



10 July 2025

Department of Planning, Housing and Infrastructure

Locked Bag 5022,

Parramatta NSW 2124

RE: SUBMISSION LETTER TO STATE SIGNIFICANT DEVELOPMENT APPLICATION | 93 BRIDGE ROAD, WESTMEAD

1. Introduction

This submission letter has been prepared by Paro Consulting on behalf of the Community Association DP 220360, Monarco Estate, (the association representing individual Strata Plans SP70764, SP73889, SP74611 and SP77983). The submission letter is in relation to a State Significant Development Application (SSD) application submitted to the Department of Planning, Housing and Infrastructure (Major projects ref. SSD 80904224) for a large-scale residential development comprising 549 dwellings, across two residential towers, basement carparking, landscaping and public domain works.

Monarco Estate is located to the south and the east of the development site at 91A, 91B, 91C and 91D Bridge Street, Westmead. The purpose of this submission is to outline the Community Associations (DP 220360) key concerns and points of objection relating to development application prior to a decision on the application. The main concerns relating to the proposal as it stands include:

- The proposed building height is excessive incompatible with the character of the immediate locality;
- The proposed building height will generate inadmissible shading on Block D (SP77982) and the principal area of private open space within Monarco Estate, generating significant adverse amenity impacts;
- The proposal would result in the significant increase in the use of private land at Monarco Estate to access the proposed public park East of the site next to Block A (SP70764);
- Significantly increased vehicle movements and parking along the private road and throughout the Monarco Estate to access the public park;
- The proposal assumes public access to a private footpath which traverses through the adjoining properties of Block D (SP77987) and the Community Association (DP270360) at 91 Bridge Road resulting in unlawful access of private land for about 200m across two different strata plans;
- The proposal includes a public pedestrian path which traverses through the stormwater basin of the adjoining property, Block A (SP70764) to reach green space (The Reserve) and a future green grid to the northeast of the development. The proposed path would result in unlawful access of private land;
- A number of documents within the proposal provide inaccurate or insufficient information.



2. The Site

The proposal site is located within the Parramatta Council Local Government Area, located at 93 Bridge Road, Westmead and legally described as SP 31901. The irregular shaped allotment has a site area of approximately 8,663m². The site is occupied by a private housing development comprising 31 attached and semi-detached single storey dwellings, vehicular access is provided via a private access road on the southern boundary of the site. The southerly road is primarily registered on the title of Lot 1 DP 270360, with a small easterly section, not connected to Bridge Road, on the title of SP31901, the right of way benefits and burdens both sites. We note that the park land of DP270360 includes an easement for recreation which permits SP 31901 to use the communal facilities in Monarco Estate, this includes pool, tennis courts, sauna and park areas.

An aerial view of the site is shown in Figure 1.



Figure 1. Aerial image of development site 93 Bridge Street, Westmead, highlighted yellow (Source. NSW Planning Portal)

3. The Proposal

State Significant Development Application

The proposal relates to a significant residential development at 93 Bridge Road Westmead, summarised as follows:

- Two residential towers of 27 storeys with a proposed building height of 89.7m;
- 549 apartments;
- 4 levels of basement carpark;
- FSR 4.68:1 (40,542.84m²);
- Affordable housing component (GFA 6,274 m² 15.45% of total GFA);
- Internal communal area;
- Communal open space;
- Public Park.





Figure 2. Proposed Site Plan (SSD Submission)



Figure 3. Artistic representation of proposed development (Group GSA)



Planning Proposal

It is understood that a planning proposal (PP-2023-2810) seeking to amend the local provisions of the Parramatta Local Environmental Plan 2023 has been submitted concurrently. The planning proposal seeks to amend the Parramatta LEP 2023 to facilitate the redevelopment of the site for high density residential development, in summary the planning proposal seeks the following amendments:

- Amend the height of buildings map from 20m to 69m;
- Amend the FSR map from 1.7:1 to 3.6:1;
- Insert provisions for the preparation of a site specific DCP and for the facilitation of the delivery of affordable housing.

