

Department of Planning and Environment

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# Waterloo South Planning Proposal submissions

<https://pp.planningportal.nsw.gov.au/ppr/post-exhibition/waterloo-estate-south>

June 2022

SUB-1093  
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Sydney

The Waterloo South's redevelopment represents a once in a lifetime opportunity to revitalise a traditionally disadvantaged area where crime rates and perceptions of fear have been notoriously high over many decades.

With this in mind it is noted that the Urban Design Review Waterloo Estate South Report commissioned by the DPIE lists the requirement that, amongst other things, the review should include whether Crime Prevention Through Environmental Design (CPTED) principles have been integrated into the planning proposal.

In my experience of over 20 years working in CPTED and broader crime prevention and community safety while much of the devil may lie in the detail, where a thorough analysis of place and its relationship to human behaviour is undertaken mixed use developments can be made not only more safe but more liveable and more sustainable.

It is therefore of significant concern to note that despite the requirement for a "broad and holistic" review the consultant's 211 page report contains just two pages given over to CPTED.

It might be expected that any review into CPTED would give due consideration to crime, safety or other important social issues in its Place Analysis but it fails to even rate a mention in the first section of the report.

It is noted that CPTED is listed as one of the "key themes" under 3.5 Observations and at 3.17 appears as one page of text followed by a page listing a figure. The so-called "analysis" makes no attempt to list what the principles of CPTED are nor how they relate to the proposed development. Section 3.17 makes vague references to "safety concerns" without actually identifying said concerns. There are no specific crimes mentioned, no reference to any existing crime data and no evidence of any consultation with police.

Observations such as "the connectivity and permeability provides multiple access and entry points to streets and public spaces to encourage activity and enable a greater level of security" read as sweeping statements lacking in any genuine analysis of the types of crime which may occur in these spaces, by who, against who, at different times of day and night. It could just as easily be argued for example that "multiple access and entry points" provide any number of escape routes for anyone lurking in the general vicinity with the wrong intentions. Other comments such as the "narrowness and publicness of mid-block links may reduce passive surveillance" potentially offer "limited visibility" and "hidden spaces" and that heights of buildings may lead to avoidance behaviours due to wind and shadowing are all valid concerns but the fact that these issues are simply passed over in the summary of observations at 3.19 as "urban design principles of the planning proposal and its resultant urban arrangement are sound" is completely underwhelming if not unsatisfactory. Given the brief is to ascertain whether CPTED is integrated into the planning proposal data from N.S.W. Bureau of Crime Statistics and any discussion with Police from Redfern Area Command would likely tell you that Waterloo has a long and troubled history when it comes to violent crime, sexual assault and rates of break and enter but the report notably elects to ignore this evidence in its key observations.

Moreover, given the brief, observations at 3.19 relating to minimising access to internal courtyards

from public spaces these observations should be considered as key issues for analysis and amelioration in this report not as something that should be dismissed simplistically "through design." The final point at 3.19 in relation to landscaping and its effect on shadowing and attractiveness while ignoring its ability to conceal and provide opportunities for illegal access to private properties underscores this point. The figure at page 60 in relation to concerns about mid-block links is not supported by any analysis of the crime risk and reads as nothing more than another vague illustration of "safety concerns."

It must be emphasised that these significant CPTED issues should be covered in part four in relation to technical analysis. The fact that the brief is to investigate how CPTED is integrated into the planning proposal and that it is completely absent from this part of the report is a glaring omission. This only serves to highlight the ridiculous claim in the less than impartial Peer Review that the technical analysis has been "comprehensive." If this claim were to be believed then it can only be assumed that issues such as wind and acoustics are more important priorities than crime and safety. Such claims arguably reinforce previous research that positive elements of developments are exaggerated without drawing attention to crime risks. (Clancey et. al. 2011).

Crime is a product of the interaction between a criminal and a criminal opportunity. Crime prevention comprises measures directed at highly specific forms of crime that involve the management, design or manipulation of the immediate environment in as systematic and permanent way as possible so as to reduce the opportunities for crime and increase its risks as perceived by a range of offenders. Quite frankly the Review shows limited understanding of the concept of CPTED. The Review makes no reference to CPTED in relation to key issues such as building orientation, separation of private and public areas, access control measures at identified pinch points, general management and maintenance issues and ambiguous spaces. The Review makes no serious attempt at more sophisticated inquiry into CPTED namely "what works, for whom and in what circumstances?" The Review is acutely flawed because it makes no serious attempt to interrogate which particular crimes the proposal will aim to prevent in which situations. This is a lost opportunity and runs the risk of the proposal being potentially crime-prone something I have witnessed countless times before where CPTED has been neglected in planning proposals.

All in all the Urban Design Review Waterloo Estate South Report in relation to CPTED is substandard and inadequate. It is a report which lacks rigour. The report either portrays limited skills, knowledge and understanding of CPTED on the part of its authors or a genuine unwillingness and commitment to explaining how its principles can be applied to create a safer, more liveable and more sustainable Waterloo South and broader community - or both. Either way the report has failed to deliver on the brief as to whether CPTED has been integrated into the planning proposal.

SUB-1098  
John Portnov  
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Waterloo

Dear Planning Team

As a son of a resident in one of the buildings in Waterloo South i am seeking to relay to you several items which has come out of discussions with residents.

We hope you will take this into consideration.

1. That existing tenants be given the chance to choose the "type" of building they are to tenant after building is completed.

Per the map, there are several high rise, medium and low rise buildings. As would be clear, many tenants do not have the physical capacity to move through buildings which are not equipped for them. Many may wish a low rise building compared to a high rise building for these reasons.

2. Sound proof walls & windows to be built to provide peace and quiet for all.

Sound and anti social behaviour is a near universal occurrence with social housing, and it would be important given we have the chance, to make sure it's negative effects are limited as much as possible on every other person in the surrounding apartments. Design wise sound proofing will be the most viable solution from my own architectural and building background, and residents and private renters will be forever grateful for this foundational decision decades from now.

3. Existing tenants be given the choice of who they are tenanted with on relocation and on resettlement to the completed buildings.

As per item 2, tenants have over years and decades come to be "stuck" with neighbouring tenants (adjoining walls) who have been anti social, noisy, troublesome. Leading residents to an inability to have peace and quiet, lack of sleep at nights and further problems and aggravation. With relocation we have a unique opportunity to create a clean slate if we let tenants choose who Not to be allocated close to.

Appreciate your consideration of the above, and if possible a reply back regarding questions if any.

Many thanks in advance  
John Portnov  
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SUB-1099  
Christopher Ewing  
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Surry Hills

It is disappointing to see the NSW Government giving up opportunities to deliver long-term benefits to the people of New South Wales by selling valuable public assets to private developers, while doing little to increase the public housing stock.

Unlike most other government spending, public housing generates an economic return to the government in addition to the direct housing policy outcomes.

Land and Housing Corporation also makes around \$800 million per year in rental income from its property portfolio. LAHC's balance sheet is larger than any of Australia's largest private housing developers.

Using a combination of build-to-rent, social housing and private dwellings, Dr Cameron Murray and Professor Peter Phibbs showed a way to almost double the number of public homes on the Waterloo South site, to 1550, while holding onto some of the risk of the asset and therefore the long-term returns.

The proposed Waterloo South redevelopment is worrying given the lack of growth in NSW social housing stock. Late last year, UNSW Sydney professor of housing research and policy Hal Pawson did the sums on national demand and supply and found the situation in NSW to be one of almost no growth.

"For example, also factoring in the numbers of existing public housing properties that governments plan to demolish or sell over just the next three years," he wrote, "we estimate the prospective net gain in social housing dwellings over this period will be only 400 in NSW, compared with 8300 in Victoria and 4400 in Queensland."

As a nearby resident I demand that the NSW Government increase the proportion of social and affordable housing stock in the Waterloo South development.

SUB-1107  
Richard Horton  
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Malabar

1. I write as former resident of public housing. I have also lived in very highrise/high density environments overseas.
2. It is critical that anti-social behaviour - as has been well observed many higher density inner urban developments - is minimised BY DESIGN. It can be done but takes more than just CCTV. I am not convinced that Sydney can maintain this beyond the phot-op of the opening ribbon.
3. Shared cycle/pedestrian paths don't work for the old and the young. Don't incorporate them.
4. Do not use synthetic open space/park surfaces. It breaks down to micro-plastic solution even if it looks pretty and is only 'low maintenance' if you discount the externality.
5. Brownfield development is to be encouraged over knocking over more pasture in the surrounding regions of Sydney.
6. Green walls, planted void decks, more trees all soften intense building. Let's see the plans please, not just political promises.

SUB-1108  
Edwina Kealan  
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Glebe

Hands off Glebe say no to forced evictions of Tenants of Waterloo Estate we come in solidarity  
Where do we they all go? This is another liberal tactic evict FACS tenants

Liberal NSW State Government including real estate property developers in it for profit most of us  
know that

Who care least for the vulnerable only the rich liberals that is

I cannot see mix of private social housing mix working

Some rich do not mix with poor or parties or hooligans next door let alone the druggies if such a  
development went ahead

Some who live in social housing mix are the poorest of the poor

A lot are well adjusted

A lot of persons in Waterloo estate just want to live their lives

And prefer to be left alone

SUB-1109  
Ken Pak  
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Camperdown

I've noticed you use the word social housing instead of public. Considering that you are redeveloping the Waterloo estate into this new proposal, are you transferring the public housing into the hands of charities and not-for-profits to create social housing? I think the distinction is very important as public housing comes with more rights for the tenants of Waterloo.

Public housing as provided by the government is typically more affordable as social housing landlords can charge up to 30% of the tenant's income whereas public housing is usually 25%. Public housing tenants have more rights when being evicted. Social housing providers can more easily sell off their stock and displace their tenants during times when they are squeezed for funding. Their revenue is more dependent on the goodwill of government and donors.

How will you address these issues for tenants through your contracts and agreements?

The stock of affordable housing needs to be massively increased to deal with significantly high rents in the area and distribute the opportunities in the inner city more equitably. The Vienna model is an inspiration for tackling housing affordability head on and not just doling out meaningless platitudes.

More needs to be done but you guys are more concerned with developer profits not people.

SUB-1110  
Luciano Svagelli  
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Redfern

Can the proposal please define and specify the amount of;

- i. Social Housing
- ii. Affordable Housing

Could it further provide how the number of each type of housing will meet the current needs of the community and future demand and the method used to calculate this?

Can the proposal provide how the project will ensure housing sustainability for current community members living within the area?

It is important that the inner city holds onto the long term residents and community of Waterloo.

SUB-1116  
SUB-1124  
SUB-1128  
SUB-1142  
SUB-1143  
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SUB-1261  
SUB-1262  
SUB-1461  
SUB-1549  
SUB-1556  
SUB-1566  
SUB-1586  
SUB-1588  
SUB-1623

Name withheld

*Multiple submissions received from an individual or organisation, are counted as one submission.*



I am in possession of copy of DPIE Waterloo Estate (South) 84 pp.

I am familiar with the content.

I did attend public virtual forum hosted by REDWATCH and featured powerpoint presentation by your Andrew Golden.

i refer to section 5 : Justification.

i could expect that principles (p. 38) might include: Streets prioritise pedestrians and cyclists.

Such that consideration in this statutory exhibition would include each of:

- \* accommodate multiple users and needs;
- \* maximise the safety of vulnerable users; and
- \* respond to stormwater . . . . . and
- \* respond to local traffic etc.

Even to consider (p. 52) Water recycling facility.

All eminently admirable, BUT

i even search further, under (p. 55)

Additional Requirements in the Waterloo Estate (South) Design Guide,

and also (p.58) consideration of

5.1.12 Design Excellence.

viz. "proposes a design excellence strategy for . . . . . issues including

noise/acoustics, solar access, wind and tree retention, and further

on (p. 60) providing guidance on each of:

vehicular entry points . . . . .

street speeds, and

intersections; and

even shared driveways.

BUT

as i am diagnosed physically disabled, and  
as i am senior aged person, and  
as i am likely with advanced age to require walking or other disability aid, requiring ramp rather than stairs  
or un-level surfaces, then  
where is the provision and consideration for  
ramps or shared ramp or other elevation at access point, on ground floor from the footpath?  
Wheelchair access, perhaps?  
In 2004, the Physical Disability Council of NSW, resolved at conference to mandate considerations in architectural and design plans for these.  
PDCN members are aware that Ticketek has still been on PDCN's radar for some time, for failing to provide equitable booking options for customer's requiring accessible seating (even to today).  
I fail at this document to find any reference to equitable ground floor access options.  
Or is that consideration NOT within the scope of this statutory exhibition and feedback and will be determined later at the discretion of a LAHC Relocations Officer, well after public exhibition and feedback periods are lapsed?  
ends.

██████████ I am a long term resident of the subject area.  
I am familiar with the published exhibition materials.  
I note that palm sized postcards have dropped to letterboxes in Waterloo South.  
I note that local newspaper delivery has been concurrent.  
I am aware that community drop-in sessions have been nominated for five dates.  
Re the methodology of soliciting community feedback and opinion, I forecast that participation will be low in number and residents will not engage, and respond in meaningful number.  
You have mis-read and mis-calculated the indifference of this social housing cohort to participate.  
So few know, so few care.

██████████  
I am familiar with the information provided.  
I have perused the document.  
Re: Determination of "social mix" and who is to live where, after redevelopment.  
Social mix refers to the diversity of levels of income, tenure mix and social class in a given neighbourhood.  
Much academic and other interest literature has been published on "social mix" or "integrated communities".  
In this particular instance it can be used in public policy to refer to the urban renewal of a housing estate, such as  
this, and the introduction of more middle class households/home owners/private tenants (renting from home owners)  
in an area already occupied by a relatively high proportion of social housing dwellings (whatever the particular relevant definition).  
I accept that there are multiple identified acknowledged typologies for planning social mix, and how it should be implemented through design planning and urban design. None of those relies on random chance or belated discretion.  
In the information initially provided and accessible to me, to date, I find no consideration, discussion or proposal for social mix, on Waterloo South planning for consultation, and it would seem to be abrogated in the scope of reference for this statutory exhibition period.

If the exhibition of a planning proposal is about whether the proposal is suitable for the location and the uses proposed, then it should consider ALL ASPECTS of planning controls and land uses. No aspect should be taken off the table for statutory exhibition feedback.

You have abrogated consultation on the most crucial and diagnostic element of a mixed estate development,

and obviously decided to leave the matter of positional location and social mix to the discretion of another

after this consultation period is closed.

IDIOTS.

Further, you have trusted that an insufficient number of exhibition respondents will identify that abrogation, and that

you can proceed to it's close without due consideration thereof.

Pitiful. Shameful. Negligent.

In deference, I do not contend reprehensible.

Ends. 15 March 2022.

██████████  
Re: Easements and laneways, both north of and south of John Street, Waterloo outh.

I am familiar with the design plans.

I refer to the provision for (blue colored) narrow easements crossing east to west, located by provision, both north of John Street, and south of John Street.

I expect that for the privacy of residents, and noise control, located immediately adjacent to each, that walls with height will need to be erected. This may have the effect of inducing unsafe conditions for pedestrians, and create unsafe areas.

The provision for water drainage, rain, sewerage, may induce undulating surface, not so conducive to disabled walkers with 4WW or even wheelchair users.

My previous experience and knowledge of such narrow walk-ways and inhibited spaces, is that they are unsafe, unappealing, particularly after dark, and not reliable or conducive thoroughfares.

Presently, and for 30 years in this area, I have had to "walk the long way round" using street pavements, without easements, and I propose to maintain the status quo, and continue the practice, thus proposing that easements should be eliminated from your design proposal(s).

Ends.

██████████  
Re: Northeast corner of corner George Street and McEvoy street.

I am aware that there exists a 1947 dated electrical sub-station, padlocked semi-permanently, rarely accessed internally, with north side perimeter grassed area and reserve fenced off.

I trust this facility will be subsumed and replaced, with alternate, as it is a key site in the design plan, and on the model presented, where housing/building is sited by proposed plan. It is an eyesore and is commonly vandalised, access without authorisation, and needs re-securing. I am known the "homeless" to locate within, requiring CoS remediation.

Demolish and relocate it.

Ends.

██████████  
Re: the site of "Cammelia Grove" units presently, near to Waterloo Park and school.

I am familiar with the high rise building, with adjacent perimeter lower level rise buildings, each with different FSR.

One could reasonably expect that the high rise building, benefiting from better views, better aspect, better lighting, sun, pre-eminent position, would be slated for hosting

"FOR SALE" signs and dedicated to private market owners, with less attribution to social housing

dwellings (whatever the latest definition of categories).

One could also reasonably expect that the adjacent low rise building(s), benefited less. with lesser aspect and other features would be attributed for social housing dwellings, in greater density.

Is this a 'de facto' incipient inducement to an appropriate "social mix" or 'de facto' typology thereof? Will the "social mix" definition, and it's practice of attribution, apply equally across all buildings the subject of this proposed design plan?

Ends.

