

In regard to my review of the the exhibition documents submitted for the...

NSW State Significant Development SSD-73228210,

being the -

“Excavation, tree removal, remediation, subdivision and construction of a mixed-used development with 1185 apartments including 219 affordable housing apartments and commercial, retail, an indoor recreational facility and public park land uses”

I herewith submit my proposal for it's **rejection**, based on the 'Preliminary Development Application' Architectural Drawings and assorted supporting documentation.

1. Deceptive Presentation:

The Cover Sheet (see Appendix 1 – Cover Sheet) shows Block A at 25 storeys, not the 31 storeys as revealed by the Sections and Elevations. Additionally, there are no major shadows for mid-summer projected from the very tallest buildings onto the site and surrounding areas included in the documentation.

2. Lack of Sustainable Design Features:

It is apparent from the Landscape Design Finishes (See Appendix 2 & 3 – Landscape Finishes) and the Architectural Materials and Finishes Board (See Appendix 4 – Materials & Finishes Board) showing just brick types and paint finishes) the construction elements have been chosen in haste with no future consideration of sustainability. Notably, all of the landscape 'Urbanstone' tile selections containing crystallised silica or 'engineered stone' are now banned.

<https://www.safework.nsw.gov.au/hazards-a-z/hazardous-chemical/priority-chemicals/crystalline-silica/engineered-stone-ban>. Additionally, there is no dedicated provision for low-e glass in these apartments to lower the thermal gain and reflectivity, on BASIX performance criteria. The current best practice benchmarks in NSW at October 2024 is achieving a 50% reduction in embodied carbon and a 50% reduction in operational energy (see Appendix 5 & 6 – Architecture & Design article from Oct – Dec 2024, pp. 12 -15).

3. Over-development of the site:

Initially, it is a massive over-development of the site regarding the total population numbers. At **1185 apartments** multiplied by an average of a conservative and approximate number of **2.5 persons /apartment = 2,962.50 persons**. It is nowhere in keeping with the expectations of the expected growth anticipated in the original Canada Bay Council 'Kings Bay Precinct Master Plan Report' of 2021 https://www.canadabay.nsw.gov.au/sites/default/files/Strategic%20Planning/1.%20Attachment_Masterplan%20Urban%20Design%20Report_Kings%20Bay%20Precinct%202021.pdf and the estimated growth suggested in the Canada Bay 'Five Dock Estimated Resident Population' growth estimates. <https://profile.id.com.au/canada-bay/population-estimate?WebID=170> The over-development of the site is unsustainable. Many of the adjacent sites along Parramatta Road are commercially unviable and there are still many long-term untenanted vacancies surrounding the site.

4. CBC members objections to PRCUTS:

The Greens on the Canada Bay Council have recently noted and objected to the extreme “excessive height and overcrowding” regarding Canada Bay Council's adaption of the NSW Government's Parramatta Road Corridor Urban Transformation Strategy, known as **PRCUTS**.

<https://canadabaygreens.org/council-accepts-high-rise-rezoning-proposal-despite-major-flaws/>
There are many clamouring official and local voices for a deescalation of these congested high-density planning proposals.

5. Site Density:

What is particularly disturbing is within the architectural documentation it claims to follow “in the spirit” of the 2021 Master Plan Report. It does so only in a limited corridor of the overall proposed PRCUTS site but exceeds the total population allowed for in that document. The resultant for this site is **378 dw/ha** as opposed to **119 dw/ha** in the Group GSA Report of 2021. The population density for this suburban region is totally unacceptable. Sadly, it fits more appropriately with urban high-rise in Melbourne. This calculation is relevant to the site area of 31, 346 m² in 'Appendix 7 – Lot Consolidation' versus the 1185 total number of apartments.

6. Overshadowing:

The overshadowing of Rosebank College in mid-summer will certainly be of serious concern but there is no indication of a mid-summer calculation of shadows in the documentation. Although the architectural documents spend some 17 pages of 'Existing Context – Shadow Diagrams' and 'Amenity Diagrams (ADG) Solar' explaining the best case re mid-winter sunlight access to apartments, when there is no addressing of the worst case scenarios. It's a major oversight and right now, in summer 24/25 (see Appendix 8 & 9 re the mid-summer sunpath) - it is increasing its span every year and in the time of worsening climate-change there has been no appreciation of this in the architectural documentation.