This letter provides a submission to the SSD application described above however; it is noted that the subject SSD relies upon endorsement of the abovementioned planning approval. A separate objection letter to planning proposal (PP-2023-2810) has also been submitted.

4. Matters for consideration

This section outlines the key issues for consideration by the Department, as part of their assessment of the submitted SSD at 93 Bridge Road, Westmead.

4.1. Building Height

The proposal includes two residential towers presenting a 27-storey (maximum) development with a maximum building height of 89.7m as shown below in Figure 4. The proposed maximum building height is excessive in nature when considered against the current planning controls and the surrounding built context and is considered to present a development that is highly inconsistent with the character of the area. As shown in the figures below, the site is located at the centre of an established residential neighbourhood which exhibits a generally residential character and is predominantly defined by; low scale residential flat buildings of 3 – 4 storeys, Government owned key worker housing consisting of 2 – 4 storey building blocks and multi storey apartment building up to a height of 15 storeys (Figure 5). Further, we note that the Parramatta LEP 2023 Height of Buildings Map depicts a maximum building height of 20m to the subject site, with the permissible building height increasing to 30 - 40m surrounding the Westmead Station to the east and 30 - 62m surrounding the Wentworthville Station to the west (Figure 6). Generally, the preferred building height immediately surrounding the development site ranges from 9m to a maximum of 20m.

Considering the context of the site, two residential towers of approximately 89.7m is highly inconsistent with the character of the residential neighbourhood. The proposed height is disproportionate in relation to its surroundings; it undermines the established character of the locality and raises significant impact on existing residential development.

In our opinion, the proposed building height is not suitable at this site and should not be supported. We submit that the number of dwellings should be reduced to present a more appropriate building height

Figure 4 below depicts the proposed SSD height plane at 89.7m, the lower height plane relates to the 69m building height proposed under PP-2023-2810.



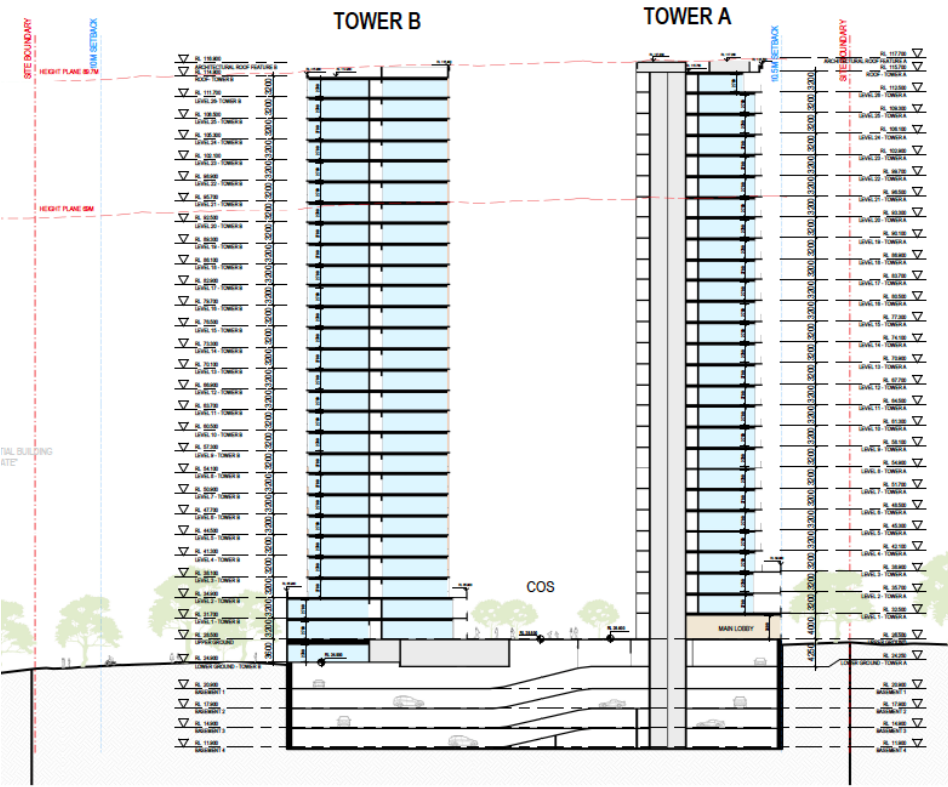


Figure 4. Proposed Section demonstrating anticipated building height (SSD submission)