[REDACTED]  
 I am familiar with the 84 page "Planning proposal Document" provided to me.

I refer to additional information, later to my attention, with Figure entitled "Solar access is a major design Requirement".

I do not find that diagram amongst 37 Figures in the former document.

I believe the diagram shows greater and lesser than 2 hours sum, taken and assessed at mid-winter.

My schooling teaches me that at that mid-winter time, the path of the sun is at its lowest trajectory to the horizon. The diagram surly could be different at other times of the year, eg. at mid summer, when my shoolding teached me that the sun's trajectory could be more over-head relative to the horizon,

I should wish to see diagram created for different time sof the year, rather than just one as nominated.

Ends.

[REDACTED]  
 I am familiar with the documents provided to me via Tuyen, and the PowerPoint presentation diagrams of Andrew Golden and Geoff Turnbull at community presentations.

I refer to the proposed site nominated to me for dedication of community centre or else/also health centre.

I find that position to be too biased to one corner of the site area, and not sufficiently central.

I identify the current community centre facility in 67 Raglan Street, servicing the needs of Waterloo South residents.

In casual shared opinion with residents of McEvoy Street and John Street and Mead Street Waterloo South, I glean in years past and also presently that activities identified to be hosted at 67 Raglan Street are

"too far away for me" or

"that's too much of a hike".

I propose that your current proposed position for those service agencies might attract a continued, similar retort.

.

Ends.

[REDACTED]  
 I am familiar with the documents provided to me, including Draft report "Waterloo Estate (South): Design Guide 2021 (DRAFT).

I refer to the latter document, specifically Fig. 22: Stormwater and its demonstration of "existing low point/ponding" sited at the south end, George Street, McEvoy Street, and not quite encompassing John Street.

Fine. No argument.

Yes the drainage there is poor and it low RL elevation, and my personal observations related are directly consequent.

As a long-term resident of John Street, on corner George Street, with extensive grassed area

perimeter to building foundations, and observations over many seasons, I relate my own observations of legacy water, and 'swampy /wet soft ground' in that corner identified.

I would expect that the nominated easement off George Street, westerly to nominated green park space, accessible to the public and all dog walkers, may, if poorly constructed, be the subject of further seasonal 'ponding' or swampy, soft ground, subject to drainage amelioration.

Legacy smells are also a consideration where ponding and/or swampy/soft wet ground persists.  
Ends.

[REDACTED]  
I am familiar with the documents provided to me by Tuyen, and I have attended public information presentations.

I refer to Fig. 34 Dedications and Easements, on pp. 50 of 84 of a planning proposal document. I have lived on this South estate for decades, and as an older person, disabled, sometimes rely on a 4WW for mobility assistance, and observe my neighbours and other community visitors to be similar, or more frail, aged and vulnerable to crime.

I advocate for the collective in advising that we value our safety and security far more so than finding a shortcut between one block and the next, or 100 metres closer to destination.

We are in the practice of walking the current layout of streets, and I find Cooper Street (with no attributed walk path) to be less popular by street walkers, than the

Conventional walk ways on the major streets. We are practised in walking where a footpath is provided, and indeed some collective solace is gained by walking "where one can be seen".

I do not favour the dedication of Easements on the design plan, other than accessing the small recreation space for dog walkers sited south of John street and west of George Street.

Ends.

[REDACTED]  
Re: Urban design strategy and land use.

I reside for decades now in this area, with main (sole) window facing onto current asphalt easement south from John street, accessed by garbage/refuse collector truck, regularly.

I refer to Fig 4: Land dedications and Easements, plus

Also Fig 5: Land use, both of

Waterloo Estate (South): Design Guide 2021 (Draft),

And also Fig 28 : Urban Design strategy [bearing no key or 'legend'].

I fully expect this easement and also perimeter road around small recreation area, will attract traffic flow, and with proximity to attributed retail space, will be a magnet for attracting goods vans, delivery vans, trucks, taxi vans, dump trucks, garbage/refuse collector truck (multiples of).

I would not wish to be exposed even on level 3 or level 4 above retail space, to the early morning and late evening noise, clutter and heavy street traffic, behind the dedicated retail space on George Street.

Off-street parking there could be expected to be out of CoS Ranger control.

In general, the ambience of an enclosed recreation space can often be spoiled by constant, regular noisy, smelly traffic on it's perimeter.

I for one, would not wish to be allocated to residence abutting there.

I for decades have lived exactly there, main (sole) window exposed to the existing easement, access from John Street, and I find it perennially unappealing and grotesque.

With a long-term mental health disorder.

Bad idea.

Ends.

[REDACTED]  
I am familiar with the documents provided to me.

I have attended public presentation by Andrew Golden on 03 March 2022.

I have attended two Information and Capacity Building Workshops hosted at Factory CC.

I observe that there is a distinct paucity of available street car parking, particularly on business days.

My senior care worker provided by My Aged Care home package to perform domestic assistance and nursing has just arrived, breathless at my house.

"Gees, what's the story?"

"It's only midday, and I couldn't find a car park for love nor money".

"Your're not allowed to park off the street, on those alcoves and bays that are LAHC land. You know that don't you?"

"Yes, I know. That's why I've just run here from way down there, to be here for my appointment".

"Well, it's just the case that car parking on the street is at a premium, these days".

"You said it. Sure is".

I believe the plan is to increase the number of residents (total of all classes) from the present number to a much larger number, in toto.

Admittedly, many social housing tenants do not bear a car, to park. If they do, they presently most commonly, park their car on LAHC land attributed to car park space.

I have studied the plans and documents, and I observe no space dedicated to off street parking, for home residents.

How many residents, in total, compared to the current number of residents?

"Where are they gunna all park their private vehicles?"

"Seems someone overlooked that small detail".

"Moreso, how do they expect to sell apartments with no dedicated car parking for the owner or his tenant?"

"More important, where am I gunna park my own?"

"Oh. Brilliant."

.  
.

Ends.

[REDACTED]  
.  
.

[REDACTED]  
Time for the silent/mute

Prominent NGOs sited in Waterloo, who mean to advocate for existing residents, to get active.

Follows is an extract copy paste from the website of one such.

Quote

As part of the Waterloo Community Capacity Building project, we will organise a discussion in March around the best ways to create socially mixed communities, and what do current residents think are the 'conditions' for a successful and truly mixed community to be created in Waterloo.

Watch this space!

[REDACTED]  
Re process in disseminating the message and eliciting feedback contribution(s).

Today, Wednesday 06 April 2022, I walked home to John street Waterloo, from a community event in Raglan Street, W along George Street, on the pedestrian footpath, passing several foci of collective letter boxes.

I remark on the number of white fliers were on the ground underfoot.

I myself, received that same flier John street box, and found it to be, in general, at first blanche, unattractive, font too small, lacking colour, lack of eye-catching headline or focal point. I showed it to my neighbour to my left. He is a Polish man, is totally deaf, only converses by a variation of Auslan, and to my empirical observation NEVER relies on a computer or telephone. He cannot speak into one anyways.

So, I turned to my neighbour on my right side, who is obviously native Chinese, moved in one year ago, never converses with me, cannot speak English, and I interrupted him using an old dictaphone with cassette. The female voice recited aloud

"I . . . . want . . . . to . . . . Go . . . . The . . . . Bank".

Guess what the Chinaman said in response?

"I . . . . want . . . . to . . . . Go.....".

Next the lady recited from the cassette:

" I . . . . want . . . . to . . . . withdraw . . . . money".

Guess what the Chinaman said, as I knocked on his door?

No computer.

No telephone.

But he is absent on his pushbike every mealtime, to somewhere else.

I have temerity to suggest/contend that you may be missing goal .

.

Ends.

Re social mix by allocation discretion in Waterloo South.

The design and location of four tall buildings in the proposed plan promotes discussion amongst local social housing tenants and other tenant advocates on inducements to likely allocation and resultant social mix

typologies. General agreement and consensus almost committed to resolution by default, at recent local gatherings and interactions is that allocation of social housing tenants will likely be entrusted to LAHC by default, and likely be "building

by building" (segregation by separate buildings from private owners) type and thus distanced from concentration of private owners/homes.

in my opinion that practice would deny opportunity for resident feedback and consultation, at early stage, likely lead to

in due course and over time to segregation of different classes of persons and likely create social enclaves in "hot-spots" with consequential social/antisocial outcomes.

Much better to adopt "in building clustering" or "unit by unit" placement typology to promote or engender

emulation of social practices and behaviours.

The models and past outcomes well documented in the academic literature at each of Airds-Bradbury-Claymore-Minto are instructive in this matter.

Ends.

I am familiar with the report and design plans provided to me.

I attended the public presentation of the proposals virtually on 3 February 2022 hosted by RedWatch.

Re the provision or other of off-street car parking in Waterloo South.

Presently there are several off-street parking areas, viz, LAHC land, adjacent to tenanted buildings viz. west end of Reeve Street behind "Madden Place" building, on John Street Cnr

George Street, car allocations in Cooper Street Cnr John Street, and car park behind OzHarvest and tennis court, car park behind WNC/Sterns Pharmacy adjacent George Street.

That parking takes many parked vehicles off the street, and provides parking for retail staff, WNC visitors, OzHarvest visitors, as well as tenant vehicles.

For the public to visit Waterloo South presently, such parking on LAHC is properly prohibited, and necessitates the visitor to park on-street. Such parking is feasible and available on weekends and public holidays, as there is empirically observed to be less demand for car space parking. However, in business hours, Monday - Friday, presently there is an observed paucity of on-street parking, a deficit of such availability, and on-street parking is at a premium.

The CoS council do well to have "abandoned" and unserviceable vehicles on-street removed, but have no jurisdiction or authority on the nominated LAHC land spaces.

In the presentations to me, I see no availability for tenants or even land (private) owners to park off-street. There appears no provision for off-street parking at all.

This would particularly apply to staff, retail staff, community centre attendees, health service centre attendees and visiting care /paramedic staff.

If the number of dwellings and homes is to be increased in total, how is the community to respond to a diminishment of car space parking accompanied by a total lack of LAHC land/off-street parking?

I see no mention of basement or other off-street car parking or even accessibility for office/retail centre staff.

Ends.

  
I am familiar with the documents and diagrams provided, and I attended the public information presentation virtual on 03 March hosted by RedWatch.

I refer to design for public recreation {large park} space nominated for extension between Wellington Street and Raglan Street. I determine that the green space/large park is a large area, greater than presently publicly accessible in any of Waterloo South, Waterloo Central and Waterloo North. The nominated area I determine is greater than presently accessible on "Waterloo Green" in Waterloo North.

I might presume that with such a large park area as nominated, that the present "Waterloo Green" area of Waterloo North will be ultimately built over with dwellings.

I empirically observe that that area of public green space identified as "Waterloo Green" is not in the main utilised by the native dwellers, now. Yes, the small basketball court area may be so, but not the expanse of green grass, other than maybe two special event(s) per year. This community of predominantly frail, aged senior citizens does not, in my judgement, necessitate a greater expanse of green (large park" area) than is currently on offer to them. They likely would not utilise it. There is no local demand

to my knowledge for areas to be marked as either football field (size) area or basketball (size) area. There already exists south of McEvoy Street, near Elizabeth Street, an expanse of green public recreation area that is not in sufficient demand

by this community of residents. Only visitor teams ingressing from outside suburbs play cricket or football thereon. The grandstand adjacent is a "white elephant" and disused.

Additionally, there is substantial cost to grass, seed and cultivate grass lawn area in a (large ) park area

between Wellington Street and Raglan Street from origin, previously covered by brick dwellings, and such expense could be averted.

It makes much more sense to me, to retain the grassed green area of "Waterloo Green" at Waterloo North, [ie: do not build over it] and

utilise the designed area between Wellington Street and Raglan Street, for brick dwellings , in toto. That is adequate for the expected community in Waterloo South, based on current recreational

habit and behaviour demand.  
Ends.

██████████  
I am familiar with the published documents and design plans provided to me, and I attended the public information session virtual on 3 March 2022 hosted by Red Watch.

I refer to the attribution of space to purpose for hobby/past-time/mental health and wellbeing viz. dedicated space to 'community garden(s)' or small building lots sprouting garden activity.

Presently in Waterloo South there is no attribution of dedicated space with security fencing for this activity.

Further north, there is the acknowledged dedicated space with security fencing, referred to as "Cook Garden", "Solander Garden" and "Marton Garden".

There are notionally traditionally, over extensive period now, been six (6) such dedicated spaces with security fencing for community garden, canvassing Waterloo and Redfern public housing estates.

In addition, there has sprouted over long term, smaller non-fenced tilled gardens adjacent to public housing building blocks, maintained by social housing residents (Chinese and Vietnamese natives in the main) eg. abutting 248 George Street; Flats 13 - 24.

These garden projects, administered in the main by CoS council, or local onsite UNSW Community Development Project (in Marton community room before closure) have high demand, and a wait-list for dedication of plots and participation.

The benefits to social housing residents are of meaningful communal outdoors activity, and the benefits within the discipline of cognitive behavioural activity within and for better mental health and wellbeing outcomes are well documented.

That same activity did not benefit myself much materially but certainly did act to improve my own rehabilitation from mental health disruption, in the past.

My scrutiny of the design plans and documents finds no nominated area(s) attributed to this pre-eminent communal, social and health amelioration activity, and I believe that to be a retrograde step, if the primary intention is just to urbanise, rejuvenate, upgrade the appearance of the suburb. A retrograde step in the interests of social housing and affordable housing residents, for the sake of the newcomers to be sited there.  
Ends.

██████████  
I am familiar with the documents provided to me, and I attended the public information Presentation on 03 March 2022 hosted by RedWatch. I have attended many meetings of Waterloo Redevelopment Group over the years but have lapsed meeting attendance of late due to health concerns, incorporating anxiety and panic.

The City of Sydney Planning Proposal Lodgement Checklist required a Social Impact Assessment, To examine a number of areas. I understand that LAHC had already prepared a Social Sustainability Report Council to accept their report rather than require a new Social Impact Assessment (SIA) in full.

I participated in the focus groups and workshops to derive the initial data collection for that.

As a consequence of the above, I believe there has been no SIA looking at the impact of this project on the existing residents, or particularly on the health ramifications or psychological distress caused to social housing tenants, or even any assessment of what may indeed be needed to ameliorate the impact on individual health on vulnerable existing residents.

The health impact of this process in toto on existing residents is ambiguous, widely unknown, and May indeed be significantly detrimental, with no uplift of residence, relocation or secondary

allocation into a new mixed  
Community even commenced yet.

This lack of a universal health impact assessment and social impact assessment study, despite being requested by this community at inception, indicates to me that that the proposal to date fails to plan appropriately for both current and future estate residents (whether priority social housing or other). The initial compilation and drafting of health impact assessments facilitated by SLHD was buried, And there was no attempt to complete the health impact assessment for this planning proposal On the psychological effects on residents of redevelopment in general.

My own keen participation in workshops, focus groups, meetings, communal sessions has lapsed of late, due not to lack of interest but due to health discomfort and upset. Extensive interaction with the public health system determines I have no physiological or other determinative cause for apparent ill-health.

My General Practitioner diagnoses that there is no apparent reason for my upset, but asks me: "Is there any particular stress or external consideration that may be playing on your mind of late?" That is my honest real life experience, as an senior man with health issues, social housing resident. A SIA report should be conducted and made public before determining the outcome of the process. Ends.

██████████  
I am familiar with the documents provided to me and I attended the public information session on 03 March 2022 virtual hosted by RedWatch.

As explained to me, the proposal is some ten percent greater than the figures provided to me and the community via the above-named means, probably due to "design excellence" being added on to the publicly disclosed quoted residential floor space.

I recall the Independent Assessment Group of the relevant Minister were recorded as having said: "having tested multiple options, the density should remain as proposed in the City of Sydney planning proposal".

The DPE planning proposal apparently does not test adequately the ten per cent higher density, to test and examine how it might work out.

Advice passed to RedWatch is to the effect that DPE making such increase in density to accord with the LAHC specification(s) might have involved substantial testing. There is no evident indication that such testing of the feasibility of a ten percent increase has been conducted.

The City of Sydney has also advised RedWatch that its own work on design has not been updated in the design guide, in order to show the likely outcome from such development, on the density at commencement.

With such ambiguity and disparity in design guide opinion, I cannot support the subsequent proposal as presented. Surely, there is an optimal design outcome as yet to be exhibited.

Ends.

██████████  
I am familiar with the documents provided to me and I did attend the public information session virtual hosted by RedWatch on 03 March 2022.

Little has been presented or discussed on the social impacts of a mixed tenure community as proposed, but that is of concern to me, as a senior, frail, aged person, with chronic health condition(s), likely immune-compromised and social housing tenant living alone in a one person household.

With a residential design excellence bonus on offer, the proposed development and tenure mix could be 10 % larger than outlined in the base case. The proposal would limit the proportion of social housing units in the design area by likely some 70% to about 30% of residential units but locate these in high density and also high rise built form. Essentially, the aim of the project is then to

replace existing residential buildings, which are mostly social housing , with new, mostly privately owned dwellings and at a greater density.

