



NSW Department of Planning, Housing & Infrastructure
Attn Rosie Turner
4 Parramatta Square
12 Darcy Street, Parramatta

16 September 2025

SUBMISSION REGARDING STATE SIGNIFICANT DEVELOPMENT APPLICATION (SSDA) SSD-80911502

Purpose of this Submission

City West Housing (CWH) **OBJECTS** to Application No SSD-80911502 for Early works for Waterloo Mixed Use Development located at 881-885 Bourke Street Waterloo (Site) on exhibition for the reasons below.

The proposal relates to initial works for a mixed-use development (subject to a **separate SSDA** SSD-80441462 which has **not been determined** by the NSW Planning Secretary), including:

- Site establishment
- Bulk excavation
- Construction of piled shoring wall and capping beam
- Infrastructure services augmentation
- Ancillary site works

About City West Housing

City West Housing (CWH) is a registered charity and a Tier 1 Community Housing Provider (R4526151110). Since 1994 we have developed, owned and managed affordable rental apartments for thousands of Sydneysiders. Since its inception we have successfully delivered nearly 1,000 affordable rental housing apartments in the City of Sydney LGA and is now the largest owner of affordable rental housing in the area. We have a waiting list of over 1,600 eligible households waiting years to be offered an affordable home. Our most recent development is Boronia Apartments in Waterloo.

Boronia Apartments by City West Housing

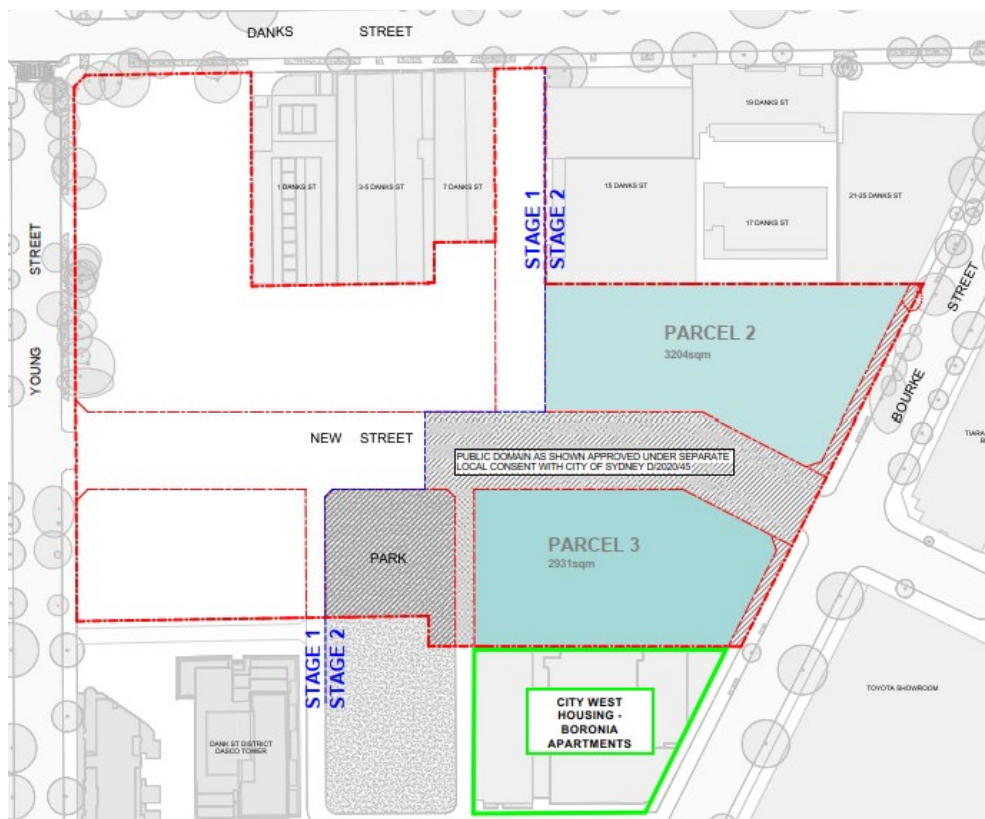
Boronia Apartments is located at 895 Bourke Street, Waterloo. City West Housing has owned the site since 2014 and received conditional development approval for the site in 2015 from the City of Sydney (DA number D/2015). In November 2022 the City of Sydney approved an amendment to the DA (D/2015/941B) which paved the way for commencement of construction in June 2023. Construction of 74 affordable rental apartments was completed in September 2025.