7. Affordable apartments:

There are 219 affordable apartments of the total **1185 apartments**. Thus $219/1185 = 0.1848$ or 18.48% or $219 \times 2.5 = 547.5$ persons. This is lower than the best average of affordable apartments in the world is currently Denmark at 20% but many EU countries have suggested that it should be closer to 30%. Now “The demand for social and affordable housing dwellings within Canada Bay (in 2024) was estimated to be 5,058.” [https://www.canadabay.nsw.gov.au/sites/default/files/2021-11/Revised%20AHCS_incl%20RW_AdjJun21_EffOct21_percentag%20clarified\(updated%2026.11.2021\).pdf](https://www.canadabay.nsw.gov.au/sites/default/files/2021-11/Revised%20AHCS_incl%20RW_AdjJun21_EffOct21_percentag%20clarified(updated%2026.11.2021).pdf). This accounts for about only 10.82% of the total required within the Canada Bay Council area. As a society we should be achieving a greater percentage of affordable apartments for these NSW SSD approved projects.

8. Traffic Management, Noise, Air Quality and Vibration:

There is already traffic gridlock around Rosebank College without the added constraints of this massive local population increase on the limited existing resources and burgeoning infrastructure. Plus, the effects of the external exhausts from the M4 tunnel (See Appendix 10 – M4 Tunnel proximity) has been overlooked. Despite the BASIX documentation suggesting performance criteria for the application of external shades and facade treatments, nothing has been documented that expresses the need to control the noise that will be internally and externally generated. The inability to dampen the noise and natural wind-borne noise heard in each apartment without some further detailed absorbent finishes and further noise controls is negligent and irresponsible.

9. Air Pollution & Maintenance:

The air quality in Five Dock is prone to be a product of the worst excesses of Parramatta Road and is constantly depositing dirt and dust into the local environment. One of the priorities of any tall building should be to plan for constant building cleaning and maintenance. Alarming, there appears to be no in-built consideration for the care and cleaning of the buildings in this submission.

10. Heating & Cooling:

In the immediate worsening summertime requirements there is no evidentiary planning for exceptional cooling solutions. Given that this is an 'all electric building' development the costs to residents in the 219 affordable apartments (as confirmed in <https://www.theurbandeveloper.com/articles/deicorp-five-dock-apartments-retail>) requires some radical rethinking in regard to reducing standard costs.

11. On-Site Water Retention:

Although the SSD design cites care and consideration of the site topography with the on site water flow descriptively performance managed, there is no evidence (given the collective run-off from the assorted buildings) for any water retention? Although, this is an area in which the water flow to King's Bay is highly sensitive to flooding and the effect of pollution upon the marine environment. https://www.canadabay.nsw.gov.au/sites/default/files/PRCUTS_Flood%20Risk%20Assessment_Burwood%20and%20Kings%20Bay%20Precincts_September%202020.pdf

12. Water and Electrical Requirements:

A fundamental concern is that there is no sign of large-scale water storage for the 2,962.5 residents in times of increasing need during summer. A large-scale community swimming pool would be of assistance for any fire-related issues. At a basic requirement the water resources would need to cope with an annual consumption of 4,000 litres per person. Similarly, a significant electrical substation would be required to service the 1,185 apartments at a conservative estimate for 2.5 people at a minimum of 900 kWh per month. https://www.energy.nsw.gov.au/sites/default/files/2023-09/NSW_Electricity_Supply_and_Reliability_CheckUp_Marsden_Jacob_Report_2023.pdf These are indicative figures, as there appears to be no lateral thinking in regard to adequate resourcing. Sadly, the provision of a supermarket and retail stores, consuming more resources are the only additions shown. My objection is that this scheme is totally unrealistic.

13. Structural Issues:

The Sections depicting the slender concrete walls in the Architectural Drawing Sections (See Appendix 11 – Section N1) don't really indicate a real structure where there would be stiffening beams and upturns to the slabs hidden in the floor to floor height of 3.2 m to ensure that the building remains rigid and yet achieve the maximum heights required. As well as the ultra-thin podium slabs which aren't 'realistic'. There has been no serious structural design undertaken on this project.

14. Engagement Outcomes:

Given the speed with which this SSD project was approved for development the detailed Community Engagement Materials that are part of these documents (See Appendix 12 - Engagement Outcomes Report) were never ever distributed to the wider local community.

15. Conclusion:

It is my opinion that this SSD scheme is hastily assembled and should be redocumented with expert sustainability consultants. The current SSD scheme shows too many fundamental weakness that should be resolved with simple, affordable solutions, leaving a legacy that is fit for future generations and isn't prone to be an ongoing headache for the citizens of Five Dock, NSW.