

## Objection to Proposed Shop Top Housing Development at Pymont Bridge/Parramatta Road (SSD-84024470 – 122-128, 130 Pymont Bridge Road, 206 Parramatta Road, Annandale).

I am writing to formally object to the proposed shop top housing development at Pymont Bridge/Parramatta Road (SSD-84024470 – 122-128, 130 Pymont Bridge Road, 206 Parramatta Road, Annandale).

As a resident of The Gantry, Camperdown, I am personally supportive of a well-planned increase in population density and increased affordable housing supply.

However, I have significant concerns regarding the impact this proposed development will have on the local community, environment, and overall amenity of the area.

Grounds for this objection are

- i. Scale and Location
- ii. Predicted Car Usage
- iii. Inadequacy of Parking Provision
- iv. Traffic Study Issues
- v. Aircraft Noise
- vi. Visual Amenity and Overshadowing
- vii. Compliance with the Apartment Design Guidelines
- viii. Construction Issues

### i. Scale and Location

Camperdown is composed of detached homes, townhouses, units of generally up to 6 storeys and low level industrial/commercial development. Typical maximum Floor Space Ratio (FSR) is 4.1 and maximum building height 35 metres.

This proposal is for a thin 22-storey building on a lot of 2570 square metres with narrow adjacent footpaths. It would have 281 dwellings, ground floor retail and 44 car spaces and a FSR of 7.52.

It is not consistent with either the current situation or other proposed developments and is unsympathetic to future area planning. It does not contribute meaningfully to the urban landscape, apart from a few trees around the perimeter, an increased setback, and a pathway along one side that does not connect to any existing path or feature.

The proposal cites the Aria building in the City Quarter and The Joinery as high-rise developments, either built or approved in the area, to support its case. However, there are significant differences between those, and this proposal. Those developments resulted from a planned approach, provide public amenity, and included green space. For example, the Joinery has a Floor Space Ratio (FSR) of 4.9, 220 apartments and 53 carparks and the City Quarter development offers excellent amenity and substantial green areas.

Additionally, the proposal claims that the building would fulfil an objective of the Parramatta Road Strategy by providing a gateway to the Camperdown Zone. However, the image below clearly shows that the scale of the building is inappropriate, particularly given the flightpath issues (highlighted in section v).



## ii. Predicted Car Usage

The predicted shift away from car use will not occur given the level of available public transport.

The Environmental Impact Statement for the proposal (EIS) cites 2016 ABS data, indicating that most residents in this surrounding statistical area travelled to work by car (56%), followed by public transport (33%), with active transport accounting for around 11%. The breakdown of resident workplaces is 27% in Sydney CBD and immediate areas, 10% within the Leichhardt – Annandale Statistical Area (living and working in the same area), 5% in Pyrmont – Ultimo, Newtown – Camperdown – Darlington and Surry Hills, with the remaining 58% distributed across Sydney.

Developments of this scale are generally centred on a transport hub. This is not the case here. The EIS's information on public transport access overstates the ease of access to public transport to destinations other than the CBD. For example, the actual walking time to Newtown Station is 25 minutes, and to Stanmore Station is 20-minutes. It also overlooks that the two bus stops closest to the development are bypassed by express buses.

While a shift to active and public transport is to be encouraged, it is unrealistic to expect that a significant enough number of residents will stop relying on cars for commuting to work. Furthermore, the inclusion of two- and three-bedroom units suggests that many residents will be families who need cars for school drop-offs, essential shopping and other activities.

Demand on public transport will inevitably increase. The EIS notes there are currently 1,948 dwellings either approved or proposed within 400 metres. There are also many developments proposed further to the west along Parramatta Road, Annandale and beyond. These extra passengers will reduce the number of passengers able to access buses when they reach Camperdown.

### iii Inadequacy of Parking Provision

The proposal is for 44 car spaces for the 281 dwellings as well as the ground floor commercial/retail spaces. By comparison, The Joinery proposes 54 parking spaces for 220 dwellings alone.

The narrow surrounding street network to the rear of the proposed development is only accessible at two points, Mathieson St and Gordon St. There are currently 46 car park spaces on these streets, all currently fully utilised by residents of the surrounding houses, existing light industry and a school. The proposed development could negatively impact on street parking by up to 10 spaces.

Parking in the proposed development is based on an assumption that for the 281 units, which are stated to accommodate 605 occupants, only 44 spaces are sufficient. This includes parking for the commercial /retail businesses as well.

ABS data for 2021 indicates that 1.3 cars are owned per household in the area and 56% of people use a car to get to work. While this number will be less for this current development, if the current pattern were applied there would be 321 extra cars parking on local streets. There is no easy access to more distant streets where parking may be available. It will be impossible for residents and visitors to find nearby parking and this will impact on adjacent neighbourhoods and the surrounding street network.

A parking occupancy survey of the surrounding street network is required, with the applicant needing to demonstrate how a realistic estimated increase in vehicles can be accommodated.