Over 120 residents are preparing to move into their new homes in the next few weeks. The residents represent the local community and include a range of very low, low and moderate incomes. The residents include singles, couples, young families and retirees. A minimum of 50% of Boronia residents are social housing residents supported by funding from the state and commonwealth and therefore likely to be at home during the day, in addition to shift workers who sleep during the day. Appreciating the adjacent proposed construction works we have clearly declared to our applicants that the Boronia building will be subject to construction impacts, and they should not accept an offer at Boronia if they cannot accept this. Notwithstanding this disclosure, CWH residents' amenity needs to be considered in the construction process by our neighbouring sites.

As part of our resident focused design approach, we have incorporated passive design elements rather than reliance on air conditioning for thermal comfort. This approach has multiple benefits including reducing our carbon footprint and lowering residents' electricity costs. Boronia residents will rely on opening the windows for cross ventilation. While acoustics have been considered in our design, extensive noise and dust from area construction for prolonged periods was not incorporated in our design criteria.

The northern boundary of Boronia Apartments is shared with the full extent of Parcel 3 of the SSDA Site as shown in **Figure 1** below and as such, City West Housing and the residents of Boronia Apartments, form key stakeholders in considering the impacts of both the Early Works SSDA and the forthcoming Main Works SSDA for the proposed buildings on the Site.

Figure 1 – Boronia Apartments Location Plan



Source: Appendix D1 - Architectural Drawings Approval Plans the Early Works SSDA as modified.

Reasons City West Housing Object to SSD-80911502

The following are key areas of concern we have identified in the proposal:

- Lack of consultation with City West Housing
- Proposed Hours of Work
- Limited detail regarding construction program and works
- Noise Impacts to Boronia residents
- Vibration impacts to Boronia residents
- Impact to Boronia Apartments Building
- Impacts of the Applicant's proposed Main Works SSDA on Boronia Residents' Amenity

Lack of Consultation

Upon learning that the Applicant was the new owner of the development Site, City West Housing expressed an interest directly to the Applicant to have an open dialogue given our position as a key stakeholder.

While CWH provided site tours to the Applicant’s design team, no follow up consultation was offered, and the notice of the community consultation was not provided to our registered address given our site was under construction.

Of further concern is the use of “letterbox drop” for notifications regarding proposed construction works as noted in s6.1 of *Appendix G Construction Traffic Management Plan* (Appendix G) to the SSD application. The letterboxes for Boronia Apartments are situated within the secure lobby and are therefore not accessible to the general public for proposed letterbox drops.

It is requested that in order to communicate construction activities City West Housing is emailed at development@citywesthousing.com.au such that CWH may then communicate activities to the residents of Boronia Apartments including expected durations to better prepare residents for noisy and dirty works.

Proposed Hours of Work

City West Housing has concerns that the proposed “permitted work hours” represent an overly long period of exposure for tenants of Boronia Apartment to construction noise, vibration, and dust and would result in an overall reduced quiet enjoyment of their homes. Allowing an 11-hour construction workday and a further 8-hours of exposure every Saturday, totaling 63-hours per week, would cause high impact to the sensitive residents living in Boronia Apartments and create a high trigger environment over many years as the site is continuously developed.

Appendix G of the Early Works SSDA sets out the proposed “permitted work hours” for the site as per the below extract.

Figure 2 – Proposed permitted construction hours for the Early Works SSDA

Table 5-2 Permitted Work Hours

Day(s)	Permitted Work Hours
Mondays to Friday	7:00am – 6:00pm
Saturday	7:00am – 3:00pm
Sunday and Public Holidays	No Work

Source: Appendix G - Construction Traffic Management Plan the Early Works SSDA.

The directly adjoining site to the south (903-921 Bourke Street, Waterloo NSW, the Dasco site) is also under construction and anticipated to take several years to complete as well, and as such residents of Boronia Apartments would be subject to construction noise surrounding the whole development for years at a time 6 days a week. Although the Environmental Impact Statement accompanying the Early Works SSDA qualifies that the hour of 5pm-6pm “may be required” it is not expressly qualified as to when this time may be used or not. In addition, permitted work hours of 7am-6pm is more akin to development in a CBD location where ongoing residential receivers are less present and commercial buildings have higher exclusion to the noise, dust and vibration due to the closed facades and availability of air conditioning.

As highlighted above, very few Boronia Apartments have air conditioning so many of the residents will rely on natural cross ventilation causing high exposure to the construction activities.

Furthermore, City West Housing is concerned that the working hours approved in the Early Works SSDA would set the standard for the building applications on the site causing years of sustained construction noise and vibration exposure to the tenants of Boronia Apartments.

