

COMMUNITY IMPACT STATEMENT: FORMAL DEVELOPMENT FORM OBJECTION

Matter Reference: State Significant Development Assessment (SSD-81426710)

Subject Site: 138 Maroubra Road Mixed-Use Built Form

Representing Group: Combined Locality Residents & Affected Adjoining Neighbours

To the Major Projects Assessment Team,

This strategic planning register compiles a collective community objection to the amended schemes submitted for 138 Maroubra Road. The core directive of this document is to evaluate the intense structural overdevelopment, localized vehicular gridlock, and permanent microclimatic degradation built into the updated proposal. The developer's framework directly circumvents the physical site constraints and neighborhood protections upheld by the NSW Land and Environment Court when it rejected the prior design on November 7, 2024 (Maroubra Property Development Pty Limited v Randwick City Council [2024] NSWLEC 1716).

The local public domain lacks the underlying physical infrastructure to safely support a 10-storey high-density footprint on an isolated, unamalgamated block. Pushing an aggressive building volume onto this standalone lot via affordable housing calculations creates immediate transit logjams and severe privacy loss that directly impact nearby families, and specifically compromises the safety of the dense demographic of senior citizens utilizing this flat pedestrian corridor. We urge the Department to reject the application based on the following key impacts:

Localized Traffic System Failure via Rear Laneway Chokepoints

The updated design drastically changes the property's logistics footprint by funneling 100% of residential transit, commercial deliveries, service vehicles, and garbage disposal through Piccadilly Place at the rear. This creates an immediate infrastructure bottleneck.

Piccadilly Place and its adjoining Bruce Bennetts Place roundabout are already highly congested from servicing the massive commercial docks of Pacific Square. Funneling an entire 10-storey multi-use tower's operational transit into this single lane will paralyze the local road network. For adjacent residents, this translates to non-stop noise and exhaust pollution, while posing an active safety hazard to local families and the heavy demographic of walking senior citizens who rely on this flat pathway for daily shopping access.

Excessive Building Density and Footprint Overload on a Standalone Lot

The Land and Environment Court previously established that this narrow parcel is physically unable to support high-density massing without first merging with neighboring land—specifically highlighting that the developer failed to acquire the adjacent Police Station plot.

Rather than lowering the building's scale to fit the clear spatial boundaries of the single allotment, the developer has chosen to expand vertically into a 10-storey layout. This aggressive footprint overloads the site lines, crowds out existing low-to-mid-rise neighbors, and sets a highly disruptive precedent that completely disregards orderly community planning and local neighborhood scale.

Exploitation of Infill Affordable Housing Rules to Bypass Local Height Restrictions

The site's original planning appeal was dismissed because the overall physical bulk, building depth, and sheer scale were fundamentally inappropriate for this streetscape. Instead of addressing these core architectural flaws, this revised application uses affordable housing bonuses as a purely mathematical tool to override local planning height protections by an extra 4 to 5 storeys.

Leveraging social incentives as a calculation trick does not change the physical reality of an overdeveloped site. It forces an unfair structural burden on the surrounding neighborhood, trading long-term pedestrian safety and community character for maximum commercial square footage on a heavily restricted parcel.

Permanent Solar Deprivation and Microclimatic Shadowing of Adjacent Homes

The applicant's shadow diagrams rely on broad regional averages under the Apartment Design Guide (ADG), completely missing the direct microclimatic impact on immediately adjacent properties. Erecting a continuous 10-storey concrete wall directly to the west blocks all essential afternoon daylight from reaching nearby living spaces.

Natural light is an absolute prerequisite for daily well-being and natural apartment warming. Depriving surrounding homes of crucial afternoon sun hours significantly degrades local living standards. This microclimatic loss is felt most severely by the high concentration of less-mobile senior citizens living in the adjacent building who spend the majority of their day indoors and depend on natural warmth.

Extreme Boundary Encroachment and Visual Oppression of Surrounding Living Spaces

The applicant's Submissions Report disregards the total loss of open western and southern outlooks for existing neighbors, claiming it is an unavoidable consequence of urban density. This completely ignores the view-sharing and residential privacy controls enforced by the Land and Environment Court.

By pushing a 32.5-meter raw, unstepped vertical concrete face directly up to the shared boundary line, the proposed structure imposes permanent visual claustrophobia on adjacent homes. Surrounding residents 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 constitute an unsustainable structural overdevelopment that completely overrides local traffic capacities. Funneling all residential and loading movements into a tight, congested rear lane creates an active infrastructure failure and poses a direct danger to community pedestrians, especially the large demographic of nearby senior citizens. We request that the Department uphold orderly planning boundaries and refuse consent, matching the prior rulings of Randwick Council, the Planning Panel, and the NSW Land and Environment Court.

Sincerely,

The Surrounding Community & Combined Adjoining Neighbours