

# EXECUTIVE BRIEFING: COMMUNITY PLANNING OBJECTION

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|-----------------------|----------------------------------------------------------------------------------|
| Application Focus     | State Significant Development (SSD-81426710) — 138 Maroubra Road                 |
| Objecting Party       | Surrounding Community & Combined Adjoining Neighbors                             |
| Core Planning Grounds | Traffic Congestion, Overdevelopment, Density Escalation, Vulnerable Demographics |

## 1. EXECUTIVE SUMMARY & LEGAL PRECEDENT

This briefing document outlines the absolute collective objection of the surrounding community to the amended built-form proposal at 138 Maroubra Road. The community requests that the Major Projects Assessment Team refuse consent based on unmanageable environmental, infrastructure, and social impacts. The proposal directly conflicts with established planning boundaries previously upheld by the NSW Land and Environment Court (Maroubra Property Development Pty Limited v Randwick City Council [2024] NSWLEC 1716), which refused a similar high-density configuration on November 7, 2024. By pushing maximum spatial volume onto a single standalone plot, the applicant presents an aggressive overdevelopment that threatens local traffic safety, reduces neighbor amenity, and introduces distinct localized risks to the heavily concentrated demographic of senior citizens living immediately adjacent to the site.

## 2. DETAILED PLANNING OBJECTION MATRIX

| Impact Focus Area                        | Proposed Design Conflict                                                                                                                                        | Identified Community & Vulnerable Risk                                                                                                                                                                                                       |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Laneway Traffic & Pedestrian Conflict    | Funneling 100% of residential traffic, commercial deliveries, and council waste disposal through Piccadilly Place and the rear Bruce Bennetts Place roundabout. | Guarantees permanent vehicle lockups due to existing Pacific Square heavy freight loading. Creates severe vehicle-pedestrian hazards for the large local population of walking senior citizens traversing this flat retail connection point. |
| Isolated Standalone Site Overdevelopment | Constructing an intense 10-storey high-density apartment block on an isolated, non-amalgamated plot without acquiring the adjacent Police Station lot.          | Directly violates previous NSW Land and Environment Court findings regarding site capacity. Overloads the tight parcel margins and establishes an unsafe zoning precedent that pushes maximum volume onto an un-merged block.                |
| Affordable Housing Control Bypassing     | Utilizing infill affordable housing state planning incentives purely as a                                                                                       | Fails to resolve the underlying physical incompatibility of the bulk and massing                                                                                                                                                             |

|                                                      |                                                                                                                                                                  |                                                                                                                                                                                                                                              |
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|                                                      | mathematical lever to override local height limits and insert 4 to 5 extra stories.                                                                              | with the local streetscape character. Trades long-term public safety and community scale for commercial footprint maximization.                                                                                                              |
| <b>Solar Deprivation &amp; Microclimate Shift</b>    | Erecting a deep, continuous 10-storey vertical interface wall right up to the shared boundary line, utilizing regional averages to justify solar exposure rules. | Strips away critical afternoon solar access and natural apartment warming from adjacent living spaces. This microclimatic loss heavily impacts nearby less-mobile senior citizens who spend most of their time indoors and rely on daylight. |
| <b>Boundary Encroachment &amp; Visual Oppression</b> | Pushing a raw, unarticulated 32.5-meter concrete vertical face directly against the shared perimeter, completely blocking western and southern spatial outlooks. | Forces severe visual claustrophobia onto surrounding homes, destroys established natural cross-ventilation corridors, and rejects the core view-sharing and privacy rules enforced by the NSW Land and Environment Court.                    |

### 3. DETERMINATION REQUEST

*The community submits that the amended 138 Maroubra Road proposal represents an unsustainable urban overdevelopment that actively outstrips local transport infrastructure. Channeling intensive vehicle volumes into a restricted, high-use rear commercial laneway introduces a critical point of failure that directly threatens the mobility and safety of walking senior citizens. In alignment with previous judgments issued by the NSW Land and Environment Court, the Planning Panel, and Randwick City Council, the Department is respectfully urged to uphold orderly zoning envelopes and refuse development consent.*

Submitted Respectfully,

**The Surrounding Community & Combined Adjoining Neighbors**