

Ref: SSD-73228210 (MOD 5)
Date: 7 April 2026

The Department of Planning, Housing and Infrastructure
Development Assessment and Sustainability
Attn: Adela Murimba

Dear Adela,

Re: SSD-73228510 (MOD5)
Property: 153 Parramatta Road, 53-75 Queens Road, Five Dock

Modification 5 seeks to allow signalisation of the Parramatta Road/William Street intersection (in-principle support from TfNSW), a new roundabout at the William Street/Spencer Street intersection, upgrades to the William Street/Queens Road intersection, additional traffic lane on the northbound side of William Street between Spencer Street and Queens Road, rearrangement of parking throughout the 4 basement levels for a total increase of 92 parking spaces.

Council confirms that meetings have been convened between the technical experts of Council and the proponent to consider the amendments to key engineering / infrastructure components. These discussions have been productive and are on-going and we do not believe resolution of council's requirements has yet been achieved.

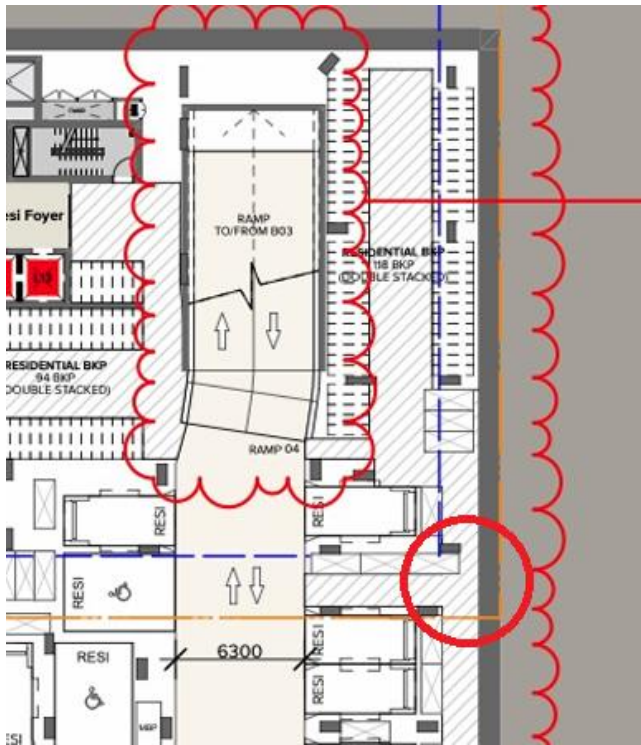
The following comments to the proposal from the following teams of council are provided to highlight critical areas that we request be resolved before any determination is made to the subject modification request.

1. Traffic and Transport

Basement parking arrangement

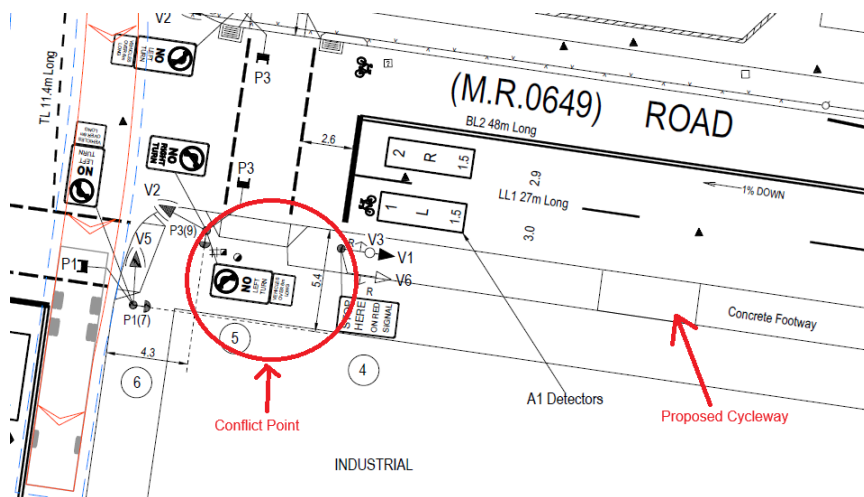
- Consent condition B21 specifically states that a total of 179 adaptable units are to be provided. There is a slight discrepancy based on the submitted architectural plans the numbers displayed in the DA-810 series of drawings only add up to 178 adaptable units.
- As per AS4299:1995, adaptable units are to provide a minimum of 1 car parking space per adaptable unit that complies with requirements as set out in Clause 3.7.3. This would result in a minimum requirement of 179 accessible parking spaces being provided for just the residential component only to be provided out of the proposed 1135 Residential Parking spaces.
- The submitted Transport Statement specifies that a total of 118 Visitor Parking Spaces have been provided for the residential component however, no such markings have been observed on the submitted architectural plans to indicate this. The applicant is to amend the plans to clearly indicate which spaces have been assigned for Visitor Parking.
- Based on the above number of Visitor Parking spaces, there should be a minimum of 2 Visitor Parking spaces made available as accessible parking spaces.

