

Submission by Residents Opposing Lavender Bay Overdevelopment Mackenzie Street and St Francis Xavier development

SSD-88702457 | 21 September 2026

This submission is made on behalf of Residents Opposing Lavender Bay Overdevelopment (ROLBO), an incorporated association registered on 12 September 2025. ROLBO was established in response to community concern about the scale and impacts of proposed State Significant Developments in Lavender Bay. We represent many hundreds of residents from Lavender Bay and adjacent suburbs.

We strongly object to the proposed redevelopment at 1–19 Mackenzie Street and 211 Blues Point Road and submit that it should not be approved in its current form.

At its core, this proposal would impose a scale of development fundamentally at odds with the heritage precinct in which it sits. The proposed 20-storey tower, approximately 73.5 metres high and 45 metres wide, together with the substantial new buildings around St Francis Xavier Church and the former school, would permanently alter the character of this part of Lavender Bay. The loss of heritage fabric and the overwhelming of the church, former school and the surrounding historic streetscapes are central to our objection.

We recognise the need for additional housing, including genuinely affordable housing, and support the renewal of parish facilities. ROLBO would support a carefully designed low- and mid-rise alternative of approximately four to six storeys on appropriate parts of the site, with lower heights and generous separation where needed to protect heritage buildings and neighbouring homes. Such an approach could deliver additional housing while respecting the site's constraints.

The present proposal has not demonstrated why these objectives require a tower of this height and bulk. Nor has it adequately accounted for the existing housing to be lost, the displacement of residents, the reduction in sunlight to neighbouring homes, or the pressures on local streets and pedestrian routes.

This note sets out the principal community concerns and should be read with Annexure A, the members' review of errors and omissions in the EIS; Annexure B – the members' assessment of the impact to public views, Annexure C, the independent traffic and parking review by McLaren Traffic Engineering; and Annexure D, the preliminary solar access analysis by CadDraft. Together, these documents identify matters that require substantive reconsideration before the application can be determined.

Heritage loss and an inappropriate scale of development

St Francis Xavier Church and the former school are integral to a wider heritage precinct. Their significance is experienced through their fabric, interiors, setting and relationship with surrounding terraces, other neighbouring religious buildings and public spaces. Retaining selected external elements while substantially demolishing a heritage building or surrounding it with much larger structures cannot, by itself, be treated as a satisfactory conservation outcome.

The members' review identifies extensive proposed demolition of the former school, including internal walls and slabs and replacement of the roof. It also identifies inconsistencies in the documentation concerning which external walls would be retained. These are fundamental matters for a proposal described as adaptive reuse. The Department should require an unambiguous account of the fabric to be removed, its significance, the alternatives considered and the justification for each intervention. Excavation and vehicle access beneath the retained building also require a convincing demonstration that its structural integrity and heritage fabric can be protected.

The proposed buildings behind and around the church would substantially diminish the prominence of the church and its spire. The tower would become the dominant element in the precinct, to the detriment of the relationship between the heritage buildings, the skyline and the surrounding residential streets. Changes to the church interior and its distinctive stained-glass feature wall also warrant explicit

assessment. These concerns extend beyond the appearance of individual facades to the ability of future generations to understand and appreciate the place.

The railway line is a clear boundary in built character

The EIS repeatedly relies on an asserted transition from the North Sydney CBD to Lavender Bay to justify the proposal. This is a misleading description of the site's immediate context. The site is south of the railway line, within and adjoining the Lavender Bay Heritage Conservation Area. The railway corridor provides a clear physical break between the CBD to the north and the predominantly lower-rise residential and heritage precinct to the south.

Proximity to North Sydney Station does not make this site an extension of the CBD. The relevant comparison must include the church, former school, Mackenzie Street and Wilona Avenue homes and the wider Lavender Bay conservation area. Placing a 20-storey tower immediately above this setting would extend CBD-scale development south of the railway which does not provide the sensitive reduction in scale that the applicant's description implies.

