

ATTN: Department of Planning, Housing and Infrastructure

RE: OBJECTION to State Significant Development Application SSD-89477725

Site: 51–55 Parramatta Road, Five Dock (City of Canada Bay)

Proponent: TOGA Five Dock No 2 Pty Limited

I am writing to formally object in the strongest possible terms to State Significant Development Application SSD-89477725. Please note that there is no objection to sensible urban renewal and medium-density development on this site, provided it strictly aligns with the originally planned zoning and established local controls.

However, the proposed 28-storey height, 3.4:1 Floor Space Ratio (FSR), and massive residential yield represent an unacceptable overdevelopment that disregards statutory planning frameworks, strains critical state infrastructure, and permanently compromises local liveability.

Flawed Transport Assumptions, Parking Deficits, and Vehicular Congestion

The proponent relies heavily on proximity to the future Sydney Metro West line to justify this bulk and scale; however, this ignores the inevitable temporal gap between the development's completion and the Metro's operational opening. In this interim period, an influx of thousands of residents will be forced onto the existing Parramatta Road bus network, which is currently insufficient and operating at peak capacity.

Furthermore, high-density transit proximity does not equate to zero car ownership. The application fails to adequately plan for realistic parking requirements. Given that surrounding suburban streets are already entirely saturated with parked vehicles, any overflow parking generated by residents, visitors, and retail staff will cripple local street accessibility. The addition of hundreds of private residential vehicles—combined with heavy customer and freight service traffic—will severely exacerbate gridlock along Parramatta Road and Queens Road. Surrounding residential feeder streets, including Courland Street, lack the physical capacity to absorb these escalating traffic volumes and queuing impacts, creating acute safety and flow risks. Reliance in planning on 2024 data which doesn't include Queens Rd or other nearby streets is also a significant oversight.

Imposition of a "Mini City" and Destruction of Housing Context

Rather than offering a sympathetic transition in housing typologies through compliant, medium-density development as originally intended for this corridor, this proposal seeks to insert an isolated, disproportionate "mini city" into Five Dock. This staggering 28-storey structural mass will aggressively crowd out the established low-to-medium density housing character of the suburb. It alienates the existing community and directly contravenes the fundamental urban design principles of context and neighborhood integration, setting a disastrous precedent for the total erosion of local residential amenity.

Critical Social Infrastructure Deficit (Schools and Healthcare)

The application fails to satisfy Section 4.15 evaluation criteria under the *Environmental Planning and Assessment Act 1979* regarding social infrastructure capacity. The substantial influx of residents will generate a significant increase in local student enrollment, placing unsustainable pressure on nearby educational facilities (such as Five Dock Public School, Rosebank College, and Domremy College) that are not earmarked for capacity expansion. Similarly, major regional healthcare networks, including Concord Repatriation General Hospital, are already operating under heavy load. The development provides no adequate developer contributions or state allocation to expand these mandatory public services to meet the needs of this proposed population density.

Commercial Supermarket Redundancy

The inclusion of a 4,200+ m² full-line supermarket represents redundant commercial Gross Floor Area (GFA). The catchment is already serviced by existing retail centers along Great North Road, and dedicated supermarket infrastructure has already been approved in the adjacent Kings Bay Village redevelopment. Approving duplicate large-scale retail on this site creates unnecessary commercial competition while introducing intrusive heavy-vehicle loading bays into a high-density residential envelope.

Zoning Contraventions, Solar Access, and Microclimate Deterioration

The proposed height severely departs from the surrounding built environment and established controls under the *Canada Bay Local Environmental Plan*. The massing fails to meet fundamental solar access criteria outlined in the *Apartment Design Guide (ADG)*, casting extensive, permanent shadows across existing low-density residential properties. Furthermore, the structural mass will induce adverse microclimatic effects, including wind-tunnel conditions at the pedestrian ground plane and heightened urban heat island retention.

The City of Canada Bay Council previously rejected excessive scale on this site, and utilising the State Significant Development process does not remedy the proposal's fundamental planning deficiencies. We welcome appropriate, medium-density renewal in line with the initial Parramatta Road Corridor plans, but Application SSD-89477725 is a severe overreach that must be refused.

Yours sincerely,

(details contained in submission notification)