

HDA/SSD Pathway, Infrastructure Capacity and Strategic Planning Merit

Eastlakes Shopping Centre Main Works - SSD-90572458

Submitted by Carina Hrysafis | 9/20 Barber Avenue, Eastlakes NSW 2018 | 31 July 2026

Position: I object to the proposal in its current form. SSD declaration gave the proposal an assessment pathway; it did not establish that the exhibited height, density, design or impacts have planning merit.

1. The HDA's own record preserves a full merit assessment

The Housing Delivery Authority (HDA) considered EOI 255247 on 15 July 2025 as a proposal for 1,000 apartments, including 10% affordable housing and build-to-rent housing, in four towers with a concurrent rezoning. It recommended SSD declaration, but expressly warned that merit assessment could result in lower development standards and dwelling yield. It also required discussion with Council about infrastructure augmentation, development contributions and public benefit arising from the significant uplift.[1]

Those qualifications are central. The current EIS proposes 736 dwellings, or potentially 877 when dual-key units are counted separately, in four buildings of 14-18 storeys, with FSR 5.29:1, 95,073 m2 GFA and 1,223 car spaces. The applicant's comparison records the previous approval as 425 dwellings, seven storeys and FSR 2.11:1.[2] The declaration therefore cannot be treated as approval of the current yield, height or massing.

2. Eastlakes is a bus-dependent local centre, not a station precinct

The applicant identifies the site as E1 Local Centre land. It records three-storey brick walk-up apartments immediately south and east, Jack Munday Reserve to the west, and further three-storey apartments beyond the reserve. It also records the site as approximately 2.7 km from Mascot Station, 3 km from Green Square Station and 1.8 km from Kingsford Light Rail, with local buses providing the connection.[2]

A qualifying frequent bus service may satisfy the technical Housing SEPP definition of an 'accessible area'. I therefore do not argue that the absence of rail automatically invalidates the SSD declaration. The stronger issue is proportionality: technical accessibility does not demonstrate that a bus-dependent local centre and its constrained road network can support this particular metropolitan-scale uplift.

The distinction is reinforced by NSW policy. The TOD program was built around rail and metro stations selected after analysis of 305 stations, including rail capacity and enabling road, water and sewer infrastructure.[3] The February 2026 Greater Sydney Infrastructure Opportunities Plan lists Mascot and Eastgardens as strategic housing areas within the subregion that includes Bayside; it does not list Eastlakes.[4] That omission is not a legal prohibition, but it increases the need for transparent, site-specific evidence of transport and infrastructure capacity.

3. The applicant's comparisons do not establish planning merit

The EIS relies on towers at Green Square, Mascot and Pagewood/Centro to describe the broader visual impact as acceptable.[2] This is not a like-for-like planning comparison. Green Square-Mascot is identified as a strategic centre with train stations and a major employment role.[5] Pagewood Green was a comprehensive master-planned redevelopment for up to 2,223 apartments across a much larger precinct.[6]

The EIS does not compare those locations with Eastlakes on direct rail access, transport capacity, strategic-centre status, employment base, infrastructure commitments, existing heights, setbacks, adjoining low-rise homes, local street capacity or public-open-space interfaces. The existence of tall buildings elsewhere is not evidence that 14-18 storeys are appropriate beside established three- and four-storey homes and Jack Munday Reserve.

4. Fast assessment must not reduce scrutiny

The Department's SSD Guidelines state that SSD projects are determined on their merits, considering economic, environmental and social impacts.[7] The faster-assessment pathway changes process and timing; it does not cure inadequate evidence or create an entitlement to approval. The Department's faster-assessment guide itself recognises that unresolved information, re-exhibition and parallel rezoning issues can prevent an application benefiting from accelerated timeframes.[8]

For Eastlakes, speed should not displace independent examination of cumulative traffic and public-transport capacity, local road and intersection performance, servicing and loading movements, infrastructure demand, overshadowing, visual enclosure, loss of daylight and open sky, and pressure on Jack Munday Reserve. These are site-specific consequences borne mainly by the existing local community.

5. Personal planning conclusion

In my considered opinion, the published material does not demonstrate why Eastlakes - a predominantly residential, bus-dependent local centre - required the HDA/SSD pathway rather than a Council-led planning proposal and development application with stronger local decision-making and community oversight. I recognise the need for additional housing, but that objective does not justify the maximum possible yield where transport, infrastructure, built-form transition and residential amenity are not adequately supported.

Now that the proposal is being assessed as SSD, the Department should apply at least the same depth of local and site-specific scrutiny. The HDA recommendation must not be used as a substitute for the merit assessment that the HDA itself expressly preserved.

6. Requested outcome

- Do not approve SSD-90572458 in its exhibited form; require a material reduction in height, density and overall bulk, with greater setbacks and genuine stepping to the surrounding residential context.
- Require independent peer review of traffic, public-transport and enabling-infrastructure capacity, including cumulative approved and proposed growth and realistic peak-period conditions.
- Publish how the HDA's infrastructure-augmentation and public-benefit advice has been addressed with Bayside Council, including funded, timed and enforceable commitments.
- Require a genuine comparator assessment using strategic status, fixed-rail access, infrastructure, existing density, adjoining interfaces and open-space impacts - not the mere presence of towers elsewhere.
- Re-exhibit any material new information or redesign. If the evidence still does not demonstrate acceptable site-specific planning merit, refuse the proposal.

Sources

[1] HDA Record of Briefing - 15 July 2025, pp. 9-10

[2] Applicant's EIS - Main Works, 19A Evans Avenue, 30 June 2026, especially ss 1.1, 1.3-1.5 and 1.8.5

[3] NSW Transport Oriented Development Program, 2023, pp. 3-4

[4] Infrastructure Opportunities Plan - Greater Sydney, February 2026, pp. 17-18

[5] Eastern City District Plan, pp. 55 and 85-86

[6] Pagewood Green Stage 1 planning material

[7] NSW State Significant Development Guidelines

[8] Guide to Faster Assessments for SSD Housing Applications, August 2025