The Department should assess the proposal against this actual context. A four-to-six-storey alternative, appropriately located and stepped down around heritage items and adjoining homes, deserves serious examination. Improved parish facilities, landscaping and pedestrian connections should also be tested within that alternative; their desirability does not establish the necessity of the proposed tower.

Existing housing and the claimed affordable housing benefit

ROLBO supports genuinely affordable housing. However, the proposal's claimed contribution must be assessed against the accommodation it would remove, its actual affordability and the needs of residents who would be displaced. A headline count of new units does not adequately capture these matters.

The EIS refers to 43 existing dwellings and 77 proposed affordable housing units, but these figures compare materially different forms of accommodation. Based on information compiled by ROLBO members, the Citadel at 211 Blues Point Road contains 12 two-bedroom apartments, providing 24 bedrooms, while Xavier Terraces contains seven one-bedroom and 22 two-bedroom apartments, providing a further 51 bedrooms. These properties therefore account for 75 existing bedrooms. The proposed affordable accommodation comprises 57 co-living rooms, excluding the caretaker or manager's accommodation, and 19 apartments in the tower. With only two of those apartments containing two bedrooms and the remainder being studios or one-bedroom apartments, the proposed provision equates to 78 bedrooms or studio/co-living rooms—a net increase of just three on this measure.

While bedroom numbers do not establish precisely how many people can be accommodated, this comparison gives a materially different picture from the headline unit count. It also highlights the loss of self-contained two-bedroom homes suitable for families and other households whose needs cannot readily be met by co-living rooms. The Department should require the applicant to reconcile these figures and demonstrate the net benefit in terms of accommodation capacity, dwelling suitability and affordability before relying on that benefit to justify the proposed scale.

Actual affordability also requires scrutiny. Residents report being told at the community session that affordable rents would be approximately 75 per cent of market rent. An indicative comparison identified by a ROLBO member in September 2026 illustrates the concern: a two-bedroom apartment in the Citadel was advertised at \$720 per week, while a modern two-bedroom apartment without parking in nearby Alfred Street South was advertised at \$1,130 per week. Applying a 25 per cent discount to the latter produces a rent of \$847.50 per week—approximately 18 per cent above the advertised Citadel rent. Although this is an illustrative comparison rather than a valuation of the proposed apartments, it demonstrates why a discount to market rent does not necessarily preserve the affordability of the housing being demolished.

The Department should require a transparent comparison of existing and proposed rents, associated charges, eligibility requirements and the duration of affordability commitments. Existing residents also need a clear and enforceable relocation strategy addressing suitable replacement accommodation, moving assistance, continuity of support and opportunities to return. The loss of comparatively affordable homes and established support networks must be weighed alongside any claimed benefit from the new accommodation.

Social impacts and meaningful community engagement

Annexure A questions the use of the broader North Sydney–Lavender Bay statistical area to assess a proposal whose most acute effects would fall on a much smaller community. Targeted engagement with displaced residents and immediate neighbours is needed to understand those effects. The community reports less than 24 hours' notice of the first walk-in session, and the engagement material records only 11 completed online surveys. These circumstances do not demonstrate that the most affected people have meaningfully informed the design. The Department should require a direct response to their concerns and evidence of how those concerns have changed the proposal.

In addition, ROLBO has spoken with a number of St Francis Xavier parishioners who oppose the proposed development but feel unable to voice criticism of their church. We encourage the Department to recognise that loyalty to the parish may inhibit objections, or lead some parishioners to feel obliged to express support, and to take this into account when assessing whether submissions reflect the full range of community views.

Annexure A

Community review of the EIS and supporting documentation

Annexure A was prepared by ROLBO members drawing on their local knowledge, the applicant's documentation and information supplied by affected residents. It identifies factual inaccuracies, inconsistencies, omissions and conclusions that require further substantiation. It should be read as a detailed schedule of matters requiring a response, alongside the independent technical reviews in Annexures C and D.

The concerns go well beyond minor drafting errors. They include the characterisation of the site and surrounding built form; the extent of demolition of the former school; the comparison of existing and proposed housing; assumptions about neighbouring homes and solar access; and the assessment of social, visual and construction impacts. These matters bear directly on whether the development is appropriate and whether its claimed public benefits outweigh its adverse effects.

