

COMMUNITY & NEIGHBOURHOOD OBJECTION SUBMISSION

Application Ref: SSD-81426710 (Amended Mixed-Use Development, 138 Maroubra Road)

Submitted By: Combined Adjoining Neighbors & Surrounding Community Members

To the Major Projects Assessment Team,

This submission represents a unified community and neighborhood objection to the revised design and amended proposal put forward for 138 Maroubra Road. This collective response is driven by deep concerns regarding localized traffic gridlock, infrastructure strain, and the severe loss of residential amenity. The applicant's updated modifications fail to address the fundamental physical and planning conflicts that led the NSW Land and Environment Court to reject the previous proposal on November 7, 2024 (*Maroubra Property Development Pty Limited v Randwick City Council* [2024] NSWLEC 1716).

Our surrounding neighborhood is heavily utilized by local families, commuters, and a high concentration of senior citizens who rely on safe pedestrian links and reasonable traffic flow. By utilizing affordable housing incentives purely to inflate the building to an excessive 10 storeys, the proposal introduces a level of density that the local street network simply cannot absorb. We request that the Department refuse consent based on the following primary community impacts:

Unacceptable Rear Laneway Traffic Gridlock and Active Pedestrian Hazards

To bypass the severe access restrictions on Maroubra Road, the revised layout routes 100% of residential, visitor, service, and delivery vehicles directly through Piccadilly Place at the rear. This shifts the entire traffic burden into a narrow, constrained laneway network.

Piccadilly Place and the Bruce Bennetts Place roundabout are already severely bottlenecked by the heavy commercial loading operations of Pacific Square. Forcing an entire 10-storey development's traffic into this single entry point will trigger constant gridlock. For neighboring residents, this introduces severe acoustic pollution right beneath their windows. More critically, it creates an active collision hazard for the numerous community members—especially the high number of local senior citizens—who rely on this flat, level precinct for their daily walking, groceries, and medical access.

Severe Solar Deprivation and Afternoon Overshadowing for Adjoining Properties

The developer's updated shadow modeling relies on broad, generic regional assumptions under the Apartment Design Guide (ADG), completely brushing aside the microclimatic impact on immediate neighbors. Erecting a deep, unarticulated 10-storey concrete structure directly to the west will plunge adjacent properties into darkness during crucial afternoon hours.

Access to natural daylight is a fundamental component of livability and passive room heating. Depriving surrounding homes of afternoon sunlight directly degrades the health and physical well-

being of neighbors. This impact is felt most severely by our vulnerable, less-mobile senior residents who spend their entire day indoors and rely on natural light to maintain warm, healthy internal environments.

Extreme Visual Oppression and High-Wall Encroachment on Shared Boundaries

The applicant's Submissions Report claims that eliminating the western and southern outlooks of existing neighbors is an acceptable trade-off for town center growth. This standard response completely ignores the core principles of view-sharing and balanced amenity enforced by the Land and Environment Court.

By pushing a continuous 32.5-meter vertical concrete face right up against the shared boundary line without any architectural stepping, the proposal inflicts permanent visual claustrophobia on adjacent homes. Neighbors will face a raw, monolithic 10-storey wall outside their windows, destroying their baseline sense of space, natural ventilation, and residential comfort.

Inability of the Narrow, Unconsolidated Allotment to Support High-Density Massing

The Land and Environment Court previously made it clear that this specific site cannot responsibly absorb a high-density footprint without first amalgamating with adjacent lots—specifically pointing to the developer's failure to acquire the neighboring Police Station land.

Instead of adjusting the building's footprint to safely fit the single, un-merged site, the developer has simply expanded vertically to 10 storeys. This choice creates an aggressive overdevelopment that overloads the narrow lot, crowds out surrounding properties, and fails to support orderly neighborhood development.

Exploitation of Affordable Housing Incentives to Bypass Local Planning Controls

The Court rejected the site's previous appeal because the proposed bulk, scale, and internal depth were entirely inappropriate for the neighborhood character. Rather than fixing these core design flaws, the new SSD application treats affordable housing provisions as a convenient mathematical tool to force extra floors into the design.

Using planning incentives as a numbers game to bypass height and density restrictions does not resolve the physical overdevelopment of the site. It forces an unacceptable compromise on our established neighborhood, trading away the daily peace, safety, and long-term living conditions of local community members to maximize commercial density.

Summary Conclusion:

The amended plans show a complete disregard for localized traffic capacities and neighboring residential safety. Shifting 100% of the vehicle movements into a narrow rear laneway network guarantees chronic gridlock and risks the safety of local pedestrians, particularly our high number of senior citizens. We urge the Department to protect our neighborhood and uphold the consistent rulings of Randwick Council, the Planning Panel, and the Land and Environment Court by rejecting this overdevelopment.

Sincerely,

The Surrounding Community & Adjoining Neighbors