- The Commercial, Retail, Restaurant and Recreational components of the development are required to collectively provide a total of 7 accessible parking spaces (4 for Commercial/Retail/Restaurant and 3 for Recreational) under the relevant BCA provisions.
- The above points would result in a total minimum requirement of 188 accessible parking spaces to be provided throughout the development. It should be noted that these spaces can come out of the current proposed total and is not considered a separate allocation to the total number of parking spaces.
- It is noted that a large number of the proposed accessible parking spaces have been designed in accordance with AS4299 rather than AS2890.6. Noting that a large number of these spaces are intended to be utilised with the relevant adaptable units, a condition requiring these spaces designed in accordance with AS4299 be specifically assigned to adaptable units only is proposed to be included.
- The plans include a number of 'small' car spaces. Should larger vehicles attempt to utilise these spaces, they may impinge on access to other parking spaces and access aisles. The provision of 'small' car spaces is not supported in developments in this Council area. Where compliance with full parking space requirements cannot be satisfied, Councils Traffic Engineer would not object to a minor reduction in the total provision of parking.
- Any stacked parking spaces (maximum 2 spaces, nose to tail) must be attached to the same strata title comprising a single dwelling unit or commercial/retail tenancy, subject to the maximum parking limit applying. The stacked parking spaces must be designated (with appropriate signage) for employee or tenant parking only (not visitor parking), prior to an Occupation Certificate being issued and moving of stacked vehicles must occur wholly within the property.
- Further to the above, it is noted that the stacked parking arrangements feature wheel stops that would inhibit the usage of these spaces in the intended parking arrangement.
- Any stacked bicycle parking spaces (maximum 2 spaces, nose to tail) must be attached to the same strata title comprising a single dwelling unit or commercial/retail tenancy, subject to the maximum bicycle parking limit applying. The stacked parking spaces must be designated (with appropriate signage) for employee or tenant parking only (not visitor parking), prior to an Occupation Certificate being issued and moving of stacked vehicles must occur wholly within the property.
- The applicant is required to propose a system to manage the potential conflict of vehicles travelling along the driveway ramps. Due to the length, grade and curvature of the ramp, a conflict may occur between vehicles manoeuvring throughout the proposed carpark. A system of traffic lights and/or mirrors may be required to indicate traffic movement on the ramp. Any signal system must maintain a green signal to entering vehicles at the point of entry and must maintain a red signal when an exiting vehicle is detected. The applicant shall also take into consideration the conflict between vehicles reversing out of spaces and vehicles entering/exiting the carpark or utilising the ramps within the basement carparks.
- The applicant should review the accessibility to the proposed bicycle parking spaces to ensure they comply with the access path requirements as specified by AS/NZS2890.3 Figure 2.4. An example of non compliance is shown below taken from Basement level 4 in the north eastern corner of the carpark where the encroachment from the storage cages has left only an approx. 900mm gap to pass through.



Queens Road/William Street intersection

- Additional information provided to Council has noted there appears to be a conflict between the current traffic signal arrangement with the approved dedicated cycle lane on the southern side of Queens Road. The TCS should be amended such that it does not encroach upon the dedicated cycle lane. These works are to be undertaken by the developer at no cost to Council.



