

REVISED STATE SIGNIFICANT DEVELOPMENT OBJECTION

Application Ref: SSD-81426710 (138 Maroubra Road Mixed-Use Proposal)

Impacted Group: Surrounding Residents & Vulnerable Senior Demographics

To the Major Projects Assessment Team,

This correspondence constitutes a formal objection against the amended architectural designs and revised sub-surface layout put forward for the development at 138 Maroubra Road. This submission is intentionally lodged on behalf of the high concentration of retirees and senior citizens who occupy the neighboring residential properties. The updated adjustments entirely fail to rectify the foundational flaws that caused the NSW Land and Environment Court to strike down the site's previous appeal on November 7, 2024 (Maroubra Property Development Pty Limited v Randwick City Council [2024] NSWLEC 1716).

The aging population living in the surrounding precinct relies heavily on environmental stability, pedestrian security, and internal living comfort. Using affordable housing statutory bonuses as a mechanism to secure a massive 10-storey concrete mass introduces a scale of overdevelopment that disproportionately impacts these vulnerable community members. We urge the Department to refuse consent based on the following key points of contention:

Direct Amenity Loss and Severe Visual Encroachment on Elderly Neighbors

The applicant's Submissions Report attempts to justify the complete loss of open western and southern outlooks by asserting that such impacts are standard in urban centers. This dismisses the clear view-sharing and privacy principles upheld by the NSW Land and Environment Court.

Erecting an unstepped, 32.5-meter vertical massing right up to the shared boundary line places a towering 10-storey wall directly outside the windows of nearby apartments. For the high number of elderly residents who spend almost all their time indoors, this design imposes severe visual claustrophobia. It robs them of a baseline sense of space and deeply reduces the long-term livability of their homes.

Inability of the Unconsolidated Site Configuration to Absorb High-Density Bulk

The Land and Environment Court previously established that this site's narrow dimensions cannot safely or properly support high-density overdevelopment without first merging with neighboring parcels—specifically highlighting the failure to acquire the adjacent Police Station lot.

Instead of restructuring the built form to fit the single, unamalgamated block, the developer has simply added vertical height to achieve a 10-storey layout. This configuration severely crowds out the adjacent buildings, disrupting the orderly town planning needed to safeguard the shared air, light, and living spaces of the many retirees residing in this immediate neighborhood.

Inappropriate Use of Statutory Incentives to Force Excessive Height and Scale

The Court dismissed the site's previous appeal because the building's scale, bulk, and internal depth were fundamentally mismatched with the established neighborhood. Rather than resolving these foundational architectural flaws, the new SSD application treats affordable housing provisions purely as a mathematical tool to force extra floors into the design.

This approach turns planning guidelines into a numbers game to bypass local building limits. It forces an unacceptable compromise on local character, trading away the daily peace and living standards of vulnerable, long-term senior residents simply to maximize commercial volume.

Substantial Reduction in Health and Natural Comfort via Direct Afternoon Solar Deprivation

The developer's shadow diagrams rely on general, regional averages under the Apartment Design Guide (ADG), ignoring the actual daily reality for the surrounding residential apartments. Placing a deep, unarticulated 10-storey block directly to the west completely blocks vital afternoon daylight.

Natural sunlight is essential for the health, physical mobility, and passive solar heating of elderly residents, many of whom stay indoors throughout the day. Stripping away these crucial afternoon light hours leaves adjacent living environments cold and dark, placing an unnecessary and direct burden on the health and daily comfort of our senior citizens.

Compromised Pedestrian Safety and Excessive Low-Frequency Noise in the Rear Laneway

To bypass traffic restrictions on Maroubra Road, the revised layout routes 100% of residential, visitor, service, and delivery vehicle movements through Piccadilly Place at the rear. This completely ignores the severe physical bottlenecks and easement constraints highlighted in the 2024 Land and Environment Court appeal.

Piccadilly Place and the Bruce Bennetts Place roundabout are already heavily congested by commercial loading areas for Pacific Square. Funneling an entire additional high-density complex through this single lane creates an active safety risk for the high volume of senior citizens who walk through this flat precinct for their daily shopping and medical needs. Additionally, the constant low-frequency noise and exhaust from idling trucks right below

apartment windows introduces a severe acoustic disturbance for the aging local community.

Summary Conclusion:

The revised application fails to respect the physical limits of the allotment and the safety of the surrounding community. The amendments merely shift a dangerous traffic burden into a narrow rear lane, endangering elderly pedestrians while using planning bonuses to circumvent height limits. I urge the Department to uphold the past decisions of Randwick Council, the Planning Panel, and the Land and Environment Court by rejecting this proposal to safeguard the aging population of this precinct.

Sincerely,

A Concerned Resident & Adjoining Neighbour

Maroubra Pacific Square Precinct