Figure 5. Aerial image of site depicting surrounding building heights (Source. Paro Consulting)





Figure 6. Parramatta LEP Height of building Map development site outlined yellow (Source. NSW Planning Portal)

4.2. Shade Analysis

As mentioned above, the proposal includes two residential towers with a maximum building height of 89.7m, located directly to the north of the Monarco Estate Park / recreation area and the residential buildings at 91A, 91B, 91C and 91D Bridge Road. The proposed building height presents a considerable increase from the existing development and the building height of 69m proposed under the current planning proposal (PP 2023 2810). The proposed 89.7m building height will generate adverse overshadowing impacts for the existing residential buildings and the park / recreation area within Monarco Estate to the south.

A shadow analysis has been undertaken and summarised in the EIS supporting the SDD which provides the following relevant statements:

- *The shadow impact analysis indicates that there is no additional impact to the living areas of neighbouring properties with the 30% uplift massing. The only minimal impact identified is on the balcony edge of 136 Bridge Road, where the shadow duration increases marginally by approximately 15 minutes between 11:15am and 11:30am compared to the planning proposal scheme. This is a nominal impact to the Monarco development.*
- *The analysis also addressed the potential overshadowing impacts to the COS of the Monarco estate. The COS will achieve 4 hours of solar access on the 21 June.*

Given the proposal relates to such a significant developmental located directly north of 91 Bridge Road it unlikely that the proposal would have 'no additional impact'. To investigate further, the Community Association (DP 220360) commissioned CAD DRAFT Pty Ltd to prepare an independent shadow analysis of the impact on the residential buildings at 91 Bridge Road. In particular, a high level of concern relates to Block D (SP77987) which is the most shadow-affected residential building of Monarco Estate.

The Apartment Design Guideline (ADG) provides consistent planning and design standards for apartments within NSW. With relation to solar access, the ADG provides provisions to ensure apartments within the development and any adjoining residential development retains suitable and compliant access to natural light. The ADG provides the following:

Objective 3B-2 Overshadowing of neighbouring properties is minimised during mid-winter

Design guidance



- *Living areas, private open space and communal open space should receive solar access in accordance with sections 3D Communal and public open space and 4A Solar and daylight access*
- *Solar access to living rooms, balconies and private open spaces of neighbours should be considered*
- *Where an adjoining property does not currently receive the required hours of solar access, the proposed building ensures solar access to neighbouring properties is not reduced by more than 20%*
- *If the proposal will significantly reduce the solar access of neighbours, building separation should be increased beyond minimums contained in section 3F Visual privacy*

Objective 34A-1 *To optimise the number of apartments receiving sunlight to habitable rooms, primary windows and private open space*

Design Criteria

- *Living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 2 hours direct sunlight between 9 am and 3 pm at mid winter in the Sydney Metropolitan Area and in the Newcastle and Wollongong local government areas*
- *In all other areas, living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 3 hours direct sunlight between 9 am and 3 pm at mid winter*
- *A maximum of 15% of apartments in a building receive no direct sunlight between 9 am and 3 pm at mid winter*

The independent shadow analysis demonstrates that the proposal would generate significant overshadowing impacts to Block D and the principal open space area of Monarco Estate, with access to natural light reduced to below ADG requirements. We submit that the proposal presents a non-compliant overshadowing situation on Monarco Estate and that increased setbacks and / or reduced building height is essential to ensure the amenity of the residents of Block D of Monarco Estate is maintained. We recommend that an updated shadow analysis be prepared and certified by a registered surveyor to ensure accurate building and shadow detail is provided.

