

# OBJECTION TO STATE SIGNIFICANT DEVELOPMENT APPLICATION

## Waterloo South Concept SSDA — SSD-93222706

Owners Corporation SP36476 — 110 Wellington Street, Waterloo NSW 2017

58 Lots | Owners Corporation Combined Submission | Deadline: 5:00pm Tuesday 2 June 2026

This is the combined objection of the Owners Corporation of SP69476. It is lodged by the Strata Manager, Daniel Russell-Cooper, GK Strata Management, on behalf of all 58 lot owners. Individual lot owners are also encouraged to lodge their own submissions at [planningportal.nsw.gov.au](https://planningportal.nsw.gov.au) → SSD-93222706 → Make a Submission before 5:00pm Tuesday 2 June 2026. Each individual submission counts separately toward the 50-objection IPC threshold.

### Submission Details

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|-----------------------|---|
| <b>To</b>             | NSW Department of Planning, Housing and Infrastructure  |
| <b>Application</b>    | SSD-93222706 — Waterloo South Concept SSDA  |
| <b>Proponent</b>      | NSW Land and Housing Corporation (LAHC) / Stockland / Waterloo Partnership                                      |
| <b>Submitted by</b>   | <b>Owners Corporation — SP69476</b>   |
| <b>Property</b>       | <b>110 Wellington Street, Waterloo NSW 2017 — 58 Lots</b>   |
| <b>Strata Manager</b> | Daniel Russell-Cooper, GK Strata Management   |
| <b>Contact</b>        | 02 8218 9999   <a href="mailto:daniel.russell-cooper@gkstrata.com.au">daniel.russell-cooper@gkstrata.com.au</a> |
| <b>Date</b>           | 29 May 2026   |
| <b>Nature</b>         | Owners Corporation Combined Objection   |

### 1. The Owners Corporation and Its Standing

The Owners Corporation of SP69476 represents all 58 lot owners of 110 Wellington Street, Waterloo NSW 2017 (Lots 1–58 SP 69476, also identified as Lot 101 DP 1044801 in the EIS site schedule). The complex consists of a total of three four-storey buildings and is residential strata situated on the northern side of Wellington Street, immediately west of its intersection with George Street, and running along the length of West Street — placing it in direct adjacency to the proposed Block 4 development envelope and within the direct influence zone of the proposed West Street works.

The Owners Corporation is a directly affected legal entity with standing to object under the Environmental Planning and Assessment Act 1979 (EP&A Act). This submission is lodged in addition to individual submissions that lot owners may make separately.

### 2. Description of 110 Wellington Street and Its Relationship to the Proposed Development

110 Wellington Street is a contemporary four-storey residential strata of 58 lots. The building addresses Wellington Street to the north, with balconies and living rooms facing north along the street canopy. The building has significant depth, running south from the Wellington Street frontage. From the street, this depth — and the building's full eastern and southern exposure — is not visible. The rear eastern face of 110 Wellington Street looks directly toward George Street and the proposed Block 4 development envelope. The existing low-scale social housing on George Street currently provides a 2-storey built-form buffer between 110 Wellington and the development site. Those buildings are within the demolition scope of the proposal — their removal will directly expose the rear of 110 Wellington to Block 4 with no intervening built form.

The following proposed blocks are of direct relevance to 110 Wellington Street:

- **Block 4:** Block 4 (George Street frontage, east of 110 Wellington): 4BB1 — 8 storeys, RL +40.50m (social housing, George Street setback 10m); 4CB1 — 21 storeys, RL +90.50m (market housing); 4CB2 — 8–9 storeys, RL +48.90m (social housing). 110 Wellington Street is explicitly identified in Figure 40 of the EIS (Block 4 maximum storey height and building envelope diagram, SJB).
- **Block 5:** Block 5 (5AB1): 19 storeys with a 5-storey street wall to Wellington Street, addressing the Wellington Street frontage immediately east of 110 Wellington Street.
- **Block 6:** Block 6 (6AB2): Part 12 and part 6 storeys, addressing West Street — the narrow one-way street that forms the western boundary of 110 Wellington Street.

### 3. Grounds of Objection

The Owners Corporation objects to SSD-93222706 on the following grounds:

#### **Ground A — Loss of solar access and overshadowing from Block 4**

The eastern elevations of each building on 110 Wellington Street currently receives morning and early afternoon solar access across its eastern-facing windows, balconies and open areas. This solar access is provided through the gap created by the existing 2-storey social housing on George Street, which acts as a low-rise buffer between 110 Wellington and the development site.

