

7 April 2026

The Department of Planning, Housing and Infrastructure
By email/online submission

**Submission to Application: SSD-73228210 - Modification 5
129-153 Parramatta Road and 53-75 Queens Road, Five Dock – Mixed Use and Affordable
Housing Development**

Background to Submission, Kings Bay Estate/Context

This submission is prepared and submitted on behalf of the owners of the Kings Bay Estate ('KBE') DP 270206. KBE is a master planned housing estate known as 11-27 Harris Road, Five Dock which was approved in the late 1990s. The estate consists of medium density apartments and townhouses surrounded by green space, gardens and community facilities. A small road/lane network allows access through, with a focus on pedestrian movements. A central focal point is the park/community open space.

As with many surrounding residential areas, KBE is much lower in scale and experiences historical parking and traffic issues in the area. There is significant concern that substantial density increases, outside of understood and studied traffic and planning documents, could further grid lock the area and create adverse impacts on existing residents.

Previously, we raised concerns and submissions as to SSDA-73228210 (mixed use and affordable housing development) and these included: scale impacts, non-compliance and minimal compliance with planning objectives and controls, worsening of traffic and access issues for existing residents and the lack of balanced planting and landscaping to match the built form and scale.

We note that the application was approved with height variations as to the SEPP Housing maximum standard and that the proposal has been designed to fit very tightly with all baseline development controls and parking requirements. The current modification seeks variation to setbacks and envelope controls and reduces the open space element/park which was a statutory requirement.

We note that an 'anomaly' is to be corrected to residential parking within this modification, and that significantly increased parking spaces (92) are proposed, new entry and exit points and 24/7 loading movements for the development. This may implicate noise and traffic in the area and for existing nearby residents.

We raise concern as to the potential impact of the proposed modification on already problematic local traffic and parking and wish to request that a strategic overview/approach be taken to establishing the best outcomes for easing local congestion in the Kings Bay catchment and ensure that despite large developments of this nature coming into the area, that these will not worsen issues. Increased traffic impacts would create adverse impacts for existing and proposed owners and would detract from the objectives of non-car transport contained within relevant strategic planning documents.

Objection is raised as to the reduction of open space when planting and open space on the site is already 'dwarfed' in terms of the scale of the built form and built elements and the potential noise impacts from the 24/7 loading arrangements.

The proposal is not considered to reflect the objectives of the Parramatta Road Corridor Urban Transformation Strategy ('PRCUTS') and urban design guidelines for Kings Bay.

Thank you for considering the following detailed concerns in relation to proposed Modification 5.

Traffic and Access Impacts

Our key objection relates to the lack of detail and strategic planning and assessment of traffic and road changes in light of such incoming dense and concentrated residential and commercial developments. Concern is raised as to the effects for existing residents and the potential impact of this

on the future of the area and delivery of the strategic planning objectives of the PRCUTS urban renewal. The PRCUTS intends to create liveable areas, reduce reliance on private transport and deliver communities near/to use public transport.

Given that such large developments are evolving in the area, it is submitted that Council, Department of Planning Housing and Infrastructure and Transport for NSW look at the capability of the local road network to cope in a catchment wide/strategic way to ensure this area does not remain the congested and bottle necked it has been known and experienced to be and to ensure that incoming mixed use densities are sustainable.

The Traffic and Parking report prepared for the modification is not considered to comprehensively address the impact of the proposed road adjustments, the parking or the loading and access implications on the surrounding road network.

We appreciate that the applicant has met with Council and Transport for NSW to deliver improvements however we submit that the traffic study/ies conducted for the PRCUTS should be re-visited in light of the density uplifts now possible for delivering additional housing under the Housing SEPP and under SSDA frameworks. A traffic review taking in impacts on the broader area should be undertaken to update the density assumptions previously considered in order to be an accurate assessment/forecast.

We request detailed assessment as to the capacity of William Street to cope, as well as impacts on the efficiency of the local road network. Residents are concerned as to impacts north of Queens Road.

In relation to the original proposal, we submitted that the original traffic study may have underestimated traffic increases, particularly at peak times. Concern was raised over the retail/supermarket use and heavy vehicles loading. The current roads are congested and result in considerable delays. The original traffic report with the DA referred to counts in July 2023. Noting that covid lockdowns and work from home arrangements have been in place for the last few years.