4.3. Increased use of Monarco Estate Park

An existing easement for recreation exists between SP 270360 (Community Association) and SP 31901 (93 Bridge Road) permitting the current residents of 93 Bridge Road to use the communal facilities in Monarco Estate. The easement currently caters for the 31 dwellings at 93 Bridge Road and those within Monarco Estate, Clause 2(E) of the 88B Instrument stipulates terms of the easement including *"The Owners Corporation and occupiers of townhouses within Strata Plan 31901 are entitled to use of the Community Facilities"*

The proposal would result in an increase from 31 town houses to a residential flat building comprising 549 dwellings (a rise of over 1600%) which would generate an extensive intensification of users at the Monarco Park. Further, the easement is restricted to townhouses and proposal relates to a residential flat building and therefore not applicable.

The existing Monarco Estate Park cannot accommodate an increase of numbers, and the associated maintenance and upkeep that would be required to keep the area safe and useable would be unmanageable. Further, the likely increase of patrons in this area will generate adverse visual and acoustic privacy impacts for residents of Monarco Estate as well as traffic and parking impacts, potential increased risk of crowd conflict and health and safety issues. Given the proposed development includes extensive onsite open space and recreation areas to accommodate the need of residents, and the use of the Monarco Estate Park by residents of 93 Bridge Road will no longer be necessary.

It is noted that the Environmental Impact Statement submitted with the SSD refers to the proposed extinguishment of the recreation easement multiple times, and should the development be supported, we strongly support this motion. Further to this, we insist the below design changes that would see public use of the private land within Monarco Estate avoided.

As shown in Figure 7 below, the proposal includes two publicly accessible pedestrian points of entry from the site's southern boundary, the first via a gate to the proposed communal open space which opens onto the private road and the second via an opening to the proposed



public park. The proposed openings within the fencing along the southern boundary will encourage a high level of public access through the Monarco land, including the use of the private road and footpath, resulting in trespass of approximately 200m, which should be avoided.

Figure 8 below demonstrates that the access to these openings would require users to walk along the road and the private footpath which is part of Block D, resulting in trespass.

We submit that the proposed southerly fence separating the public and private spaces at 93 Bridge Road, should extend the full length of the site's southern boundary, with pedestrian access located to the west of the proposed kiosk / substation via Bridge Road and not the private road. This would ensure pedestrian access is provided wholly within the site of 93 Bridge Road and prevent the public and future residents accessing the private road and footpath within Monarco Estate.

The proposed exit from the public park on the south causes the most serious trespassing issue. The consultation report describes this park entry point as an 'emergency exit' only however, this has not been reflected in the EIS or the architectural drawings. We submit that any emergency exit should be via 93 Bridge Road and not reliant upon the use of private land within Monarco Estate. The proposed southerly fencing should extend from Bridge Road to the south east corner of the site where the property adjoins Block A of Monarco Estate to ensure an internal public footpath can be provided for safe and lawful access.



