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OBJECT

Submission ID: 225740

Organisation: N/A	Key issues: <i>Built form and design, Residential amenity, Traffic, parking and servicing, Affordable housing</i>
Location: New South Wales 2065	
Attachment: N/A	

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JOHN DESMOND FITZGERALD submission to Independent Planning Commission NSW

SSD 66826207. 22-storey mixed-use development comprising commercial premises within a 3-storey podium, a 19-storey residential tower above with 188 apartments (140 market and 48 affordable housing apartments) and seven basement levels.

SUBMISSION

I object to the development.

REASONS

1. GIVES LIMITED BENEFIT TO PROVISION OF AFFORDABLE HOUSING

The proposed 22-storey development relies on the SEPP provisions for bonus incentives linked to affordable housing. However, it includes a 15-year sunset clause, after which the affordable housing units can be sold on the open market. This represents a significant policy failure, as affordable housing must be maintained in perpetuity to support the long-term expansion of this critical housing category. The proposal disproportionately benefits the developer, providing substantial initial advantages followed by an extraordinary windfall when the apartments are sold.

2. COMPOUNDS OVERDEVELOPMENT PROBLEMS OF TRANSPORT ORIENTED DEVELOPMENT

The 2036 Plan, already allowed for substantial increases in building heights and floor space ratios (FSRs) to facilitate the construction of 6,500 new apartments within the designated area

However, the Plan failed to account for the critical social infrastructure required to support this growth, including education and healthcare facilities, road transport networks, and sufficient open spaces to ensure residents have access to recreational and sporting amenities.

The Transport-Oriented Development (TOD) compounded the problems from the 2036 Plan by providing for a further density uplift. Initially, a proposal for 3,500 additional apartments beyond the 6,500 envisioned in the 2036 Plan was exhibited for public consultation.

However, the government ultimately adopted a revised plan on 27 November 2024, allowing for 5,900 additional apartments instead of the 3,500 initially proposed. This unprecedented increase in density from proposal to adoption compounded the governments failure to adequately address the need for open space. To date, no concrete plan for implementing this allocation exists, and the specific needs of children within the precinct have been overlooked.

In this context, the proposed development on the Five-Ways site adds an unwarranted number of new apartments to an area already burdened by poorly planned density increases. It reflects a government approach prioritizing height and population growth at any cost, to the detriment of sound urban planning and livability.

Summary: The SSD proposal will add 188 apartments and up to 400 more persons but zero open space to the TOD. It will increase density and is undeniably overdevelopment.



3. BUILDING HEIGHT

the maximum allowable building height should be reduced from 76.05m to 74.45m (plus 2m for all roof top structures). This height reduction from the proposed height will help reduce overshadowing, views and wind impacts. It is time that the community's concerns are appreciated and supported.

4. COMPOUNDS CAR PARKING PROBLEMS

The TOD rezoning plan now in effect, has modified car parking rates to align with North Sydney Council's Development Control Plan (DCP) Table 10.1 for new high-rise developments close to train stations.

For unknown reasons the same conditions have not been applied in the proposal for this site. I adopt the following analysis taken from the submission of the Wollstonecraft Precinct.

If this submission is adopted then the car parking numbers would be reduced by 67 from 220 to 153:

<i>One BR apartments -</i>	<i>33</i>	<i>0.4 space per apartment</i>	<i>13 spaces</i>
<i>Two BR apartments -</i>	<i>118</i>	<i>0.7 space per apartment</i>	<i>83 spaces</i>
<i>Three BR apartments -</i>	<i>37</i>	<i>1.0 space per apartment</i>	<i>37 spaces</i>
<i>TOTAL Residential-</i>	<i>188</i>		<i>133 spaces</i>
<i>Non-residential (8,000sqm) = 1.0 / 400 sqm</i>			<i>20 spaces</i>
<i>Service/delivery</i>			<i>incl above</i>
<i>TOTAL</i>			<i>153 spaces</i>

The assessment report makes no suggestion of a reduction in the number of basement levels when the applicant was seeking 328 spaces. This is an obvious oversight that requires adjustment. 67 spaces would reduce the number of basements by at least 2 levels, possibly 3 levels.

Recommendation:

That the car parking rates be in accordance with North Sydney Council's DCP Table 10.1 for new high-rise developments in the near vicinity of high access to public transport.

That the number of basement levels be reduced from 7 to align with the reduced number of car parking spaces and that the actual number of basement levels be agreed and confirmed with Council.