### iv Traffic Study Issues

The traffic study in the EIS does not consider either all current activities or likely future ones.

Assumptions in the traffic study are based on parking space numbers. As stated above these numbers are inadequate.

Additionally, the previous traffic study for the hospital site (referenced in the current study) was done when there was no school in Mathieson Street. The Mackillop Education Waranara School now exists and has a traffic load, especially during peak hours. It is also highly likely that future development in the Mathieson/Cahill/Water/Cahill Streets- all very narrow - would significantly

increase traffic volumes and congestion. Cars that have been unable to park will also add to traffic volume as they re-enter Parramatta /Pymont Bridge Roads. There is high traffic flow along Parramatta Road towards the city and turning left into Pymont Bridge Road. Traffic originating from Bridge Road Stanmore is unpredictable in its behaviour, with vehicles often crossing lanes suddenly. The only time traffic turning left from Parramatta Rd into Pymont Bridge Rd stops, is when a pedestrian crosses Pymont Bridge Road at the lights.

An independent traffic study, looking at current demand and that from likely development in this essentially enclosed area, should be conducted to ensure that this proposed development does not impair future uses for this area and produce increased hazards at this major intersection.

#### v. Aircraft Noise

Noise level testing used in the EIS is totally non-representative and misleading of usual flight noise patterns.

The site of the proposed development is located well within the 20 Australian Noise Exposure Forecast (ANEF) contours. Flights directly over the proposed development are frequent during southerly winds and non-existent when winds are from the north. As a result, noise levels vary significantly dependent on the season, and prevailing winds.

The FlightRadar App shows aircraft flying at a height of 320 meters over the site. The ground elevation of 14 meters plus development height means that planes will fly only around 225 metres above the building. The site is proposing the highest tower of all local proposed developments. This is concerning in the context of existing PANS OPS heights as shown in the EIS .(Appendix E p52)

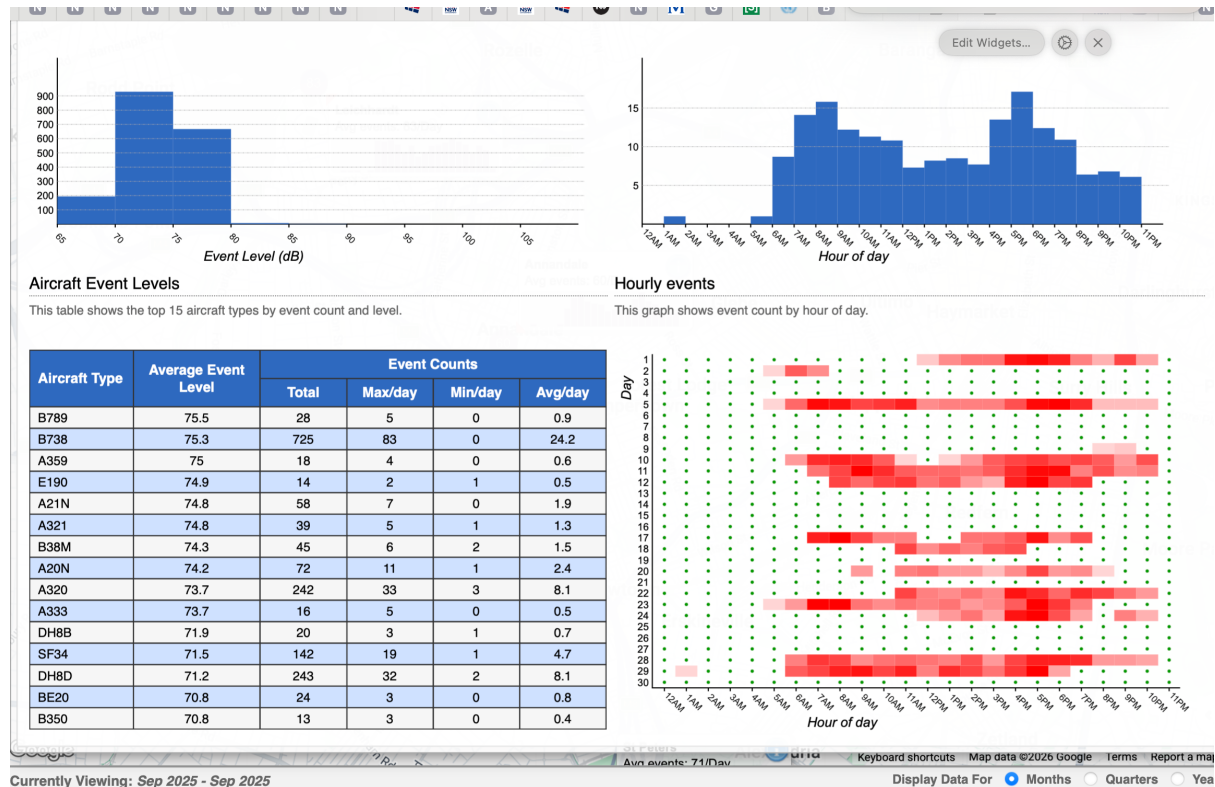


The Airservices Australia website <https://myneighbourhood.emsbk.com/syd5/> shows aircraft noise levels at noise monitoring sites near airports. The closest such site to the proposed development is at Annandale.