Based on this, City West Housing requests a condition of consent which mirrors that approved by the City of Sydney in the Dasco sites development application extracted below:

Figure 3 – Permitted hours condition for 903-921 Bourke Street, Waterloo NSW, the Dasco site
NOTICE OF DETERMINATION – APPROVAL D/2021/1415

SCHEDULE 1D

(157) HOURS OF WORK AND NOISE – OUTSIDE CBD

The hours of construction and work on the development must be as follows:

- (a) All work, including building/demolition and excavation work, and activities in the vicinity of the site generating noise associated with preparation for the commencement of work (eg. Loading and unloading of goods, transferring of tools etc) in connection with the proposed development must only be carried out between the hours of 7.30am and 5.30pm on Mondays to Fridays, inclusive, and 7.30am and 3.30pm on Saturdays, with safety inspections being permitted at 7.00am on work days, and no work must be carried out on Sundays or public holidays.
- (b) All work, including demolition, excavation and building work must comply with the City of Sydney Code of Practice for Construction Hours/Noise 1992 and Australian Standard 2436 – 2010 Guide to Noise Control on Construction, Maintenance and Demolition Sites.
- (c) Notwithstanding the above, the use of a crane for special operations, including the delivery of materials, hoisting of plant and equipment and erection and dismantling of on-site tower cranes which warrant the on-street use of mobile cranes outside of above hours can occur, subject to a separate application being submitted to and approved by Council under Section 68 of the Local Government Act 1993 and Sections 138/139 of the Roads Act 1993.

Note: Works may be undertaken outside of hours, where it is required to avoid the loss of life, damage to property, to prevent environmental harm and/or to avoid structural damage to the building. Written approval must be given by the Construction Regulation Team, prior to works proceeding.

The City of Sydney Code of Practice for Construction Hours/Noise 1992 allows extended working hours subject to the approval of an application in accordance with the Code and under Section 4.55 of the Environmental Planning and Assessment Act 1979.

Reason

To protect the amenity of the surrounding area.

Source: Notice of Determination – Approval, Application Number D/2021/1415, City of Sydney LGA

This standard City of Sydney condition makes clear expectations around any works after 5:30pm and provides certainty for City West Housing to communicate with residents that from 5:30pm onwards there will be no construction noise, vibration and dust generated from the site.

Construction Program and Works

Appendix G also sets out the proposed construction works program for the two stages of the Early Works SSDA, reproduced below for ease of review.

Figure 4 Construction Works Program Early Works SSDA

Table 5-3 Works Program for Stage 1				Table 5-4 Works Program for Stage 2			
Phase	Works Stage	Parcel 1 Estimated Period (Weeks)	Parcel 4 Estimated Period (Weeks)	Phase	Works Stage	Parcel 1 Estimated Period (Weeks)	Parcel 2 Estimated Period (Weeks)
1	Preparation works	5	3	1	Preparation works	5	3
2	Installing shoring systems	13	8	2	Installing shoring systems	13	8
3	Capping Beam	8	4	3	Capping Beam	8	4
4	High level piles	4	4	4	High level piles	4	4
5	Bulk excavation	7	8	5	Bulk excavation	7	7
6	Installing bracing	6	5	6	Installing bracing	5	5
7	Piling for main super structure	5	4	7	Piling for main super structure	4	4

Source: Appendix G - Construction Traffic Management Plan the Early Works SSDA.

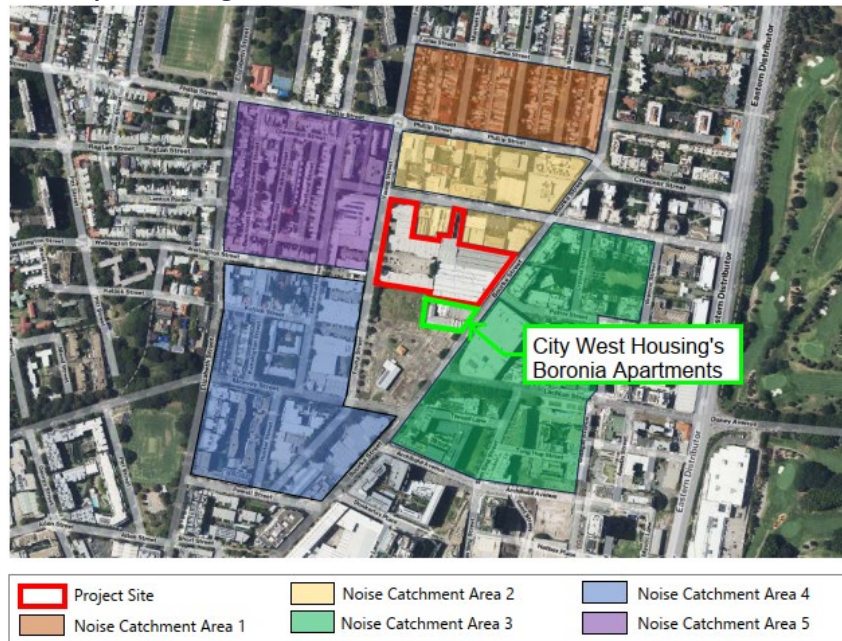
It is difficult to appreciate the cumulative impacts of the proposed program and whether the various phases within each Stage will have any overlap as well as each Parcel within a Stage having any overlap. It is also unclear if Stage 2 works will ever coincide with Stage 1 works. Better understanding of the overlapping of works will ensure total impacts at any one time to City West Housing tenants is fully understood.

