

To: NSW Department of Planning, Housing and Infrastructure

Re: SSDA – Waterloo Mixed Use Development (881–885 Bourke Street, Waterloo NSW 2017)

Submitter: Resident of 2 Thread Lane, Waterloo NSW 2017

Objection to SSDA 881–885 Bourke Street, Waterloo

Dear Assessing Officer,

I am a resident living at **2 Thread Lane**, directly **north of the proposed 125m tower**. I strongly object to the current SSDA for the reasons outlined below. My concerns are based not only on lived experience of the neighbourhood but also on a review of the applicant's own documentation, including the **Solar Access Report**, **Environmental Impact & Rezoning Statement**, and **Visual Impact Assessment (VIA)**.

1. Height Non-Compliance & Incompatible Urban Character

The proposal's main tower rises **36 storeys (approx. 125m)**—far exceeding the **24m height limit** under the current LEP.

The *Environmental Impact & Rezoning Statement* acknowledges this height exceedance as part of a rezoning justification, not a compliant outcome.

Despite this, the proponent argues the height aligns with emerging trends in *Green Square*, not Waterloo. This is misleading:

- Waterloo north of Danks Street remains **predominantly low-rise**, human-scaled, and community-based.
- The VIA relies on buildings **1–1.5 km away** to claim character alignment, rather than the **immediate residential context**.

Allowing such a significant height departure creates an **unsound precedent** that could trigger cumulative overdevelopment across Waterloo.

2. Overshadowing Impacts Not Assessed on Thread Lane

The **A2 Solar Access Report** does **not** assess overshadowing onto Thread Lane or adjacent **north-facing existing homes**, despite these being the most solar-sensitive locations.

Shadow diagrams on pp. 2–3 of the report:

- Analyse shadows primarily on the **Toyota showroom** and commercial sites.
- Fail to map or quantify impacts on existing residences.
- Do not provide any winter solar loss measurement.

A 125m tower will inevitably cast **substantial winter shadows** deep into Thread Lane and neighbouring dwellings, yet this is not disclosed.

3. VIA Acknowledges Moderate–High Visual Impacts

The Visual Impact Assessment (VIA) acknowledges:

- **Moderate to high significance visual impact** at the key public viewpoint: Young Street × Danks Street (VIA pp. 53–58).
- **Low to moderate impact** from all other major public vantage points.

The VIA also recognises a “**high magnitude of change**” created by the tower, yet concludes the impact is acceptable based on strategic housing policy—not neighbourhood reality.

Residents of Thread Lane were not provided any simulated viewpoints from our location.

4. Misleading and Unrepresentative VIA Photomontages

The VIA’s photomontages do **not** accurately represent the true visibility or aesthetic of the proposed tower:

- **Colour Misrepresentation**

The building’s façade is depicted in **lighter, softer tones** than those shown in the **Architectural Design Report**.

This visually minimises mass and reduces the perceived dominance of the tower.(figure 40 in VIA report)

- **Building Hidden Behind Trees**

Many VIA view angles place **mature trees in the foreground**, obscuring major portions of the tower.This contradicts NSW LEC Photomontage Guidelines, which require unobstructed, realistic visibility (figure 25, figure 33, figure 37 in VIA report)

- **Non-representative Viewpoint Selection**

The VIA does not include any views from the major northern approach along Bourke Street, specifically:

- Corner of Bourke Street and McEvoy Street, and
- Further south along Bourke Street approaching the site

These are primary public gateways into the suburb and are the most direct and commonly used viewing corridors for residents, pedestrians, cyclists, and vehicles.

5. Environmental Impacts Not Properly Addressed

The *Environmental Impact & Rezoning Statement* does not provide adequate assessment of:

- **Wind Tunnel Effects**

Based on the height and placement of the 125m tall tower, wind tunnel and downdraft effects are most likely along:

- **Bourke Street**, where downward wind flow off the tower will accelerate along the long north–south corridor.
- **The proposed new public park**, where downdrafts will fall directly into the open space, reducing safety and comfort.
- **Thread Lane**, due to narrow street geometry that will channel wind sideways and create localised tunnel effects near the Bourke Street intersection.

The EIS does **not** include any computational wind modelling or pedestrian comfort assessment, despite the recognised risks at these exact locations.

- **Wildlife Impacts**

No mitigation for bird strikes on the extensive glass façade is provided despite proximity to green corridors and several parks.

6. Traffic, Transport, & Local Infrastructure Strain

The EIS describes the area as “well served by transport”, but does not address:

- Current congestion on Bourke Street
- Bus capacity constraints
- Increased pressure on small residential lanes
- Lack of modelling for pedestrian–vehicle conflict

The traffic analysis is not proportionate to a tower of this scale.

7. Public Exhibition Process Did Not Enable Genuine Community Understanding

Many residents, especially those in Thread Lane and Bourke Street, could not understand the technical diagrams—particularly solar access and height studies. Critical information was buried within technical documents, without simple explanatory summaries.

The exhibition:

- Was **too short** for a development of this magnitude
- Did **not** include clear, digestible diagrams for the public
- Provided no direct engagement sessions
- Left many residents unaware of the full impacts on solar access, traffic, or visual dominance

Request:

I request that the Department require:

- Extended public exhibition, and
- Clear, accessible community-facing materials, including:
 - Simple shadow diagrams for surrounding streets
 - Height illustrations
 - Viewpoints from *Thread Lane*

- In-person community consultation

8. Conclusion & Formal Request

The proposal, in its current form, does not provide sufficient information, analysis, or justification to support the introduction of a 36-storey tower in a predominantly low-rise residential neighbourhood governed by a 24m height control. Key impact assessments—including overshadowing on existing housing, accurate visual simulations, wind environment testing, traffic impacts, and clear disclosure of the building's actual height—are incomplete, inconsistent, or missing from the public exhibition material. This prevents residents and decision-makers from understanding the true consequences of the development.

Given these unresolved issues, the proposal cannot be considered to have demonstrated acceptable planning merit, nor does it achieve the transparency and rigour expected of a State Significant Development. The scale, massing, and likely height of the tower would result in irreversible changes to the character of Waterloo, substantial public domain impacts, and disproportionate burdens on the surrounding community.

Accordingly, I respectfully request that the Department:

1. **Reject the 36-storey tower in its current form**, on the basis that it significantly exceeds the LEP height limit and has not demonstrated that its impacts can be adequately mitigated.
2. Require the proponent to submit a **substantially revised scheme** that:
 - **Complies with the 24m height control**, or provides a clear, evidence-based and community-tested justification for any variation.
 - Includes **complete and accurate overshadowing analysis** on Thread Lane and surrounding residential streets.
 - Provides **truthful, guideline-compliant visual impact simulations**, including views from Bourke Street, McEvoy Street, and other realistic public approaches.
 - Undertakes **wind environment modelling** for Bourke Street, Thread Lane and the adjoining public park.
 - Addresses traffic, pedestrian safety, and infrastructure impacts with updated modelling.
 - Delivers a **transparent and accessible community engagement process**, with clear summaries, diagrams, and adequate exhibition time to allow meaningful public participation.

A proposal of this scale demands clarity, rigour, and responsible planning. Until these fundamental concerns are resolved, the current application should not proceed.

Kind regards,

Resident
2 Thread Lane, Waterloo NSW 2017