

Troy Filson
409 / 17 Danks Street
Waterloo NSW 2017

27 April 2026

Re: Proposed Increase in Gross Floor Area and Floor Space Ratio – State Significant Development (SSD - 95997711) – Waterloo

Dear NSW Department of Planning, Housing & Infrastructure,

I am writing to formally object to the proposed amendment seeking an increase in gross floor area (GFA) and floor space ratio (FSR) for the above State Significant Development.

I acknowledge the importance of housing delivery across metropolitan Sydney and support sensible development plans. However, any uplift in density must be accompanied by demonstrable infrastructure capacity, transport capability, and proportional public benefit. In my view, the current proposal does not adequately satisfy these requirements.

My concerns are set out below.

1. Infrastructure Capacity and Cumulative Impact

The proposal seeks to increase dwelling numbers without demonstrating corresponding upgrades or confirmed capacity across supporting infrastructure, including:

- Local road network performance and intersection capacity
- Stormwater and sewer infrastructure
- Electrical and utilities capacity
- Waste collection and servicing logistics

The surrounding streets, particularly Bourke Street and the Danks Street precinct, are already heavily congested and subject to significant construction-related strain. No updated Traffic Impact Assessment has been provided to demonstrate that the existing network can accommodate additional vehicle movements, service vehicles, rideshare activity, and delivery traffic generated by increased density.

State Significant Development requires assessment of cumulative impacts. The precinct has experienced substantial recent intensification, and further uplift without infrastructure expansion risks compounding existing pressure.

2. Public Transport Limitations

The site is not located within a comfortable 800-metre walking catchment of a major rail or metro station.

The nearest heavy or metro rail services — Green Square, Waterloo Metro, Redfern Station, and Surry Hills Light Rail — are each approximately one kilometre or more from the site. Bus services remain the primary transport mode; however:

- Bus corridors are already operating within congested road environments
- There are no dedicated bus priority lanes on Bourke Street
- No additional transport upgrades are proposed in connection with the uplift

Increasing residential density in the absence of improved transport infrastructure risks further congestion, increased private vehicle reliance, and diminished amenity for existing residents.

3. Lack of Proportional Public Benefit

The requested increase in GFA and FSR does not appear to be accompanied by additional measurable community benefit, including:

- Increased affordable housing provision
- Expansion of public open space
- Delivery of community facilities
- Infrastructure contributions secured through a Voluntary Planning Agreement (VPA)

Density uplift must be balanced by tangible public outcomes. In the absence of additional community benefit, the proposal raises concerns regarding proportionality and planning equity.

5. Pedestrian and Cycling Safety

Bourke Street functions as a primary traffic corridor yet lacks protected cycling infrastructure. The increase in population density will:

- Intensify pedestrian movement
- Increase vehicle and delivery activity
- Heighten safety risk for cyclists and pedestrians

No evidence has been presented that pedestrian crossings, traffic calming measures, or cycling infrastructure will be upgraded to accommodate increased demand.

Without corresponding safety and public domain improvements, the proposal places additional burden on already constrained streets.

6. Insufficient On-Site Parking Provision

The proposed increase in gross floor area and dwelling yield is not accompanied by a corresponding increase in on-site car parking.

While we acknowledge broader planning objectives aimed at reducing car dependency, the subject site is not within an 800-metre walking catchment of high-capacity rail infrastructure. As previously noted, bus services remain the primary transport mode and operate within congested corridors.

In this context, the absence of additional parking provision is likely to result in:

- Increased demand for already limited on-street parking
- Heightened circulation traffic as vehicles search for spaces
- Additional congestion on Bourke Street and surrounding local roads
- Increased conflict between residents, visitors, service vehicles and commercial users

The proposal does not provide updated modelling to demonstrate that existing street parking capacity can absorb the projected uplift in demand.

Density uplift without corresponding transport infrastructure or parking strategy risks transferring the burden from the development site to the surrounding community.

7. Lack of Additional Communal Open Space and Green Infrastructure

The proposed uplift does not appear to include additional communal open space, landscaped areas, or public domain enhancements proportionate to the increase in density.

The Danks Street precinct has experienced significant intensification in recent years. Further increase in dwelling numbers without expansion of green infrastructure may result in:

- Reduced per-capita access to open space
- Increased pressure on existing public parks and footpaths
- Diminished urban canopy and tree cover
- Exacerbation of urban heat island effects
- Reduced residential amenity and outdoor recreation opportunities

Open space and green infrastructure are not discretionary amenities — they are critical components of sustainable urban density.

Increased FSR without meaningful enhancement of communal or publicly accessible green space risks undermining the long-term liveability and resilience of the precinct.

Conclusion

I respectfully request that the proposed increase in GFA and FSR not proceed unless:

1. Independent modelling demonstrates sufficient infrastructure and road capacity;
2. Transport impact assessments are updated and publicly reviewed;
3. Proportional public benefit is secured; and

4. Pedestrian and cycling safety measures are meaningfully addressed.

We ask that the NSW Department of Planning, Housing & Infrastructure reconsider the proposed uplift in light of cumulative precinct impacts and the absence of commensurate infrastructure expansion.

I would welcome further engagement should the proponent wish to discuss these concerns in detail.

Yours sincerely,

Troy S. Filson

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