

# SSD-80441462 — Objection Submission (881–885 Bourke Street, Waterloo)

**Submission to:** NSW Department of Planning, Housing and Infrastructure

**Application:** SSD-80441462 — Waterloo Mixed Use Development, 881–885 Bourke Street

**Contact Planner:** Chris Eldred — 02 8289 6855

**Position:** Object

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## Submission text (ready to paste)

Dear Assessment Team,

I am a resident of a street immediately adjacent to the proposed development site and write to formally object to SSD-80441462 in its current form. While I support well-planned densification in appropriate locations, this proposal is, in my view, materially out of step with its context, unsupported by the surrounding infrastructure, and a significant departure from the planning framework under which this site was originally approved.

My objections are as follows.

### 1. Excessive height, wholly out of character with the neighbourhood

The proposed built form — including a 36-storey tower reaching approximately 125m — is more than double the height of any surrounding building in the precinct. Recent and current developments in the immediate area sit between 4 and 13 storeys. The proposal creates an abrupt and visually jarring transition with no meaningful modulation, dominating the streetscape and the skyline from multiple public vantage points. A tower of this scale belongs at a major transit intersection (e.g. Green Square, Waterloo Metro, Wollie Creek) — not on a mid-block site on Bourke Street.

## **2. Substantial and unjustified departure from the approved planning controls**

The site already has a development approval that was granted under significantly lower height and FSR controls. The current proposal seeks an extraordinary uplift — from approximately 29m to 125m in height, and from an FSR of 2.15:1 to 3.05:1 — without commensurate public benefit. Residents and neighbouring owners made purchasing and investment decisions based on the existing planning framework and the previously approved envelope. Allowing this magnitude of uplift, on a site that already had an approved scheme, undermines the predictability and integrity of the NSW planning process. If a shorter building was acceptable to the proponent at application stage, the onus is on them to demonstrate why that scheme is no longer viable — not simply to request substantially more.

## **3. Loss of sunlight and solar access to surrounding residences**

The scale and positioning of the proposed towers will materially reduce sunlight to existing residential buildings in adjacent streets, including my own residence. I note that the proponent's own Solar Access report (E3 Architectural Design Report, A2 Solar Access) does not appear to assess impacts on a number of directly affected residential buildings in the precinct — including Cameo (6 Lachlan Street), Aria (4 Lachlan Street), and other west-facing dwellings along adjoining streets. This is a significant gap in the EIS and should, in my view, require the assessment to be re-exhibited once completed.

## **4. Dangerous precedent for the precinct**

Approving a 36-storey tower on this site — which is not adjacent to a major transport interchange and sits among 4–13 storey built form — will establish a precedent for further disproportionate upzoning across Waterloo. Other landowners will reasonably point to this approval as justification for equivalent uplifts on their own sites, progressively eroding the character and amenity of the precinct. This is inconsistent with the orderly development objectives of the *Environmental Planning and Assessment Act 1979*.

## **5. Inadequate transport infrastructure**

Waterloo has no train station. The Waterloo Metro is approximately a 15-minute walk and is closer to Redfern than to this site. Bus services — particularly the 304 along Bourke Street — are already consistently at or near capacity during peak periods. The 392 and 348 are similarly overcrowded. Adding

approximately 850 dwellings to this corridor, without any committed upgrade to public transport frequency or capacity, will push existing services beyond their functional limit.

## **6. Traffic congestion and road network impacts**

Local streets are already heavily congested, particularly at the Bourke/Lachlan, Bourke/Danks, and Bourke/McEvoy intersections. Residential streets in the precinct are increasingly used as rat-runs to avoid arterial bottlenecks, degrading safety and amenity. The Traffic Impact Assessment accompanying the proposal does not, in my view, adequately model cumulative impacts from this development combined with the adjacent Dasco project, the Waterloo Metro precinct, and the broader Waterloo Estate renewal.

## **7. Local services are at capacity**

Existing community services — schools (Green Square Public School is already operating at capacity and there is no nearby public high school), local medical clinics, and healthcare facilities — are stretched. The proposal provides no meaningful commitment to additional social infrastructure to support an influx of residents of this scale.

## **8. Inadequate public open space**

The central park proposed as a public benefit is small, heavily enclosed by buildings of 13–36 storeys, receives limited winter sunlight, and lacks meaningful recreational function (no play equipment, limited open lawn, no dog-friendly areas). It cannot reasonably serve the open-space needs of 850 new households in addition to existing residents. Moore Park and existing local open spaces are already operating at capacity.

## **9. Cumulative construction impacts**

The precinct is already experiencing sustained construction activity from multiple concurrent developments. Residents are living with ongoing noise, dust, vibration, heavy-vehicle movements, and street disruption. Adding a development of this scale — which will involve multi-year construction at significant height — will compound these impacts substantially. I request that any approval, in any form, include an enforceable and publicly available Construction Management Plan addressing noise limits, operating hours, haulage routes, and cumulative coordination with other active sites in the precinct.

## Requested outcome

For the reasons above, I respectfully request that the Department:

- **refuse the application in its current form**, or alternatively
- require substantial amendments, including a significant reduction in maximum building height (aligned with surrounding built form), a redistribution of massing away from adjoining residential interfaces, a complete and transparent solar access assessment covering all affected residential buildings, and an enforceable Construction Management Plan.

I do not oppose development on this site. I oppose a development of this scale, at this height, on this site, under the current planning framework.

Thank you for considering my submission.

Yours sincerely,

Hugo Welke

Unit Owner on Danks Street