

Submission to the NSW Department of Planning, Housing and Infrastructure

RE: Objection to SSD-105575706 – Early Works Application, 19A Evans Avenue, Eastlakes

I am a resident of **9/ 20 Barber Avenue, Eastlakes**, located on the corner of Barber Avenue and St Helena Parade, immediately south of the proposed development site.

I object to the proposed Early Works Application SSD-105575706 and request that the Department carefully consider the concerns outlined below before determining the application. Please note, I am in objection to the proposed 800-1000 units and believe early works should not proceed further as this will hinder any real adjustments to the major works proposal which has yet to be released.

While I acknowledge the need for additional housing and redevelopment within appropriate locations, I am concerned that the scale of the proposed development, the lack of meaningful consultation, and the significant impacts on existing residents have not been adequately addressed.

1. Premature Approval of Early Works

The application seeks approval for substantial excavation, shoring works, service diversions and construction of a four-level basement before the full impacts of the future development have been assessed.

The proposed development is anticipated to support approximately 800–1,000 dwellings which has neither been approved nor rezoning approved for such works.

Approving major excavation and basement works at this stage may effectively predetermine critical aspects of the final development, including:

- Building footprint;
- Tower locations;
- Site levels;
- Basement extent;
- Traffic arrangements;
- Open space configuration.

The Department should not approve works that constrain future opportunities to modify the design to reduce impacts on neighbouring residents.

2. Significant Overshadowing and Loss of Solar Access

I reside directly south of the proposed development.

As a result, my property and surrounding residential buildings are particularly vulnerable to overshadowing from the proposed towers.

I attended the community consultation session held in May 2026. During that session, only limited shadow analysis information was presented. Residents were not provided with detailed shadow reports that would allow meaningful assessment of the impacts on individual properties.

Based on the information presented, I am concerned that:

- Residents of 20 and 22 Barber Avenue (not excluding other south and west side apartments in Barber Avenue) will experience significant loss of solar access.
- Some north-facing apartments on the south side block will lose more than four and six hours of winter sunlight; this does not include the hours outside of 9am-3pm and will likely be sunless from early morning, having a significant impact on our front gardens and requirements of our current plantings.
- Morning sunlight currently received between approximately 9:00am and 3:00pm will be substantially reduced;
- Common property areas (all north facing ceiling to floor glass windows in communal foyers (my building of 20 Barber Avenue), gardens and landscaping will be adversely affected over 18 units in 20 Barber Avenue.
- Reduced sunlight will impact vegetation growth and the usability of communal outdoor areas.
- In looking at a photo from the presentation in May, there is a significant possibility that blocks 20 and 22 Barber Avenues ***will not have the minimum 2 hours of DIRECT sunlight within the hours of 9 am to 3 pm as regulated by SEPP 65***. As the rezoning has yet to be approved, this may even be a minimum of 3 hours required of direct sunlight. The building heights on the south are TOO high and MUST be set back significantly with a design change to allow sunlight access. Possibly a step style as a previous solution. The development does not interface well with the community and it is detrimental to the quality of life for such matters to the neighbouring residents.

These impacts will affect a significant number of residents and have implications for:

- Residential amenity;
- Mental wellbeing;
- Thermal comfort during winter; (including increased energy use for heating)
- Property enjoyment;
- Property values.

The applicant should be required to undertake detailed solar access modelling and publicly exhibit the results before any approval is granted.

To mitigate these impacts, consideration should be given to:

- Reducing building heights;
- Increasing setbacks substantially beyond the currently proposed setbacks;
- Locating the tallest buildings closer to the centre of the site rather than along site boundaries;
- Ensuring neighbouring residential properties retain reasonable solar access during winter months.

3. Inadequate Community Consultation

I attended the community consultation session held in May 2026.

Prior to that consultation, I was unaware of any earlier consultation process and did not receive notification of any previous consultation activities. I believe many other residents were similarly unaware.

The consultation process was inadequate because:

- Consultation opportunities were limited;
- Sessions were not conducted at times accessible to many working residents;
- Detailed overshadowing information was not provided;
- Residents were not provided with sufficient information regarding traffic, noise, groundwater and flooding impacts.

The applicant's conclusion that limited responses indicate limited community concern is not persuasive.

Residents cannot provide meaningful feedback when key information has not been readily available.

I request that further community consultation be undertaken, including evening sessions that allow working residents to participate.

4. Traffic Congestion and Road Network Capacity

Traffic is already a significant issue within Eastlakes.

Existing residents regularly experience congestion and bottlenecks during peak periods, particularly around school and commuter travel times. Traffic will often extend past Stb Helena Pde , around Barber Avenue and there are only two exits at Racecourse Pde and Malony street which has a difficult right turn to exit.

The Department should consider:

- Existing morning traffic bottlenecks around 8:00am;
- Additional traffic generated by approximately 800–1,000 new dwellings;
- Commercial traffic associated with retail and mixed-use components;
- Delivery vehicles and service traffic;
- Impacts on local intersections and surrounding roads.