One particularly concerning example is the visual assessment material identified in Annexure A as referring to Badgerys Creek roads, rural and industrial land and an entirely different setting. The applicant should explain how this material entered the assessment, identify every conclusion affected and provide a corrected, site-specific analysis. Until that occurs, the community and the Department cannot confidently rely on the relevant assessment.

The members' review also questions how the visual assessment moves from acknowledging sensitive public views and limited capacity to absorb development to more favourable overall conclusions. Correctly framed viewpoints and transparent reasoning are essential where a large new building would alter the setting of heritage items and views experienced daily from homes, streets and parks.

The proposed through-site link and church forecourt may provide public benefits, but those benefits should be described accurately – currently it is a through-site link with no clear purpose. The link's connections, accessibility, public access arrangements and relationship with existing routes to the station and foreshore need to be demonstrated. Vehicle access across an area promoted for pedestrian use also

requires careful scrutiny. The existence of a new route cannot, without that analysis, justify the scale of development sought.

Construction impacts are another substantial concern. The members' review records predicted noise above the "highly noise affected" level at nearby residences, while important construction and mitigation details are deferred. Excavation and vibration risks require particular attention given the surrounding heritage buildings and older homes. The applicant should demonstrate a feasible construction approach and effective safeguards before approval, including structural protection, dust and noise controls, access arrangements and a clear response process for affected residents.

Taken together, these deficiencies warrant independent scrutiny and a consolidated response from the applicant. Material corrections should be made available for community review, with further exhibition where warranted. ROLBO's concern is that decisions about irreversible change should be based on a reliable account of the place and the people affected.

Annexure B

ROLBO's estimates of the impact of the development on important public vantage points

The proposal would permanently diminish the expansive public views from Blue Street Plaza and St Peter's Park towards Sydney Harbour and the city skyline. These outlooks are enjoyed by local residents, workers and visitors alike and form an important part of the area's public amenity. The proposed height and bulk would obstruct substantial portions of this panorama and confine remaining views to narrower corridors between buildings. Retaining a restricted glimpse of the harbour is not equivalent to preserving the breadth and openness of the existing outlook. This enduring loss to the wider community must be given proper weight in the assessment of the proposal.

Annexure C

Independent traffic and parking review

McLaren Traffic Engineering's review identifies substantial deficiencies in the assessment of parking demand, road-network performance, access safety and construction traffic. These findings are particularly important in a locality where residential access, church activity, school movements, pedestrians and cyclists already share constrained streets.

The review finds that the parking surveys do not align with relevant church and school peak periods and that the survey results show on-street parking operating at capacity during peak demand. It also questions the treatment of increased church floor area alongside a substantial reduction in parking for church users. The conclusion that surrounding streets can readily absorb additional parking demand is therefore not adequately established.

McLaren identifies gaps in the verification and modelling of traffic conditions. These include the absence of raw survey information needed to check the reported volumes, insufficient information about model calibration, an omitted key intersection and no modelling of future intersection performance. The review also identifies inadequate assessment of the Montessori school's pick-up and drop-off operations and the cumulative effects of nearby development. Existing-condition modelling alone cannot establish that future traffic can be accommodated satisfactorily.

The western driveway is proposed near the Mackenzie Street and Miller Street bend, where pedestrian, cycle and vehicle movements interact. McLaren calls for a detailed sight-distance assessment and further consideration of the safety of this location. The need for three driveways also requires justification, given the additional conflict points and effects on kerbside parking.

The review identifies specific design deficiencies. The eastern servicing ramp has a proposed gradient of 20 per cent, compared with the 15.4 per cent maximum identified by McLaren for the nominated small rigid service vehicle. The review also identifies approximately 16 metres of queuing space between the roller door and property boundary, compared with the 30 metres it says is required. These shortcomings raise the prospect of servicing spilling onto the street and vehicles queuing across pedestrian routes or into Mackenzie Street.