City West Housing requests that further information be provided to understand the “work stages” occurring simultaneously or linearly and subsequently the number of construction design vehicles operating on site at a particular time.

Noise and Vibration Impacts

The Noise and Vibration Impact Assessment Report at Appendix H of the Early Works SSDA does not include City West Housing’s Boronia Apartments in the assessment of noise and vibration impact even though City West Housing’s Development Application (DA) was approved in 2022 and was 18 months into construction at the time of the reports production in 2025. As such, the Boronia Apartment’s is noted in bright green on the below aerial with the assumed noise levels equivalent to “Noise Catchment Area 2” for analysing impact levels.

Figure 5 – Aerial site map illustrating the noise catchment areas



Source: Appendix H - Noise and Vibration Impact Assessment Report the Early Works SSDA as modified.

Boronia Apartments is assumed to have the equivalent noise impact as those residential and commercial premises in Noise Catchment Area 2 as these sites are in as close proximity as Boronia Apartments, or share a boundary with the Early Works proposed, much like the City West Housing site.

Table 8 of the Noise and Vibration Impact Assessment Report is the most concerning for City West Housing in that it reports on the “worst case” predicted noise levels generated in delivering the Early Works SSDA across the proposed construction hours and days of the week.

Figure 6 – Catchment 2 Worst Case Predicted Construction Noise

Table 8 – Worse-Case Predicted Noise Impacts – Catchment 2

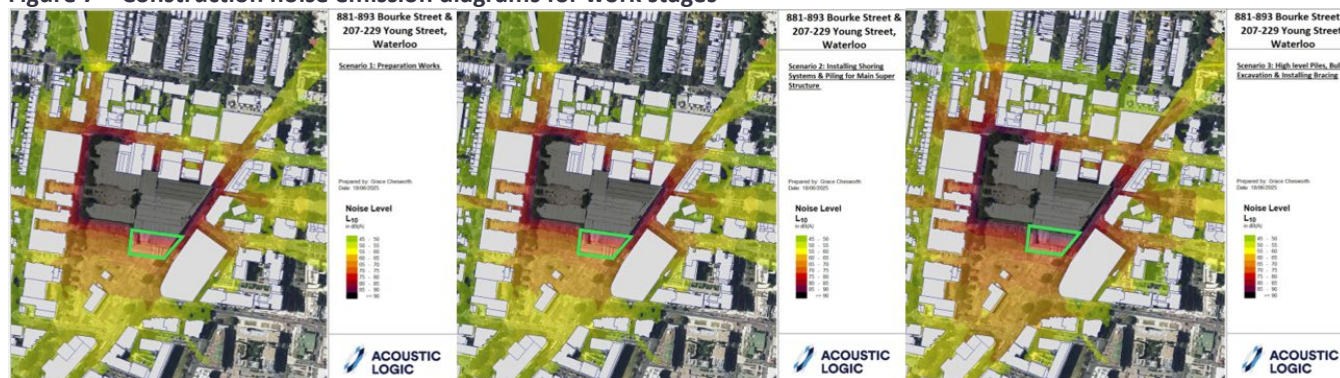
Scenario	Predicted Level dB(A) L ₁₀	Recommended Construction Noise Level dB(A) L ₁₀	
		Scenario	Level
1 – Preparation Works 5 weeks	104 1.5 times greater	M-F 7am-8am	62
		M-F 8am-5pm	67
		Sat 7am-8am	57
		Sat 8am-3pm	66
2 – Installing Shoring Systems & Piling for Main Super Structure 17 weeks	110 1.6 times greater	M-F 7am-8am	62
		M-F 8am-5pm	67
		Sat 7am-8am	57
		Sat 8am-3pm	66
3 – High Level Piles, Bulk Excavation & Installing Bracing 18 weeks	106 2.0 times greater	M-F 7am-8am	50
		M-F 8am-5pm	52
		Sat 7am-8am	47
		Sat 8am-3pm	51

Source: Appendix H - Noise and Vibration Impact Assessment Report the Early Works SSDA as modified.