The proposal at that time appeared to just comply with the minimum/maximum/basic code requirements for parking and there are already spill on effects to the already congested and parked out surrounding areas.

The proposed modification now involves the provision of 92 additional parking spaces on-site which is considerable, plus new entry and exit points and changes to loading. This will add to car traffic movements and heavy vehicle movements given the mixture of uses, including a recreation facility.

The traffic report indicates that no new floor space is proposed. However, variation as to uses is involved and therefore variation as to traffic movements and parking requirements is involved. Parking and traffic movements relevant to the proposed uses should be properly assessed.

Concern is raised that the increase of 92 parking spaces and additional entries will lead to worsening on street parking/congestion issues, delays at intersections (roads already not functioning well) and potentially worsened safety issues and driver frustration. The proposed traffic report does not address the impacts on the area as a whole. The traffic and parking report does not specifically address needs of particular uses, such as the recreation facility or the impact of the reduction of parking available for the food and drink premises (which tend to require considerable parking at certain times).

The traffic impact assessment is not considered to comprehensively/detail the operation of the local road network with the proposed changes or roundabout, additional large vehicles in the area 24/7, or the cumulative effects of increased traffic resulting from this high density development with supermarket/commercial uses during peak hours in terms of impact on the broader area.

The Statement of 4.55 Modification indicates that there is to be an increase of 3 residential parking spaces for market dwellings and a reduction of 1 space for the affordable housing component is involved. There is a question as to social equity in reducing the parking available to the affordable housing elements as well as what that potentially does for on-street parking in future reality.

The residents within KBE are already impacted by people from the broader area parking within its specific, limited driveway network and this implicates available parking for visitors of KBE residents. This is a serious issue for visitors who require accessible access. There are generally no or very few opportunities to park within the estate due to broader community members using the area for parking due to shortfalls of parking associated with other uses. With the substantial increase of housing and commercial uses and lack of public transport and on-site parking to just meet requirements, it is likely there will be spillover issues.

Transport for NSW should re-visit the additional volumes in pressure which now would likely depart from the PRCUTS assumptions. Certainly, if additional similar developments were to unfold, this would change the tested scenario.

Traffic and planning assessments should assess the cumulative impact of this development in connection with other much denser developments on the broader local road network.

Traffic impacts such as these will impact existing residents in terms of emergency response times which should also be considered for residents and emergency personnel.

It is considered that the proposed dominance on traffic and vehicles would compromise the PRCUTS objectives of promoting non-car/active transport and reliance on incoming public transport such as the Metro.

Landscaping and Open Space

As part of the consultation for the PRCUTS, KBE residents highlighted the lack of open space available in the area. The strategy contained community and sustainability objectives, the objective of promoting quality places with designed landscape and built form outcomes to create livable local precincts.

The Canada Bay local controls require the allocation of William Street Park. Clause 8.3 of the Canada Bay Local Environmental Plan, 2013 indicates that '(e) for Area 32—at least 2,290m² of public open space on land at 57 Queens Street, Five Dock that fronts William Street, Five Dock. The original approval only just complied and now this is proposed to be reduced to breach the required standard.

The Statement of Modification provided by Gyde Planning indicates: *'The road upgrades require realignment of the footpath, site boundary and part of the Building C podium along William Street. These works require consequential adjustments to the approved park boundary and result in a reduction of the physical landscaped park area from 2,290sqm to approximately 2,221sqm. The reduction reflects the reallocation of a portion of the originally configured open space at the William Street / Spencer Street interface to accommodate essential public road infrastructure, including the expanded intersection and additional traffic lane'.*

The loss of 69m² for a park is considered significant in the context of the scale of development and the policy intentions of balancing green space with housing and density. Parkland to support housing.

The development is becoming more intense, with more parking and truck movements and new ratios of commercial uses which can place additional pressure on the ground traffic network and streets. This, coupled with less proposed open space and planting is not considered to be a compliant or desirable outcome in line with the controls, Council Urban Design Guidelines or PRCUTS objectives for quality urban renewal.

Parking and road movements should have been provided at the outset and not as a modification to then result in the reduction of open space and amenity (given the scale).