There is no apparent strategic merit assessment of any specific likely social impacts.

One tall building is sited proposed for the south-west position of the estate near McEvoy-Cope Street corner. I fully expect that would be attributed in full to a cohort of social housing tenants in acknowledgement of its proximity to McDonalda retail outlet.

Where can you expect to find the concentration of small, cheap mal-nutritious retail food outlet(s)? Always close to and in direct line of sight of social housing tenants.

Another tall building is sited proposed for the north-east position of the estate abutting Waterloo Park, and with greater elevation. I fully expect that would be attributed in full to a cohort of . . . . .

. . . . .

I lament the apparent lack of adequate consideration and discussion of social mix and associated consequential social impacts in a mixed tenure estate, when the design(s) proposed invite immediate presumption(s) of pre-meditated sorting.

Ends.

SUB-1125

Name withheld

Pitt St is a rat running road. Opening it up will further perpetuate this. Cars speed - lots of people are nearly run over on the zebra crossing! Delivery drivers often complain of near accidents. Currently, Congested turning from Pitt St onto Redfern St & from Pitt onto Cleveland St. Close Pitt St so cars go via Wellington St, then onto Elizabeth St, or straight onto McEvoy St! Higher density building near main roads - McEvoy & Regent St. Don't get greedy, by repeating the Green Square congestion nightmare!! We haven't got the resources or facilities in this area for extreme high density living! Current home owners should have specific residential only parking areas. It's hard enough parking now!! We have to park on roads so make sure that we can. I'm sick of driving around for hours looking for parking spots!! Wastes petrol & time!

SUB-1126

Name withheld

I have lived in Waterloo since 1994

In that time I have been on the local neighbourhood advisory board and the area board for the Dept of housing and regional board of the Dept of housing

The drug action team

The DOCS Street team board

And volunteered on the street beat bus

And in the 1980s and early 1990s I attended the gym in Eveleigh street Redfern

Currently I represent the community on the Sydney local health district board dental Hospital

So I know a lot of people in this community

The great majority of people support this proposal and look forward to it getting started

A small minority of people some who do not live in this community have tried to stall this project since it's inception

So I write to tell you that the majority of social housing tenants also support it and every private owner I have spoken to supports it

It is what this community has long needed

You have the majority of community members support

SUB-1179

Name withheld

I'm absolutely against this development plan. By developing more social housing and increase capacity of housing, our road and traffic will end up in disaster, our road are not designed to support main ongoing traffic flow. Its already a nightmare every morning during peak traffic time.

SUB-1190  
Richard Richard  
richardbento@hotmail.com  
2049

Could we please have a “strong focus” on greening our street scapes lots “canopy trees” -  
Underplanting, cutout pathway areas where trees may not be appropriate. Let’s beautify and green  
our suburbs and contribute to a cleaner less toxic carbon community

SUB-1198

Name withheld

Dear Sirs

We currently reside at [REDACTED] directly south of the new development just east of George Street.

Whilst we welcome the redevelopment, I wish to raise two primary concerns, the impact the development will have on sunlight to our apartment block and the amount of trees that will be removed directly opposite our apartment balcony.

Other than increased yield prices for the land I see no benefit to build tower blocks on this piece of land. Furthermore, whilst the proposal has considered the amount of sunlight for the new apartment blocks I see no viable consideration of the apartment blocks to the south of McEvoy Street. In particular we raise concerns with the 27 story tower block that will be directly opposite our unit depriving us of any sunlight during the entirety of the Winter months of the year. Even the low rise units be considerably higher than the blocks on this side of the street and could block the light if built to the highest permissible storey.

We also have an excellent view of 10-20 mature trees and it is unclear if these trees will be retained as part of the new development. Given the scale of the recent flooding and the desire for high tree canopy coverage we would encourage you to ensure that these trees are retained at all costs.

On a more practical consideration we would also recommend the inclusion of retention basins across the estate to prevent the low level flooding that has occurred recently.

Kind Regards,

[REDACTED]

SUB-1200  
Kathleen Hill  
kathleenhill99@gmail.com  
Waterloo

I am very concerned about the height of some of the proposed towers in the Waterloo Estate (South) plans, in particular the 27 storey tower on the corner of Kellick Street and Gibson Street. This tower would be far too close to the heritage listed site of Our Lady of Mt Carmel church and school and would have a significant detrimental effect on the community of people served by the church and school. In particular the negative impact of the down-draft winds would not be acceptable and despite claims, would not likely be mitigated to an agreeable extent by the existing trees, or even a newly planted substantial forest. Additionally, there will be significant overshadowing that will deprive the church and school of much needed light. The same concerns apply in relation to the 30 storey tower on Pitt Street near McEvoy Street.

There are no buildings of similar height anywhere nearby and to introduce such tall structures would be out of character with the existing street scape. If such large buildings are required, surely there are better places to build them.

SUB-1201

Name withheld

Dear PLANNERS of the WATERLOO - SOUTH ESTATE,

I have lived and worked as a psychologist and health practitioner at the southern end of Cope Street, Waterloo South Estate, for the past 24 years, since 1998.

For several years, since it was first announced that the Waterloo - Metro Station and Major Rezoning of Waterloo was going to take place, I have been creatively and enthusiastically participating in the discussions about the future planning of this area and writing hard copy letters to the respective Ministers for Planning, the Hon. Mr Robert Stokes, as well as the Hon. Anthony Roberts, as well as leaders and decision - makers within the Land and Housing Corporation.

I would basically love to see WATERLOO - SOUTH ESTATE as a role - model of energy saving, plant - covered, oxygen - creating, sculptures of high-rise buildings, where parks, gardens and walkways are prolifically built on top of numerous rooves of high buildings, so that there would be many public outdoor spaces in the sky, rather than on the ground, where land is limited. With this overall design, you can fulfill the much needed amount of accommodation, services, cafes and retail outlets required, without losing lovely green outdoor spaces. There could also be ultra-strong, glass walkways between different high-rise buildings, that do not limit light, but give lots of options for long plant - lined walks and even possible bicycle rides, between buildings, at different heights. High-rise buildings also create much needed shade, which will greatly cool the street levels, as well as personal residential and commercial balconies. Much more Oxygen is created by having most buildings covered in greenery, with beautiful parks and gardens on most rooftops. People can exercise, sit, read, meditate, community garden and picnic outdoors, up high in the sky, where they can access fabulous views and lovely breezes during the warmer months.

I would dearly love to see the original, early 2018 planning ideas of OPTION 3, that the LAHC actually wanted in the first place. I believe that LAHC would be most wise to re - ignite and strongly go for what they originally wanted previously, before their ideas were watered down by others, who did not really appreciate what I have assessed as their best ideas, which were their earliest ideas.

Please see my ATTACHMENT below that shows OPTION 3, specifically named "WATERLOO PARK" in early to mid - 2018, which is my personal favourite of the LAHC earliest submission. Option 1, would be my second choice. (I do not like Option 2 at all.)

I would be immensely grateful to hear back from a decision - maker of both the LAHC, as well as NSW State Planning, regarding what you both think about my strong encouragement for both government departments to fully adopt OPTION 3 - WATERLOO PARK that existed as a real choice back in early to mid - 2018.

I look forward to your response,

A large black rectangular redaction box covering the signature and name of the sender.



SUB-1209

Name withheld

Opening Pitt Street to McEvoy Street will create a rat-run/thorough-fare along Pitt St, even with left in, left out, particularly for traffic coming east along McEvoy (as WestConnex M8 now opening onto Euston Rd/McEvoy St). Pitt St will become a convenient new route to reach Cleveland St/the CBD, and to avoid Elizabeth St, which has more traffic light stops and diverts into Redfern St to join Cleveland St. Pitt St Redfern has 3 day care centres (ROC, SDN, Only about Children), in addition to other close day care facilities on Raglan St (KU James Cahill), and Wellington St (Lois Barker SDN). Pitt St is also predominantly residential terrace housing. Already facing speed and traffic issues, opening this street up will create further concerning safety issues for local residents, and those with young families picking up/dropping their children safely (from day care; and the new Inner Sydney City school) - that no speed limit or special traffic slowing could reliably enforce. As a resident in the street, I have witnessed traffic accidents and regularly see vehicles (car/motor bikes) travelling well in excess of the speed limit.

Could I suggest alternatives be considered, and at worst case, if the road needs to be open, to create a dead-end middle of Pitt Street, so access is provided to Waterloo South, but also the safety and residential amenity of the community is looked after, particularly for those currently residing or dropping children off in the street. In similar circumstances, this has been done in Alexandria, on Belmont and Laurence Streets (to prevent rat runs for Mitchell Road), which has been enormous for the residential community spirit there, and seeing children out playing.

For example, a dead end in Pitt Street, at the southern side of Phillip Street, would provide access onto Raglan St, via Phillip street, improve the pedestrian amenity and safety for people walking down from Phillip street (lane), and at the same time, act as a deterrent for rat-running traffic.

Thank you for considering the well-being and safety of residents and children in the Redfern community.

SUB-1225

Svetlana Rodgers

svetlanarodgers@gmail.com

Waterloo

-Density - unimaginably high density calculated to break even, which has nothing to do with liveability. People would feel alienated and lost in the forest of high-rises. Many social housing tenants are house bound and have serious health issues – the high-density settings are not suitable for them, providing more relaxed settings in other areas of Sydney could be a better option.

-No solar access diagram was provided by the Proposal; the Hassel diagram 4.6 shows that the significant part of the development has less than 2 hours of direct sun; the common open spaces are mostly overshadowed – this is not acceptable.

-Building 110 Wellington street is four storeys tall and consists of three towers; if the buildings around it would be eight storeys tall, the inner units will not have enough sunlight

-Environmental issues – urban heat islands from the high density, the Climate Change report states that the Redfern area is already worst performing within the City of Sydney. The assumption of the Air Quality report is based on traffic speed of 10km /h, which is lower than the allowed speed in the Traffic report; according to the report, many pollutants would be increased in the area.

-Green spaces – the new park opposite the station will be overshadowed by high-rises around it and compromised by the constant stream of diesel state transit 392 buses on Raglan street and the increase in frequency of diesel 355 buses on Wellington street. The Mount Carmel park would be overshadowed by the new 33 story high-rise and the newly created traffic flow from the opening of Pitt street to McEvoy street

-Traffic – minimum car traffic is recommended by the Air Quality report; according to the Traffic report table 5.1, 236 000 new trips per day will be generated. To encourage pedestrian access, protect open spaces and minimize pollution in the estate we suggest the following:

1. To keep Pitt street closed to McEvoy street traffic – the Air Quality report by SLR diagram page 71 Figure 20 'Maximum Predicted Cumulative 24-Hour Average Ground Level PM2.5 Concentrations' shows the high level of pollution on the corner of Wellington and Pitt street.
2. To remove the suggested 1685 parking spaces in the development close to the station, leave only a few for the units for disabled.
3. To stop state transit buses through the Waterloo estate; instead, use the major traffic corridors around the area to streamline bus flow. Provide bus exchanges at Redfern and Waterloo stations to stop buses cutting through the quiet residential areas.
4. Any local buses crossing the Waterloo estate should be electric.

SUB-1241

Name withheld

Dear Planning Officer,

I am a unit owner at [REDACTED] Waterloo. I am writing to provide my views on the proposal.

- The Waterloo South Affordable Housing Financial Feasibility Assessment available on the exhibition portal finds that it is not feasible to redevelop 110 Wellington St at any rate of return. That finding does not even include an affordable levy. That shows that proposed height/storey limit is insufficient. The feasibility of redevelopment will get worse rather than improved as the market values will only go higher.
- The master plan aims to renew and redevelop Waterloo South. It seems that it will be a waste of public's money if the proposal is deemed financially not feasible. Many private land owners echo the concerns around what is the point of spending years of planning and proposing a plan that is not considered financially feasible?
- Also, I have concerns around the overwhelming shadow that will be projected to 110 Wellington St, Waterloo from surrounding future development on LAHC land on a higher land elevation and with higher storey limit.
- The renewal is anticipated to be developed over 10 years. I have significant concerns around private land owners' safety, health and wellbeing as a result of the noise and pollution from the future development on LAHC owned land.  
I am hoping that the planning committee will consider a higher storey limit for 110 Wellington St, Waterloo to make the redevelop financial feasible.

SUB-1242

Alexandra Bodganova

ale.bog.and@gmail.com

Leura

Developing an area that is in the centre of a big metropolis is a critical step in creating connections and adding value to the existing neighbourhoods. However, the increase in road areas is concerning. The precinct doesn't target a reduction in private vehicle dependency and improvement of active mobility. The masterplan doesn't show the creation of a safe streetscape for diverse mobility.

SUB-1252

Name withheld

Is fine to create modern living in an area but to do nothing about the road system is beyond belief. McEvoy Street cannot cope with the current traffic conditions after the complete stuff up of building the M8 and having traffic flow onto it and into Burke Street. Parking needs to be removed from both sides of the street at all times to enable two lanes of traffic in each direction to flow freely. The bottleneck at botany Road and McEvoy Street causes havoc with traffic. Also takes is a red arrow left and a red arrow right with traffic turning which causes traffic to back up down McEvoy Street. 30 story buildings I do not support.

SUB-1253  
Anushka Chainani  
anushka.chainani@hotmail.com  
Alexandria

To whom this may concern,

My husband and I are writing to express our opposition to the planning proposal **PP-2021-3265**.

We would like to state an objection to the construction of the tall buildings planned for Waterloo Estate (South). We are owners living in building 222 Botany Road in Alexandria, opposite McDonald's, Waterloo, and we are opposed to this development for the reasons stated below:

- Exposure to sunlight will be blocked in our and others' apartments. The construction of these tall buildings will create shade in our balcony area and inside our apartment which we currently have and enjoy.
- More buildings in the area are going to result in over-population in an already busy location as well as constant traffic and further road noise on weekends, especially around Botany Road.
- Visual impact will be blocked by the tall buildings being constructed and our current view of the trees, sky and sun in the Northeast will be obstructed.

We would like to ask if consideration has been made for the re-negotiation in the construction of these buildings for Waterloo Estate (South).

Thank you,  
Anushka Chainani & Benoit Andre

SUB-1258  
Will Lawson  
will.lawson@outlook.com  
Waterloo

The tall building proposed for the corner of Kellick and Gibson Sts will have a considerable visual impact on Our Lady of Mount Carmel School and the Waterloo Heritage Conservation area.

Can the location of this building be moved in order to retain the character of the area?

SUB-1259  
Lee Thompson  
leethompson1985@gmail.com  
Waterloo

Overall I'm in support of this, however the placement of a tower right next to a heritage area of OLMC church, and the heritage houses across the road on Elizabeth St seems ill thought out.

The church & school should not be overlooked by a tower, and the heritage houses on the other side of the road cannot change anything about them. Overlooking them with a huge new tower is hypocritical. There must be a better location for this tower than ruining a beautiful heritage area.

SUB-1260  
Martin Davies  
martindavies123@yahoo.co.uk  
Waterloo

I want to register my dissatisfaction around the treatment of the current private residents of the development area and my concerns around the development of the site bounded by John, Cooper and Cope Streets with John to the south.

As private residents we will be forced (by economics) to live through the development of the Waterloo South site, with little option to sell our unit due to the impact of the impending development on the price we could realise.

As noted in your feasibility study, the land we occupy is unfeasible to redevelop, yet you refer to the study as 'point in time' and suggest that it will become more feasible over time. When? How? By how much? Unless you can quantify your statement you simply cannot say it and by doing so you undermine faith in the process. Do you guess other parts of the plan?

The land we occupy (237 Cope Street) is tied to the land to the south in the plan, with twinned developments proposed. Will the development to the south be able to go ahead whilst meeting the Unit Planning Guidelines? Or will we have a development on our southern boundary that under other circumstances wouldn't achieve planning consent?

Finally, do the dwelling numbers in this plan rely upon the proposed development of the private lands and if so, bearing in mind the feasibility study suggests that developers will not purchase these lands, what are the dwelling numbers without the private lands and where will the numbers be made up to account for this shortfall?

SUB-1274  
John Hackett  
johnhackett@iinet.net.au  
Alexandria

While I'm happy for the area to be developed and improved I worry about traffic flow and on street parking once Waterloo station has been completed. I ready parking on Botany rd, Wellington st and Cope st has been all but totally removed making it hard not just for those without onsite parking but for tradespeople and removalists. If there is to be more housing built this will only exacerbate the problem. I assume here that there will be no parking for the entire Waterloo station block.

Also, at present the lights at Wellington/Botany are on a cycle making it very slow to cross Botany Rd in either direction. The peak hour jam that occurs both on McEvoy st and Raglan st while trying to cross eastwards across Botany rd has been increasingly bad for the past year or so. The roundabout at Cope/Raglan gets totally blocked.

SUB-1450  
Serafima Rybka  
serafimarybka@gmail.com  
Waterloo

I live in the Martin building, Waterloo.