William Street/Spencer Street intersection

- The proposed roundabout is generally supported and should assist with redistributing traffic to other exit points in the precinct.
- Noting that there are proposed length restrictions at the William Street/Parramatta Road intersection and to better align with identified heavy vehicle routes from previous submissions, there should be similar "No Left Turn, No Right Turn, Vehicles under 6m Excepted" restrictions installed at the William Street/Spencer Street intersection. This is necessary to reinforce the original heavy vehicle route that would predominantly utilise Spencer Street.

- Council has previously advised that as per the relevant Street Design Guide, a pedestrian crossing was envisaged to be installed on William Street north of Spencer Street. As such, the applicant is recommended to amend the design to include this key piece of infrastructure and deliver it in conjunction with these works at no cost to Council.

Proposed loading dock operations

- Consent condition E43 (C) specifically restricts vehicles from travelling to the site during peak morning and afternoon periods whilst Consent condition F4 (C) specifically calls out that all loading and unloading operations associated with the site must be carried out in a manner so as not to cause inconvenience to the public or detrimentally impact the amenity of the locality.
- The Preliminary Loading Dock Management Plan proposes to operate for 24 hours a day, 7 days per week with reduced activity during peak school pick up/drop off periods (typically 8am-9am and 2:30pm-3:30pm). This appears to not comply with the aforementioned consent conditions restricting times of travel to the site.
- There are similar concerns where the proposed 24 hour operation will encourage heavy vehicle movements during the night between 12am-5am, thereby impacting the amenity of the locality and future residents.

2. Stormwater

The submitted flood study for this modification and the stormwater management plan do not adequately address Council's requirements.

Specifically, the submitted flood report indicates that the future park will be fully inundated during the 5% AEP and 1% AEP storm events. However, the approved SSDA indicates that the park will not be inundated during the 5% AEP event, and only a small portion will be inundated during the 1% AEP event. As such, the submitted flood report cannot be supported.

In principle, this issue may be resolved through appropriate engineering design prior to the Construction Certificate stage, supported by a detailed public domain plan. Accordingly, there is no objection from an engineering perspective to the proposal in relation to the roundabout / intersection works.

In addition, the proposed stormwater management plan does not fully demonstrate compliance with Council's DCP, Appendix 2 – Engineering Specification, and further review is required in relation to the proposed stormwater pipeline within the Spencer Street extension. However, this matter can be further reviewed and discussed with the applicant prior to the issue of the Construction Certificate.

As such, it is recommended that DPHI not approve the submitted stormwater management plan and flood report in their current form and that design details are required to be addressed and resolved prior to the issue of the relevant construction certificate.

3. Landscape comments

The following comments are provided by our landscape and open space team

- i. It is noted that pedestrian crossing points are proposed as part of the modification. The landscape plans are to be updated accordingly to reflect these changes, ensuring coordination with pavement treatments, kerb alignments, and adjoining landscape elements.