Figure 7. Proposed pedestrian access along southern boundary of site



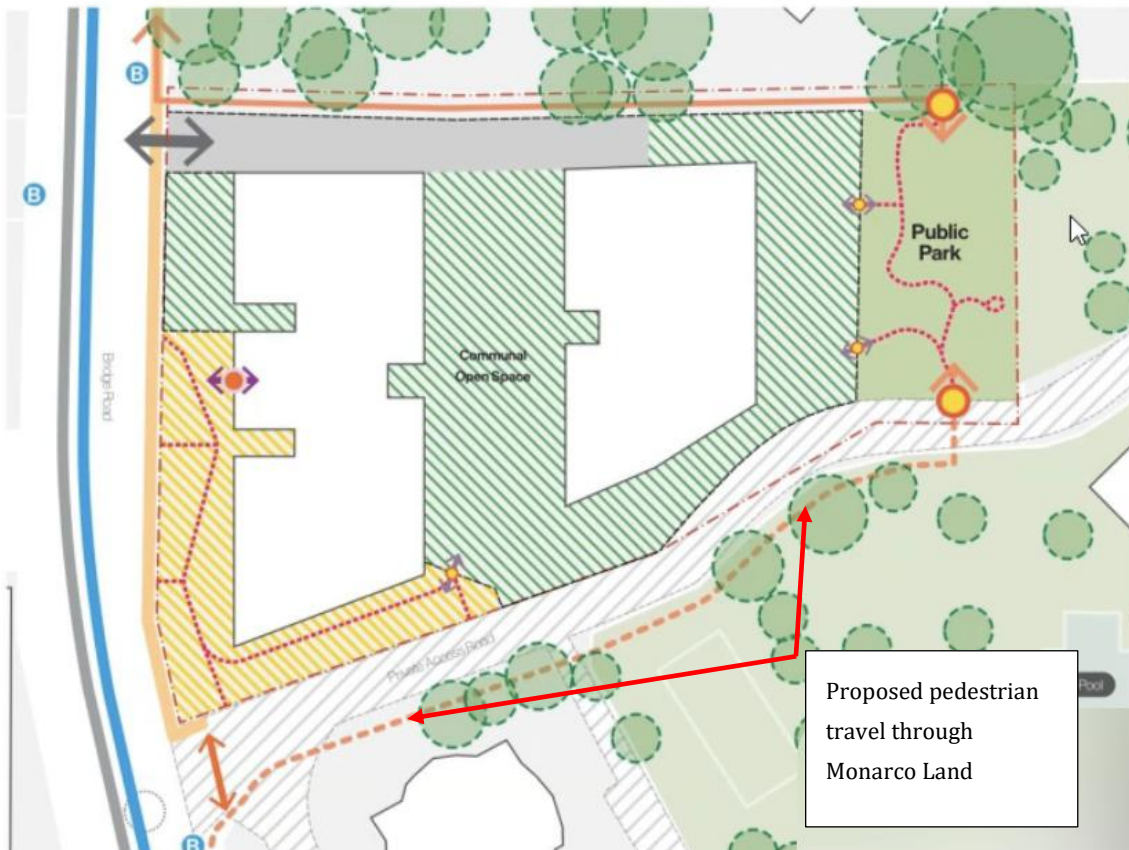


Figure 8. Proposed pedestrian access along SP77987 and DP220360

4.4. Potential Impacts associated with increased vehicle usage and insufficient carparking

An existing Right of Way is located on the southern boundary of 93 Bridge Road and to the north of 91A – 91D Bridge Road, providing access to the existing residential development on both sites. The private road is depicted in Figure 2 above.

Whilst it is noted that vehicular access to the proposed basement carpark is provided to the north of 93 Bridge Road, concern is raised regarding the likely increase of traffic and the unauthorised parking along the private road and within internal road areas of the Monarco Estate by users seeking to access the proposed public park at the east of 93 Bridge Road.

Given the extent of the proposal and the large publicly accessible park at the east of the site, the potential for increased traffic and parking in this area is high. The increase of vehicle numbers and parking along this road will generate significant adverse impacts for occupants of Monarco Estate including; access difficulties, congestion, reduced carparking, inability for cars to turn around before trespass on private property of 91A Bridge Road, noise and privacy impacts and reduced safety associated with unauthorised traffic and carparking. This combined with safety issues of pedestrians having to walk on the private road to and from the public park because the Monarco footpath next to the private road is on private land crossing two strata plans.

In order to prevent unauthorised use of the Monarco areas and reduce the likelihood of such impacts we strongly recommend that the existing shared right of way between the two sites be extinguished. This would enable, Monarco Estate to consider the construction of a boom gate near the roundabout to access the private road preventing public use of the private road by car.

We note that the proposal does not include any vehicular access from the existing shared road to the site at 93 Bridge Road neither during construction or occupation and therefore, the shared road is no longer needed by 93 Bridge Road.

Further to this, carparking is proposed within the four (4) level basement carpark which includes a total of 441 carparks, 391 spaces for residents and 48 spaces for visitors. Whilst the proposed carparking rate complies with the resident parking requirements of SEPP Housing



(2021), we note that SEPP (Housing) 2021 does not provide a parking rate for visitor carparks and therefore consideration should be given to the rates provided within the Paramatta DCP. In accordance with the Paramatta DCP a parking rate of 0.25 spaces / dwelling is required, equating to a total of 138 visitor carparks. The proposed visitor carparking rate [48] falls significantly short of the DCP requirement.