I do not believe that public tenants could live in such dense development as the majority are house bound and have serious health conditions.

The original setting in Waterloo had a lot of open space for relaxation.

The model where people live in sunless units and asked to go to the communal park is what is practiced in China. I know that some of the Chinese residents here do not object, but I don't think Australian people like this way of life.

If the Government wants to maximize the return on the valuable land, perhaps it would be better to provide social housing with lots of open spaces in other cheaper areas of Sydney using the funds generated in Waterloo.

This would also solve the problem of the squalor we are experiencing here - uncontrollable dumping of rubbish and feeding vermin with OZHarest food.

The Government would not be able to sell the units at a premium price if buyers would see the current pictures of horror we are seeing.

The open places you are offering in the Proposal will be overshadowed by the tall buildings around them, they would be over-run by revving buses - the State Transit 392 on Raglan street and the increased frequency of the 355 bus on Wellington street.

This and the additional 1680 cars (planned private parking spaces) as well as opening of the Pitt street would make our lives hell. Please, remove the parking which is not needed in this development next to the station, leave only for the units for disabled.

I thank you for your consideration.

SUB-1458

Name withheld

I strongly disagree with the proposed development at Waterloo South. The Waterloo/Green Square area is already over-developed and over-crowded. I don't believe that this planned redevelopment is necessary, and I don't believe the plans accurately reflect the negative impact the redevelopment will have on traffic congestion, the environment, and the lack of green space and schools in the area. Futhermore, if redevelopment of the area should occur, it should be exclusively social housing. This area doesn't need additional private homes; and it is disgraceful that developers have managed to take hold of social housing land.

I strongly oppose the inclusion of 30 story buildings, which are unsightly and unnecessary.

SUB-1471

Name withheld

Here is my submission.

Ref: The opening of McEvoy Street onto Pitt Street

I am writing this submission to strongly oppose the opening of Pitt Street to McEvoy Street as part of the Waterloo South redevelopment.

Here are some major points:

Heritage -We have recently moved to Redfern and love the fact that the area has significant historical heritage including some of the most significant architecture of the late 19th century which has been maintained. This is increasingly rare in Sydney. Redfern is also a Heritage area in parts of which Pitt Street is part of.

Pitt street is one of the streets that has maintained the authenticity of the area with many Victorian terrace houses, including the terraces of Mrs Glover, one of Australia's first female builders (from which the name Glover Lane was created). Dr Redfern's farm manager's house still exists and some of the most beautiful colonial Georgian style houses near Cleveland street.

These houses were not designed or built to withstand the heavy traffic flows that have the potential to be created via the opening of a major road (McEvoy) into Pitt Street. The vibrations are bad for the structures and the foundations and the pollution created is deleterious to not only the health of the residents but also the buildings' upkeep.

Traffic will always look to the path of least resistance and increasing traffic flows through this area would be inevitable.

Width of Street & children -Pitt Street is also a two lane street and narrows significantly in places. It houses multiple child facilities from day-care (three) and after-school care, the street is populated with many children, families and pets. Not a street designed or capable of accommodating an increase in traffic flow.

There is also at least two sections of Pitt Street with nose to curb parking for cars, which slows the traffic flow with people parking and narrows the street. There are also successful (yet amenable) to the community cafes and restaurants which would be negatively impacted by more carbon monoxide fumes and car pollution. As it is, cars often bank up at the corner of Pitt and Redfern streets, making for noise and pollution.

Noise - The noise levels would also rise, and Pitt street is predominantly a residential street.

Conclusion -Residents shouldn't have to bear the brunt of the potentially major negative externalities of the street being opened up to a rat run for the increasing population that is coming to Waterloo South. The facilitation of more traffic on historic residential streets, runs counter to the work and claims of City of Sydney on working towards more sustainable cities and communities.

Air pollution, noise pollution and vibrations have the capacity to substantially erode public amenity and that of the residents and the community.

SUB-1479  
Thomas Oskar  
lynch.thomas@hotmail.com  
Waterloo

There must be more separated cycleways as part of this development. You are not proposing to install any new separated cycleways, instead, you are simply promising not to remove the current separated cycleway on George Street. Not good enough!

You must install dedicated cycleways on all the roads that are within the development area, for example, Wellington, John and Pitt Streets should all have dedicated cycleways.

Pedestrians and cyclists must have priority over private motor vehicles.

The footpath should be extended on McEvoy Street. McEvoy Street is currently one of the most unpleasant streets in the area as it's just a busy, dirty, polluted funnel for cars. The number of cars using the street must be reduced. This can be done by extending the footpath so there are less car lanes, as well as reducing the speed limit. This is particularly needed given it is proposed to have three large towers on McEvoy Street.

There also needs to be pedestrian crossings (zebra crossings, with pedestrians having priority over cars) on all the streets within the development area. Pedestrians must be able to cross the street with priority over private motor vehicles.

There should be no more than one car lane in each direction in each street.

SUB-1484

Name withheld

I would like to voice my support for this proposal.

This piece of land is very well located and suitable for transit oriented development and as such, we should be maximising the opportunity to build as much housing as possible on this land. I would actually encourage this proposal to be scaled up with taller buildings.

I support the provision of as much parkland and amenities as possible, however we need more housing in our growing city.

SUB-1490  
celticphoenician@hotmail.com  
Surry Hills

It is very pleasing this area is being redeveloped, it is sorely needed and long overdue. The total increase in housing and TOD are great to see.

While very supportive of the broader redevelopment and increased transit access, there are a few specific concerns with the plan I wanted to raise:

1. Why are the new buildings so short?

This is an enormous piece of land but it appears to be poorly used. With the high pre-dominance of low and medium-density buildings, most of the available space is given over to building footprints. It would be far better have fewer taller towers and increased open space for the public to enjoy. The rows of low, closely-clustered buildings give a distinct ghetto-vibe. The new development around St. Leonards should be the aim with a beautiful public park in the middle.

2. Why are the existing eyesore buildings not being redeveloped?

I appreciate everyone has their own architectural preferences but it's very hard to see many people appreciating the revolting 70s, soviet-style concrete bunkers that litter the site. This is the perfect opportunity to tear them down and replace them with something that adds to the character of Waterloo, rather than acting as a giant warning sign to stay away. I can't imagine they're remotely comfortable for the residents to live in either.

3. How does the retention of social housing on this site help meet the strategic aim of a 20 minute city?

Waterloo is within walking distance of the southern end of Tech Central and one metro stop from the city proper. The city and its immediate suburbs should be densified with people working in the city to reduce the burden on our transit networks. There are huge swaths of Sydney that are un/under-served by public transport and we're spending a generational fortune to build metro to bring them into the city (I fully support the metro btw).

When we have the opportunity on a huge site to bring in many thousands of workers right to the doorstep of the city and get them to our 20min goal, we fill it with social housing. It's contradictory to good city-planning and our own stated aims. It's a doubly bad strategy as this land is far more expensive than land which isn't adjacent to the city, so we're reducing the amount of funds we have for social housing. So instead of providing more social housing, we're providing less, in the wrong place, and forcing more people on to our already over-crowded transit networks.

It seems like bad policy-making any way you look at it.

Thanks for reading - my apologies you have to read all these submissions, I'm sure there will be lots predominantly consisting of exclamation marks and all caps. Stock up on the coffee. Or drugs. Whatever helps get you through.

And while I've got your attention, any danger we'll get a look at the plans for Barangaroo Central and Circular Quay any time soon?? I'm very keen to see both and it's been a while.

SUB-1512  
Olivia Lambert  
liv\_lambert@hotmail.com  
Zetland

Great to see that this portion of city owned land will be utilised for new housing and better designed social housing.

If anything the city should consider increasing the density to allow for more apartments. To reflect the demand from the growing housing market. This is a unique opportunity for councillors to create more apartments so close to the city and a new transport hub. Density should be pushed to the maximum to future proof this new suburb for generations to come.

SUB-1518

Name withheld

I'm very against the tall buildings along McEvoy. They'll block sunlight and take years to complete causing disruption in the area.

SUB-1519

Name withheld

The planned development of Waterloo south does go far enough to revitalise and renew the area. The northern boundary should not be Wellington St , but rather the development should be extended all the way to Philip St to ensure all of Waterloo is improved.

Stopping half way is completing half of the job. The project needs to include the whole area.

SUB-1551

Name withheld

My submission is short.

### 1. Height & Density

Please reduce the height of the towers & density of the project and look to Zetland as a model. Tall tower blocks are fine in the CBD but look at how ugly and out of place the blocks that are there already are. They don't suit suburbs with terraced housing.

Yes we need more social housing but not so densely populated in imposing towers. Spread social housing across Sydney, don't just pile it all into a few imposing high rise blocks.

### 2. Local amenities

Again please look to Zetland as your model. Mid height blocks around parks, local school & other amenities that locals actually want & need.

Please survey the local residents of the area to ask what their actual community needs are before signing off on this plan.

Thank you for taking into account my thoughts on the Waterloo project.

SUB-1555  
Thomas Foxton  
tafoxton@gmail.com  
Waterloo

I strongly agree with the proposal to redevelop the area and with the plans as presented.

As a Cope Street resident and property owner (at 186-188 Cope Street), the redevelopment will have a significant and detrimental impact on on-street car parking availability in the area, however. There are currently parts of Cope Street with no parking restrictions, allowing residents of properties such as mine with no on-site parking provision and a restriction on our ability to apply for on-street resident parking to park near to our property.

This development will fundamentally change the car parking on Cope Street and likely severely affect our ability to continue to park in this way - either because it will see the introduction of new parking restrictions or the inflow of new residents. Consideration should therefore be given to lifting the restriction on existing multi-unit properties built after 1996 on Cope Street from being eligible for an on-street parking permit.

SUB-1560

Name withheld

The following are issues that as an existing private resident I have issues with:

- making one way, currently quiet streets, two-way and a high way - e.g. West Street - which you want to connect to McAvoy and bring a huge amount of traffic into the area and down this street. This will destroy the peace of residents currently living next to West Street, but there seems to be no care about that. This must not happen also more danger to children and animals with road accidents.

- Density excessive - this I believe is also calculated to a break even financial formula, which has nothing to do with liability. It will reduce the value of current properties.

- Overwhelming and socially unsustainable – there are many social housing people who will not cope with the new set up. Also the taller buildings will be oppressive and help destroy social fabric. People will be totally on top of each other and this is not a good social environment.

- No dynamic solar access simulation has been provided in the submission, the Hassel diagram 4.6 shows that the significant part of the development has less than 2 hours of direct sun – not acceptable'

- Financially unsustainable - the Savills Consultants report shows a marginal break even, they make a disclaimer that they disagree with some of the findings and have a difference of opinion to LAHC; consultants used market values for units in the adjacent areas, which do not have social housing - these are not valid assumptions. Undesirable social aspects and squalid conditions in social housing could significantly reduce the market value of units. The increase in interest rates and in the influx of buyers from China would also reduce the value. This would significantly increase the break even point and thus demand ever higher unimaginable and unsustainable density to justify the development proposal

- Environmentally unsustainable – This will create urban heat islands, the Climate Change report states that the Redfern area is already worst performing within the City of Sydney. The assumption of Air Quality report was that traffic speed is 10km /h which is lower than in the Traffic report, according to the report many pollutants would be increased in the area

- Green areas - canopy coverage of 30% recommended by the Air Quality report is not achieved in the Waterloo South, the large park outside the area is compromised by the state transit buses and the increase in frequency of the 355 bus route, later it would be overshadowed by the high-rises in Waterloo Central and Waterloo North

- Traffic – reduced car traffic is recommended by the Air Quality report, according to the Traffic report table 5.1, 236 000 trips per day will be generated. In order to encourage pedestrian access, protect the large new park and minimize pollution from traffic in the estate we suggest the following:

1. Keep West Street a one way, one lane street.

2. Keep Pitt street closed to McAvoy street traffic – if this happens, the Air Quality report by SLR diagram page 71 Figure 20 'Maximum Predicted Cumulative 24-Hour Average Ground Level PM2.5 Concentrations' shows high level of pollution on the corner of Wellington and Pitt street

2. Reduce the number of property parking spaces in the development to reduce traffic - the whole point is using the subway.

3. Stop state transit buses through Waterloo estate, use the major traffic corridors around the area instead

4. Local Waterloo estate buses should be electric and quiet.

In conclusion, the development is socially, environmentally and financially unsustainable - the development around Mascot and Wolli Creek which is disgusting shows how awful this high rise, high density approach is. Also Green Square is an eye sore and properties further on look into each others balconies and it there is no privacy.

SUB-1562  
Geraldine O'Brien  
inscribe@bigpond.net.au  
Sydney

As a resident of Pitt Street Redfern I strongly object to the proposal to open Pitt Street from McEvoy to Cleveland Streets. There is already a heavy volume of traffic along Pitt Street and this will only exacerbate the problem. Pitt Street is a long established residential street, which also has two child-care centres between Philip and Cleveland Streets. The redevelopment of the former Rachel Forster Hospital site has parking for about 150 + cars, meaning yet more traffic, and parking is already at a premium. Just the other day I counted over 40 cars lined up from the south towards the Redfern Street lights. The area is very well served by public transport (and will be better off still with the new Metro station opening at Waterloo). We do not want MORE traffic. We want clean, quiet, efficient public transport and we want to maintain the amenity of our homes and maintain an environment which is safe for children, the elderly and all pedestrians. If more road space for yet more cars is deemed necessary, why not open Elizabeth Street to two-way traffic between Cleveland and Redfern Streets. Pitt Street is only two lanes so it cannot be widened.

SUB-1563

Name withheld

As a resident of Redfern I am would like to lodge an objection to the proposed extension of Pitt Street through to McEvoy Street.

The proposed extension will create a 'rat run' from McEvoy Street through residential Redfern to Cleveland Street, providing access to:

- The CBD
- Moore Park Precinct including the Sydney Cricket Ground and new 40,000 seat stadium
- The Eastern Suburbs

This access will provide an alternate route through our area for traffic from the WestConnex. Pitt Street, Redfern currently becomes a 'bottleneck' when delays are experienced on Cleveland Street, Botany Road and South Dowling Street. The proposed changes will further exacerbate this problem. Existing 'traffic calming measures' do not deter the practice of using Pitt Street in this way. There is no evidence as suggested in the report by Jacobs that traffic calming measures actual deter those wanting to use residential streets as 'rat runs'.

I request that in the interests of the residential amenity of the area that the proposed extension not proceed.

The Department's consultation with impacted residents of the changes you propose to make is at best inadequate and potentially deceptive. Impacted residents should not be expected to go to a website that has 49 documents to identify a subsection within a document of 82 pages.

SUB-1564  
Gregory Pearson  
keydigital@live.com  
Waterloo

My only feedback is to have ZERO housing commission / social housing. Housos are a demonstrable failure in Australia. Watch one Episode of Housos. Or if you disagree, why not buy a property close to a houso estate yourself? Whats holding you back? You know it and I know it, everyone knows this to be fact, houso estates are almost the kiss of death to any suburb. I live in Waterloo and it's miserable. We almost need one new police station for each houso district.

SUB-1565

Name withheld

I strongly disagree with the proposal to join Pitt Street with McEvoy Street.

This will have the effect of destroying the quiet residential area of Pitt St Redfern.

Making Pitt St a through-road at the south end will create a 'rat-run' along Pitt St between the CBD and Moore Park, airport, and Eastern suburbs for traffic to avoid Elizabeth St. It will increase vehicle traffic on what is now a quiet residential street. It will create unsafe conditions with more cars, encourage faster and more dangerous driving and reduce the amenity and village feel of Pitt St Redfern.

Whilst the proposal otherwise has merit, I would strongly request this part of the proposal be reconsidered to avoid a flow-on effect of destroying the north section of Pitt St between Cleveland St and Raglan St.

SUB-1567  
Clinton Ault  
clintjault@gmail.com  
Redfern

I live/own at 187 Pitt Street Redfern, and I am terribly concerned about the plan to open Pitt St from Cleveland Street through to McEvoy Street. Pitt St will become an alternative rat run to Elizabeth Street and unfortunately Pitt St is a residential street that is narrow and has parking on both sides of the street and ill equipped for the current level of traffic. Cars parked parallel on Pitt Street which means that families are already weary to cross the street in many cases because they do not have a good view and in fact when you are driving along that street you also often must pull over and let a car pass because the parallel cars are too far out and both cars do not fit. If you were to remove the parallel parking many residences would have nowhere to park their cars because this street is full of terraces that do not have parking. Not to mention that they Rachel Forster hospital has been turned into Apartments and these are yet to occupied so we do not understand the impact of this project on Pitt Street and the neighbourhood.

Often, I lie in bed at all hours of the night and hear people hooning up the Pitt Street and as they discover the speed bump near my house so the engine gurgles and breaks squeal as they as they realise it is there. It very unsettling. If you open a large straight street up where there are unlikely to be police this is the behaviour that you attract.

