

To: NSW Department of Planning, Housing and Infrastructure
Re: Submission objecting to SSD-90572458 — Redevelopment of Eastlakes Shopping Centre
From: Kelly Dos Santos
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Date: 20/7/2026

Dear Sir/Madam,

I write as a nearby resident to object to the Redevelopment of Eastlakes Shopping Centre, SSD-90572458, in its current form.

I am not opposed to the renewal of the shopping centre in principle. Eastlakes needs investment, a better retail environment and additional housing in appropriate locations. However, I object to this proposal as exhibited because the **scale, height, density and traffic consequences have not been adequately justified for this site and its immediate low-rise residential context.**

My principal concerns are the following:

The proposal is excessive in scale and height relative to the immediate neighbourhood.

The exhibited material describes a development comprising a two-storey podium with four towers of approximately 14 to 18 storeys above it. By contrast, the immediate residential context to the south and east is identified in the applicant's own material as being predominantly three-storey brick walk-up apartments. The Visual Impact Assessment expressly states that there are three-storey brick walk-up apartment buildings immediately south and east of the site. The Design Report's Appendix B also reproduces the State Design Review Panel comments that the "substantial uplift" sought for the site is a significant departure from the existing context and that the height strategy should be revised to better transition to the lower-scaled context to the south.

In my submission, this is the central flaw in the proposal. The bulk and height are not being introduced into a context already defined by comparable tower forms on the surrounding boundaries. The applicant's own response material states there are currently minimal development applications proposed within the immediate locality. Accordingly, the argument that the proposal is simply responding to an already-established future high-rise character is not persuasive.

Under section 4.15(1) of the Environmental Planning and Assessment Act 1979, the Department must consider the likely impacts of the development, the suitability of the site, submissions and the public interest. The Department must also consider the relevant planning instruments. Under Chapter 4 of the State Environmental Planning Policy (Housing) 2021, the

consent authority must consider the quality of the design evaluated against Schedule 9 and the Apartment Design Guide. Schedule 9 requires good design to respond to context, achieve a scale, bulk and height appropriate to the existing or desired future character of the street and surrounding buildings, ensure density is appropriate to the site and its context, and positively influence amenity for residents and neighbours.

In my view, the current scheme does not satisfy those considerations.

The proposal will have unacceptable overshadowing impacts on existing low-rise neighbours.

The exhibited solar access analysis is one of the clearest examples of why the design is not acceptable as shown. The Appendix E solar analysis indicates very poor winter solar outcomes for several of the existing Barber Avenue apartment buildings. Across the nine existing Barber Avenue buildings tabulated in the solar appendix, only 54 of 112 units achieve more than two hours of direct sunlight in mid-winter.

That is not a minor or incidental impact. It is a strong indicator that the southern edge of the built form remains too tall and too bulky for its relationship to existing neighbours.

The Apartment Design Guide states that, in the Sydney Metropolitan Area, living rooms and private open spaces of at least 70% of apartments in a building should receive a minimum of 2 hours direct sunlight between 9 am and 3 pm at mid-winter, and that a maximum of 15% of apartments should receive no direct sunlight in that period. I acknowledge that those criteria apply to the design of the proposal itself, rather than directly regulating neighbouring buildings. However, they remain a highly relevant benchmark for understanding the seriousness of the shadowing now being imposed on adjoining low-rise apartments.

At minimum, the Department should require a revised built form that materially improves solar access to the neighbouring Barber Avenue apartments before any approval is considered.

The applicant has not demonstrated that the surrounding road network can accommodate the proposal at this scale.

The surrounding local road structure is constrained. Access is concentrated on Evans Avenue and Barber Avenue, with broader network connection dependent on Racecourse Place, Gardeners Road and nearby intersections including Maloney Street / Gardeners Road / Dalmeny Avenue. This is not a location with abundant alternative road access.