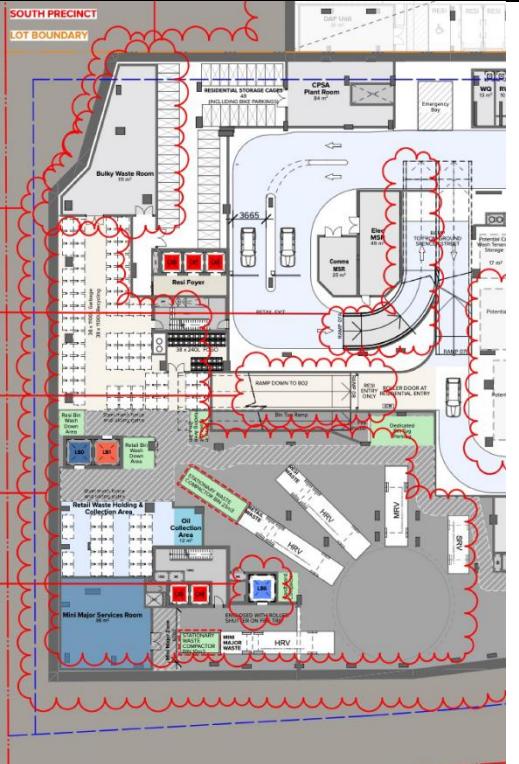

- ii. The revised landscape design should demonstrate integration with the proposed pedestrian crossings, including clear pedestrian desire lines, continuity of accessible paths of travel, and appropriate interface treatments (e.g. paving, tactile indicators where required).
- iii. Consideration should be given to the relationship between proposed lighting within the pocket park and the location of tree planting, including future canopy growth, as needed.
- iv. The final form and outcome of the proposed arbour is unclear, with only indicative plan dimensions (approx. 18m x 6m) provided and no confirmed height or structural detail. Further design resolution is required in a future drawing update to Council to ensure the structure is appropriately scaled, integrated with the surrounding landscape, and designed with suitable materials to provide durability and effective shade/protection from the elements.

4. Waste comments

A review of the revised waste management plan has highlighted the following matters:

Item	Issue / location	Description	Reference
1	FOGO bin calculations are incorrect.	Should be 77 x 240L bins and not 76 x 240L bins	Table 3 – OWMP – section 4.1 and 4.2 pages 11 and 12
2	Bin issue	Concerns raised regarding paragraph after Table 4 under section 4.3, waste generation greater than the 4 x 1,100L bin supplied for 2 days' worth of waste and recycling. Applicant will need to address how this will be managed appropriately to reduce risks of overflowing bins on a daily basis.	Section 4.3 page 13 of OWMP
3	Basement 4	The Building B waste room has been moved to Basement 4 – clarification around whether basement 4 is directly underneath building B or under building C/D	Architectural drawings - Basement 04 and GYDE Modification letter Table 2- page 9

3	Basement 3	<p>Nearly all the bin room sizes have been reduced by almost 10m² – is a smaller design able to house the correct amount of bins</p> <p>Bulk household room moved from basement to Loading Dock on Basement 1</p>	All bins rooms in architectural drawings - Basement 03
4	Basement 2	<p>Bin room sizes changed see below:</p> <ul style="list-style-type: none"> ○ Bin room 156m² and FOGO room 22m² now - previous was 1 room at 181.83m² ○ Bin room at 65m² compared to 77.8m² ○ Bin room at 47m² compared to 66.81m² ○ Bin room at 132m² compared to 151.8m² ○ Bulk waste room removed from basement 2 and moved to loading dock on Ground ○ Bin room at 103m² compared to 93.56m² (increased in size) <p>Are these size changes able to house the correct amount of bins?</p> <p>Removal of entire bin room and loading dock on B2 - changed to parking spaces and bike racks</p>	All bin rooms in architectural drawings - Basement 02
5	Basement 1	<p>Loading dock now located on B1</p> <p>Bulk waste room is located at the loading dock and 111m² space provided – the OWMP has a different space to the architectural plans – Council accepts the space provided on the</p>	Architectural drawings – Basement 01

		<p>Architectural plans of 111m²</p> <p>Bin tug parking – this area needs to be secure and enclosed</p>	
6	Level 1	<p>Loading dock on level 1</p> <ul style="list-style-type: none"> Concerns around the size of the residential bin holding bay. There is an assumption applied that waste and recycling is collected on different days this is incorrect. The holding bay needs to be large enough to accommodate for all bins required for service on collection day. The previous space provided was 332m² the current MOD proposal has provided 109m² – less than half the previous space. The room size for the Bulk Waste Room must be provided – it is currently too small to see on the drawings. What is the residential FOGO bin zone – is this another holding bay for bins for service day or an actual FOGO bin room? If actual FOGO bin room, this room must 	<p>Architectural drawings – Level 01</p> 

		be enclosed and secured so retail / commercial tenants cannot use the bins.	
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The relevant referral teams of Council remain open to continued discussions to address and resolve the above matters.

If you require anything further, please don't hesitate to contact me on 9911 6441 or shannon.anderson@canadabay.nsw.gov.au

Yours faithfully,



Shannon Anderson
Manager Statutory Planning