Many of the streets in Redfern have been protected from this sort of behaviour like George, Chalmers, Walker, Kepos. it has forced all the cars to travel along Regent, Elizabeth, or Bourke where these major roads have better parking rules are wider and families avoid  
Opening this street up will also cause no end of traffic, jams due to parking and two cars trying to pass as is the case near Well St and it will also cause significant risk to pedestrians, particularly the many children that live in this street now. Can you imagine deaths being caused by this poorly thought-out decision and I am very certain that the community will be in outrage?

Cars/Trucks should continue to be directed up Elizabeth Street that is designed and equipped to handle high volumes of traffic

I am happy to be contacted at any time and I will take you on a tour of Pitt Street

Regards,  
Clinton Ault  
0459 162 403

SUB-1569  
Quinn Chow  
quinnchow@live.com  
Redfern

I object to section 6.7.5 "Pitt Street connection to McEvoy Street" of the proposal, as well as any other possibility of opening up Pitt Street to through traffic.

Pitt Street, from McEvoy to Cleveland Streets, is a prized local street with at least three child daycare centres. It is already used as a 'rat-run' by some commuters, and any increase in activity would jeopardise the quietness of the neighbourhood and safety of the children.

I understand the project team has modelled the potential for through traffic on Pitt Street, and said that the impact would be "very low". They have also stated the intended introduction of traffic calming measures such as pedestrian crossings and narrowing of streets. If the impact were so low, why would traffic calming need to be introduced at all? If through traffic would have to be discourage its use, then why open Pitt to McEvoy Street at all?

SUB-1570  
loli.cyp@gmail.com  
Redfern

This is in regards to the proposal on display that includes the extension of Pitt Street, Redfern from Cleveland street through to Mc Evoy Street, Waterloo as part of the broader Waterloo Estate Project. This is on page 82 of the transport study which forms part of another 89 document that residents are expected to consider and understand. <https://www.planning.nsw.gov.au/waterloo-south>

I strongly disagree with opening up Pitt street to McEvoy. This will have a huge impact on the traffic flow to Pitt Street which is already congested, specially at pick time and with a very slow red light that creates long queues of cars beeping at each other to get from the intersection fast when the light turns green for a few seconds! This is going to have a significant negative impact on the amenity of our residential area by creating a 'rat run' and increase traffic in our residential area.

It will increase vehicle traffic on what is now a quiet residential street. It will create unsafe conditions with day cares/residential street, encourage faster and more dangerous driving and reduce the amenity and village feel of Pitt St Redfern.

My ask is that council implement a cul-de-sac in consultation with residents and rate-payers on Pitt Street, Redfern in order to maintain the no-through status from McEvoy Street. This will not impact on the Waterloo Estate plan and will remove any false sense of security that traffic calming measures might provide.

Thank you for your support

SUB-1571  
Sarah Mandelson  
sarahmendelson@gmail.com  
Redfern

From Sarah Mandelson  
58 Pitt St, Redfern 2016  
10 April 2022  
RE Proposal for Waterloo Estate (South)  
PP-2021-3265

I support the overall plan for the redevelopment of the area with the following caveats:

1. I feel that the percentage of private housing is too high compared to social and affordable housing.
2. I object strongly to the opening of southern Pitt St, which has been closed for more than 30 years.

It is currently a quiet pleasant place but will become noisy and busy like the northern area of Pitt St.

It will also create a new rat run, and will make the northern part of Pitt St even worse.

I have no political donations to report.

Sincerely, Sarah Mandelson  
(Resident of 30+ years)

SUB-1572  
Alison Ziller  
alison.ziller@mq.edu.au  
Macquarie

# Submission re. Waterloo South Gateway Determination

This submission concerns the social impacts of the proposed Waterloo South urban renewal project.

I am a social planner with extensive experience in assessing the likely social consequences of planning proposals. I am also a lecturer at Macquarie University where I teach a specialist social impact assessment course as part of Macquarie's planning degrees.

The Waterloo South Gateway Determination report concerns the current proposal for the re-development of an area defined as Waterloo South. In summary, the base proposal is for 847 social housing units distributed on a smaller footprint than the current social housing (749 units) within a development of largely in 8-13 storey towers and four 27-32 storey towers. A small number of affordable dwellings (some 5-10% of net additional units) and 1,976 private market dwellings, 12,000m<sup>2</sup> commercial space and up to 5,000 m<sup>2</sup> for community facilities including a child care centre are also proposed. With a residential design excellence bonus, the development could be 10% larger than outlined in the base case. The development would reduce the proportion of social housing units in the area by some 70% to 27.7% of residential units but locate these in high density and high rise built form. Essentially, the aim of the project is to replace existing residential buildings, which are mostly social housing, with new, mostly privately owned dwellings at a greater density.

Residential units are where people live. Thus, both the current and proposed primary uses of this area are social. People's living conditions will be the long term product of the development. Since living conditions can vary from excellent to poor, the development proposal should address a basic criterion, namely:

## **Does the current proposal identify, and aim to avoid, foreseeable adverse social impacts?**

This submission sets out:

- the several ways in which the current documentation fails to meet this basic criterion, and
- a non-exhaustive list of significant social impact issues which should be addressed before a Gateway Determination is made.

# The Waterloo South Social Sustainability Report

In March 2020, a Waterloo South Social Sustainability Report [WS SSR] was prepared by the consulting firm Eltons for the NSW Land and Housing Corporation [LAHC]. The WS SSR states that it was prepared in response to Section 23 of Study Requirements for the Waterloo South project issued by the Department of Planning [DPE] to support a rezoning application to be lodged with the City of Sydney. The fundamental purpose of the report was to 'identify measures to promote positive social outcomes throughout the development of Waterloo South' and this was reflected in the Study Requirement 'to guide the implementation and scope of the project to promote positive social outcomes' (WS SSR p4).

While the Study Requirements also required an 'in-depth social needs analysis' and consideration of 'the relative equity of the project' (WS SSR p5), they did not require identification or assessment of likely adverse social impacts that might arise from the nature of the project or aspects of it. That is, the promotion of positive social outcomes was not expected to be derived from a consideration of what might go wrong. In fact there appears to be an underlying assumption that nothing could go wrong.

A separate Social Baseline Report was also prepared by the consulting firm GHD for LAHC. Although it was said to include 'recommendations and next steps to inform the preparation of the Social Sustainability Study' (GHD p i), the two documents were published concurrently (in March 2020).

The WS SSR was also prepared in response to City of Sydney Planning Proposal Lodgement Checklist requirements which included requirements for an 'outline of likely impacts' on relevant communities and 'a plan to reduce negative impacts' (WS SSR p5). These requirements seem to assume that 'likely impacts' might include some negative ones, but there was no direct requirement to work out what these might be. Further, the WS SSR says

Conversations between LAHC and the City of Sydney have confirmed that a social impact assessment was not required and a Social Sustainability Report could be submitted. This Report does not intend to follow the methodology of a Social Impact Assessment, however, it responds to the above requirements (WS SSR p 6)

The WS SSR was dated 25 March 2020 - more than a year before DPE published its Social Impact Assessment (SIA) Guideline for State Significant Projects. It might be said, therefore, that a SIA was not a mandatory requirement for this project. However, the question whether a SIA would be appropriate at this stage of major project development was raised by the consultants as reported at p6.

It appears therefore that failure to prepare a SIA, and identify likely adverse consequences, was not an oversight but a choice exercised by the responsible agencies.

The Gateway process is an initial and strategic high level assessment of what is proposed so as to avoid foreseeable flaws in subsequent development processes. The Redfern-Waterloo urban area is listed in Schedule 2 of the State and Regional Development SEPP 2011. The SEPP does not suggest that a major project at Gateway stage is not State Significant. In addition, while the Department's 2021 SIA Guideline for State Significant Projects had yet to be published, numerous guidelines were available at the time to which the LAHC could have referred for suitable methodologies. Even if a SIA as such were not mandatory, it was, and is, simply good practice to exercise caution at the early planning stages of a major urban renewal. One of the key functions of a SIA is to activate precaution. Consideration of social benefits alone is not a precautionary process. Assessing a planning proposal in terms of its likely benefits only is fundamentally flawed.

The omission of a SIA at this stage is formative. It validates a substantive and significant shortcoming in the planning process, and creates a precedent for omission of key social impact issues in subsequent documents. For this reason alone, the Gateway Determination Report lacks a justifiable basis for proposing this social initiative. A social sustainability report, and the WS SSR in particular, is not an alternative to a SIA.

A review of the documents suggests this Gateway proposal gives priority to developer financial feasibility considerations rather than the long term social quality and value of the places where people will live. Avoidance of a SIA appears to support this interpretation. An assessment is needed to take a long-view account of emerging futures to ensure that the buildings, and their spatial context, will be fit for their social purpose during their anticipated life, that is, not just during the period in which the developer profits.

In addition to the above major omission, the WS SSR report structure limits its analysis to three headings 'place, people and process' (WS SSR p 42). The basis for this report structure is unclear. It constitutes a second formative restriction on an assessment of likely social impacts. For example, the WS SSR could just as easily have been (but was not) structured under headings with a clear futures and precautionary focus, such as distributive equity impacts, public health impacts and climate warming impacts.

As it is, at best, the WS SSR is a wish list spun along with unsubstantiated claims and generalised assertions. This is epitomised by the list of targeted initiatives which appears at page 75 of the WS SSR, an extract of which is provided below.

Extracted from Table 7 WS SSR p 75

Group	Issues	Targeted initiatives
Children and families	High unemployment and low education levels Change in existing social and support networks	Access to programs and support groups especially for sole parent families Recreational opportunities through public open space Affordable childcare
Young people	Disengaged youth Mental health and drug and alcohol abuse	Training and employment Youth support services Subsidised TAFE Recreational opportunities

Targeted initiatives are beyond the scope of the project.

Further,

- According to the WS SSR, the list of issues and responses in Table 7 both 'identifies key issues and targeted measures for different groups of the community' and 'will be considered for targeted delivery to social housing residents ... by the future proponent' (WS SSR para 5.4.4 p 74). This sentence is not even consistent.
- The strategies as summarised in the WS SSR Executive Summary seem to be largely focused on social housing residents who will comprise at most 28%<sup>1</sup> of the anticipated residents of Waterloo South.

<sup>1</sup> Since most public housing residents are sole occupiers, 30% of dwellings (or 27.8% of GFA) is unlikely to result in 28% of residents being public housing residents.

- The WS SSR mentions the social determinants of health (p 19) but not the key findings of that literature as they apply to planning for housing.
- The WS SSR appears to accept that studies said to be underway are a sufficient substitute for identifying critical social issues.
- The WS SSR suggests that 6700m<sup>2</sup> would be provided for community purposes but fails to note that the child care centre, OOSH services and recreation facilities requiring an entry fee are likely to be mainly used by non-social housing residents – thus avoiding equity of access and provision issues.
- The WS SSR says that single tenure of buildings is supported by consultation findings (p44), but fails to say
  - a who was consulted,
  - b the stakeholder interests they represent, or
  - c how this feedback relates to research findings on this topic.

In short, the scope of the WS SSR is narrow both in terms of its focus on social benefits and in terms of its treatment of selected topics. It is opaque rather than foresightful. It does not appear to be tied to a strategic merit assessment of specific likely social impacts of this proposed development.

By failing to consider

- potential adverse social impacts,
- distributional equity issues,
- public health impacts,
- social consequences of climate change, and
- recent and foreseeable changes to the nature and distribution of work, work places and patterns of transport,

the WS SSR cannot be said to contribute reliably to a high-level strategic merit assessment of the social impacts of the proposed development. This is significant as the proposal is primarily for a long term residential development.

As a result a major required component of the Gateway Determination process appears to be missing. Thus, the Waterloo South Gateway Determination Report does not appear to meet the Department's requirements for 'a high-level check'

and 'a strategic merit assessment' of this planning proposal against 'potential environmental, social, economic and infrastructure impacts'.<sup>2</sup>

## Strategic merit assessment omissions

The current proposal omits high level strategic social outcome concerns, which include but are not limited to:

- i the distributive impacts of the proposed development on social housing and private housing in the City of Sydney and, separately, Greater Sydney;
- ii other distributive equity issues (such as the potential use of social housing as a noise and pollution buffer for other residential development &/or to occupy the least desirable parts of the site);
- iii the social consequences of spatial segregation by housing occupant type;
- iv the social risks of concentrating people with high level complex needs in dense high rise developments;
- v the social impacts of high density urban development in the context of climate change;
- vi the social impacts of the role of high density dwellings in increasing infection rates and contributing to other public health risks;
- vii the implications of current and likely changes in workplace locations and travel to work patterns for dwelling density, design and amenity arising from:
  - a the pandemic experience, as well as
  - b rapid changes in technologies affecting patterns of employment and modes of transport, among other potential factors;
- viii equity and adequacy of proposed social infrastructure (including public open space, private open space, recreational space, community facility space) for a dense population among which there will be a high proportion

<sup>2</sup> <https://www.planning.nsw.gov.au/Plans-for-your-area/Local-Planning-and-Zoning/Making-and-Amending-LEPs>

of residents at home at any one time, either because they are unemployed or because they frequently work from home.

The fact that I can identify eight major missing social impact considerations is a significant indicator of inadequacy. The project seems to be based on old planning memes (e.g. workers will travel to work by train; housing shortages are best met by small dwellings in tall towers on small footprints). These memes never held up under scrutiny, and are even less relevant in 2022. Fundamentally, this proposal is for a social environment but is inadequate in social impact terms. It is also remarkably out of date.

A high level strategic social impact assessment should consider these missing (and any other) issues in the context of:

- the history of housing in the area,
- available research findings about social housing provision and distribution,
- the current policy which renders social housing available only to people with a high level of complex needs,
- likely changes in patterns of employment and place of residence, and
- the anticipated life of the project.

As it stands, the Gateway Development Report is, in my opinion, unsupported by a valid and reliable assessment of social impacts, particularly foreseeable social risks and social change and long term distributive inequity impacts. As a result, a Social Impact Assessment should be undertaken by the Planning Proposal Authority to address these major shortcomings before a decision on the application is made.



**Alison Ziller PhD**

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SUB-1573  
Matthew Crompton  
og6fzh8ay@mozmail.com  
Waterloo

Waterloo is a key area for social and affordable housing.

In the midst of Sydney's crisis of housing affordability, at least 1/3rd (33%) of the housing in the new Waterloo precinct should be designated as social housing. Another 1/4 (25%) should be affordable housing.

The purpose of the NSW Department of Planning is NOT just to funnel more money into the hands of developers.

SUB-1574

Name withheld

I oppose anymore units in waverloo ,or Zetland . These are causing traffic, (bike lanes do nothing but add to traffic as less lanes ) they are causing pollution which includes noise. Council profits from rates but they use money elsewhere. Visitors park in streets and take up parking spots. Also oppose anything over 10 stories and it will block views for other apartments that where there before and I think that's very unfair and selfish by the council allowing this.

SUB-1575

Name withheld

As a local residents we totally appose the proposal to open Pitt street, Redfern from Cleveland street through to Mc Evoy street. This will clearly significantly impact the amenity of our residential area by creating a rat run of tremendous hazardous traffic from ears to and from CBD, Moore Park precinct and broader Eastern Suburbs.

The concerns about the huge impact in traffic flow on our residential street needs to be addressed as a major health concern with additional pollution and noise.

As a concerned resident of Pitt street Redfern, this submission is to totally appose this proposal.

[Redacted signature]

SUB-1579

Name withheld

Stop overdeveloping the area. We don't need anymore high rises. The traffic is already bad. People have lived her all their lives and don't need this change. If anything, fix what's already there. The development over the new Waterloo station is enough. Just remember Green Square station only has two platforms and buses have already been cut. Move this development somewhere else.

SUB-1581  
Adam France  
adam@adamfrance.com.au  
Erskineville

The development of waterloo is just that - for developers by developers. This design does nothing for the existing community who will not even recognize their own streets. The local Aboriginal community is not visible in this design at all - this design should be theirs to shape.

This high density and sanitized suburb appears hostile, unrealistic and lacks any of the soul and personality of the area. Its disgusting, shortsighted and greedy. This is colonialism.

SUB-1583

Name withheld

To whom it may concern

I would object to the Waterloo south planning proposal, in particular the four oversized tower buildings along McEvoy Street and the new Pitt Street extension.

The four 'tall buildings' (towers) along McEvoy Street lack strategic merit and will unduly overshadow the Waterloo Oval (which is heritage listed) and existing residential areas to the south of McEvoy Street.

The overshadowing diagrams in the Urban Design Report prepared by Hassell are inadequate and fail to clearly demonstrate the overshadowing impacts on 266-268 Pitt, Waterloo and Waterloo Oval. Presumably, as the impacts are unacceptable.

