

FORMAL OBJECTION TO STATE SIGNIFICANT DEVELOPMENT

Redevelopment of Eastlakes Shopping Centre | Application No. SSD-90572458

Application Details

Application name	Redevelopment of Eastlakes Shopping Centre
Application number	SSD-90572458
Applicant / developer	Eastlakes Development Pty Ltd
Consent authority	NSW Department of Planning, Housing and Infrastructure
Submission type	OBJECTION
Date of submission	31 July 2026

Submitted by

Full name	[REDACTED]
Address	[REDACTED] 16B Evans Ave, Eastlakes NSW 2018
Tenure	Owner-occupier
Email	[REDACTED]

1. OPENING STATEMENT AND FORMAL OBJECTION

I am a resident of The Grand, Eastlakes, and I write to formally and strongly **OBJECT** to the above-referenced State Significant Development application. This proposal, as currently drafted, represents one of the most significant and damaging overdevelopment proposals this community has faced. It must be refused in its current form.

The proposed development seeks to construct four residential towers (ranging from 14 to 18 storeys), two levels of retail, and four levels of basement parking on the current Eastlakes Shopping Centre site. It would introduce 736 new residential dwellings, comprising 521 market housing units and 215 build-to-rent units, to an area whose infrastructure, roads, services, and character are wholly unprepared to absorb this level of intensification.

The proposal simultaneously seeks three extraordinary departures from current planning controls:

- A rezoning from E1 Local Centre to MUI Mixed Use
- An increase in maximum building height from 14 metres to 66 metres which is a nearly fivefold increase
- An increase in floor space ratio from 1.5:1 to 5.5:1 which is a more than threefold increase in density

Each of these changes, individually, would be cause for serious concern. Together, they constitute a wholesale transformation of this site that bears no relationship to the surrounding urban fabric or the expectations of the community that lives here. I urge the Department to refuse this application.

2. SUMMARY OF THE PROPOSAL AND ITS DEFICIENCIES

The scale of this proposal must be understood in full:

Residential towers	4 towers, 14–18 storeys
Total dwellings	736 (521 market + 215 build-to-rent)
Estimated new population	Approximately 1,400–1,800 residents
Retail levels	2 levels of retail outlets
Parking levels	4 levels of basement/structured parking
Proposed max height	66 metres (currently 14 metres)
Proposed FSR	5.5:1 (currently 1.5:1)
Zoning change sought	E1 Local Centre → MUI Mixed Use
Est. additional daily vehicle movements	3,500–5,500+

At no point does the application adequately address how the existing community, infrastructure networks, or public services will absorb this population and the associated demand it generates. The absence of credible infrastructure planning is, in itself, grounds for refusal.

3. TRAFFIC AND TRANSPORT — A CRISIS IN THE MAKING

The traffic implications of this proposal are severe and have been materially underestimated. Adding 736 dwellings, two levels of retail, and 4 levels of parking to the Eastlakes precinct will generate an estimated 3,500 to 5,500 additional vehicle movements per day. This is not a marginal increase on the current baseline — it is a transformation of traffic load that the surrounding road network cannot accommodate.

3.1 Current road network already at capacity

The roads serving the Eastlakes Shopping Centre precinct, including Gardeners Road, Botany Road, and Wentworth Avenue, already experience severe congestion during morning and evening peak periods. Residents of The Grand currently experience significant delays entering and exiting the car park, and pedestrian safety at nearby intersections is already compromised by traffic volumes.

3.2 Impact on The Grand car park

The increased traffic volumes will make it unsafe and, at peak times, functionally impossible for residents and visitors of The Grand to enter and exit its car park. This constitutes a direct and material impact on the amenity, safety, and property values of the existing residential community.

3.3 What state-level transport infrastructure is required

No credible traffic management solution can be delivered without major state government transport infrastructure investment, including:

- **Signalised intersection upgrades on Gardeners Road and Botany Road to manage the increased vehicle movements**
- **Dedicated turning lanes and slip roads at the development entry and exit points**
- **Expanded and redesigned pedestrian and cycling infrastructure along all adjacent roads**
- **Potential widening of Gardeners Road to accommodate increased capacity**
- **A new or substantially upgraded bus service connecting the development to Mascot and Green Square stations, the nearest heavy rail access points, given that the site has no direct rail access**
- **Review and potential redesign of the local road hierarchy to manage construction-period and operational vehicle movements**

None of these works are funded, planned, or committed to in the application. They represent significant state government expenditure that is being quietly passed to the public purse while the developer captures the uplift value from the rezoning.