Further to this, we note that no parking provisions have been allocated for users of the proposed public park which is likely to attract a large number of patrons. The proposed shortfall in residential visitor carparks and the lack of parking provisions of park visitors, will place a significant traffic and parking strain on the surrounding streets, which already experience a high level of volume and parking demand and will result in unlawful parking within the Monarco Estate. In this instance extinguishment of the Right of Way between the two sites is vital to ensure the private land within Monarco Estate is not unlawfully used by the public.

4.5. Pedestrian access towards planned future green infrastructure to east

The proposal appears to include a publicly accessible path of travel, in the form of a nature trail, along the southern and northerly boundary of 93 Bridge Road, through the proposed park at the rear of the site and onto the boarder green open space network to the east and north east of the site and the defined north south active transport link as identified in the Westmead Place Based Transport Strategy and the Westmead Place Strategy (Figure 9). From a review of the submitted documentation and relevant mapping we note that this proposed pathway traverses through 91A Bridge Road with no formal easement in place and would result in unlawful access. It is also noted that the supporting Landscape Report incorrectly refers to the adjoining site as 'adjoining parkland' when it is in fact private land and consists of a stormwater basin which is flooded during rain.

The proposal presents a misleading design, access to the future reserve and future 'green grid,' cannot be achieved and the connectivity detailed in the EIS cannot be achieved as it appears to rely upon unauthorised access through private land at 91A Bridge Road.

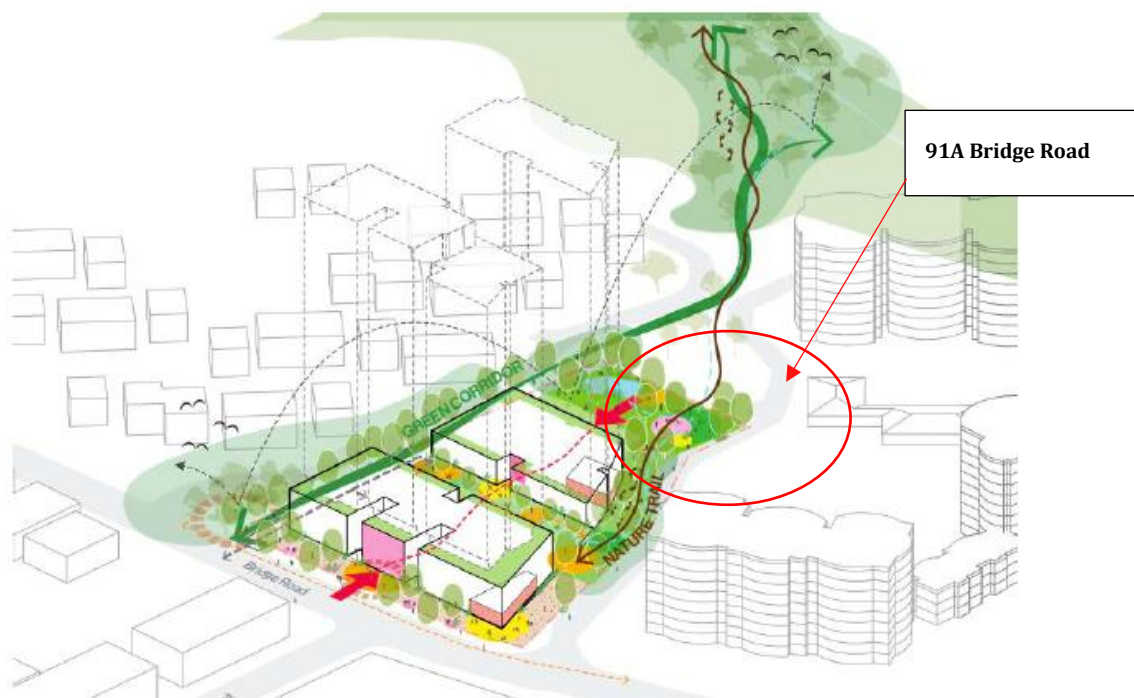


Figure 9. Proposed pedestrian travel path, edited to demonstrate unauthorised access through 91A Bridge Road



