

Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

1 May 2026

Attention: Chris Eldred, Senior Planning Officer, Housing Delivery Authority
SSD Assessments
Email: Chris.Eldred@dpie.nsw.gov.au

Dear Chris,

**RE: Mixed Use Development - 903-921 Bourke St Waterloo (SSD-95997711)
– Letter of Objection**

Part A - Summary

Planning Lab has been engaged by the Body Corporate of Moore Park Gardens at 780 Bourke Street Waterloo, which is located to the north-east of the subject development site, including:

- SP54721 comprised of Grosvenor and Hopetoun Apartments (145 apartment owners)
- SP51517 comprised of the Argyle Building, Bowers Building, Reckitts Apartments, Lamont Building, Waverly Building (158 apartment owners)
- SP62884 comprising of the Caley Building (97 apartment owners)
- SP60182 comprising of the Dowling Apartments, Palmer Building (173 apartment owners)
- DP270095 Community Association, and
- other impacted residents

Due to time constraints, it was only possible to submit a placeholder submission of objection on behalf of our clients within the formal exhibition period for SSD-95997711.

Following a review of the recent publicly exhibited documents and current relevant State and City of Sydney Council legislation and planning policies, I would now like to submit this detailed letter of objection to the Department in respect of the proposed development SSD-95997711.

My clients wish to oppose this development in the strongest possible terms, with a focus on the following key concerns:

- A lack of consideration for the broader cumulative environmental and infrastructure impacts of the proposed major redevelopment uplift for this site, as well as other recently approved and emerging uplift proposals approved by the NSW Housing Delivery Authority in the Redfern and Waterloo areas, such as the current SSD-80441462 – 881-885 Bourke Street);
- A lack of consideration for the extensive strategic planning processes undertaken by the City of Sydney for the subject site and Redfern/Waterloo precincts, which have produced community supported local planning controls of a scale and character that represent a sustainable and responsible growth response to NSW State Government housing and employment targets, and those well planned and considered areas targeted for urban growth, such as the Sydney CBD, Green Square and Ultimo Pyrmont;
- A lack of consideration of the Mayoral Minute adopted by the City of Sydney dated 17 March 2025, raising concerns with the NSW State Government regarding the recent actions of the Housing Delivery Authority and the impacts that its decisions could have on the City's long-term vision and planning for the surrounding area; and
- A totally inappropriate scale of proposed development, virtually doubling the development capacity across the site from that approved in the original DA D/2021/1415, generating direct environmental impacts (overshadowing, loss of privacy, loss of visual character and amenity) for those immediately adjoining and surrounding properties, as well as the broader impacts for properties in the near vicinity (such as Moore Park Gardens), including increased traffic congestion on local roads, disruption to streetscape and character of this part of the City, and placing further pressure on already crowded public transport facilities, and lagging social and physical community infrastructure.

Further details of these concerns are provided in Part B of this submission.

On the basis of these concerns, my clients oppose and object to SSD-95997711 and call upon the Department to either refuse the application or seek substantial amendments to the proposal in further consultation with the City of Sydney and its community.

Please contact me at any time to discuss this further.



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Part B – Detailed Identification of Concerns

Background to the Objector - Moore Park Gardens

As shown in Figure 1 below, the site commonly known as Moore Park Gardens, 780 Bourke Street, Redfern, is located approximately 360m to the north-east of the proposed redevelopment site, 903-923 Bourke Street, Waterloo.

