

To: NSW Planning Panel

Re: Objection to Modification of SSD-82639959 – 73 Mary Street, St Peters (Precinct 75)

Summary of Objection

I write to formally object to the proposed modification of DA/2021/0800 (now SSD-82639959), which seeks to increase the approved development from 205 to 471 dwellings - approximately 850 residents - on a constrained site in St Peters.

The modification is being advanced under the State Significant Development (SSD) framework, granting streamlined approval and bypassing local council oversight. While this pathway is intended to accelerate delivery of housing that addresses NSW's housing crisis, the proposal fails to do so.

The additional 267 dwellings are overwhelmingly skewed towards studios:

- Studios: 84%
- 1-bed: 9%
- 2-bed: 7%
- 3-bed: 0%

This means almost all new apartments are tiny studios, while not a single three-bedroom unit has been added. By contrast, studios represent only around 2% of the broader NSW housing stock of units. This imbalance directly contradicts the Apartment Design Guide (ADG), which requires developments to deliver a diverse apartment mix and sets a minimum size of 35 m² for studios.

Neighbouring Strathfield Council has already recognised this problem and proposed requiring 20% of apartments in new developments to be three-bedroom units. St Peters, like Strathfield, is an established inner-west suburb with similar demographics, infrastructure constraints, and family demand. The failure to provide meaningful three-bedroom stock here is therefore especially unjustified.

The proposal does not demonstrate compliance with:

- Section 4.15 of the Environmental Planning and Assessment Act 1979
- The Apartment Design Guide (ADG)
- The Inner West Local Environmental Plan (LEP)

- Ministerial Direction 1.1 – Business and Industrial Zones
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Grounds of Objection

1. Housing Mix and Failure to Address the Crisis

Current Approved Mix (204 dwellings)

Type	Grand Total	Percentage
Studio	44	22%
1 Bed	62	30%
2 Bed	89	44%
3 Bed	9	4%

This approval, while weighted towards smaller apartments, still provided a balanced distribution, with almost half of apartments being two-bedroom.

Additions (267 dwellings)

Building	Grand Total	Percentage
Studio	224	84%
1 Bed	24	9%
2 Bed	19	7%
3 Bed		0%

The additions are almost entirely studios, with no new three-bedroom apartments.

Resulting Proposed Mix (471 dwellings total)

Building	Grand Total	Percentage
Studio	268	57%
1 Bed	86	18%
2 Bed	108	23%
3 Bed	9	2%

This outcome is a dramatic shift away from diversity. Studios would represent 57% of all apartments, compared to only ~2% of the broader NSW housing stock of units. Three-bedroom apartments would fall to just 2% of the total, far below what is needed to meet demand for family housing.

Requested outcomes:

- Reduce the proportion of studios so they reflect their small share in the broader housing stock (~2%).

- Require at least 20% of dwellings to be three-bedroom apartments, consistent with the benchmark set by Strathfield Council.
 - Require all studios to comply with the ADG minimum of 35 m².
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2. Affordable Housing – Insufficient Provision

Only 16 affordable housing units are provided out of 471 - a mere 3.4% of all dwellings in the proposal. This is substantially below the 10–15% range encouraged by recent In-fill Affordable Housing reforms, which offer developers floor space and height bonuses in exchange for meaningful affordable housing contributions. Comparable developments in inner suburbs, such as a Randwick mixed-use project, have proposed 15% affordable units, aligning with best-practice benchmarks. Furthermore, the NSW Government has committed that developments on surplus government-owned land include at least 30% affordable, social, or universal housing.

Requested mitigation: Increase the provision of affordable housing to at least 15% of total dwellings - consistent with both state policy and industry precedents.

3. Traffic, Infrastructure and Road Capacity

- Mary Street intersection is already forecast to be over capacity by 2037 without the additional traffic burden.
- Edith Street is misrepresented in the traffic assessment; in practice it cannot safely accommodate two-way traffic plus parking.
- This creates risks for emergency access and pedestrian safety.