Construction arrangements remain insufficiently resolved. McLaren identifies a lack of adequate provision for worker parking, assessment of the proposed work zone's effect on on-street parking, and restrictions on truck movements during school peaks. It also calls for assessment of pedestrian movements and public transport capacity. Proximity to rail and bus services is an advantage, but does not remove the need to demonstrate safe access and workable servicing.

ROLBO submits that these issues require resolution through proper assessment and, where necessary, redesign. They should not be left to later management plans where the underlying site layout or development intensity may prevent a satisfactory outcome.

Annexure D

Independent preliminary solar access analysis

CadDraft's analysis provides comparative existing and proposed sun-view drawings for 21 June and the equinox, together with winter shadow plans. The drawings illustrate how the proposed built form would obstruct sunlight to parts of the residential precinct to the south. The equinox comparisons are also important: assessment of the community's concern should extend beyond the shortest day of the year.

The drawings should be considered alongside the property-specific errors identified in Annexure A. These include disputed assumptions that some windows receive no existing sunlight, incorrect identification of living areas and private open space, and omission of existing solar panels at 12 Wilona Avenue. As the baseline is wrong, the calculated loss and the resulting assessment of acceptability cannot be relied upon.

Of particular concern is the approach identified in Annexure A under which properties already receiving less than three hours of sunlight are not treated as adversely affected for the purposes of the applicant's assessment if they remain below that threshold. Further loss of the limited sunlight such homes receive is a real impact. It must be quantified and assessed, rather than disappearing from the reported adverse-impact figures.

The equinox comparisons are also important, as they demonstrate that the impacts extend well beyond the winter solstice and affect the community across approximately half of the year.

ROLBO asks the Department to require corrected, property-specific assessment of living areas, private open spaces and solar installations, with assumptions checked against affected residents' information. The preliminary drawings do not provide a complete quantified schedule for every property. A reconciled assessment is needed to establish the duration and extent of losses and to test how a substantially lower development would avoid or reduce them.

Conclusion

ROLBO submits that the EIS has not adequately addressed the SEARs in the following critical respects:

- Engagement — SEARs 5: Inadequate consultation and insufficient evidence that community concerns informed the design.

- Design and built form — SEARs 6–7: Unjustified height and bulk, underpinned by a misleading characterisation of the site’s relationship to North Sydney’s high-rise centre.
- Environmental amenity — SEARs 8: Inaccurate assumptions and omissions undermine the assessment of overshadowing and impacts on neighbouring homes.
- Visual impact — SEARs 9: Inadequate consideration of maintaining significant public views from Blue Street Plaza and St Peter’s Park, despite an express requirement to do so.
- Transport — SEARs 10: Unresolved deficiencies in the assessment of traffic, parking, access safety and cumulative construction impacts.
- Noise and vibration — SEARs 11: Insufficient assessment of impacts and mitigation measures to protect nearby residents and sensitive structures.
- Heritage — SEARs 22: Inadequate assessment of the destruction of significant heritage fabric, harm to surrounding heritage settings and alternatives that could avoid or reduce that damage.

These are substantive deficiencies.

ROLBO is of the view that SSD-88702457 has not demonstrated that its proposed height, bulk or intensity is appropriate for this heritage-sensitive site. The loss of heritage fabric and setting, the extension of CBD-scale development south of the railway line, the effects on existing residents and the unresolved transport and solar-access impacts are not adequately justified by the claimed benefits and so render this SSD unacceptable.

We respectfully request that the proposal not be approved in its current form. The Department should require a substantially revised scheme that conserves the heritage buildings and their setting, provides a transparent and demonstrable affordable housing benefit, protects displaced residents and materially reduces impacts on neighbouring homes and local streets.

ROLBO would support constructive consideration of a carefully designed four-to-six-storey alternative on appropriate parts of the site. That is a reasonable basis for additional housing and parish renewal in Lavender Bay, subject to the heritage, amenity and access constraints that this proposal has not satisfactorily addressed.

Yours faithfully,

Nicole Beavan
Chair
Residents Opposing Lavender Bay Overdevelopment