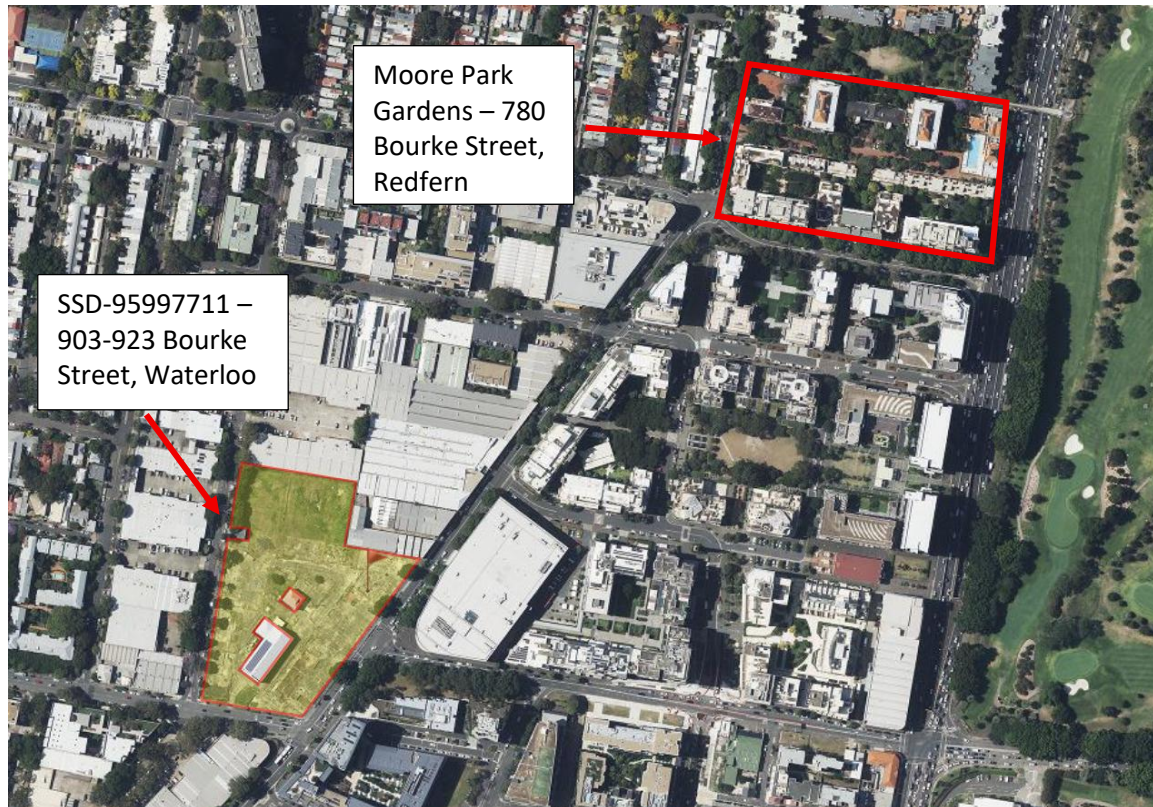


Figure 1 – Aerial Map identifying location of Moore Park Gardens and the SSD-95997711 site.

It consists of the following Strata Plan buildings and Community Association:

- SP54721 comprised of Grosvenor and Hopetoun Apartments (145 apartment owners);
- SP51517 comprised of the Argyle Building, Bowers Building, Reckitts Apartments, Lamont Building, Waverly Building (158 apartment owners);
- SP62884 comprising of the Caley Building (97 apartment owners);
- SP60182 comprising of the Dowling Apartments, Palmer Building (173 apartment owners);
- DP270095 Community Association.





Lack of consideration for the extensive strategic planning processes undertaken by the City of Sydney for the subject site and Redfern/Waterloo precincts

As identified in the Central Sydney Planning Committee's (CSPC) deferred commencement consent determination of local DA D/2021/1415 on 16 February, 2024 for the former Water Board site, 903-921 Waterloo Road, the approved mixed use redevelopment proposal arose from a background of extensive locality and site based strategic planning processes undertaken by the City of Sydney, complemented by 2 alternative competitive design processes, to produce controls for a scale, density and mix of new and retained building types, suited to the desired future character of this area. The approved D/2021/1415 only contained relatively minor variations to the City's planning controls.

It is therefore highly concerning that the more recent HDA determination of a State Significant DA and Concurrent rezoning has supported an almost doubling of the City's maximum height and FSR on different sections of the D/2021/1415 site, without any detailed strategic planning justification, thereby providing the potential to totally undermine the City's desired development capacity for the subject site.

This major uplift in potential redevelopment capacity is demonstrated in **Figure 3** below:



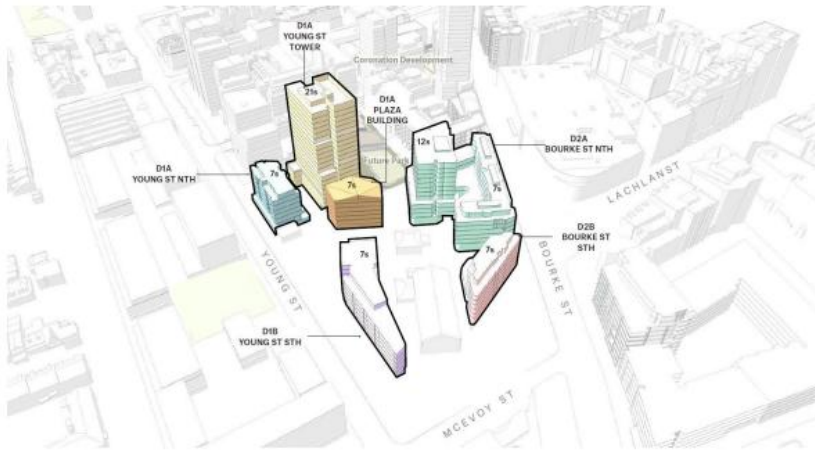


Figure 4:

Approved development D/2021/1415

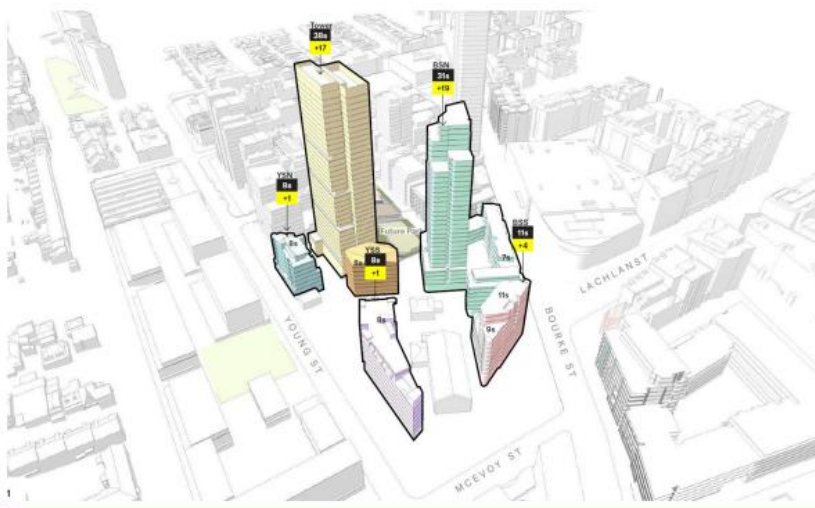


Figure 5:

Proposed alterations and additions to approved development D/2021/1415

Figure 3 – Plans identifying the proposed increase in scale between the approved D/2021/1415 and SSD-95997711 (SEE, Sutherland and Associates Planning)

A lack of consideration of the City of Sydney Mayoral Minute – HDA Approvals

Given the growing concern for the emergence of Housing Development Authority determinations in the City of Sydney, Council considered and adopted the following resolution of a Mayoral Minute at its meeting of 17 March 2025:

(A) Council note:



(i) the City of Sydney has met 71% of its 20-year housing target in just 7 years with over 21,000 dwellings built and almost 19,000 in the pipeline;

(ii) the City of Sydney stands ready to deliver on the NSW Government's new short term housing targets, but it must be done with responsible planning and infrastructure delivery; and

(iii) the current processes of the Housing Delivery Authority are a threat to the City of Sydney's long-term vision and planning for our area, particularly in areas like Green Square, Oxford Street and Pyrmont/Ultimo; and

(B) the Lord Mayor be requested to write to the NSW Premier and the NSW Minister for Planning and Public Spaces to request a meeting with them to:

(i) raise the City's concerns about the Housing Delivery Authority and the impacts its decisions could have on our long-term vision and planning for our area;

(ii) ask the Housing Delivery Authority to consult with councils on applications in their local area and require them to consider existing planning controls and development approvals;

(iii) urge the Housing Delivery Authority to ensure any council's Affordable Housing contributions schemes apply to any application; and

(iv) improve transparency of the Housing Delivery Authority's processes by:

(a) publicly releasing application details before meetings are held; (b) holding public meetings;

(c) publishing application reports and details with minutes; and

(d) consulting with councils and their policies at every stage of the process.

Within that Minute, The Mayor and Council sought a greater consideration by the State Government of the impacts that its HDA decisions could have on the City's long-term vision and planning for our area.

The City's concerns for these emerging HDA approvals are highlighted in a detailed submission of objection to the recently publicly exhibited SSD-80441462 – 881-885 Bourke Street. A key extract below identifies the major broader concerns:

The City raises a significant number of consistent objections in relation to the exhibited development, primarily concerned with; adverse amenity impacts due to the excessive scale of the building envelopes and massing, departures from Apartment Design Guide criteria that would contribute to a poor relationship between buildings not only for future residents but also adjoining land owners; and the inequitably allocated communal open space and deep soil areas.

The City has been clear on its position on new parking spaces beneath land that is to be dedicated by the registered Voluntary Planning Agreement, and this scheme continues to ignore the



feedback previously provided in the Early Works SSD (Council Reference R/2025/14 and R/2025/14/A). The strategic planning considerations as part of the concurrent rezoning will require diligent assessment.

It is not proven that such a significant built form is in the public interest or that amenity impacts can be mitigated. Assessment considerations are set out in the following submission and the conclusion drawn is that the additional yield is dependent on non-compliance with state amenity objectives.

As such, the City objects to the application as currently proposed, which is a significant departure from the Concept DA approved by the City. The short exhibition period of only two weeks should be extended it is not enough time for the community to respond to such a significant proposal.

Inappropriate Scale of Proposed Development

The scale of the proposed development is entirely inappropriate; doubling the development capacity across the site from that approved in the original DA D/2021/1415, generating direct environmental impacts (overshadowing, loss of privacy, loss of visual character and amenity) for those immediately adjoining and surrounding properties, as well as the broader impacts for properties in the near vicinity (such as Moore Park Gardens), including increased traffic congestion on local roads, disruption to the visual landscape and character of this part of the City, and placing further pressure on already crowded public transport facilities, and lagging social and physical community infrastructure.

Local traffic generation is a particularly major concern for the Moore Park Garden residents, who already experience major peak hour congestion and bottlenecks at the three main intersections, Lachlan/South Dowling, Bourke/Lachlan and Bourke/McEvoy. Whilst the traffic studies for SSD-95997711 claim a net reduction of 1 vehicle per hour in the AM peak and 11 vehicles per hour in the PM peak compared to the approved D/2021/1415, this seems highly implausible given the proposed doubling of the allowable development controls, and an increased number of residential apartments from 347 to 580, with only an increase of residential car parking spaces from 340 to 376.

Conclusion

Based on these concerns, my clients oppose and object to SSD-95997711 and call upon the Department to either refuse the application or seek substantial amendments to the proposal in further consultation with the City of Sydney and its community.