I question whether the existing road network and infrastructure are capable of accommodating development at the proposed scale. Reducing street parking will further negatively impact residents as current dwellings have old scale garages and often no longer fit vehicles onsite which require many to park on the street. This has been fine as it is residential in nature.

The community was previously informed of significantly smaller development outcomes. The proposed density now appears substantially greater than earlier concepts and significantly exceeds what many residents reasonably expected.

The Department should require transparent modelling demonstrating how the road network can accommodate the increased population and vehicle movements. Realistically before disastrous situation is built.

5. Noise Pollution

The application does not adequately explain the likely increase in noise associated with:

- Increased traffic volumes;
- Commercial activity;
- Service vehicles;
- Loading dock operations;
- Waste collection;
- Deliveries;
- General population growth associated with the development.

I request that the Department require detailed assessment of:

- Existing ambient noise levels;
- Predicted future noise levels;
- Expected decibel increases;
- Impacts on surrounding residential properties;
- Appropriate mitigation measures.

Residents should clearly understand how noise levels will change as a result of the development.

6. Loading Dock and Commercial Vehicle Concerns

I am concerned about the proposed location of loading docks and commercial servicing areas.

Loading dock operations should not be positioned in a manner that directs increased truck movements adjacent to residential buildings and community spaces. South side is residential and trucks being directed along barber avenue around Eastlakes reserve is dangerous and problematic due to size and safety concerns with local children and park users who cross the roads frequently to access the park from their homes.

In particular, I am concerned about:

- Increased truck traffic near children's recreational areas;
- Pedestrian safety risks;
- Noise impacts;
- Early morning servicing operations; due to commercial business in a residential area
- Air quality impacts;
- Reduced residential amenity.

Commercial servicing should be designed to minimise impacts on neighbouring residents and public open spaces.

7. Groundwater, Water Table and Excavation Risks

The proposal involves excavation for a four-level basement in a flood-affected area.

I am concerned that excavation may:

- Intersect groundwater systems;
- Alter groundwater movement;
- Require dewatering;
- Increase flood risk;
- Affect neighbouring properties;
- Cause settlement or subsidence.

The Department should require detailed information regarding:

- Existing groundwater conditions;
- Water table depth;
- Long-term groundwater management;
- Climate change impacts;
- Flood behaviour following redevelopment.

8. Flooding and Stormwater Impacts

The site is already identified as flood affected.

I am concerned that:

- Raising site levels;
- Constructing extensive basement structures;
- Altering drainage systems;
- Increasing hard surface areas;

may adversely affect overland flow paths and flood behaviour.

The Department should ensure neighbouring properties are not exposed to increased flooding risk as a result of this development. And should not allow unnecessary early excavation that is not required if the Major Plans are not accepted due to the above mentioned issues.

9. Public Open Space and Community Benefit

Given the scale of the proposed population increase, the community deserves meaningful public benefit.

I request clarification regarding:

- Public open space provision;
- Community facilities;
- Recreation areas;
- Landscaping outcomes;
- Public gathering spaces.

Particular attention should be given to **preserving existing landscape features**, including the character and topography of nearby parkland. The hills were designed for increased surface area and work better than a flat only surface.

If a town square or public plaza is proposed, it should:

- Receive adequate sunlight;
- Be genuinely accessible to the community;
- Include landscaping and shade;
- Be designed to support community interaction and passive recreation.

If a Town square is not planned, I would request that it is to give back open access to sun and space to the community.

10. Community Safety and Ongoing Management

The design should also address:

- Community safety;
- Anti-social behaviour;
- Loitering;
- Lighting;
- Passive surveillance;
- Ongoing maintenance and cleanliness.

Public spaces should be designed to encourage positive community use while minimising opportunities for anti-social behaviour.

Conclusion

I respectfully request that the Department:

1. Refuse the current Early Works application; or alternatively,
2. Require further assessment and public consultation before determining the application;
3. Require detailed assessment of overshadowing, traffic, noise, groundwater and flooding impacts;
4. Ensure meaningful consultation is undertaken with affected residents;
5. Require design amendments that reduce impacts on neighbouring properties and improve community outcomes.

The proposed development will have long-term consequences for existing residents. It is essential that the Department fully considers the cumulative impacts on solar access, traffic congestion, noise, flooding, residential amenity and community infrastructure before any approval is granted.

Please note, although I have no access to the proposed Major plans, based on what has been provided, I refuse and object to the number and size of the proposal. The Matter at all stages must go through rigorous community consultation where all people have an equal chance to attend (not only during business hours which was conducted at eastlakes community centre) and clear owner / resident addressed mail be sent to notify of such future consultations. A letter drop is inadequate and unable to be traced if all residents were actually notified or not.

Submitted by:

Carina Hrysafis

9/ 20 Barber Avenue, Eastlakes NSW 2018