

PUBLIC PLANNING SUBMISSION: AMENDED DEVELOPMENT OBJECTION

Application: State Significant Development – 138 Maroubra Road (SSD-81426710)

Perspective: Surrounding Community Members & Adjoining Residential Neighbors

To the Major Projects Assessment Team,

This planning submission register provides a formal community objection to the amended design plans tendered for 138 Maroubra Road. The purpose of this document is to highlight the unsustainable density, structural overdevelopment, and severe localized traffic network failure inherent in the updated proposal. The applicant's revised strategy fails to resolve the clear physical constraints and infrastructure boundaries upheld by the NSW Land and Environment Court when it rejected the previous design on November 7, 2024 (Maroubra Property Development Pty Limited v Randwick City Council [2024] NSWLEC 1716).

The local community and surrounding residential buildings cannot safely absorb the spatial and operational impacts of a 10-storey mixed-use building on a narrow, single allotment. By manipulating infill affordable housing incentives solely to maximize yield, the developer introduces extreme scale and localized transit bottlenecks that compromise public safety, especially for the high concentration of senior citizens and walking pedestrians utilizing this precinct. The proposal should be rejected based on the following direct community impacts:

Critical Laneway Infrastructure Failure and Localized Traffic Bottle-necks

The revised design completely shifts the building's traffic network by funneling 100% of residential vehicles, visitors, service fleets, and commercial delivery vehicles through Piccadilly Place at the rear. This design modification creates an immediate crisis for the local street network.

Piccadilly Place and the adjoining Bruce Bennetts Place roundabout are already severely choked by the existing heavy commercial loading docks of Pacific Square. Adding an entire 10-storey development's traffic into this narrow lane guarantees continuous gridlock. This directly impacts nearby residential neighbors through ongoing vehicle noise and exhaust, while presenting a major, active safety risk to local families and the substantial population of nearby senior citizens who walk through this flat corridor daily for shopping and transit access.

Severe Structural Overdevelopment on a Narrow, Non-Amalgamated Allotment

The Land and Environment Court previously determined that this specific site is physically incapable of absorbing a high-density, multi-storey footprint without first consolidating neighboring land—explicitly noting the developer's failure to acquire the adjacent Police Station plot.

Instead of restructuring the proposal to fit within the physical limits of the single, un-merged block, the applicant has simply expanded vertically to a 10-storey layout. This aggressive overdevelopment overloads the block, crowds out surrounding low-to-mid-rise residential properties, and establishes a dangerous precedent that completely disregards orderly community planning and local neighborhood character.

Exploitation of Affordable Housing Incentives to Evade Local Height Controls

The site's previous appeal was dismissed because the overall bulk, building depth, and scale were fundamentally inappropriate for the neighborhood. Rather than revising the core architectural mass, this new State Significant Development application relies on infill affordable housing rules as a purely mathematical lever to force an extra 4 to 5 storeys onto the site.

Using social planning incentives as a numbers game to override local height limits fails to fix the structural overdevelopment. It compromises the surrounding community by trading long-term safety, residential space, and local town character for maximum commercial volume on a constrained block.

Afternoon Solar Deprivation and Extreme Microclimatic Shadowing on Adjoining Homes

The developer's updated shadow modeling relies on broad regional averages under the Apartment Design Guide (ADG), ignoring the direct microclimatic reality of neighboring properties. Constructing a deep, unarticulated 10-storey concrete envelope right to the boundary line completely blocks essential afternoon daylight.

Natural light is a crucial component of local living standards and natural apartment warmth. Depriving surrounding homes of afternoon sunlight degrades the well-being of neighboring residents. This impact is disproportionately borne by the high concentration of less-mobile senior citizens living in the adjacent building who stay indoors and depend heavily on natural sunlight for physical health and daily warmth.

Boundary Encroachment and High-Wall Visual Oppression of Surrounding Living Spaces

The applicant's Submissions Report dismisses the loss of open western and southern outlooks for adjacent neighbors, claiming it is an acceptable consequence of urban development. This approach rejects the core view-sharing and residential privacy principles enforced by the Land and Environment Court.

By pushing a continuous 32.5-meter raw vertical concrete face right up to the shared boundary line, the design forces permanent visual claustrophobia onto existing properties. Surrounding neighbors will be forced to look directly at a massive 10-storey concrete wall outside their windows, severely reducing natural cross-ventilation, destroying spatial openness, and directly harming local residential livability.

Summary Conclusion:

The amended plans represent an unsustainable structural overdevelopment that completely ignores localized traffic capacities. Funneling all residential and loading transit into a congested, narrow rear lane creates an operational bottle-neck and poses an active danger to neighborhood pedestrians, specifically the high concentration of elderly residents nearby. We urge the Department to uphold orderly planning standards and reject this proposal, matching the consistent prior rulings of Randwick Council, the Planning Panel, and the NSW Land and Environment Court.

Sincerely,

The Surrounding Community & Combined Adjoining Neighbors