The proposed demolition of the existing George Street social housing, combined with the construction of 4BB1 (8 storeys, RL +40.50m) and 4CB1 (21 storeys, RL +90.50m) on the George Street alignment, will fundamentally transform the solar access conditions for the eastern elevations of 110 Wellington Street. 4CB1 at 21 storeys and RL +90.50m will cast significant shadows over the eastern and upper elevations of 110 Wellington throughout the day, particularly in winter months. This will restrict the solar access of each of the 58 lots, and all common areas of 110 Wellington.

The EIS does not include any solar access or shadow analysis for privately owned properties on Wellington Street or the western side of George Street, including 110 Wellington Street, in breach of SEAR 7. The privately owned properties immediately adjacent to the development site — the properties most directly impacted — have been entirely omitted from the solar access assessment.

#### **Ground B — Visual bulk, loss of amenity and overlooking from Block 4 and Block 5**

The rear and eastern elevations of 110 Wellington Street will be directly overlooked from multiple upper floors of Block 4 (4BB1 at 8 storeys, 4CB1 at 21 storeys) across George Street, and from Block 5 (5AB1 at 19 storeys) along the Wellington Street frontage. Residents currently enjoy privacy in their balconies and living rooms without awareness of being observed from above or from across the street. The proposed envelopes will place hundreds of dwellings in direct line-of-sight to the private open spaces and habitable rooms of 110 Wellington Street.

No privacy or overlooking assessment has been conducted for 110 Wellington Street or any other privately owned residential building on Wellington Street or the western side of George Street. The ADG separation distance between 4CB1 (21 storeys) and the rear eastern elevation of 110 Wellington has not been assessed or demonstrated to comply.

#### **Ground C — West Street: carpark traffic in a constrained shared zone**

West Street forms the western boundary of 110 Wellington Street. It is a narrow one-way street designated as a 10km/h shared zone with a painted bicycle lane — as evidenced in the attached photographic record of the street taken from within the carriageway. The existing carriageway width is severely constrained, with no meaningful separation between the shared pedestrian/cyclist zone and vehicle travel.

Figure 49 of the EIS (Indicative car park entrances, Updated Waterloo South Design Guide, SJB) identifies multiple carpark entries on West Street, serving Blocks 5 and 6. The EIS also confirms that Block 6's basement is accessed via Block 5, implying consolidated vehicle movements from multiple residential buildings onto West Street. The Design Guide cross-section for West Street (Figure 8(e)) confirms the street is proposed at 14m total width with a 3m travel lane — a width entirely incompatible with the volume and frequency of vehicle movements that will be generated by the carpark entries for two major residential blocks (Blocks 5 and 6) combined with the existing shared-zone pedestrian and cyclist use.

The residents and visitors of 110 Wellington Street use West Street as a primary pedestrian and cyclist access route, and as the principal entrances for residents when moving furniture in, or out of 110 Wellington as it is the only direct access to open common space area at 110 Wellington. The proposed carpark entries will

introduce 24-hour vehicle movements — including heavy construction vehicles during the 10–15 year construction programme — onto a street that is currently characterised by quiet shared pedestrian and cyclist activity. No specific pedestrian safety or traffic impact assessment has been conducted for West Street in the context of its use by residents of the privately owned buildings on its boundary.

#### **Ground D — Removal of the existing built-form buffer and transition**

The existing 2-storey social housing on George Street currently provides a physical and visual buffer between 110 Wellington Street and the eastern side of the development site. This low-rise built form establishes a graduated transition from the 4-storey private residential context on Wellington Street to the broader Waterloo Estate.

The demolition of these buildings — which is a prerequisite for the Block 4 development — will remove this buffer entirely and leave 110 Wellington Street with no transitional built form between it and the proposed 8-storey (4BB1) and 21-storey (4CB1) envelopes on George Street. The EIS does not assess the impact of this buffer removal as a discrete and material change in amenity for the residents of 110 Wellington Street.

#### **Ground E — Heritage: Duke of Wellington Hotel and Wellington Street precinct character**

110 Wellington Street is located on the same block as the Duke of Wellington Hotel (Heritage Item I2085), which anchors the south-eastern corner of Wellington and George Streets. The EIS confirms this heritage item was constructed on the site in its original form and that the hotel and its immediate streetscape context contribute to the Waterloo Heritage Conservation Area.