4.6. Inaccurate detail

Following a review of the submitted documentation, we note that there are some important details that have been depicted inaccurately or even omitted throughout the supporting documentation as described below;

Site distance to stations

it is identified that a number of reports including the EIS and the Transport Impact Assessment have provided incorrect distances between the development site and the two nearby train stations. We note that the EIS states the site is *'800m from the Westmead Station and 770m from the Wentworthville Station'* and the Transport Impact Assessment states the development site is *'600m from the Westmead Train Station and 650m from the Wentworthville Train Station.'*

Whilst an accurate survey portraying the distance is not provided, Google Maps indicates that the site is 900m walking distance from the entrance of the Westmead Station and 800m walking distance from the entrance of the Wentworthville Station. Considering the Wentworthville station is not listed in *Schedule 11 Low and Mid Ride Housing Area Stations of SEPP (Housing) 2021*, the site is not considered a low and mid-rise housing area and therefore *Chapter 6 Low and Mid Rise Housing* does not apply to the site.

Traffic Report

The submitted traffic report has been updated to reflect the proposed access road to the north of the site however, the assessment does not accurately reflect the traffic impact on the surrounding roads. We note that a single access road via the Monarco roundabout for access to 93 and 91 Bridge Road is still shown.

Aviation Report

We note that previous applications have included an aviation report which provided an assessment of an 18-storey development (101.2m AHD), the report stated that temporary crane operation during construction would affect the flight path of YWST HLS. The SSDA has not included an updated aviation report based on the proposed increased building height and therefore does not accurately portray the potential impacts of the increased building height on the Westmead Hospital operations.

5. Summary and Recommendations

The proposed large -scale residential development at the site 93 Bridge Road will result in several unacceptable impacts on the surrounding locality, in particular the 4 strata plans at 91 A – 91 D Bridge Road and DP 220360. A summary of the Community Associations (DP 220360) key concerns and our recommendations are provided below:

- The proposed building height of 89.7m is excessive and inconsistent with the character of the neighbourhood
- The proposal generates significant overshadowing impacts to Block D and the open space areas of Monarco Estate, reducing solar access to below ADG requirements. The proposal in its current form will significantly reduce amenity impacts for adjoining sites and should not be supported;
- Given the extensive open space and recreation area proposed at 93 Bridge Road and significant increase of dwellings, we strongly support the extinguishment of the recreation easement between both sites. Further we submit that design changes should be made, including the extension of the proposed fence along the sites southern boundary towards the West and the East to ensure public use of Monarco land is avoided;
- The existing Right of Way between the two sites is no longer needed given no vehicle access is proposed from the south. In order to prevent the significant increase of traffic and unauthorised parking along the private road and within the private areas of Monarco Estate, we strongly recommend the extinguishment of the existing Right of Way between the two sites and fencing along the entire southerly border. This will allow 93 Bridge Road to extend the green area to where the small part of the private road



runs on their land and create a new southerly access path to and from the public park, reflecting the proposed northerly access path;

- The proposal appears to rely on a pedestrian access through 91A Bridge Road to provide access to the reserve north-east of the site, considering there is no formal easement in place, the proposed access would be unlawful. The design in its current form has misleading references to pedestrian access through the Monarco Estate and access to the northeast and east green space corridor and to a future green grid which should be removed.

6. Conclusion

This independent review of SSD 80904224 has identified that the proposal is considered to be highly inconsistent with the character of the locality and will generate several unacceptable environmental impacts on the surrounding properties, in particular; significant overshadowing, increased patronage and subsequent degradation of the Monarco Park, adverse traffic and parking impacts, increased noise and privacy issues and unlawful access of private land. Based on the findings of this review, we recommend the subject proposal should not be supported.

We look forward to working with the Department to ensure that the appropriate consideration is given to residents of adjoining properties and the broader community. Feel free to contact me on 0422 983 710 or at daniel@paroconsulting.com.au should you wish to discuss the context of this letter and to arrange an opportunity to represent the landowners at an upcoming meeting.

Kind regards,



Daniel Barber

Director

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