If such large developments are going to be proposed and approved with substantially increased residential population (including affordable housing) then the quantum and approach to open space planning should be reviewed for this key renewal area to ensure healthy future urban populations and the desired quality neighbourhood outcome.

Developments should involve site planning from the outset which looks at road needs and landscaping as being integral to the development to ensure the quality of the area/urban design is not eroded.

Urban design objectives relating to multi level residential development indicates that: *Good design recognises that together landscape and buildings operate as an integrated and sustainable system, resulting in attractive developments with good amenity. A positive image and contextual fit of well designed developments is achieved by contributing to the landscape character of the streetscape and neighbourhood.*

Good landscape design enhances the development's environmental performance by retaining positive natural features which contribute to the local context, co-ordinating water and soil management, solar access, micro-climate, tree canopy, habitat values and preserving green networks.

Good landscape design optimises useability, privacy and opportunities for social interaction, equitable access, respect for neighbours' amenity and provides for practical establishment and long term management.

Part K20.18 of the DCP in relation to 'Landscape Design' in Kings Bay indicates that C3. Landscape design should 'complement' the proposed built form and minimise the impacts of scale, mass and bulk of the development in its context. One of the 'public domain' objectives in K20.8 is to increase tree canopy cover and provide for more greenery associated with the public domain.

Part K C5 requires that for development along Parramatta Road, a minimum of 1 canopy tree per 10m of length of frontage is to be planted in the 'green edge' setback area, capable of reaching a mature height of at least 10m.

Whilst the potential benefits proposed by the road changes and signalised intersection are recognised, appropriate street trees and planting to balance the frontages and improved planting would improve the screening and balance of the built scale and ratio of hard surfaces. This would assist in creating the intended 'urban design', village character and improve the pedestrian experience for residents and visitors (in accordance with planning objectives and intentions).

The development should provide appropriate landscaping and open space to balance the scale, in accordance with the Canada Bay DCP and to provide a desirable living environment and streetscape.

Water Catchment and Potential Flooding issues

It is noted that the change to the road is reported as creating less impact which is positive.

It is considered that flood modelling should be assessed on an area wide basis to address what would occur if the whole area were to be redeveloped for larger than zoned developments with minimum open space and soft/absorptive landscaped areas. Concern is raised in relation to cumulative issues

Acoustic Issues

The Acoustic Impact letter is considered to cover a limited scope given the proposed 24/7 loading times. This addresses the subject building and limited sensitive receivers. It is considered that 24/7 loading and movements of large vehicles in the area will create noise at all hours and disturb existing residents.

The Plan of Management also does not comprehensively deal with noise management or cross reference the Loading Management Plan.

Summary

Residents support the reasonable development and renewal of the site, the principle of affordable housing delivery, the construction of a well-designed/considered architectural design and traffic

improvements. However, concern is raised in relation to the scale and density, additional non-compliances, the lack of co-ordination and supply of balanced landscaping and open space and the need for a strategic traffic assessment for the area given the density, additional parking spaces, traffic and loading movements. This should be considered in the context of cumulative impacts of other larger than anticipated developments in the pipeline.

The development lacks balance with landscaping and does not meet the Canada Bay objectives for planting, landscaping and creating a lower scaled village character. Additional open space should be considered with the scale uplifts to ensure amenity and environmental quality for the area and existing residents.

Concern is raised in relation to the accuracy of the traffic parking assessment as it is considered to underestimate the situation, not specifically address and respond to uses and peaks, and not address the local catchment.

It is considered that traffic studies should be reviewed in light of the much higher densities evolving and in terms of potential cumulative impacts in an area that is not well serviced by rapid public transport services.

Concern is raised in relation to the adverse environmental impacts associated with such an increase in hard surface areas in a flood prone area, the impact of the proposal on the amenity of landscaping and open space, increased traffic congestion, noise from 24/7 deliveries and parking pressure.

Density should be provided which is suitable to the site and context. Housing/mixed use developments which have access to efficient road access and public transport services, supported by quality open space, landscaping and play areas/community and supports and appropriate scale transitions should be key components of NSW ensuring a liveable, workable and sustainable outcome for existing and future residents.

Thank you for considering these points in the assessment.

Please be in contact if we can assist with any information or enquiries on behalf of KBE residents.

Yours sincerely,



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