

Application Number SSD-95997711

Project Name: **903-921 Bourke St Waterloo Mixed Use Development**

I object to the approval of, for the following reasons,

1. I believe that the assessment SSD-95997711 application cannot be done in a vacuum and that the assessment should take into account the cumulative effects of adjacent developments **SSD-95997711 - 903-921 Bourke St Waterloo Mixed Use Development 881-885 Bourke St Waterloo –Waterloo Mixed Use Development – SSD-80441462 (the Coronation Development) for 850 apartments, the 923-935 Bourke St Waterloo Development (Development Application - D/2024/1208 – the Woolworths Development) for 121 apartments, the adjacent 224-234 Young St Waterloo (Development Application D/2025/944 – the Scape Development) for 283 apartments, when assessing whether to approve the increase from 347 to 580 apartments in the 903-921 Bourke St Waterloo Mixed Use Development.**

These **4** above mentioned developments when considered together demonstrate there is a far greater impact on the local area than just considering the proposed change to the **903-921 Bourke St Waterloo Mixed Use Development in isolation.**

If this SSD is approved, the number of apartments over the 4 adjacent sites will be in excess of 1850 apartments. This is without considering whether the proposed **923-935 Bourke St Waterloo** development will also seek increased height and apartment number under a similar SSD application.

2. Effect on 887 to 901 Bourke St – The Boronia Apartments

The current SSD proposal increases the height of the currently approved 2 apartment towers on the **903-921 Bourke St Waterloo** development. For one tower which is to be sited immediately on the southern side of the Boronia Apartments there is a proposed increase is from 12 to 31 storeys (a 155% increase). For the second tower on the western side closely adjacent to the Boronia Apartments there is a proposed increase is from 21 to 38 storeys (an 80% increase).

The developer of **881-885 Bourke St Waterloo** (the Coronation Property Development) has a proposed 35 storey tower on Bourke St closely adjacent to the northern side to The Boronia Apartments.

These 3 towers will dwarf the Boronia Apartments which is only 5 levels, cutting out large amounts of natural light, creating wind tunnels and one would assume creating a noise bowl trapping noise with the confines of the 3 towers.

It needs to be noted that the Boronia Apartments are designed without air-conditioning, relying on natural airflow to control temperature, which will also be affected by these towers.

City West Housing (the developer and owner of the Boronia Apartments) in their objection to SSDA-80441462 - 881-885 Bourke St Waterloo makes the point that the 35-storey tower proposed for this site does not provide adequate solar access to 887 to 901 Bourke St – The Boronia Apartments. I will think that the addition of the other 2 30+ towers to the south and west of the Boronia Apartments will only make this worse.

Further the closeness in proximity of 3 x 30+ storey towers will severely and adversely impact the amenity for the residents of the Boronia Apartments who are enclosed by these towers on 3 sides.

3. Towers are not in keeping with the surrounding area

There are currently no towers of the size proposed under the SSD in the near vicinity of the **903-921 Bourke St Waterloo** development. Towers of this size are completely disproportionate and out of place for the local area.

There nearby Redfern Public Housing Towers are only 16 Storeys. The nearby Meriton development on the old ACI Glass site (bounded by Bourke, Lachlan and Crescent Sts Waterloo) reach a maximum height of about 16 storeys. The Crown Waterfall development, 18-20 O’Dea Avenue, Waterloo is 22 storeys.

At 38 storeys one of the towers is approx. 60% taller than the current nearby tallest building in Waterloo, being the Crown Waterfall development and is an 80% increase on the currently approved height for this tower (approved at 21 storeys). At 31 storeys the Bourke St tower is a 155% increase in the currently approved height for this tower (approved at 12 storeys).

Towers of the height proposed and closeness in proximity to each other are completely out of keeping and out of balance with building heights in the local area. The overbearing visual outlook created by the 3 towers will adversely affect the amenity all residents currently living in the area particularly those to the immediate east, west and south of the development.

4. Transport Impact Assessment

The effect of this development must be considered in the light of surrounding developments being the **Coronation Development** and the proposed developments of **923-935 Bourke St Waterloo** (the Woolworths development) and the Scape Student Accommodation development (283 residential units - **224-24 Young St Waterloo** – opposite **903-921 Bourke St Waterloo** Development).

It needs to be noted that the Scape Development will not have any off-street Parking and assumes the residents will all be using a mix of bicycles and public transport.

In considering the 4 developments, there will be in excess of 1850 apartments in the immediate area seeking to use the meagre and already stretched public transport in the local area.

The JMT Consulting Transport Impact Assessment Document appears to suggest there is ample Public Transport until you take a deeper dive into it. The document uses incorrect information that gives the misleading appearance of sufficient public transport. Out of date information appears to have been taken from a JMT Consulting document prepared in September 2022 supplied to Sydney City Council in support of the 923-925 Bourke St Waterloo (Woolworths) Development.