Requested mitigations:

- Convert Edith Street to one-way (west–east).
 - Install traffic lights at Edith Street/Unwins Bridge Road.
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4. Parking Provision and Compliance

The proposal fails to meet Marrickville DCP standards:

- Residential: 227 spaces short.

- Commercial: Disproportionate reduction in spaces relative to GFA.
- Visitor: None provided.
- Car-share: 6 provided vs 11 required.

These shortfalls will inevitably displace parking into surrounding residential streets, contrary to ADG principles.

Requested mitigations:

- Extend residents-only parking zones (Mary, Edith, Roberts, Silver, Alfred Streets).
- Retain all existing on-street parking for current residents without off-street spaces.

5. Environmental and Social Impacts

- Transient population risks tied to an over-supply of micro-studios.
- Amenity deficits acknowledged by the applicant: solar access, ventilation, and apartment mix falling below ADG benchmarks.
- Noise impacts from activated rooftops and public domains not sufficiently mitigated for heritage weatherboard dwellings nearby.
- Litter impacts on surrounding streets not addressed.
- Lease instability risk: To qualify for Build-to-Rent (BTR) tax incentives, developments must offer leases of at least 3 years. Yet the applicant's own submission states: "Flexibility is at the heart of every Nation home. We offer renters the choice of long and short-term leases." This contradiction raises serious concerns that the development will default to short-term leasing, exacerbating resident turnover and undermining community stability.

Requested mitigations:

- Minimum 12-month leases (preferably longer) to discourage transient occupancy.
- Ensure compliance with BTR tax incentive conditions, with clear enforcement mechanisms.
- Extend litter and waste management responsibilities beyond the development boundary.
- Developer-funded double-glazing for impacted neighbours.

6. Local Character, Bulk and Scale

- Precinct 75 is surrounded by low-rise federation and Californian bungalows.
- Buildings of up to 10 storeys are incompatible with this context and breach Council's 2018 resolution to limit heights.
- The bulk and height conflict with the amenity objectives of the Environmental Planning and Assessment Act 1979 and the Eastern City District Plan.

Requested mitigation: Reduce the heights of Buildings C, 6 and 8 to align with the original rezoning intent.

7. Employment and Land Use Balance

- The proposed reduction in commercial and industrial floor space undermines the rezoning's original employment balance.
- This contravenes Ministerial Direction 1.1 – Business and Industrial Zones, which requires employment capacity to be retained.

Requested mitigation: Retain the clause limiting residential floor space to <50% of GFA.

Positive Amendments Worth Retaining

- Increased publicly accessible commercial parking (49 spaces).
 - Additional rooftop communal amenities.
 - Increased setbacks to Unwins Bridge Road residences.
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Conclusion

The proposed modification would see the additions made up of 84% studios and 0% three-bedroom apartments, leading to a final mix of 57% studios and only 2% three-beds overall, compared to studios making up just ~2% of NSW's housing stock of units. This is the exact opposite of what the housing crisis requires.

The Apartment Design Guide demands a diverse housing mix and minimum standards for size, sunlight, and ventilation. The NSW Productivity & Equality Commission stresses the

importance of distribution, not just raw supply. Strathfield Council's benchmark of 20% three-bedroom units shows what genuine housing diversity should look like in inner-west Sydney.

The proposal also provides only 3.4% affordable housing, far below NSW policy benchmarks of 10–15%, comparable local examples at 15%, and government commitments of 30% on public land. This falls well short of community expectations for developments of this scale.

The developer's own submission admits to offering short-term leases, contradicting Build-to-Rent tax incentive requirements for 3-year minimum terms and heightening the risk of transient occupancy. This undermines community stability and long-term housing outcomes.

The SSD fast-track pathway should not be used to bypass scrutiny for projects that fail to deliver the right housing mix, sufficient affordable housing, or community stability. St Peters deserves the same standards as its inner-west neighbours.

I respectfully request the Panel refuse this modification or require significant redesign to rebalance the mix, increase affordable housing provision, and deliver genuine housing outcomes.

Yours sincerely,

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