This shows that the predicted noise levels for all the construction activities will exceed the recommended construction levels ranging from 1.5 times to 2 times the recommended levels on weekdays alone with higher impacts on weekends. When the planned works program for Stage 1 (Figure 4) is overlaid for all activities this demonstrates that there are sustained periods of time where noise levels well exceed the recommended amount with piling works at the highest exposure.

The basement walls are proposed to be pile construction and the basement wall for Parcel 3 is directly on the northern boundary of Boronia Apartments which means the City West Housing tenants will be significantly impacted during this period of construction. This is supported by the below work scenario diagrams produced by Acoustic Logic in the Noise and Vibration Impact Assessment Report with Boronia Apartments highlighted in green.

Figure 7 – Construction noise emission diagrams for work stages



Source: Appendix H - Noise and Vibration Impact Assessment Report the Early Works SSDA as modified.

This shows that the City West Housing site is consistently in the upper noise impact levels across all of the work scenarios.

City West Housing appreciates that they are the first building to be delivered in a large urban renewal precinct and that construction noise is to be anticipated as the site becomes infilled overtime. However, it is requested that appropriate conditions be put in place to mitigate as best as possible impacts to tenants and their quiet enjoyment of their homes, these include:

- 1. Activities exceeding HNML 75dB(A) are scheduled at least-sensitive times of the day and City West Housing is notified via email 7 days prior to works occurring;**
- 2. Regular respite periods from noisy works are set for the site and followed by contractors; and**
- 3. Quiet work methods and technologies are adopted.**

Setting these criteria and being able to communicate anticipated impacts to residents of Boronia Apartments aims to reduce likelihood of noise complaints as it provides greater certainty to sensitive receivers. Understanding expected timeframes for sustained noise levels will also assist City West Housing in supporting the residents through this period to maintain tenancy levels and overall building vacancy levels which impacts City West Housing’s ability to deliver sustainable affordable rental housing.

Impacts to Boronia Apartments Asset

In addition to noise, vibration levels during certain construction activities including the proposed piling, produce significant ground vibrations. Appendix C – Consolidated Mitigation Measures of the Early Works SSDA only recommends vibration monitoring at the western and eastern boundaries of the site (NV-4). City West Housing requests that the Applicant also monitor at the shared boundary between the sites as a minimum to review and understand vibration impacts to the Boronia Apartments in anticipation of managing any damage to the asset.

The Geotechnical Investigation Report (Appendix J) of the Early Works SSDA also highlights a few areas of concern for City West Housing in relation to the impacts of the proposed works on the Boronia Apartments asset. It is difficult to fully understand the potential impacts to the Boronia Apartments at this point as intrusive investigations have not been able to take place in the Stage 2 parcel of the Early Works SSDA directly to the north due to the ongoing remediation activities. **However, City West Housing would like to raise some concerns regarding the inferred results from Stage 1 investigations and request that appropriate conditions be put in place to fully investigate and mitigate risks to Boronia Apartments.**

The first condition requested is that of completing a detailed dilapidation survey of Boronia Apartments at the commencement of both excavation and construction of both Stages 1 and 2 of the Early Works SSDA. The second supporting condition is for the Applicant to assess the impact of the proposed secant piling wall and associated dewatering on the structure of Boronia Apartments in consultation with the buildings Structural Engineer and confirm that the proposed system is appropriate to not result in damage to the Boronia Apartments.