The McEvoy towers lack strategic merit and are inconsistent with the following district plan objectives:

- Great places that bring people together - Unfortunately, the towers will not bring people together but will further overshadow Waterloo Oval sterilizing the area. They will also deactivate pedestrian access along McEvoy Street and Pitt Street south due to wind and overshadowing impacts caused by the towers.
- Environmental heritage is identified, conserved and enhanced – Waterloo Oval is heritage listed and used by local aboriginal people; the towers will overshadow this heritage listed item and culturally important place.
- Investment and business activity in centres – The towers should be located near Waterloo station, so that the ground floor uses can be activated, bringing the streets to life. Locating the towers on McEvoy street will not encourage activation which is required for successful businesses.
- Scenic and cultural landscapes are protected – The towers will destroy the cultural and scenic landscape of the city skyline and will look out of place.
- Public open space is accessible, protected and enhanced – The proposal does not seek to maximise existing public open space such as Waterloo Oval, rather it will become further overshadowed and unpleasant due to wind impacts.

The proposed tower-built form does not include sufficient setbacks, this will magnify wind impacts at street level and create an uncomfortable environment along McEvoy Street, Waterloo Oval and its surrounds. Relying on podiums and awnings to offset wind impacts is not sufficient as they are likely to fail over the life of the building given the projected wind speeds.

The Wind Assessment prepared by Arup fails to assess the wind impacts on Waterloo Oval and the existing residential buildings along Pitt Street south of McEvoy Street.

The proposed heights of 27 to 33 storeys are not contextually appropriate given the nearby existing residential uses, Waterloo Oval and the CBD skyline. A 6 to 8 storey medium rise building would be better suited along McEvoy Street given the existing residential buildings and Waterloo Oval.

It is unclear how the towers would be accessed by vehicles given that McEvoy Street is a busy street, it would seem more appropriate to locate the towers near Waterloo station where traffic would not be as heavy.

Light spill on the nearby existing residential areas is likely to be unacceptable and result in sleep disturbance for residence noting that the Light Spill report states that ‘  
A number of surveyed areas already exceeded the applicable night-timer lighting level requirements of Australian Standard AS 4282-1997 Control of the Obtrusive Effect of Outdoor Lighting (herein “AS 4282-1997”)

SUB-1584  
Garry Richards  
garrynrichards@gmail.com  
Waterloo

I am concerned there is no indication for bicycle storage in this proposal. While this may be more a decision at the DA stage, cycling is an important mode of transport given the proximity of the metro station, the lack of parking, the proximity to the city and the George Street cycle path.

Bicycle storage in small apartments is difficult, and I currently store my bike in the common area outside the lifts in my building, although I have come to understand this is not a recommended practice, and in fact it may be illegal.

I would like there to be provision for storage of bicycles in common areas in buildings including outside of lifts, with bolts for bicycle locks installed, or of weather protected bicycle cages outside of each building.

SUB-1585  
Phong Luu  
pluu43@gmail.com  
Waterloo

I am writing my concerns for the Waterloo South redevelopment as I am a tenant living on Cooper Street and Raglan street end.

I have three important comments on the proposal to discuss.

1. I grew up in Waterloo and my parents still live here. I moved back to Waterloo in 2019 because of family and domestic violence. I contacted Counter Point Community Services for support to finding me a safe home and environment. My parents also have a history of violence and mental health illness. I need to be close to them and support them as they get older. I stay connected with Counter Point Community Services for my mental health and community connections with other Waterloo tenants. Being relocated away from this support affects my capability to function in a healthy way and is disruptive to the strong community. I experience anxiety often and staying connected with community support allows me to manage my anxiety. I am also uncertain that we tenants have the right to come back to Waterloo after being relocated.

2. I understand that private and public parking will be reduced and this is a concern for how many public tenants will have a car space. I also have family who come to visit. I realise this raises some stress for where we will park in Waterloo.

3. I am concerned about the smaller social housing dwelling sizes according to the planning proposal. That 28.2 % of the front doors but only 26.5% of the total area means smaller dwelling sizes. And whether this is adequate for the needs of social tenants.

SUB-1587  
David Williams  
davidw.gulgamree@gmail.com  
Redfern

I wish to strongly object to the proposal to open Pitt St to McEvoy St as proposed in the Waterloo development plan . I am a resident of Pitt St and the increase in traffic flow would greatly take amenity and add noise and danger to getting our cars in and out of our driveways ...

SUB-1590  
David Ninham  
nine.hams@gmail.com  
Redfern

24 April, 2022  
David Ninham  
80 Pitt Street  
Redfern. NSW. 2016

Mr Alan Bright  
Director, Planning Proposal Authority  
Planning & Assessment  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Re: Waterloo Estate (South). Planning Proposal PP 2021 3265  
I am objecting to the proposal.

The reason that I am objecting to the proposal is because surrounding neighbourhoods, including mine on Pitt Street Redfern north of Waterloo Estate (South) have not been properly consulted in creation of your Transport Study, and I believe my neighbourhood will be adversely affected by the plan to open Pitt Street at McEvoy Street.

As you note at p. 70 of the Transport Study, this is "the only significant works proposed to the external road network as a result of the Waterloo South development". In my opinion, this external road network is indeed external to your project, and I don't believe it appropriate that you include plans to modify access to our street.

Page 58 of the Transport Study indicates that opening up Pitt St at McEvoy St will "remove a significant number of right turn movements from the Botany Road/McEvoy Street intersection". Pages 61-62 of the Transport Study describes "traffic calming measures including pedestrian crossings and threshold treatments, narrowing of the street and low speed limits" on Pitt Street. These two objectives seem contradictory to me, and it is not clear why the plan would make a change that would lead to a significant number of right turns into Pitt Street on the one hand, yet that traffic would be subjected to traffic calming measures on the other hand. This clearly indicates that there will be a significant increase in traffic to the extent that traffic calming measures will have to be put in place.

The plan does not indicate any detail of what the calming measures are, except to describe them broadly. These need to be clearly specified and presented to our Council prior to the plan being approved with respect to the opening of Pitt Street at McEvoy.

I do not think it appropriate for the plan to be opening up Pitt Street to additional traffic, and I request that either you maintain the closed status of Pitt Street at McEvoy Street, or you create a closure immediately north of your proposed opening, so that there is no increase in traffic on Pitt Street, Redfern coming from McEvoy Street.

Pitt Street Redfern is an established community with 3 pre-schools, and hosts many cafes and community services.

I would like that Pitt Street remain closed to through traffic from McEvoy Street and for Pitt Street to remain a safe and relatively quiet neighbourhood for residents to continue to live as we have for decades whilst this closure has been in place.

I declare that I have made no reportable political donations in the previous two years.  
Thank you for considering my objection, and for your response.

Regards,  
David Ninham  
80 Pitt Street  
Redfern. NSW 2016

SUB-1592

Name withheld

Opening up Pitt Street Waterloo, at the junction with McEvoy Street, will create a significant detrimental effect on community amenity and safety, particularly in the section of Pitt Street between Phillip and Cleveland Street. There is no way to reliably enforce speed limit measures, and already there are speed issues, that cannot be enforced. The opening will create a rat-run to avoid Elizabeth and Botany roads, allowing M8 traffic/other southwest traffic a direct route to the CBD with less traffic lights. The street is predominantly residential with 19th century terrace houses, in addition to a number of day care facilities (SDN, ROC, All about children). People are dropping off/picking up their children on this street. You will be destroying, not creating opportunities for community spirit (e.g. like dead-ending Lawrence and Belmont Streets in Alexandria had significant benefit in avoiding their rat-running from Mitchell Rd/McEvoy Street and boosting community interaction). There are increasing numbers of apartments already in the area, which is increasing the traffic, and will continue to increase the traffic as new buildings finish.

While I don't support the opening of Pitt Street, I propose that if you did need to open it up, that you dead-end the street, (e.g. at Phillip St), so that a thorough-fare is not created, and the safety of residents, children and the community amenity is actually fostered, not detracted from.

SUB-1593

Name withheld

I live in Redfern and am concerned about the proposed traffic flow changes in the Waterloo estate (south) development. I have two objections with suggestions.

I object to opening Pitt St to McEvoy St – whether all directions traffic or left in/left out – as it creates a rat run between McEvoy St and Cleveland St, even with traffic calming measures. I suggest this could be mitigated by creating a cul de sac nearby in another part of Pitt St.

I object to the 24/7 blocking of the right turn access from Botany Rd (travelling north) to Wellington St. I suggest a peak hour restriction, as there is from William Henry St turning right into Bulwarra St in Ultimo.

SUB-1595  
Carol Quast  
aaacaz@gmail.com  
Redfern

Carol Quast  
40A Pitt Street  
Redfern NSW 2016

(no political donations made in the previous 2 years)

25/4/2022

Mr Alan Bright  
Director, Planning Proposal Authority  
Planning and Assessment  
Locked Bag 5022  
Parramatta NSW 2124  
(Objection submitted electronically via website)  
<https://www.planningportal.nsw.gov.au/ppr/under-exhibition/waterloo-south>

Application: Waterloo Estate (South)

Planning Proposal: PP-2021-3265

Dear Sir,

I am writing to express my **strong opposition** to the proposal for the extension of Pitt Street, Redfern, from McEvoy St, Waterloo to Cleveland Street Redfern.

**My first concern** is there are presently 3 childcare / preschools in Pitt Street Redfern, two primary schools and one high school in the immediate walking vicinity of Pitt Street Redfern. They are:

Only About Children, Childcare and Pre School. Children 6 weeks to 6 years Rear of Australia Post building, 219-241 Cleveland Street, on the corner of Cleveland and Pitt Street, Redfern. Entrance on corner of Pitt and Cleveland and small drop off and pick up car park at rear of building opposite 20 Pitt Street as well as street parking both sides of Pitt Street. Monday to Friday, 7am to 6pm.

City of Sydney, Redfern Occasional Child Care, 55 Pitt Street, for children from 6 weeks to 6 years. Monday to Friday 9am to 4pm.

SDN Redfern Children Services, 141-145 Pitt Street Redfern, 6 weeks to school age. Early childhood education. Monday to Friday, 7am – 6pm

Our Lady of Mount Carmel Catholic Primary School, 4 Kellick St, Waterloo NSW 2017  
Approx. 250m walk from Pitt Street to entrance to the schools, Kindergarten to Year 6, 8am-5pm

Redfern Jarjum College, 117 Redfern Street, Redfern, only 100m from corner of Pitt Street and Redfern Street, education for urban Aboriginal and Torres Strait Islander children who are not participating or coping in mainstream primary schools as a result of their domestic circumstances.

Inner Sydney High School, Corner of Cleveland and Chalmers Street, Prince Alfred Park, Redfern / Surry Hills. Year 7, 8 and 9 (this will increase to Year 12 over the next 3 years) This High School is only one block away from Corner of Pitt Street and Cleveland Street, Redfern.

Because of this, the increase in traffic along Pitt Street (even with an increase of traffic calming methods) is counter intuitive to the care of duty to these children walking to and from school and parents dropping off babies and toddlers by car at various times throughout the day.

Presently there are some traffic calming measures in place and there are signs stating that this is an existing high pedestrian area however these measures do not slow down all the cars which often go at a much higher speed than allowed to race to catch the lights on the corner of Pitt Street and Cleveland Street or the lights at Pitt Street and Redfern Street. An increase of traffic by opening up Pitt Street at McEvoy St end will only add to further congestion and possible accidents.

**My second concern** is that an inclusion of a new access to Waterloo South at McEvoy Street would enable traffic to travel through the Waterloo Precinct and this would consequently become a rat run for commuters to avoid Elizabeth and Chalmers Street.

Living in Pitt Street Redfern I am aware that there is already a high volume of traffic throughout the day. The proposal to open Pitt Street at McEvoy Street would only increase traffic along what is a residential area and I disagree with the statement that modelling shows that “through traffic along Pitt Street would be highly undesirable”. The idea that commuters would use Elizabeth Street and Botany roads because the traffic speed is greater does not reflect the fact that those roads during peak times get very busy and commuters will always look for ‘rat runs’ to avoid this congestion. Has the council put traffic counting devices at different points along Pitt Street to count existing traffic? I have not seen them. This would show the higher traffic volume than indicated. Even the implementation of crossings, narrowing of roads, speed bumps and traffic calming methods will not stop the extra vehicles using a local residential street turning it into a quicker through road to Cleveland Street on the north side and to get to McEvoy Street on the south side.

**I urge you to NOT consider and approve the extension of Pitt Street Redfern from McEvoy Street, Waterloo to Cleveland Street, Redfern.**

Sincerely,

A photograph of a handwritten signature in black ink on a white piece of paper. The signature is cursive and appears to read 'Carol Quast'.

Carol Quast

SUB-1598  
Ingrid Rieger  
ingridrieger@hotmail.com  
Redfern

I am concerned about the plans to have traffic throughflow into Pitt St. Pitt St is already often choked with traffic at the Cleveland Street end. The street currently has garden beds and 40Km per hour limits to try to curtail traffic flow, but if it becomes a major thoroughfare it will destroy the ambiance of the area, it will be even more difficult than it currently is for residents to exit their properties via Pitt St and if the parking is removed it it will make life extremely difficult for the long-term residents of Pitt St. With the wealth of cafes in Redfern parking is already at a premium.

SUB-1599  
Peter White  
j.peter.w@gmail.com  
Redfern

I write to oppose the plan to open Pitt Street through to McEvoy Street. I believe this is trying to solve one problem by creating at least two others.

Most importantly, Pitt Street is a street with several bends, two roundabouts, a set of street lights (at Redfern St) and ends in a T-junction at Cleveland Street. It is suitable only for slow traffic and is subject to considerable queues of cars, notably at the Cleveland Street end during rush hours. It is not suitable to be considered as a through street.

Secondly, Pitt Street is a dense residential street. It has a school and a church at the McEvoy Street end, high density housing at the southern end (from McEvoy through almost to Redfern Street) and has some important historic houses at the northern end (including a residence of Edmund Barton for some time). The proposal will seriously impact on the residential amenity of all citizens by making the street more polluted by exhausts and more dangerous due to increased traffic.

SUB-1600

Name withheld

I am an owner and resident within [REDACTED], a strata complex situated [REDACTED] [REDACTED], within 1 block from the south side of the proposed Waterloo Estate (South). I object to the planning proposal. My concerns are primarily housing density and building heights and reasons are as follows:

- The proposal does not adequately detail impact on traffic in the local area including access to parking. I am concerned this will lead to increased congestion including for flow on areas such as Lachlan St and South Dowling Street which are already heavily congested. Inaccessible parking will also have an impact on local events being held at Waterloo Oval such as sporting events and also impact local businesses.
- The proposed building heights are not in keeping with the local area and will make the area less pleasant to live in.
- The proposal does not explain the impacts of sun/light for the local area. The towers proposed along McEvoy Street of 27-33 storeys are excessive. These buildings will cause shadowing on neighbouring residential areas and also the community space at Waterloo Oval. Green Square Oasis has recently expended considerable funds to rejuvenate common areas including an outdoor swimming pool, which will be impacted by buildings of the height proposed. This will negatively impact all residents. I strongly urge you to reconsider the building heights in this development. In my view a maximum height of 8-10 storeys should be imposed. This would still mean buildings are 2-3 times the current height in the area.
- Green areas and outdoor space are a key quality of the local area. The revised proposal does not include adequate outdoor or green space for the number of proposed residents.
- I believe the above impacts will reduce the liveability of the area and ultimately the value of the properties (particularly as a result of overshadowing).

SUB-1602  
Michele Fraser  
law@michelefraser.com.au  
Glebe

Stop selling off public land and destroying public housing. It has been a disaster here in Glebe. The Elgar Street redevelopment left only about a 1/4 of the land for social housing.

Stop the plunder now.

SUB-1603  
Ruby Thomas  
emailrubythomas@gmail.com  
Potts Point

The NSW government should not be selling this land and it should remain social housing. There is not nearly enough affordable or social housing available in the area and having so much taken away will be devastating for the community and leave people removed from everything and everyone they know.

SUB-1604

Name withheld

I am requesting that the NSW Government stop the sell-off of public lands to developers. Public land has been granted for community need, including housing, recreation and social support. The original purpose of the public lands should be maintained as the primary purpose and must be kept in public hands for the current and future generations that require housing support. As a minimum, the number of public housing should be the minimum that is retained PLUS the Government should ensure there is planning for community needs, especially extra education, health, sporting, and community facilities.

There is currently insufficient public and affordable housing, with long waiting lists. My understanding is that this proposal reduces the number of public houses significantly, ensuring current public housing occupants are not fully catered for in the area they have lived, in some cases for many years, let alone using public lands to increase much needed public housing. Affordable housing of 7% will barely make a dent in the affordable housing crisis.

Public lands will not be able to be established in the inner city in future so we should protect the public lands we have to ensure they are available for public good.

SUB-1605  
Robyn Lee  
bainlee@smartchat.net.au  
Sydney

The sale of public lands for private profit has to stop.

The Waterloo Estate has housed thousands of people for many years and is a thriving community. It is cruel and callous to remove all of them, demolish their homes and return a few to the absolutely minimal new social housing.

It is important to reduce density and height of towers, so that the whole area does not become hugely overcrowded.

It is time to do something positive for people, rather than the State coffers.

It is no wonder we are all so cynical.

Please consider the people.

