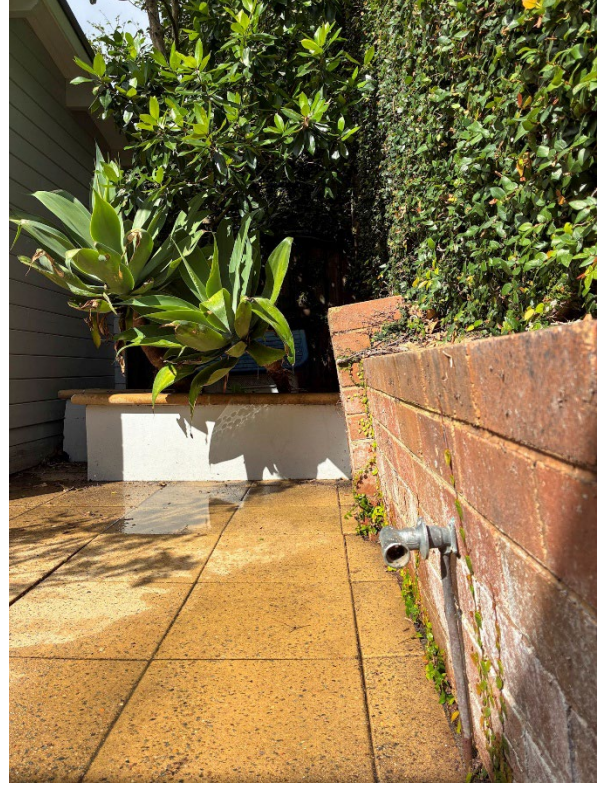
3. Existing eastern boundary retaining wall and “sub-wall”

The photographs below document the condition of the eastern boundary between 27 Rosalind Street and the development site at 19–23 Rosalind Street. They show a failing retaining wall located on the development site, retaining higher ground, and temporary propping works constructed on my land to counteract its instability. The images illustrate progressive movement, cracking, and the inadequacy of the existing structures, particularly in the context of proposed deep basement excavation.



Rear of 27 Rosalind Street – eastern boundary

- The hedge is located above the retaining wall on the developer’s land. The structure comprises a brick base, topped with a timber fence, with the hedge growing above.
- The ongoing lean/movement of this retaining wall/fence/hedge structure is visible along the eastern boundary.



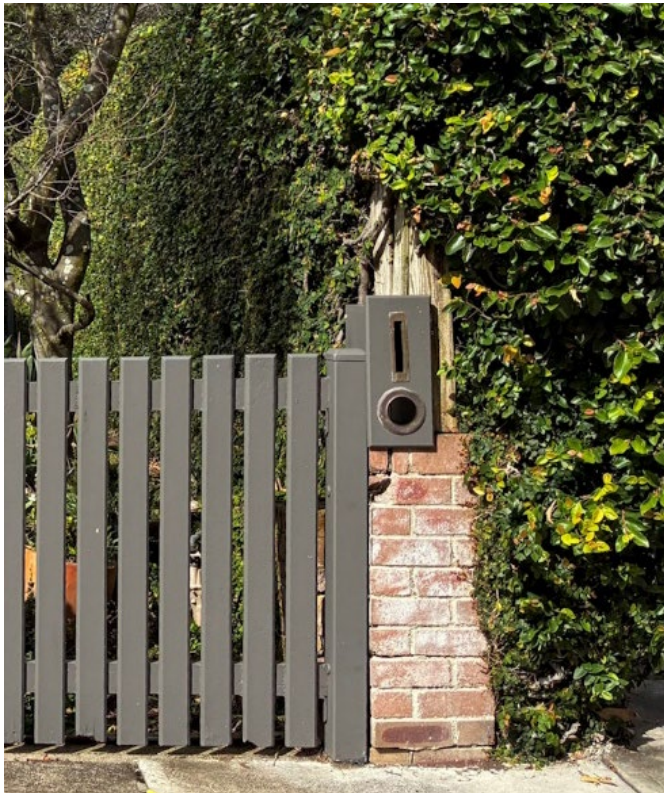
Rear of 27 Rosalind Street – sub-wall supporting eastern boundary

- A brick “sub-wall” has been constructed on my land, extending into Lot 29A, to prop the failing retaining wall on the development site.
- The sub-wall is itself leaning, consistent with ongoing pressure from the retaining wall behind.
- Cracking, displacement, and deterioration are visible along the length of the sub-wall.



Brick sub-wall at the rear of 27 Rosalind Street (eastern boundary), supporting the developer's retaining wall:

- The brick sub-wall exhibits visible cracking and leaning, consistent with pressure from the failing retaining wall behind it.
- Brick loss, root penetration, and general deterioration are evident along the length of the wall, indicating ongoing instability.



Retaining wall on eastern boundary, view from Rosalind Street:

- View of the retaining wall from Rosalind Street. The developer's survey identifies this wall as being on the development site.
- Visible cracking, displacement, and missing bricks are evident. The wall retains the higher ground level of 19-23 Rosalind Street.

4. Potential presence of a watercourse beneath the site requiring further investigation

