

19 November July 2025

Dear Sir/Madam

Re: 2-16 Spencer Street ROSE BAY NSW 2029

I am writing on behalf of my family and other concerned residents of Hamilton and Spencer Streets, Rose Bay, to express our serious concerns regarding the proposed construction of athis enormous residential flat building (SSD-86122958). The proposed development raises significant issues related to zoning, traffic, parking, infrastructure, and overall amenity of the area.

I understand many of my concerns relate to broader issues than those covered by the specific application, it is imperative that they be considered to ensure sustainable development in Rose Bay and the greater Woollahra Council area.

Clarification and Compliance

Woollahra Council is seeking clarification from the Minister regarding the zoning of Rose Bay for mid-rise development. Until this clarification is received and ratified, approval must not be given to construct a oversized inappropriate structure. Low and mid-rise housing area is defined as having a full line supermarket with at least one bus service per hour. According to Planning NSW ([Site selection | Planning](#)), Rose Bay town centre is on New South Head Road.

There is no full line supermarket (or equivalent) on New South Head Road, Rose Bay.

Schools that cannot take growth

We do not have a Major hospital

We do not have a District shopping centres on train line

No University

No TAFE

We do not have a CBD core with employment

Sporting facilities / Aquatic centres

We do not have adequate infrastructure such as storm water, sewerage, roads etc

Infrastructure Constraints

Rose Bay's current infrastructure (water, sewer and roads) is already struggling to deliver adequate services.

During peak hours travelling by car between Dover Road, Rose Bay and Edgecliff Station takes on average 45 minutes; travelling by bus takes well over one hour. A test undertaken by *Wentworth Courier* several years ago, determined that it was faster to walk from Rose Bay to Edgecliff Station during peak hours than it was to drive. This has not improved in recent years.

The lack of contiguous, dedicated bicycle lanes on both New South Head and Old South Head roads further worsens the congestion and increases the risks to both motorists and cyclists.

Sewage from the area is currently pumped to outfalls in Dover Heights. While Sydney Water is committed to building pumping stations to direct this waste to Bondi, these pumping stations are not due for completion until late 2026 ([Parsley Bay Pump Station](#)). and indications are that the proposed pumping station capacity may be inadequate to support the proposed residential growth.

Loss of Amenity

Given the height of proposed building, surrounding properties will also experience a loss of privacy as many dwellings will overlook neighbouring properties.

The bulk of the building will significantly alter the streetscape, as it overshadows adjacent buildings and contributes to additional on-street parking as only two visitor parking spaces are being provided.

Parking and Flood Risk Management Report

A flood risk management analysis based on the current development proposal has not been conducted.

Flood Risk Management Report dated 11 December 2024 is based on the original proposal submitted in December 2024. At that time the proposal was for 6 units and one level of parking. The current submission is for 12 units and 2 levels of parking, both of which are below ground. The site was previously classified as a medium flood-risk precinct. The flood hazard rating must be reviewed based on the deeper excavation required to accommodate the second parking level.

Risk from Geotechnical and Hydrogeological issues

- the water table will be intercepted by excavation and/or piling;
- the excavation and foundations will occur below the water table;
- dewatering or groundwater displacement is likely;
- a contiguous piling system would operate as a subterranean dam wall, altering groundwater flow, potentially raising waterlevels upslope or adjacent and creating a shadow on the low side.
- The risk to adjoining structures and adjacent Streets cannot be assessed.
- This is a complex area and much is known and unknown. This serves as notice for the approval authority to be aware of their liability in this area as well.

Transport Impact Statement

Traffic

Before considering the Transport Impact Statement (TIS), it must be noted that:

- The Land Use Trip Generation analysis that informs the medium density residential summary was undertaken in 2013 and is seriously outdated.
- The Land Use Trip Generation analysis that informs the low density residential summary was undertaken in 2022.
- The number of cars per household (Woollahra LGA) increased by almost 10.5% (based on ABS Census of Population and Housing 2011 and 2021).
- The proposed dwelling is in Woollahra LGA, where car ownership is considerably higher than the State average (Motor Vehicles, Australia, January 2022, ABS).

Guide to Transport Impact Assessment V1.1(GTIA) states that “Mode shares were found to vary widely across the sites surveyed, and any mode share estimate should be site specific, considering the site characteristics and network context.” The mode share estimate quoted in TIS does not consider the location of the development, an area known for its high vehicle usage.

According to the Transport Impact Statement (TIS), current trip generation during peak hours is estimated at 2 vehicle trips per hour—based on the GTIA peak period traffic generation rates of 0.95 and 0.99 vehicle trips per dwelling per hour. Applying these rates to the proposed 12-unit development yields a minimum estimated traffic generation of 12 vehicle trips per hour (one per dwelling), representing a net increase of 10 additional trips per hour. This figure is more than three times higher than what is stated in the TIS.

Furthermore, the assumption of one trip per household significantly underestimates the true impact, particularly given that all proposed units are four-bedroom dwellings. It is reasonable to expect that

each household will generate multiple trips during peak hours—for example, at least one adult commuting to work and children being driven to school or daycare. As such, the projected traffic volumes presented in the TIS do not reflect the likely real-world usage and Turning out of Hamilton Street onto Old South Head Road can currently take between 10 and 15 minutes during peak hours. This will only increase with an additional 5 to 10 cars using the intersection.

Crash History nearby

Crash history only reports on the “current” crash history between 2019 and 2023. It does not included crashes that occurred in 2024, nor does it include ambulance, or paramedic, calls to the area in response to pedestrian accidents and/or near misses. While the intersection may not be eligible for Black Spot funding, the intersection of Old South Head Road and Hamilton Street together with the pedestrian crossing on Old South Head Road are known locally as dangerous sites. It is my understanding that Transport for NSW is reviewing both the intersection and pedestrian crossing to determine whether additional safety measures are required.

The conclusions reached in the Transport Impact Statement (TIS) do not reflect the body of the report. Particularly Section 5 Traffic Impacts notes that the net increase of vehicle trips/hour is 3 but, in Conclusion, it states that there are only 2. Notwithstanding this notable inconsistency, one should wonder how many other “minor” details were overlooked in the creation of this report.

Shadowing and Solar Access

Direct solar access currently enjoyed by adjoining properties will be decreased by the proposed building. Adjacent properties will be significantly affected by shadow impacts and will receive less direct sunlight required by State Environmental Planning Policy No 65 - Design Quality of Residential Apartment Development (SEPP 65).

The lack of solar access will considerably diminish the residential amenity of the properties by decreasing light and warm and increasing reliance on artificial lighting and heating.

The proposed building, itself, does not comply with SEPP 65.

Objections

I object to the proposed SSD-86122958 proceeding. My objections are based on:

- State Government rezoning of Rose Bay as a nominated town centre under State Environmental Planning Policy (Housing) 2021
- Shadowing and solar access for the proposed and surrounding buildings
- Increased traffic and transport implications
- Inadequate infrastructure (roads, sewage, water)
- Out-of-date flood risk management plan
- Risk from Geotechnical and Hydrogeological knows and unknowns

I look forward to receiving your considered response to my objections.

Kind Regards