SUB-1606  
David Lilley  
lilleydavid@yahoo.com.au  
Petersham

# Submission re Waterloo South Planning Proposal

David Lilley

I am writing as an individual who has a longstanding interest in social housing issues generally, and the redevelopment of social housing estates in particular.

By way of background, I worked for the NSW Land and Housing Corporation for 15 years, the majority of which were spent in social planning roles, working on renewal projects in Minto, Bonnyrigg, Claymore, and Airs Bradbury. I have since worked as a social planning consultant, as the Founding Director of a Collective Impact initiative on a large public housing estate in Western Sydney, and as the Deputy Director of UNSW's Health Equity Research and Development Unit, based in Sydney Local Health District. I am currently completing a PhD at UNSW, in which I am using the redevelopment of Waterloo South as my primary case study, and I have been attending Waterloo Redevelopment Group (WRG) meetings for the past four years.

Through my research and my participation in WRG meetings, I have become well acquainted with the serious concerns of community members and other stakeholders regarding the proposed density and housing mix (ratios of social, affordable, and market housing) in Waterloo South. I would like to stress that I have no ideological, theoretical, technical, or other objection to urban renewal, density, or mixed housing as such. Quite the contrary. I am aware that they can play an important role in increasing housing supply, reducing the climate impacts of development, improving housing affordability, and improving liveability. The key issue that arises from a social planning perspective is not whether these things are good or bad per se, but the nature, scale, and relative distribution of positive and negative impacts amongst diverse individuals and groups. At present there is no assessment of these issues, which I believe calls the legitimacy of the planning proposal into question.

While I understand that a Social Impact Assessment (SIA) has not been formally required to date, I believe that this contradicts the spirit of planning policy in NSW, as well as local and international principles of good practice. By way of evidence, I offer the following summary, which is elaborated via policy extracts located in Attachment 1:

- The objects of the *NSW Environmental Planning and Assessment Act* include reference to the inclusion of social considerations in decision-making re environmental planning and assessment.
- The Department of Planning and Environment's (DPE's) *State Significant Precincts Guideline* requires the Department to consider the implications of any change in land use.
- DPE's *Guide to Preparing Planning Proposals* requires:
  - that a planning proposal "be technically competent and include an accurate assessment of the likely impacts of the proposal. It should be supported by technical information and investigations where necessary."
  - An explanation as to if/how the proposal addresses any social or economic effects.
- DPE's *Local Environmental Plan Making Guideline*:
  - Requires the identification, assessment, and mitigation of potential impacts.
  - Requires that studies be undertaken to confirm potential impacts and their significance.
  - Requires the Planning Proposal Authority to consult with relevant authorities and government agencies regarding adverse impacts.
  - Notes that the Planning Proposal Authority may vary a proposal to mitigate impacts.

- The first principle of the International Association for Impact Assessment's *Social Impact Assessment International Principles* is that "equity considerations should be a fundamental element of impact assessment and of development planning".
- The Planning Institute of Australia's *SIA Position Statement* includes the claim that "proposals for change which require an environmental or economic impact assessment also require a social impact assessment".
- DPE's *Social Impact Assessment Guideline for State Significant Projects*, while technically only applying to Development Applications, notes that its use can enhance: community understanding of projects; proponent-community relations; and risk management.

Based on the above, I believe it is crucial that a Social Impact Assessment is carried out prior to any further progression of the Waterloo South Planning Proposal. This is the only way to properly consider the interests and concerns of local community members, as well as the distribution of impacts amongst diverse individuals and groups.

## Attachment 1 – Policy Extracts Supporting a Social Impact Assessment re the Waterloo South Planning Proposal

<b>Environmental Planning and Assessment Act 1979 No 203</b>	
Part 1, Section 1.3	<p>The objects of this Act are as follows–</p> <p>b. to facilitate ecologically sustainable development by <u>integrating relevant economic, environmental and social considerations</u> in decision-making about environmental planning and assessment</p>
<b>State Significant Precincts Guideline (DPE 2016)</b>	
Department’s Assessment (p. 5)	<p>The Department of Planning and Environment’s assessment will <u>consider</u> the exhibited study, issues raised in submissions and the response to submissions report. It will also consider implications of the proposed changes in land use and provide recommendations to the Minister for Planning relating to:</p> <ul style="list-style-type: none"> <li>• the State or regional planning significance of the precinct</li> <li>• the suitability of the precinct for any proposed land use</li> <li>• <u>the implications of any change in land use.</u></li> </ul>
<b>Planning Proposals: A guide to preparing planning proposals (DPE 2018)</b>	
Section 1 (p. 4)	<p>1.1 What is a planning proposal?</p> <p>A planning proposal is a document that explains the intended effect of a proposed local environmental plan (LEP) and sets out the justification for making that plan. It will be used and read by a wide audience including those who are responsible for deciding whether the proposal should proceed, as well as the general community. It must be concise and written in language that is clear and easy to understand. <u>It must also be technically competent and include an accurate assessment of the likely impacts of the proposal.</u> It should be supported by technical information and investigations where necessary.</p>
Section 2.3.1 Questions to consider when demonstrating the justification (p. 17)	<p><i>Q9. <u>Has the planning proposal adequately addressed any social and economic effects?</u></i></p>

<b>Local Environmental Plan Making Guideline (DPIE 2021)</b>	
Introduction (p. 7)	<p>The guideline aims to:</p> <ul style="list-style-type: none"> <li>ensure that planning proposals provide adequate information to explain the proposal and <u>explain the likely impacts</u> of the amendment when assessed against government legislation, strategic plans, council policies and other guidelines</li> </ul>
What is a planning proposal (p. 13)	<p>A planning proposal is a document (including supporting information) that explains the intended effect of a proposed LEP or proposed amendments to an LEP. It describes the intended outcomes, <u>identifies and assesses the potential impacts</u> that the changes to the LEP may have and provides justifications for making the LEP.</p>
Preparing a planning proposal (p. 27)	<p>Based on advice provided in the pre-lodgement stage of the process <u>a planning proposal should identify the likely environmental, social, economic and other site-specific considerations of the proposal.</u></p> <p>The planning proposal should be drafted to ensure that <u>a wide audience</u> including departmental staff, authorities and government agencies, councils, stakeholders and the community, <u>can clearly understand the scope and impacts of the proposal.</u></p>
Department Review (p. 39)	<p>The Department undertakes a review of the planning proposal. In completing this review, the Department will typically:</p> <ul style="list-style-type: none"> <li>undertake a high-level check of the planning proposal to ensure the package meets the minimum administrative requirements in this guideline. This check is generally undertaken within 5 days of the proposal being submitted</li> <li>undertake a strategic merit assessment of the proposal against relevant district plan, regional plan, LSPPS, section 9.1 Directions, SEPPs and any Department endorsed local strategy</li> <li><u>undertake an assessment of potential environmental, social, economic, and infrastructure impacts of the proposal</u></li> <li>obtain high level advice and guidance from the Department’s legal team or PCO (where required)</li> <li>seek agency advice and/or comments, where required or where an authority or government agency has not consulted at the pre-lodgement stage</li> <li>review proposed community consultation and the expected timeframe for the proposal</li> </ul> <p>Department officers then prepare an assessment report and provide a recommendation to the Minister (or delegate) on whether the planning proposal should proceed.</p>
Varying a planning proposal (p. 41)	<p>The PPA may vary a proposal at any time during the LEP making process or request the Minister (or delegate) to determine that the matter not proceed. Variations may be necessary to:</p> <ul style="list-style-type: none"> <li>improve the intended outcome of the proposal</li> <li>respond to issues raised in submissions by the local community, an authority or a government agency</li> <li><u>further mitigate the impacts of the proposal</u></li> </ul>

Planning Proposal Preparation  Part 3 – Justification of strategic and site-specific merit  (pp. 72-78)	This section must provide a detailed assessment of the proposal’s strategic and site-specific merit to determine whether the planning proposal should be supported.	
	This is the <u>most important section of the planning proposal</u> and should <u>integrate findings from supporting studies</u> and investigations and provide justification for the proposed amendments to the LEP. It must also consider the interaction between these findings and whether the proposal will align with the strategic planning framework and have any <u>environmental, social, or economic impacts</u> .	
	<b>Strategic and site-specific merit</b>  For a planning proposal to proceed through Gateway determination, <u>the Minister (or delegate) must be satisfied</u> that the proposal has strategic and site-specific merit and <u>that identified potential impacts can be readily addressed</u> during the subsequent LEP making stages.	
	<b>Site-specific merit</b>  Sections C, D, and E in Table 3 [see Q10 below] <u>must be included in the planning proposal and identify the potential environmental, social, and economic impacts of the proposal and outline proposed mitigation measures and justification</u> . In this way the planning proposal is to demonstrate that the proposal is suitable for the site and the site is (or can be made) suitable for the resultant development.	
	<b>Questions to consider when demonstrating the justification</b>	
	<b>Question</b>	<b>Considerations</b>
Q10. <u>Has the planning proposal adequately addressed any social and economic effects?</u>	<ul style="list-style-type: none"> <li>• Identify effects on items or places of non-Aboriginal or Aboriginal cultural heritage not already addressed elsewhere</li> <li>• Estimate the number of jobs or housing growth (e.g. construction/post-construction and housing diversity)</li> <li>• Identify the impact on existing social infrastructure, such as schools and hospitals</li> <li>• Identify the need for public open space or impacts on green infrastructure</li> <li>• Identify the impact on existing retail centres</li> <li>• <u>Identify measures to mitigate any adverse social or economic impacts, where necessary, and whether additional studies are required</u></li> <li>• Identify any proposed public benefits</li> </ul>	

**Social Impact Assessment International Principles (International Association for Impact Assessment 2003)**

Principles specific to SIA practice (p. 6)

1. Equity considerations should be a fundamental element of impact assessment and of development planning.
2. Many of the social impacts of planned interventions can be predicted.
3. Planned interventions can be modified to reduce their negative social impacts and enhance their positive impacts.
4. SIA should be an integral part of the development process, involved in all stages from inception to follow-up audit.
5. There should be a focus on socially sustainable development, with SIA contributing to the determination of best development alternative(s) – SIA (and EIA) have more to offer than just being an arbiter between economic benefit and social cost.
6. In all planned interventions and their assessments, avenues should be developed to build the social and human capital of local communities and to strengthen democratic processes.
7. In all planned interventions, but especially where there are unavoidable impacts, ways to turn impacted peoples into beneficiaries should be investigated.
8. The SIA must give due consideration to the alternatives of any planned intervention, but especially in cases when there are likely to be unavoidable impacts.
9. Full consideration should be given to the potential mitigation measures of social and environmental impacts, even where impacted communities may approve the planned intervention and where they may be regarded as beneficiaries.
10. Local knowledge and experience and acknowledgment of different local cultural values should be incorporated in any assessment.
11. There should be no use of violence, harassment, intimidation or undue force in connection with the assessment or implementation of a planned intervention.
12. Developmental processes that infringe the human rights of any section of society should not be accepted

**Social Impact Assessment Position Statement (Planning Institute of Australia 2010)**

<p>PIA Position (p. 1)</p>	<p>PIA POSITION</p> <ol style="list-style-type: none"> <li>1. Impact assessment is an important part of planning and decision-making processes.</li> <li>2. <u>Proposals for change which require an environmental or economic impact assessment also require a social impact assessment</u></li> <li>3. Social impact assessment of policies or plans should be sufficiently robust to anticipate the impact of proposals made under the plan and minimise the need for further assessment.</li> <li>4. Without limiting the matters in regard to which a social impact assessment may be appropriately required, proposals for:             <ul style="list-style-type: none"> <li>• larger developments, including: major retail, sports or social infrastructure proposals,</li> <li>• a significant change of land use, including: new highways, loss of agricultural land,</li> <li>• sale or rezoning of publicly owned land,</li> <li>• new planning policies and plans amendments to them, and/or,</li> <li>• controversial uses or increases in intensity (e.g. brothels or gun shops, or of gaming or liquor outlets), should be fully assessed for their social impacts in a SIA.</li> </ul> </li> <li>5. Social impact assessment should be undertaken by appropriately trained and qualified personnel using rigorous social science methodologies and with a high degree of public involvement.</li> <li>6. A social impact assessment should be a public document.</li> </ol>
<p>Policy Principles (pp. 1-2)</p>	<p>A number of guidelines are available to assist social impact assessment practitioners. These documents confirm that the following are critical aspects of an adequate SIA:</p> <ol style="list-style-type: none"> <li>i. The process is undertaken by a competent, professional social scientist and uses rigorous social science methodologies.</li> <li>ii. The process includes effective, timely and transparent public involvement.</li> <li>iii. The baseline (pre-change) situation is adequately researched and documented.</li> <li>iv. The scope of proposed changes is fully described.</li> <li>v. Examples of similar changes are identified, including impacts likely to affect minority groups, different age, income and cultural groups and future generations.</li> <li>vi. Direct as well as indirect, long term and short term, positive and negative, passing and accumulating impacts are identified.</li> <li>vii. The relative equity of impacts is identified. It is important to identify how the benefits and losses will be distributed to different sections of the community.</li> <li>viii. Impacts over time and location are considered (e.g. local as opposed to state and national benefits and losses.)</li> <li>ix. Impacts which are not amenable to precise measurement are not excluded from consideration – the assessment is and evaluation not a proof.</li> <li>x. A review mechanism is included where appropriate.</li> <li>xi. The precautionary principle is applied in making an assessment.</li> </ol>

## Social Impact Assessment Guideline for State Significant Projects (DPIE 2021)

Section 1.1 (p. 8)

This Guideline has been developed for proponents of State significant projects. It can also be used by the Department of Planning, Industry and Environment (the Department), and the community.

It explains how to assess likely social impacts for State significant projects under the EP&A Act.

Using this Guideline during the preparation of an SIA can:

- build higher levels of community understanding of projects
- help proponents to understand what is required to meet the Department's expectations
- give stakeholders and the community confidence that their concerns and perspectives are being considered early in the assessment
- reduce project risks and costs related to unplanned or reactive management of social impacts
- create better proponent-community relations and more socially sustainable outcomes
- streamline assessments by reducing departmental requests for more information
- better integrate the SIA and EIA.

SUB-1607  
Sonia Mattson  
soniamattson6@gmail.com  
Forest Lodge

Stop the selloff of public lands. Public land must be kept in public hands for future generations.

Reduce the over-development and density. Ensure there is planning for community needs, especially extra education, health, sporting, and community facilities.

Not enough public and affordable housing.

The NSW Government is fudging the figures to make it is building public housing, when it will deliver the same - or less - beds for people who need them.

Affordable housing of 7% will barely make a dent in the affordable housing crisis.

The largest public housing estate in the city is the best place to genuinely grow the public and affordable housing the city needs.

SUB-1608

Name withheld

Dear Dpt of Planning and Environment,

I am a landowner at [REDACTED] and object to the proposed Waterloo South planning proposal on the basis of:

1. Tall buildings proposed locations

222 Botany Rd residents currently enjoy a pleasant aspect from Botany Rd balconies out to the Sydney CBD area. This includes many trees and CBD buildings. The proposed tall building locations will obstruct and overtake these views so the views will be the new tall buildings. Moving the proposed tall buildings to Wellington St would be preferable. The tall buildings would enjoy the Main Park aspect better.

2. Tall buildings proposed heights

222 Botany Rd residents currently enjoy pleasant sunlight for several hours from the morning which comes across from Green Square direction. The proposed tall building heights will cause shadowing and potentially mean that no sunlight will enter some of the units. This is extremely undesirable and I ask that the tall building heights are significantly reduced or the tall buildings relocated to Wellington St as in 1. above.

3. Social housing integration strategy

I'd like to make some comments on lived experiences with Social housing tenants. The concept sounds marvellous on paper. However, having had several social housing tenants in 222 botany Rd constant issues were experienced by all residents in the entire building including:

\*Theft from neighbouring units. Social housing residents climbed balconies on the 4th floor to access open balcony doors on the 4th floor. Police were called and all residents have been recommended to install Crimsafe on balconies if leaving the doors open. This is for 4th floor units and costs several thousand dollars.

\*Destruction of common property on a regular basis and breach of strata by-laws. This included smashing of glass door entrances which had to be paid for by strata as there was no CCTV evidence, leaving household rubbish outside unit doors rather than taking to the garbage bin, leaving household rubbish in fire stairs, defacing notice boards, scratching lifts with intention.

\*Breaching by-laws of interfering with other resident's property use and enjoyment. One social housing resident kept asking to loan money from his neighbour who kindly lent him some but was then almost stalked for his arrival home to always be asked for more. It was also noted that there was a general lack of self care with no regular showers so there was an awful smell in the common lift. Chain smoking on balconies was common also with the smell drifting into neighbour units so the balcony doors could not be kept open. Social housing tenants also had guests who were unruly in common areas and appeared intoxicated, also smoking in common areas eg in the lift.

I would also like to comment that I worked with a lady who lives in Waterloo social housing who was delightful so it is not all social housing residents however perhaps planning for the worst case scenario yields better results. I am sure there are some very clever people in the department who can think of some solutions.