4.1 Buses

4.1.1 Non-Existent or changed Bus Routes

On page 7 of the JMT document in regard to available bus routes, it references as being available to the Development

- The M20 - route no longer exists.
- The 301 - route no longer goes through Waterloo.
- The 302 - route no longer exists.
- The 303 - route no longer goes through Waterloo.
- The 343 - Route now only goes from Rosebery along Elizabeth St (Waterloo) to Circular Quay – it is currently not a widely used Bus Route

4.1.2 Current Bus Routes

The closest bus route to **903-921 Bourke St Waterloo** going to the city is the 304.

The 304 bus route commences at East Village in Zetland (estimated population of Zetland in 2026 is in excess of 15,000) servicing this development, it then goes up through Gadigal Ave servicing the apartments in Gadigal Avenue and then into Potter St Waterloo where the first bus stop is located opposite **903-921 Bourk St Waterloo** development but this bus stop also services the large Meriton apartment complexes on the east side of Bouke St Waterloo opposite the **903-921 Bourke St Waterloo** development.

DASCO, the developer of **903-921 Bourk St Waterloo**, is also currently constructing the 44-48 Odea Avenue Development (**the Aware Super Development**) adding an additional 400 apartments to the area. The Aware Super project is less than 300 meters from **903-921 Bourke St Waterloo** development. The 304 bus using Gadigal Avenue will also service the apartments of the Aware Super Development.

- 4.1.3** Public transport in the area has gradually been reduced over the last 10 years, for example there was previously 3 buses on Bourke St going to Circular Quay – now there is only 1.

The buses at the closest bus stop on Bourke St during rush hour to the city are problematic. There are usually more people trying to get on than the buses can cope with.

These developments will add over 2250 apartments across 5 developments. These buses are currently already full or close to full when they arrive at the local bus stops. The additional 233 apartment proposed for the 903-921 Bourk St Waterloo Development are only going to make what is going to be an extremely bad and overcrowded bus service worse and should not be approved on this basis alone.

4.2 Trains

- 4.2.1** While there are 2 trains stations in the vicinity – Green Square and Waterloo Metro both are over 1 km from the **903-921 Bourk St Waterloo** Development and there are no buses from these stations to the **903-921 Bourk St Waterloo** Development.

- 4.2.3** The walk from the Waterloo Metro to the **903-921 Bourke St Waterloo** development requires a very steep uphill walk. Which in reality only the young or fit would undertake. As such I would submit that little reliance should be placed on the use of the Waterloo Metro as a public transport option for **903-921 Bourke St Waterloo**.

4.3 Road

The **903-921 Bourke St Waterloo** development proposes to use Young St as the street by which residents will access their off-street car parking spaces.

Residents coming from the East or from Southern Cross Drive or along Bourke St from the south and entering McEvoy St cannot turn right into Young St. Essentially the **903-921 Bourke St Waterloo** development will create a rat run along Danks St or Philip St to access Young St. Only residents approaching from the west will be able to access Young St from the south end of Young St.

When residents driving vehicles depart the **903-921 Bourke St Waterloo** development, they will either drive north along Young St towards to city or the head south if going to the east or to pick up the Southern Cross Drive and the Eastern Distributor. Vehicles travelling south are forced to turn left into McEvoy St (by a left hand turn only sign) and then enter Bourke St.

The intersection of McEvoy, Bourke St and Lachlan Sts is one of the worst designed intersections in Sydney and adding additional traffic is going to both cause greater delays than currently exist and cause more accidents.

When entering Bourke St, the traffic can go north to the city or south towards the airport.

However, after immediately turning left on to Bourke St there is a second set of traffic lights for traffic going north or to the east or to pick up the south bound Southern Cross Drive. This is a bottle neck at the best of times. If turning south the traffic will be heading for the airport or will make a left-hand turn (rat run) into Archibald Avenue a narrow local street to pick up Lachlan St and access to Southern Cross Drive. Archibald Avenue is used by local traffic and pedestrians to access their apartments or local parks.

Adding additional traffic in this area from the 3 developments will create a nightmare for all residents. The developers just pick up and go when they are finished.

4.4 Pedestrian and Cycling

The statement in the JMT report that the pedestrian environment in the vicinity is strong with pedestrian footpaths provided on both sides of the surrounding streets sounds good but does not work.

On the west side of Bourke St, the footpath is narrow with council garden plantings making it worse. Pedestrians rarely use this footpath as they are likely to be hit by bike riders at high-speed using the narrow path who have no consideration of other users. No government authority is taking an interest in this problem.

Most pedestrians use the east side of Bourke St which is also narrow and made narrower by council garden plantings but still have to contend with rude bike riders who just bully their way past.

The document references extensive cycleways in the immediate vicinity – there are no dedicated cycleways in the immediate vicinity. All these cycleways are shared narrow footpaths.

5. Social Impact Assessment for SSD Housing

The Document “**Social Impact Assessment for SSD Housing – Proposed Alterations and Additional 903-921 Bourke Street Waterloo – SSD-95997711**” prepared by Sarah George Consulting March 2026, states

5.1 At Page 7 that an agreement has been made with the City of Sydney Council to provide a \$40 million contribution to the Council’s Affordable Housing fund. While

the cause for which the monies are provided is laudable, could such a large contribution give rise to a perception that any favourable decision made in regard to this development have in some way been influenced by this contribution?