The exhibited Traffic Impact Assessment calculates a net increase of approximately 246 vehicle trips in the AM peak, 332 vehicle trips in the PM peak, and 291 Saturday peak trips associated with the retail component. Even after using multiple demand-reducing assumptions, the modelling still reports a 194.5 m AM queue at Gardeners Road / Racecourse Place and a DoS of 1.063 at Maloney Street / Gardeners Road / Dalmeny Avenue in the AM development scenario.

The traffic conclusion should not be accepted at face value because the modelling depends on several optimistic assumptions:

- the former shopping centre was only 70% active at the time of survey,
- 20% of proposed retail trips will be internally captured,
- no Saturday residential trip estimate is included,
- only Existing Base and Existing Base + Development scenarios are modelled, and
- post-development signal optimisation is assumed.

The applicant has therefore not demonstrated, in a sufficiently conservative way, that the local road network can absorb the full demand of the development. That is especially so when the Design Report also states that dual-key units could increase the total number of dwellings from 736 to as many as 877.

In my view, the Department should require a revised Traffic Impact Assessment that includes:

- a cumulative future background traffic scenario,
- sensitivity testing at the possible higher dwelling count,
- Saturday residential trip assessment,
- sensitivity testing with reduced or no internal capture,
- a more robust justification for the existing retail deduction, and
- independent agency confirmation that any assumed signal optimisation is feasible.

Servicing and loading are not adequately resolved.

The exhibited servicing analysis indicates a substantial servicing task, with 503 daily vehicle arrivals through the Freight Forecaster. The initial loading scenario tested on the current arrangement has only 74.94% average efficacy, with 74 rejected vehicles per day and 12 rejected vehicles in the peak hour. It improves only if small vehicle spaces are increased to 14.

This suggests that the current servicing arrangement is not properly resolved. For nearby residents, the consequence is obvious: more risk of kerbside friction, waiting vehicles, informal loading behaviour and additional traffic pressure on the surrounding streets.

Construction impacts are significant and not properly pinned down in the exhibited material.

The exhibited construction traffic material is only preliminary. It says construction traffic volumes are unknown, staging is to be confirmed, and the final routes and access arrangements via Evans Avenue and/or Barber Avenue will be settled later by the contractor. That is not sufficient for a project of this scale in close proximity to existing apartments.

The Noise and Vibration Assessment also concludes that construction noise management levels are expected to be exceeded during **all construction stages**. This means the construction impact is not hypothetical. It is expected.

The visual bulk and streetscape impact are unacceptable in the current form.

The Visual Impact Assessment itself identifies **moderate-to-severe** visual impacts from close public viewpoints, including Evans Avenue and Jack Munday Reserve. At the Evans Avenue

viewpoint, the report says the proposal would significantly change the apparent height, scale and enclosure of the immediate streetscape and transform the existing low- to mid-rise character into a much denser urban edge condition. **It is a fundamentally different order of scale.**

Requested outcome

For the reasons above, I request that the Department:

1. Refuse the proposal in its current form, or alternatively require a substantially revised scheme and re-exhibition before any approval is considered.
2. Require reduced height and bulk, especially along the southern and eastern boundaries adjoining the existing low-rise apartment context.
3. Require increased setbacks, deeper landscape buffers and a more meaningful transition to neighbouring three-storey apartments.
4. Require a revised Traffic Impact Assessment with cumulative growth, sensitivity testing and a conservative approach to trip generation.
5. Require a redesigned loading and servicing strategy that demonstrably avoids spillover and rejected vehicles.
6. Require a final detailed Construction Traffic Management Plan and Construction Management Plan before any consent is granted or relied upon, including quantified truck movements, routes, staging and resident protection measures.
7. Require revised overshadowing analysis and built form changes that materially improve solar access to affected neighbouring apartments.
8. Require exhibition and review of any stand-alone wind assessment and any other technical material not presently available in a full and accessible form to the public.

I therefore object to the proposal in its current form and request that the Department refuse it, or require a materially reduced and redesigned proposal before any approval is considered.

Kind Regards,
Kelly Dos Santos