

Felicia Lauridsen
Wellington Street, Waterloo 2017
25 April 2026

To: Department of Planning, Housing and Infrastructure

Re: Objection to SSD-95997711 – 903–921 Bourke Street, Waterloo

As a long term Waterloo resident (I have lived on Danks Street and Wellington Street for the past decade) I write to formally object to the amendments proposed under SSD-95997711.

I am not against development on this site. I supported the original approval (D/2021/1415, granted 16 February 2023) for 376 apartments across six buildings up to 21 storeys, which went through a proper competitive design process and community consultation. What is being proposed now is not a minor tweak - it is a near-doubling of the original scheme's scale, and it deserves proper scrutiny.

My 3 main concerns are scale, transport, and affordable housing, followed by a number of other issues I believe require thorough investigation.

1. The proposed heights are excessive and out of character

This application proposes increasing the Young Street Tower from 22 to 38 storeys and Bourke Street North from 13 to 31 storeys - requiring LEP amendments to raise the tower height limit from 65 metres to 126 metres, and Bourke Street North from 40 metres to 105 metres (EIS, Section 1.4.3, Sutherland & Associates, March 2026). These are not incremental changes.

I have walked these streets for ten years. The area around Bourke Street, Danks Street, and Young Street has an established mid-rise character. A 38-storey tower will be the dominant structure in this part of Waterloo by a significant margin.

That original approval reflects exactly the kind of thoughtful, design-led densification that the City of Sydney Council, under the stewardship of Lord Mayor Clover Moore, has championed for many years. The Green Square urban renewal area - of which this precinct forms part - is a clear example of what coordinated, well-governed density can achieve: vibrant mixed-use streets, generous public open space, activated ground planes, and a diversity of housing types delivered at a scale that responds to and respects the existing neighbourhood. It is precisely because I value this model of development - one grounded in community consultation, design excellence, and local planning frameworks - that I am troubled by an application that seeks to bypass those processes entirely through the Housing Delivery Authority pathway.

The applicant's own Wind Report (MEL Consultants, Appendix 33) also concedes that "some localised mitigation measures may be required to achieve sitting comfort" at ground level. I use the streets and public spaces around this site every day, and promising post-hoc mitigation is not the same as getting the scale right.

2. The transport and parking analysis does not hold up

The proposed development adds an additional 233 apartments but only around 30 additional car spaces - an 8% increase in parking for a 67% increase in dwellings (TIA, JMT Consulting, Table 4, February 2026). There are several serious problems with how this has been assessed:

- The traffic generation calculation is based solely on on-site parking spaces, not on apartments. The TIA explicitly states: “it is appropriate to forecast traffic movements based on the quantum of parking provided within the site” (TIA, p.27). Every resident of the 233 new apartments who owns a car but has no allocated space is invisible in this analysis. The resulting claim of only 3-4 extra vehicle movements in peak hours (TIA, Table 8) is therefore a significant underestimate. Spill-over parking demand on surrounding streets (the streets I live on) has not been assessed at all.
- The TIA’s assumptions about low car ownership are applied uniformly across all apartment types, including 118 three-bedroom and 20 four-bedroom apartments. No sensitivity analysis has been provided to test whether this holds for larger family-oriented units.
- The TIA projects up to 191 additional peak-hour bus and metro trips and simply asserts existing services “can accommodate” this demand (TIA, Section 4.10). Route 304 on Bourke Street - which I use regularly - is already crowded in the mornings. No additional public transport capacity has been committed to. Transport for NSW’s response to the consultation asked only for a Green Travel Plan (Engagement Report, Section 4.4.1), which does not address actual service capacity.
- Most significantly, the traffic modelling in this TIA relies on precinct-wide assessments done for the original Danks Street South planning proposal (2019) and signed off by TfNSW in July 2022 for the original DA. The adjacent Coronation site - a separately lodged HDA application for 850 additional dwellings immediately to the north - is not included in any of this modelling. No cumulative traffic assessment has been provided that accounts for the combined population growth of all active and proposed developments in this precinct.

I ask the Department to require a fresh, **independent** transport assessment that accounts for spill-over parking, tests car ownership assumptions against the actual unit mix proposed, and models cumulative traffic impacts across the full Danks Street South precinct including the Coronation site.

3. The affordable housing approach is inadequate

No affordable housing units will be built on this site. Instead, the application proposes a cash contribution of approximately \$40 million to the City of Sydney’s Affordable Housing Fund, embedded in the Sydney LEP via Schedule 6C as a requirement for 12% of the floor area representing uplift above a 2:1 FSR (EIS, Section 1.4.3). The developer’s own report confirms: “The subject proposal does not include affordable housing, but makes a significant (~\$40M) contribution to the City of Sydney’s Affordable Housing fund to fund future affordable housing projects” (Engagement Report, Section 4.1).

This means 580 market-rate apartments are built in Waterloo, a levy is paid, and affordable housing becomes the City of Sydney’s problem to deliver somewhere in the LGA at an unspecified time. I have watched what unaffordability has done to this community over the past decade. A development of this scale, extracting this level of uplift through a rezoning, should be delivering affordable units on-site - not deferring the obligation elsewhere.

Other concerns

Ground contamination from the former Lawrence Dry Cleaners

The applicant’s own contamination report (EI Australia, Appendix 13A, February 2026) confirms that the former Lawrence Dry Cleaners to the north-east is an identified source of contamination migrating onto the site. Contaminants, including perchloroethylene, TCE, cis-DCE, and vinyl chloride have been detected in soil vapour in the northern portion of the site (Appendix 13A, pp.3–4). The SSDA now proposes a new basement at the Young Street

North (YSN) building in this affected area, where the original approved plan had only a slab-on-ground design. The contamination report advises this basement requires a tanked design with vapour-proof membranes (Appendix 13A, p.5). The original contamination reports were prepared for a different basement configuration. I ask the Department to require an updated, independent contamination and vapour intrusion assessment before any consent is granted.

Community infrastructure; no assessment provided

The Social Impact Assessment acknowledges community concerns about schools and services but offers only that “the State Government has plans to increase infrastructure” - no timeline, no capacity data (SIA, p.15). No school capacity or community infrastructure assessment has been submitted with this application. Given the cumulative population growth from multiple active development sites in this precinct, I ask the Department to require one.

Construction timeline

No revised construction programme has been published with this application. Residents living near an already-active construction site cannot assess the full impact of this amendment without knowing how much longer construction will extend. I ask that a clear construction timeline be required as part of the assessment.

What I am asking for

I ask the Department to require the developer to revert to the consented development under D/2021/1415 as modified or, if some level of uplift is considered acceptable, to impose conditions that at minimum:

- substantially reduce the proposed tower heights to be proportionate to the surrounding built form;
- require a transport assessment that accounts for spill-over parking demand and cumulative precinct-wide traffic impacts;
- require a verifiable commitment to additional public transport capacity; and
- mandate a meaningful proportion of on-site affordable housing, not a deferred cash contribution.

I have lived in this neighbourhood for ten years and I want to see it continue to grow through considered, community oriented development

Sincerely,

Felicia Lauridsen

Waterloo NSW 2017

Resident since 2016