The proposed Block 4 envelopes (4CB1 at 21 storeys, RL +90.50m) rising immediately adjacent to the Duke of Wellington Hotel on George Street will overwhelm the heritage item and its curtilage. The applicant's own heritage consultant has assessed Design Guide Principle 4 as not being met. The Owners Corporation submits that the visual and contextual impact on the heritage setting of the Duke of Wellington Hotel, and on the low-scale character of Wellington Street, has not been adequately assessed in the EIS Heritage Impact Assessment.

#### **Ground F — Construction impacts: 10–15 year programme directly adjacent**

The proposed construction programme for Block 4 is a direct-adjacency construction event for 110 Wellington Street. Demolition of the existing George Street social housing, basement excavation for the three-level basement beneath 4CB1 and 4CB2, and the construction of the 21-storey 4CB1 tower will generate sustained noise, vibration, dust and construction traffic impacts on 110 Wellington Street across a programme of 10–15 years.

West Street will carry construction vehicle movements for both Block 4 (via George Street) and Blocks 5 and 6, compounding the construction traffic impact on the narrow shared zone that 110 Wellington Street residents use daily. No Construction Environmental Management Plan addressing privately owned properties on Wellington Street or West Street has been provided as part of this application.

### **4. What the Owners Corporation Is Asking For**

- **Supplementary solar access analysis:** Require the proponent to commission supplementary solar access modelling at hourly intervals between 9am and 3pm for both the winter and summer solstice, specifically modelling overshadowing impacts on 110 Wellington Street and other privately owned properties on Wellington Street and the western side of George Street, in accordance with SEAR 7
- **Visual impact and overlooking assessment:** Require a supplementary Visual Impact Assessment with viewpoints from within 110 Wellington Street and other privately owned residential buildings on Wellington Street, assessing privacy and overlooking from the Block 4 and Block 5 envelopes
- **ADG separation compliance:** Require ADG separation compliance to be demonstrated between 4CB1 (21 storeys, RL +90.50m) and the eastern elevation of 110 Wellington Street
- **Buffer removal impact assessment:** Require an assessment of the impact of the demolition of the existing George Street social housing buffer on the amenity of 110 Wellington Street as a discrete matter, prior to demolition consent being granted
- **West Street pedestrian safety assessment:** Require a specific pedestrian safety and traffic impact assessment for West Street addressing the conflict between proposed carpark entries for Blocks 5 and 6 and the existing shared pedestrian/cyclist zone, including during construction
- **Construction Environmental Management Plan:** Require a Construction Environmental Management Plan addressing impacts on all privately owned properties on Wellington Street and West Street prior to any demolition or excavation on Block 4

- **Heritage impact assessment:** Require a supplementary Heritage Impact Assessment addressing the visual impact of the Block 4 envelope on the Duke of Wellington Hotel (12085) and the Wellington Street heritage conservation area precinct
- **Independent Planning Commission:** Appoint the Independent Planning Commission as consent authority, given the number of objections received and the contentious nature of this application

## 5. Photographic Record

The following photographs were taken in May 2026 by the Owners Corporation and accompany this submission as an annexure: 1. 110 Wellington Street — south-facing, showing building depth not visible from street frontage 2. 110 Wellington Street — relation to West Street (shared zone, letterbox bank) 3. 110 Wellington Street — left side context showing Duke of Wellington Hotel 4. 110 Wellington Street — south-facing depth (second view) 5. Rear of 110 Wellington — facing east toward proposed Block 4 site 6. 110 Wellington — facing west toward proposed Block 3A 7. West Street — one-way shared zone between Wellington and John Street (from within carriageway) 8. George Street — facing north near proposed 4B and 4C, with 110 Wellington in background behind existing social housing 9. George Street — facing north near proposed 4B and 4C 10. Rear of 110 Wellington — taken from George Street

## Declaration

This submission is lodged by the Owners Corporation of SP69476 as the representative body for all 58 lot owners of 110 Wellington Street, Waterloo NSW 2017. The Owners Corporation has standing to lodge this objection as a directly affected legal entity. Individual lot owners are separately encouraged to lodge individual submissions.

This submission is authorised by the Strata Manager on behalf of the Owners Corporation Committee.

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| <b>Submitted by</b> | Daniel Russell-Cooper   |
| <b>Role</b>         | Strata Manager, GK Strata Management                                  |
| <b>On behalf of</b> | Owners Corporation SP69476 — 110 Wellington Street, Waterloo NSW 2017 |
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| <b>Signature</b>    | <i>D Russell-Cooper</i>   |
| <b>Date</b>         | <u>1 June 2026</u>  |