The Boronia Apartments does not have a basement, rather an on-grade car park with a combination of ground bearing driveway slabs and suspended slabs on ground along the northern boundary, supported on concrete foundation piles. There is also a vapour management system installed under the suspended slabs to manage vapours from in-ground contamination associated with the dry-cleaning industry. The vapour membrane contains odours from the contamination making safe for residential uses above. Cracking or damage to the vapour membrane due to draw-down effects caused during de-watering of the Applicant's site would impact City West Housing's ability to maintain residential uses. **City West Housing therefore requests that engagement with Boronia Apartment's Structural Engineer occurs to ensure the safeguarding of the asset during excavation and construction.**

In addition, the Early Works SSDA suggests that the piles will be permanently anchored, however no details are provided as to where these anchors are proposed. Given Parcel 3 and Boronia Apartments share a boundary the detail is of concern. The Boronia Apartments structure consists of regularly spaced foundation piles along the northern boundary supporting the superstructure, suspended slab on ground, load-bearing concrete precast northern boundary wall and substation slab. **If the Applicant proposes anchoring along the boundary with City West Housing this could clash with Boronia Apartments foundation piles and be detrimental to the buildings structure. On this basis, it is requested that no ground anchors trespass across the boundary and any basement boundary shoring wall for Parcel 3 be internally propped to prevent any potential structural issues with Boronia Apartments.**

Overall, damage to the asset represents a costly issue for City West Housing, like any other owner and operator, however additional unexpected maintenance costs significantly impacts City West Housing's ability to deliver more affordable rental housing which is much needed across Sydney.

Impacts of the proposed Main Works

Although not the subject of the Early Works SSDA, City West Housing has carried out some initial analysis of the proposed buildings covered in the Main Works SSDA to understand the impact to Boronia Apartments and its residents as City West Housing was not included in the community consultation sessions. **In providing this early analysis as part of this submission it would be welcomed if consultation took place prior to the Main Works SSDA being lodged so that City West Housing could provide upfront support for the proposed development.**

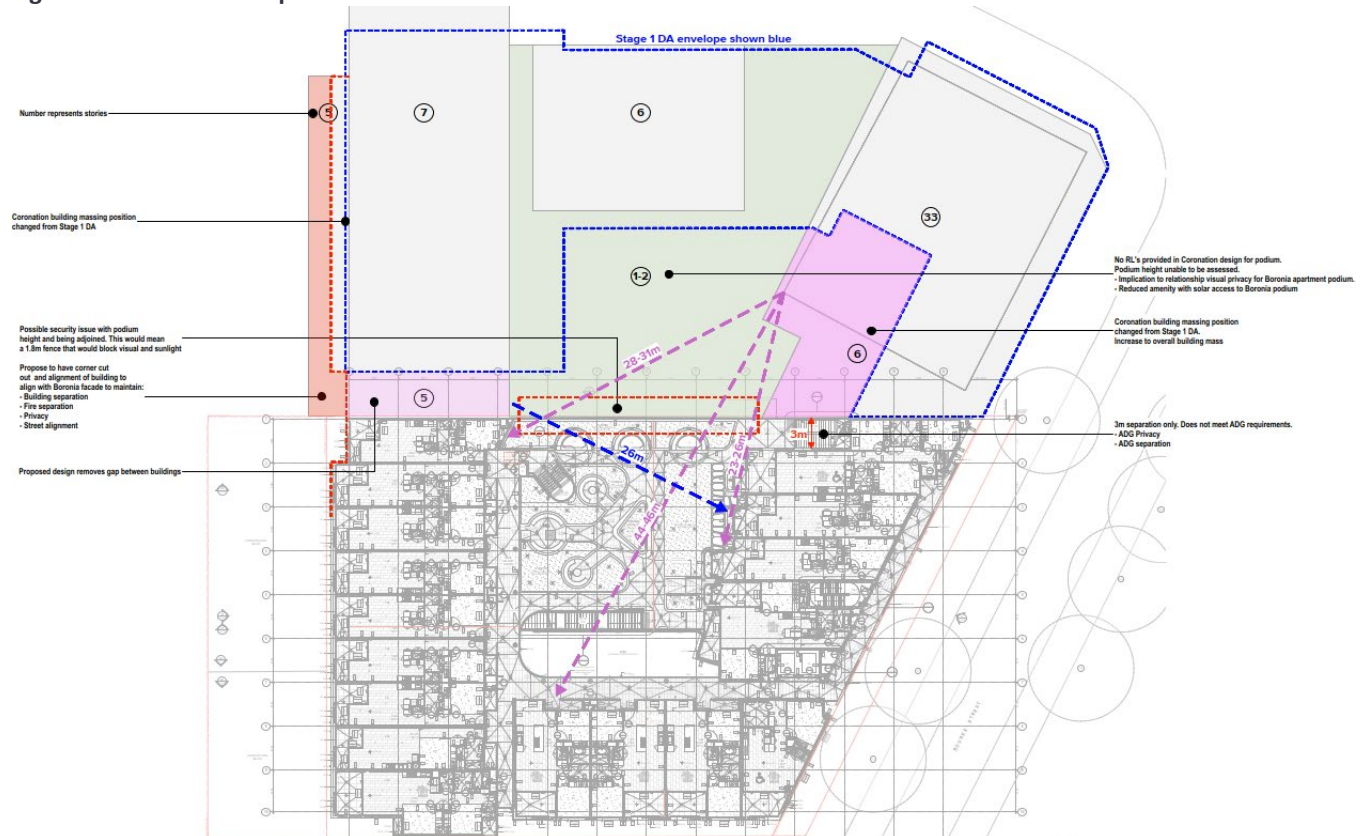
Initial analysis using the diagrams provide in Appendix F – Engagement Report indicate that there would be some negative impacts to Boronia Apartments potentially compromising the ability to achieve compliance with:

- *State Environmental Planning Policy (Housing) 2021*, namely:
 - The Apartment Design Guide; and

- Schedule 9 Design Principles for Residential Apartment Development.
- *State Environmental Planning Policy (Sustainable Buildings) 2022* – particularly thermal performance (NatHERS Rating).

Figure 8 provides a high-level comparison of the site's Stage 1 DA envelope as approved by the City of Sydney.

Figure 8 – ADG and Compliance Review



Source: Turner STUDIO - review of proposed neighbouring development

Height & Massing:

The proposed Main Works SSDA increases both height and massing on the site at various locations and has a cumulative effect on Boronia Apartments. Preliminary analysis suggests that the 33-storey tower proposed directly to the north of the northeast corner of Boronia Apartments would increase overshadowing and privacy issues for Boronia Apartments as well as the proposed 16 storey tower due north. The proximity of the taller building on the boundary also raises concerns over lateral forces. When buildings are subjected to lateral forces, from earthquakes or wind events, a building will drift or displace laterally. Due to the proposed height of this building the lateral movement will not be insignificant.

It is requested that the building is setback from the common boundary to prevent it from trespassing across the boundary in the event of a codified earthquake or wind event. This will ensure the building doesn't 'pound' into the Boronia Apartments structure. The setback distance is determined by the National Construction Code (NCC), which references Australian Standard AS1170.

Figure 9 – Street Impact Bourke Street



Bourke Street - Stage 1 DA Massing + 10%

10% massing increase taken from City of Sydney LDC 2012. Figure 5.209 noting increase for Design Excellence process.