- 5.2** At Page 9 it states that the number of households not owning a car in Waterloo is 37.4%. This would mean that 62.6% of households do own cars.

However, in regard to this SSD application there is only a 15% increase in off street parking in **903-921 Bourke St Waterloo Development** (i.e. 36 extra spaces provided) to accommodate the increase in number of units (233 extra units). This is nowhere near the 62.6% of required additional off-street parking.

As a result, new residents' vehicles will be parked on already overcrowded local streets. As such the changes in the number of apartments as set out in this SSD should be rejected.

6. Solar Access

- 6.1** I live on the west side of 830 Bourke St about 50 – 60 meters from the proposed 31 storey Bourke St Tower and about 60 meters from the proposed 38 storey tower. I find it very difficult to believe the Solar Access Report showing my unit will have plenty of sunlight on the winter solstice. My unit is already in shadow from my own building until the sun has passed into the north-west sky and using page 2 of the report as a guide this supposedly occurs about 10am. I do not believe this is correct but rather it occurs much later in the day. On writing this submission at 11:30am on 18 April my unit is still in the shadow of my own building. Page 2 shows my unit is then in the shadow of the towers at 11am.

The report does not seem to me to be an accurate assessment of the shadowing effect.

- 6.2** Why is it that a developer has the right to reduce the amount of direct sunlight I or other residents currently receive. It seems little to no consideration has been given to residents with the Solar Access Document writing this off by stating that the residents get at least the minimum 2 hours prescribed by the Council of the City of Sydney.

Why does the SSD application seek to rely on meeting absolute minimum standards as its goal. I believe a good corporate citizen should do better than that. I find this a deplorable money driven attitude which is devoid of any respect for the local community.

6.3 Development not in Keeping with NSW Government Guidance Principals for Sunlight / Shadowing as put forward for the nearby Waterloo Estate Re-Development

Currently there are 2 x 30 level towers in the Waterloo Housing Estate – the **Matavai and Turanga** towers, they currently dominate the Waterloo skyline to the west. They are to be demolished and replaced as part of the NSW Government’s redevelopment of the Waterloo Housing Estate.

The NSW Department of Housing website states that 4 new Towers are proposed to be included in the redevelopment of the Waterloo Housing Estate - varying in height between 27 and 33 Storeys and states,

“The location of the buildings and how they can be positioned on the block will help to minimise the shadow from buildings falling on outdoor areas, existing homes and new homes. This will make sure that sunlight can come into homes and outdoor areas, such as court yards and parks.”

Considering the location and spacing of the proposed 4 new towers for the Waterloo Housing estate will not dominate the Waterloo skyline, whereas the proximity of the proposed 3 towers on the Danks St District / Coronation developments will achieve the opposite of what the State Government is attempting to achieve in its nearby by Waterloo Housing Estate Re-Development.

The 3 Towers in the 881-885 and 903-921 Bourke St Waterloo developments taken together will create a wall that is both an enormous in height and breadth and will create a visual blight on the skyline and will be an affront to the current residents of Waterloo.

From whichever direction these towers are viewed, they will reduce light and the visual outlook of all currently living in the area particularly those to the immediate east, west and south of the development.

7. Provides an Unwanted Precedent for Future Developments

The approval of the 31 and 38 storey towers will provide a precedent for other nearby developments such as Woolworths development on 923 to 935 Bourke St Waterloo. The Woolworths development is currently proposed to have 5 and 7 storey residential blocks. Why would they not also want to have at least 1 x 30+ storey tower?

8. Development causing dust and dirt accumulation for nearby residents

The current developments of 881-885 and 903-921 Bourke St Waterloo are disturbing so much dust and dirt for neighbouring properties, and the developers are making no

attempt to retain the dirt and dust within their property. Our balconies and windows are just filthy compared to before the developments commenced.

9. Building Foundations have already been laid

The foundations of the 2 towers of **903-921 Bourke St Waterloo** development have already been laid before any approval of the additional height has been granted. As the existing DA approval is for 2 towers of 12 and 21 storey towers, it raises the question of whether these foundations are sufficient to take into account increased vertical load, higher lateral forces (wind/seismic) and increased settlement risks for buildings that are 31 and 38 storeys?

The last thing anyone wants is to revisit are the Mascot Towers and the Opal Towers disastrous building developments.

Conclusion

It is concerning that if the SSD application contains easily verified inaccuracies such as the incorrect bus routes in the area, then

- 1. what other inaccuracies are contained in the supporting documentation which are more difficult to identify?**
- 2. how closely has the SSD application been vetted by the applicant to detect such errors?**
- 3. how much reliance can be placed on the documentation provided by the applicant in support of the SSD application?**

I believe SSD-95997711 - 903-921 Bourke St Waterloo Mixed Use Development should not be approved for the reasons provided above as it is of no benefit to the local community.

If the SSD is approved the local community will be left having to deal with the fall out of the problems that it will cause, which will then become problems for the government to resolve.