

Jan van Deventer
Unit 409, 17-19 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 write 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.

While I support sensible housing delivery, any density uplift must be accompanied by demonstrable infrastructure capacity, transport capability, and proportional public benefit. The current proposal does not adequately satisfy these requirements.

1. Infrastructure Capacity and Cumulative Impact

The proposal increases dwelling numbers without demonstrating corresponding upgrades to supporting infrastructure. No updated Traffic Impact Assessment has been provided for the local road network, stormwater, utilities, or waste servicing. The surrounding streets — particularly Bourke Street and the Danks Street precinct — are already heavily congested. Further density without infrastructure expansion risks compounding existing pressure across the precinct.

2. Public Transport Limitations

The site is not within an 800-metre walking catchment of a major rail or metro station. The nearest services — Green Square, Waterloo Metro, Redfern, and Surry Hills Light Rail — are each approximately one kilometre or more away. Bus services remain the primary transport mode but operate within congested corridors with no dedicated priority lanes on Bourke Street. Increasing residential density without improved transport infrastructure risks greater congestion and private vehicle reliance.

3. Lack of Proportional Public Benefit

The requested GFA and FSR increase is not accompanied by measurable community benefit. There is no additional affordable housing provision, public open space, community facilities, or infrastructure contributions secured through a Voluntary Planning Agreement (VPA). Density uplift without tangible public outcomes raises concerns regarding proportionality and planning equity.

4. Pedestrian and Cycling Safety

Bourke Street functions as a primary traffic corridor yet lacks protected cycling infrastructure. Increased population density will intensify pedestrian movement,

vehicle activity, and safety risks for cyclists and pedestrians. No evidence has been presented that crossings, traffic calming measures, or cycling infrastructure will be upgraded to accommodate increased demand.

5. Insufficient On-Site Parking Provision

The proposed increase in dwelling yield is not accompanied by additional on-site parking. Given the site's distance from high-capacity rail, this is likely to result in increased demand for already limited on-street parking, heightened circulation traffic, and additional congestion on Bourke Street. The proposal provides no updated modelling to demonstrate that existing street parking capacity can absorb projected demand.

6. Lack of Communal Open Space and Green Infrastructure

The proposed uplift does not include additional communal open space or public domain enhancements proportionate to the increase in density. Further intensification without expanded green infrastructure risks reduced per-capita open space access, increased pressure on existing parks, diminished urban canopy, and exacerbated urban heat island effects. Open space and green infrastructure are critical components of sustainable urban density, not discretionary amenities.

Conclusion

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

1. Independent modelling demonstrates sufficient infrastructure and road network capacity;
2. Transport impact assessments are updated and publicly reviewed;
3. Proportional public benefit is secured through binding planning agreements; and
4. Pedestrian, cycling safety, and open space measures are meaningfully addressed.

I ask that the Department 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.

Yours sincerely,

Jan van Deventer

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