4. BURDEN ON STATE AND LOCAL INFRASTRUCTURE — WHOLLY UNADDRESSED

This proposal will introduce an estimated 1,400 to 1,800 new residents to the Eastlakes precinct. The existing infrastructure serving the area was not designed for this level of intensification. The application fails to demonstrate that the necessary infrastructure capacity exists or will be provided.

4.1 Water and sewage

Sydney Water's network in the Eastlakes area was built to serve an established low-to-medium density residential catchment. A development generating demand from 736 additional dwellings, plus two levels of commercial retail, will require substantial upgrades to water mains, sewer capacity, and stormwater drainage infrastructure. No evidence has been provided that Sydney Water has assessed the network's capacity or committed to the necessary upgrades. Without these upgrades, the development risks placing strain on the existing network, with consequences for all residents in the area.

4.2 Electricity and telecommunications

The addition of four residential towers, retail space, and basement parking (including EV charging infrastructure) will place significant additional load on Ausgrid's electricity distribution network in the area. Network augmentation works, including substation upgrades and new high-voltage feeders, will be required. Similarly, NBN and telecommunications infrastructure will need significant expansion. These costs and timelines must be transparent and committed before any approval is granted.

4.3 Schools and childcare

The local school catchment areas, including Eastlakes Public School and nearby secondary schools, are already operating at or approaching capacity. An influx of 736 dwellings will generate demand for hundreds of additional primary and secondary school places, as well as significant childcare and early learning capacity. The NSW Department of Education has not, to my knowledge, committed to any additional school infrastructure in this area. Approving this development without a funded, committed school infrastructure plan is irresponsible and will harm both new and existing families.

4.4 Health and medical services

The Eastlakes area is not well-served by primary healthcare. GP clinics, bulk-billing medical centres, pharmacies, and allied health services are already under pressure and have lengthy wait times. An additional 1,400–1,800 residents will worsen access to healthcare for the entire community, new and existing alike. This proposal should not be approved without evidence of a funded strategy to expand healthcare capacity in the area.

4.5 Open space, parks, and recreational facilities

The proposal makes no meaningful provision for new public open space to serve the incoming population. The existing parks and recreational facilities in the Eastlakes area are already heavily used. The NSW Government's own planning benchmarks require a minimum provision of open space per resident, this development, as proposed, will cause the precinct to fall far below those benchmarks. The developer must be required to provide or fund new public open space as a condition of any approval.

4.6 Emergency services

Police, fire, and ambulance services in the inner-south Sydney area are already stretched. A development of this scale increases demand for emergency response capacity. NSW Police, Fire and Rescue NSW, and NSW Ambulance should be required to formally assess and respond to the impacts of this proposal before any determination is made.

5. WASTE MANAGEMENT — A SERIOUS AND UNRESOLVED PROBLEM

The waste management implications of 736 residential dwellings combined with two levels of commercial retail have not been adequately addressed in this application. This is not a minor administrative matter — it is a significant public amenity and environmental issue that will affect the existing community for decades.

- At an average of 14–16 kg of waste per household per week, 736 dwellings will generate approximately 10–12 tonnes of residential waste weekly. Combined with commercial retail waste, particularly if food retail is included, total waste generation could exceed 15–20 tonnes per week.
- The logistics of collecting this volume of waste, large compactor trucks, multiple weekly collections, bin presentation areas, will generate substantial additional heavy vehicle movements through local streets, compounding the traffic impacts already identified.
- Bin storage, waste rooms, and compactor areas for a development of this scale must be carefully designed to prevent odour, pest infestation, and amenity impacts on neighbouring properties including The Grand.
- The retail component, particularly if it includes supermarket or food and beverage tenancies, will generate significant volumes of food waste, cardboard, and liquid waste requiring dedicated and separate management arrangements.
- No Waste Management Plan has been submitted with this application that satisfies me that these issues have been resolved. A comprehensive, independently reviewed Waste Management Plan must be a mandatory condition of any approval, with binding commitments before occupation.

6. BUILDING HEIGHT, AVIATION SAFETY, AND AIRSPACE

The proposed maximum building height of 66 metres represents a nearly fivefold increase on the current 14-metre height limit. This is not an incremental planning adjustment. It is an extreme departure from the established built environment of Eastlakes.