Recordings at the Annandale monitoring site for September 2025, during the period used for the EIS, show that of the days fully covered in the study, only three of the eleven days had any significant number of noise incidents greater than 70 dB (10<sup>th</sup>, 11<sup>th</sup> and 12<sup>th</sup> September). The EIS study shows significantly higher LA01 levels on these days.

Total >70dB incidents at the Annadale monitoring site in September were around 1,600. However, had the recordings been done in August 2025 the number of incidents greater than 70dB would have increased by more than 1000. Screenshots from the Airservices site are copied below.

September 2025





August 2025

The National Airports Safeguarding Framework Guideline A

([https://www.infrastructure.gov.au/sites/default/files/documents/1.1.3\\_Guideline\\_A.pdf](https://www.infrastructure.gov.au/sites/default/files/documents/1.1.3_Guideline_A.pdf) )

indicates that rezoning of brownfield sites for noise-sensitive development should be carefully considered where ultimate capacity or long-range noise modelling for an airport indicates 20 or more daily events greater than 70 dB(A) or the site is within the 20 Australian Noise Exposure Forecast (ANEF) contours. The proposed development’s site falls within these criteria, and the building’s proposed height will magnify the health and comfort impact of aircraft noise for occupants.

Current and future surrounding dwellings will also be impacted through reflected noise.

The disadvantages outlined elsewhere in this document should indicate that a careful consideration of this application would result in its rejection

vi Visual Amenity and Overshadowing

The proposed 22 story tower will detract from visual amenity and overshadow existing buildings as well as shade solar panel infrastructure.

Images in the EIS attempt to downplay the proposed development’s impact on residents in surrounding areas. Almost all the images only show the lower floors of the proposed tower, and not its substantial height. Also, photomontages are used to downplay the scale of the development.

For example, the below image misleadingly attempts to portray the development as similar in scale to existing buildings. However, the building on the left is only 6 storeys high, the one on the right is 5, and the proposed tower is 22.



This second image, while more realistic in scale, cuts off multiple storeys of the proposed tower.



This third image is the view from a third-floor apartment in the Gantry Building A, directly opposite the proposed development. This shows that residents' current views towards Annandale landmarks and green space would be completely obliterated by the proposed tower.



Shade diagrams in the EIS reveal that Building A of The Gantry will experience significant shading from the proposed development, Further, they only show the impact of overshadowing till 3pm, as required by the guidelines. However, afternoon sunlight would be impacted for additional hours each day.

Solar panels on townhouses in Australia Street will also be substantially impacted.

#### vii. Compliance with Apartment Design Guidelines

The proposed development may not comply with the Apartment Design Guidelines for separation, and this could impact on future development.

Section 3f of the Apartment Design Guide requires minimum setbacks from site boundaries for buildings over 9 storeys. The minimum separation distances from these buildings to the side and rear boundaries are 12 metres for habitable rooms and balconies and 6 metres for non-habitable rooms.

There are residential units on the northern wall in all but the ground floor with windows facing directly north onto Cahill St.

As shown below this proposal would not appear to comply. Plans show angled windows, but these would not address privacy concerns for any adjacent development. Approval of this development could result in a loss of opportunity and amenity for any development proposed on the adjacent site in the future. (see figure below)



The land area is too small to support the proposed development without impacting on other sites.

viii Construction Issues

Construction plans have not yet been developed.

Nevertheless, it appears there are many potential issues. The report mentions the construction crane intruding into airspace. It also acknowledges that parking for construction workers will be problematic and suggests that workers travel by public transport. This is highly unlikely, given the equipment, tools etc they bring to work.

Impacts in construction phase, on parking and access for residents and the school in the surrounding very narrow streets will be significant.

Additionally, it is difficult to see how access to commercial premises in Cahill Street East (a dead-end street) can be maintained during construction.

Many of these may impact on the deliverability or commercial feasibility of the project.

Conclusion

This is the wrong building in the wrong place.

The site is too small.

The proposed building's scale could only be appropriate at a transport hub, which the proposed site is not.

Lack of parking will impact both potential residents and those in surrounding areas.

The proposal has an adverse impact on existing dwellings including loss of views and overshadowing of existing buildings and solar panels.

Application of aircraft noise exposure guidelines for rezoning and the many disadvantages outlined in this submission should disqualify this application

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A local planning scheme is urgently needed to guide development, including affordable housing, that is in keeping with the character and capacity of the neighbourhood.

For these reasons, I strongly oppose the proposed unit development in this EIS and seek its rejection.

Thank you for considering this submission. I am happy to provide further information or attend a hearing if required.

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