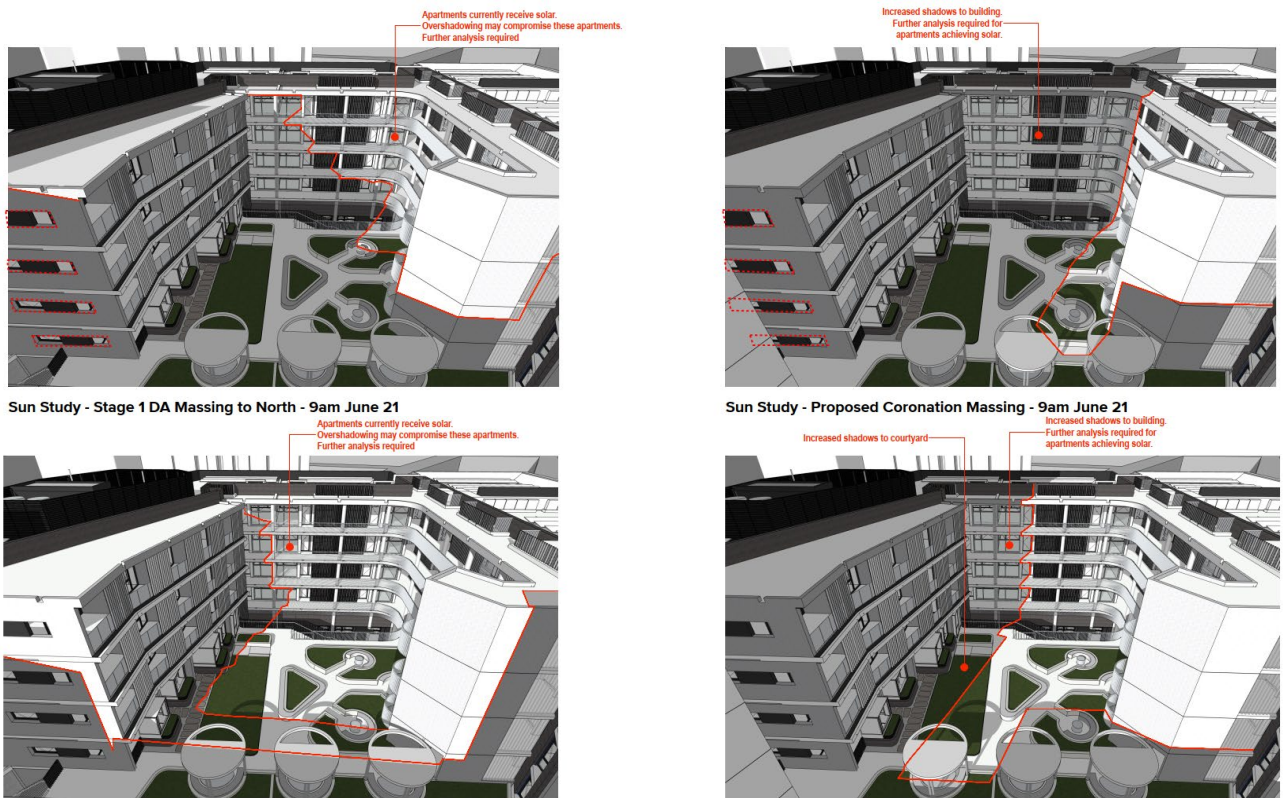
Bourke Street - Coronation Massing

Source: Turner STUDIO - Review of proposed neighbouring development

Privacy & Overshadowing

Initial analysis on privacy and overshadowing also indicates that the 33-storey tower creates direct overlooking to an arrangement of windows on the northeastern elevation of Boronia Apartments with these windows looking directly into the kitchen and living rooms of these 3-bedroom apartments.

Figure 10 – Sun Study various times



Sun Study - Stage 1 DA Massing to North - 9am June 21

Apartments currently receive solar. Overshadowing may compromise these apartments. Further analysis required.

Sun Study - Proposed Coronation Massing - 9am June 21

Increased shadows to building. Further analysis required for apartments achieving solar.

Sun Study - Stage 1 DA Massing to North - 10am June 21

Apartments currently receive solar. Overshadowing may compromise these apartments. Further analysis required.

Sun Study - Proposed Coronation Massing - 10am June 21

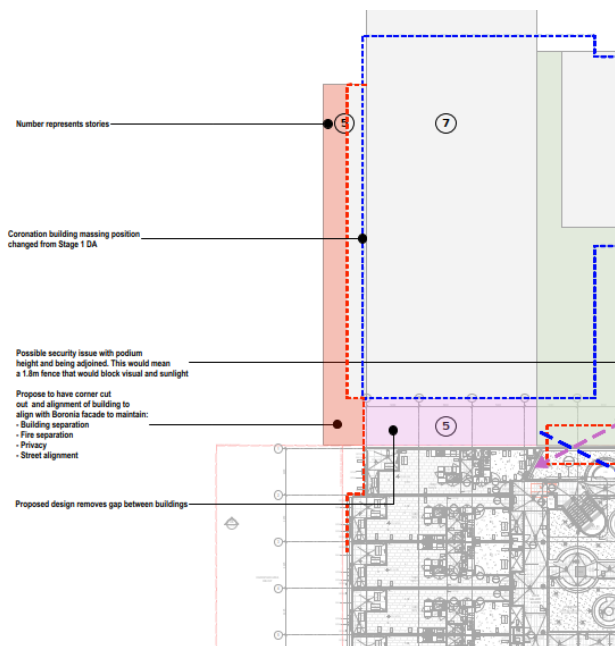
Increased shadows to courtyard. Increased shadows to building. Further analysis required for apartments achieving solar.

Source: Turner STUDIO - Review of proposed neighbouring development

Further analysis is required to understand impact to apartments and whether compliance is maintained with solar access approved in the Boronia Apartments planning application. City West Housing requests consideration to redistribute massing from the 33-storey tower across the site rather than concentration in such a large floorplate.

Urban Design Principles

The proposed western podium of 5 storeys is sitting proud of the Boronia Apartments western elevation which is intentionally aligned with the future street at the ground plane and the edge of the future park. **City West Housing believes that from a good urban design point of view this alignment of the street should be preserved throughout the development.**



Additional Considerations

We note that the Applicants' proposal for the Main Works SSDA includes affordable housing that is time limited for 15 years. While this aligns with the NSW Housing SEPP, it ignores the City of Sydney's Affordable Housing Plan which requires a cash or works in kind contribution for affordable housing that is not time limited.

We strongly argue that the any SSDA application on the Site conforms with the City of Sydney's contribution plans including the Affordable Housing Plan.

We look forward to supporting the state in delivering much needed additional quality housing in NSW.

Yours faithfully,

Lisa Sorrentino
Head of Development
City West Housing