Of particular concern is the potential aviation safety impact of these towers. The Eastlakes precinct sits within the flight path corridor of Sydney Airport, one of Australia's busiest airports. The current 14-metre height limit exists, in part, to protect operational airspace. Towers of 14 to 18 storeys may exceed the Obstacle Limitation Surface (OLS) or approach/departure path clearances applicable to this area.'

I call on the Department to:

- Require an independent aviation safety assessment by the Civil Aviation Safety Authority (CASA) or an accredited aviation safety consultant before any determination is made
- Require Airservices Australia to formally assess and advise on the implications of the proposed tower heights for flight path operations

- Refuse any approval that cannot demonstrate full compliance with airspace protection requirements without any mitigation condition that reduces the height to a level acceptable under CASA standards, which would, in itself, likely require a materially different development

7. INAPPROPRIATE SCALE, DENSITY, AND REZONING

The proposed FSR of 5.5:1 represents a more than threefold increase from the current approved limit of 1.5:1. This, combined with the height increase from 14 metres to 66 metres, and the rezoning from E1 Local Centre to MUI Mixed Use, constitutes a complete transformation of the planning intent for this site.

The E1 Local Centre zone was applied to this site for good reasons, such as to provide a local-scale retail and community hub that serves the surrounding neighbourhood without overwhelming it.

The proposed MUI Mixed Use zone, at the densities sought, is fundamentally incompatible with the low-to-medium density residential character of the surrounding streets.

This rezoning and density uplift will also set a dangerous precedent. Once approved, similar applications in the area will point to this development as justification. **The cumulative impact of multiple such developments would permanently and irreversibly transform the character of Eastlakes.**

8. CONSTRUCTION IMPACTS — YEARS OF DISRUPTION TO EXISTING RESIDENTS

A development of this scale, four towers, four levels of basement excavation, and two levels of retail, will involve three to five years of sustained heavy construction activity. Existing residents of The Grand and surrounding properties will be subjected to:

- Demolition, excavation, and piling noise and vibration which likely to affect sleep, work-from-home arrangements, and the wellbeing of elderly and vulnerable residents – a significant makeup of Eastlakes demographics
- Dust and reduced air quality from earthworks across an extended period
- Significant increases in heavy construction vehicle movements through local streets, compounding already difficult traffic conditions
- Potential structural impacts on The Grand building from deep basement excavation and piling works
- Loss of the existing shopping centre facilities during construction, removing access to local retail, supermarket, and services for the current community

A comprehensive, independently reviewed Construction Management Plan, with binding and enforceable noise, vibration, dust, traffic, and community notification obligations, must be required as a mandatory condition of any approval.

9. CONCLUSION AND REQUEST

This proposal must be refused.

The Redevelopment of Eastlakes Shopping Centre, as currently proposed, is an overdevelopment of extreme scale that cannot be supported by the existing road network, infrastructure, services, or community character of Eastlakes. It has been brought forward without adequate planning for the infrastructure burden it creates which is a burden that will fall on existing residents, taxpayers, and the NSW Government rather than the developer who will profit from the rezoning uplift.

Specifically, I call on the Department to:

- Refuse this application in its current form
- Require a fully funded Infrastructure Delivery Plan by committing state-level investment in roads, water, sewage, schools, healthcare, open space, and emergency services, before any modified application is considered
- Require an independent aviation safety assessment from CASA and Airservices Australia
- Require an independently reviewed Traffic Impact Assessment that honestly models 3,500–5,500 additional daily vehicle movements
- Require a comprehensive Waste Management Plan and Construction Management Plan as mandatory conditions of any future approval
- Refuse any rezoning that enables a density incompatible with the character and infrastructure capacity of the surrounding area

I reserve my right to make further submissions and to appear at any public hearing on this matter.

10. DECLARATIONS

Political donations declaration: I declare that neither I nor any member of my household have made any reportable political donations in the past five years.

Disclaimer and declaration: I acknowledge and accept the Department of Planning, Housing and Infrastructure's disclaimer and declaration as published on the NSW Planning Portal in relation to submissions made on development applications.'

Yours sincerely,

[REDACTED]

[REDACTED] 16B Evans Ave, Eastlakes NSW 2018

July 31, 2026