Thank you for the opportunity to make this submission, I request that my name and address details are not disclosed.

SUB-1610  
Kira Lum Min  
kiralummin@hotmail.com  
Redfern

I STRONGLY OBJECT to section 6.7.5 opening/connecting of McEvoy St, Waterloo to Pitt St, Redfern. Opening this road would further create a rat-run problem down Pitt St, an issue which already exists (with traffic during rush hour stretching down Pitt Street waiting for the Cleveland St turning light).

Traffic slowing measures (speed humps, street/planter-scaping) does not sufficiently ensure the safety of local families, residents, and especially children using the no-less than 3 childcare centres along Pitt St. The terrace character charm and liveability of the area will be greatly diminished with increased traffic. Moreover, the Waterloo South project should be well serviced by Metro, cycleways, buses, and nearby Redfern train lines; therefore, the plan should NOT promote increased car use.

SUB-1613  
Elizabeth Bessell-Browne  
libbybb66@hotmail.com  
Redfern

Mr Alan Bright, Director, Planning Proposal Authority  
Re: Waterloo Estate (South). Planning Proposal PP 2021 3265

Dear Mr Bright,

As a long-time resident of Pitt Street, Redfern, I wish to object to this proposal, specifically, the plan to open Pitt Street at McEvoy Street, which will result in highly undesirable increase in traffic, and destroy Pitt Street residents' quality of life.

Surrounding neighbourhoods, including mine on Pitt Street Redfern, have not been properly consulted in the creation of the Transport Study, and I believe my neighbourhood will be adversely affected by the plan to open Pitt Street at McEvoy Street.

As you note at p. 70 of the Transport Study, this is "the only significant works proposed to the external road network as a result of the Waterloo South development". This external road network is definitely external to your project, and it is not appropriate that you include plans to modify access to Pitt Street.

Page 58 of the Transport Study indicates that opening up Pitt St at McEvoy St will "remove a significant number of right turn movements from the Botany Road/McEvoy Street intersection". Pages 61-62 of the Transport Study describes "traffic calming measures including pedestrian crossings and threshold treatments, narrowing of the street and low speed limits" on Pitt Street. This clearly indicates that there will be a significant increase in traffic to the extent that traffic calming measures will be necessary. The plan does not give any detail of what the calming measures are, except to describe them in the broadest terms. These need to be clearly specified and presented to Council prior to approval if the traffic plan for opening Pitt Street at McEvoy Street were to go ahead.

However, I strongly object to any plan that opens Pitt Street up to additional traffic, and I request that either you maintain the closed status of Pitt Street at McEvoy Street, or you create a new closure immediately north of your proposed opening, so that there is no increase in traffic on Pitt Street, Redfern coming from McEvoy Street.

Pitt Street Redfern is an established residential community with 3 pre-schools, many cafes and community services.

Pitt Street should remain closed to through traffic from McEvoy Street so that it continues to be a safe and relatively quiet street for residents to continue to live safely and peacefully as we have for decades whilst the existing closure has been in place.

This traffic proposal threatens to turn residential Pitt Street into an extremely busy and dangerous thoroughfare, constantly jammed with polluting traffic. Please do not implement it.

Thank you for considering my objection, and for your response.

Yours sincerely,  
Elizabeth Bessell-Browne  
53 Pitt Street  
Redfern 2016

SUB-1614  
Andreea Kindryd  
andeaus@hotmail.com  
Glebe

There is already too much public land sold off to developers. The density is too high. Community needs are not being recognised and there is Not enough public housing and too many people living on the street. .

The NSW Government is lying and I have seen what they promised and what they have actually done.

Do not destroy The largest public housing estate in the city.

SUB-1616  
Philip Quast  
quastphilip@gmail.com  
Redfern

Philip Quast  
40A Pitt Street  
Redfern NSW 2016

(no political donations made in the previous 2 years)

27/4/2022

Mr Alan Bright  
Director, Planning Proposal Authority  
Planning and Assessment  
Locked Bag 5022  
Parramatta NSW 2124  
(Objection submitted electronically via website)  
<https://www.planningportal.nsw.gov.au/ppr/under-exhibition/waterloo-south>

Application: Waterloo Estate (South)

Planning Proposal: PP-2021-3265

Dear Alan,

I am writing to express my vehement objection to the proposal for the extension of Pitt Street, Redfern, from McEvoy St, Waterloo to Cleveland Street Redfern.

Before stating my objections I would like to ask a number of questions.

1. If the proposal goes ahead will you be offering double glazing to all residents to cope with the increased traffic noise?
2. If the proposal goes ahead what happens to street parking and the peninsular guards that are currently present? You are proposing catering for vehicular ownership of non-residents and seem to be suggesting where possible residents should use their fronts gardens for parking. Does this mean you will be eliminating street parking? If so how will you compensate residents for the devaluation of their properties as council presently allows each premises two parking permits?
3. What is your estimate of my property devaluation?
4. What traffic counting mechanisms did you use? I don't see any evidence of how you counted traffic. Was the supposed traffic counting conducted during any of the *Covid* lockdown period? When was the counting last conducted?
5. Have you taken into account the increase in traffic once the Rachel Forster development opens? (134-144 Pitt St)

Now for my objections.

Pitt St is already a rat run. I really do question your traffic figures and the demographic of that traffic. It has become increasingly obvious to those of us who live here that much of the recent increase in vehicles involves 'tradies'. Diesel engines are loud, and at present they start at 5am and are continuous until 9 am when they slightly ease. Again, in the afternoon the returning traffic repeats and the noise, dust and pollution is almost unbearable as it is. How can you guarantee that the extending Pitt St will not exacerbate this problem? You

can't because you have done no studies on the type of vehicles which will use the Pitt St extension.

I notice no suggestion that only electric vehicles should have access to the extension other than local traffic.

Most importantly there are presently 3 childcare / preschools in Pitt Street Redfern, two primary schools and one high school in the immediate vicinity of Pitt Street Redfern.

To extend Pitt St is madness. 3 childcare centres on one street! How can you even be considering it?

**I would like to go on record as predicting that by increasing the traffic in Pitt St. there will be a child fatality. Already traffic does not observe the 40 km speed limit and there are no speed cameras.**

And lastly, I object to any increase of traffic through a residential area. With Redfern and Central stations so close and the new station opening in Waterloo why are you not discouraging the use of vehicles all together? Especially with climate change being such an issue?

I refuse to believe that you have considered how much the street is already being used by commercial vehicles and how the increased traffic flow will mainly be loud, polluting diesel engines who speed and who will kill a child.

Sincerely,  
Philip Quast

SUB-1617  
Hannah Middleton  
hannahmiddleton1917@outlook.com  
Glebe

Dr Hannah Middleton  
39/75 St Johns Road  
Glebe NSW 2037

Waterloo Estate (South)  
PP-2021-3265

I wish to register my strong objection to the plan for Waterloo South for the following reasons:  
Public housing currently occupies 80 per cent of the site. This will be bulldozed and replaced by only 12 per cent public housing.

Apart from its potentially significant role in the post-pandemic economic recovery, public housing has many other advantages. Access to public housing provides stability and lowers the risk that vulnerable families become homeless. It decreases housing stress and by limiting housing costs, public housing leaves families with more resources for expenses like child care and transport as well as basic needs like food and medicine.

Quality public housing helps create a stable environment for children, contributing to improved levels of school attendance and educational outcomes. Public housing located near public transport can help low-income residents save money, access better jobs, improve health and reach critical community services.

Quality public housing can promote better mental and physical health, improved quality of life and independence for low-income seniors. For frail seniors and people with disabilities, public housing enables them to remain in their home communities and avoid or delay moving into nursing homes or other institutions that are much more costly for state and federal governments.

The sell off of public land is unacceptable. The suggestion that the land has to be sold off to pay to “renew” the public housing stock is risible. The proposal will actually deliver the same - or less - beds for people who need them. In reality the proposal will help private developers make millions in profit through handing over public land.

Public land must be kept in public hands for future generations.

The Waterloo South project is unacceptable because it will force public housing residents out of the homes and away from where they have established their lives.

It will destroy local communities which are essential for so many residents’ emotional and physical health and quality of life.

Local small businesses which have served these communities for so long are also destroyed by the wanton destruction of public housing estates.

The proposal also undermines any hope of dealing effectively with the housing affordability crisis.

The proposal for affordable housing of 7 per cent of the Gross Residential Floor area and 7.5 per cent of dwellings will barely make a dent in the crisis.

It is imperative that the Waterloo South development is focussed on human scale liveability and not on maximum profitability. The proposed over-development and density must be reduced.

The proposed density is a matter of serious concern. Low and medium rise housing will be replaced by 2 to 33 storey towers.

The Waterloo South plan follows on from the massive increase in density of the new Metro development, and there are two more Waterloo proposals coming down the track to further add to overdevelopment. The State Government is creating one of the highest density communities in Australia

New developments need to be built sustainably and with the required extra resources to support them. In the Waterloo South proposal there are minimal or no plans for vital community facilities like schools, health, childcare, sport or community centres.

The Waterloo towers have a life of at least another 30 years. Investment in refurbishment and good maintenance would be cheaper and more effective than their planned destruction.

The largest public housing estate in the city should be the place to genuinely grow the public and affordable housing our city needs.

SUB-1618

Andreas Dalman

Andreas.Dalman@uts.edu.au

Earlwood

- Stop the selloff of public lands. Public land must be kept in public hands for future generations.
- Reduce the over-development and density. Ensure there is planning for community needs, especially extra education, health, sporting, and community facilities.
- Not enough public and affordable housing. The NSW Government is fudging the figures to make it is building public housing, when it will deliver the same - or less - beds for people who need them.

Affordable housing of 7% will barely make a dent in the affordable housing crisis. The largest public housing estate in the city is the best place to genuinely grow the public and affordable housing the city needs.

SUB-1619  
Lea Walker  
leakwalker@gmail.com  
Redfern

Ref: The opening of McEvoy Street onto Pitt Street

I am writing this submission to strongly oppose the opening of Pitt Street to McEvoy Street as part of the Waterloo South redevelopment.

We are recent purchasers of a property on this street and were drawn specifically the community nature of the area, the outdoor dining, the kids playing in the street etc.

This proposal would significantly impact this community.

The traffic and noise alone would entirely change the neighborhood and turn Pitt St into a major commuter road instead.

Not to mention the safety concern of increased traffic. Our children regularly ride their skateboards and bikes in the street. As do many others.

It would be awfully disappointing.

The heritage listed buildings and 100 year old homes are not built to withstand a major road. Nor do many of these homes have parking, given their age, so creating more traffic would also have an impact on the home owners parking capabilities.

Residents shouldn't have to bear the brunt of the potentially major negative externalities of the street being opened up to a rat run for the increasing population that is coming to Waterloo South.

The facilitation of more traffic on historic residential streets, runs counter to the work and claims of City of Sydney on working towards more sustainable cities and communities.

Appreciate you hearing the communities thoughts on this matter.

SUB-1620  
Barry Gardner  
barneygardner07@hotmail.com  
Millers Point

I'm appalled that the NSW LNP Government is continuing down this destructive and failed path when it comes to housing our vulnerable citizens who don't have a place to call home.

In the last decade this government has sold-off over \$3bn of public land and assets and hasn't alleviated the suffering of our homeless, those on the waiting list and the many thousands of others who don't register because of the time it takes to be offered a place to call 'home'!

Our NSW government should not be cannibalising it's housing stock to allow developers to greedily profit from our citizens misery, instead they should be competently repairing and maintaining the stock we have as well as building 100% public housing on vacant public land. Then, and only then we may see an improvement to our housing crisis!

This is achievable if we have a competent stand alone Minister for Housing with intelligent staff members who are familiar with how public housing operates!

SUB-1621  
Frances Clarke  
frances.clarke100@gmail.com  
Sydney

I write to lodge a strong objection to the government's plans for Waterloo South.

In the midst of a public housing crisis, it is beyond belief that the government is planning to reduce public housing still further. At present, 80 percent of this site is devoted to desperately needed public housing. The current plan to reduce this figure to 12% is a disgrace. It is also one that will be permanent. Once public housing is sold off to private developers, the public will never get it back. We will lose doubly in the long run, too, given the role of public housing in improving the health and welfare of those who need this service.

The current plans for Waterloo South will have profoundly negative consequences for current residents. It will destroy existing local communities and uproot lives, and it will do nothing to alleviate the current housing crisis. Every previous similar destruction of public housing developments shows the same dynamic. Selling off our public assets for short term gain, leading directly to social dislocation, depression, and worse for once relatively stable communities. The plan to replace low and medium rise housing with towers of 33 stories represents gross overdevelopment of this area as well. I'm only glad that I won't be living anywhere near these hideous towers.

Does this current government have any plan to deal with Sydney's housing crisis aside from horrendous over-development in some parts of the city, selling precious public housing stock to developers, and trying to fool us with glossy brochures of smiling children? This Waterloo proposal suggests that the current government has no clue and no soul.

SUB-1622  
Jay Gillieatt  
jaygillieatt@hotmail.com  
Waterloo

I object to the proposal for Waterloo South.

NSW is experiencing an affordable housing crisis, with over 50,000 people on waitlists for public housing, including 1000 people in the inner city allocation zone. The marginal net increase in the total number of public housing units delivered by this project is woefully inadequate. The NSW Government should be using public land to alleviate this crisis, not to develop for private sale. I am further concerned about the impact of this proposal on the Waterloo community. While there is no doubt the housing stock is in need of major refurbishment and rebuilding in some cases, there is no plan to ensure all community members remain in the area while this is done. This risks dislocating vulnerable people from their support networks and community. There is limited evidence that replacing public housing with mix-tenured developments results in any improvements for residents.

The NSW Government should reconsider its plans to privately develop the site. Any plans to redevelop the site should be done for the benefit of the community, with a view to addressing the housing crisis and in a way that does not result in the dislocation of residents from their homes and community.

SUB-1624  
Amy Croft  
amycroft@gmail.com  
Chippendale

I strongly object to this proposal.

The current housing crisis is getting worse. There are fewer rental properties available and rents have been increasing substantially for me and everyone I know. With increasing cost of living and expected interest rate rises, social and affordable housing will be more needed than ever. to prevent more people becoming homeless.

The first and most obvious step would be to retain and properly maintain current publicly owned social housing stock, and invest in more sustainable developments to increase the number of homes with adequate local publicly owned amenities for Sydneysiders in need — not for developers to turn a quick buck.

Please reconsider this proposal.

Donations: I regularly donate to the Greens Party.

SUB-1625

Name withheld

I write with reference to the Waterloo Estate (South) Plan. Below I refer to this as the "Plan" and page numbers refer to pages in the Transport Study contained within the Plan.

As you may be aware, the Plan intends to extend Pitt Street southwards to connect with McEvoy Street. This is "the only significant works proposed to the external road network as a result of the Waterloo South development" (p. 70), however we believe that it will adversely impact on the neighbourhood immediately north of Waterloo Estate, at Pitt Street Redfern.

Pitt Street has been closed at McEvoy Street for well over 30 years.

The Plan indicates at 6.7.5 that the proposed opening of Pitt Street at McEvoy Street is to allow all movements into and out of Waterloo South, and then at page 58, it indicates that opening up Pitt Street at McEvoy will "remove a significant number of right turn movements from the Botany Road/McEvoy Street intersection. In our opinion traffic management on Botany and Elizabeth Streets as well as the use of "traffic calming measures including pedestrian crossings and threshold treatments, narrowing of the street and low speed limits" on Pitt Street Redfern (pages 61-62) are out of scope for Waterloo Estate Planning and that they should not be making these decisions that will impact our neighbourhood at Pitt Street, Redfern.

I ask that a cul-de-sac in consultation with residents and rate-payers on Pitt Street Redfern in order to maintain the no-through status from McEvoy Street. This will not impact on the Waterloo Estate plan and will remove any false sense of security that traffic calming measures might provide.

SUB-1627  
Adam Bartley  
adamoveroz@gmail.com  
Surry Hills

Re

Objection to proposed  
Waterloo Estate (South)

the planning proposal number - PP-2021-3265

Public Land Housing and Amenity must remain in Public Possession.

This estate cannot be stolen from the people.

More not less is required to house the homeless.

A sell-out as proposed is offensive and will have immediate repercussions at the next election.

SUB-1629  
Norrie  
spansexual1@gmail.com  
Waterloo

#### SUBMISSION ON WATERLOO SOUTH PLANNING PROPOSAL PP-2021-3265

The walkups in Waterloo South were built around 1960, at the same time I was built. Brick buildings are generally presumed to last longer than a human lifetime. I am only middle aged, not ready for demolition yet, and neither are the buildings here. I OBJECT to the proposal for Waterloo South. This development would evict hundreds of public housing tenants from their homes for little to no public benefit - fewer than 100 hundred additional social housing units in a state with more than 50,000 households on the waiting list. There has been no cost/benefit analysis that takes in to account the impacts of forced evacuation and relocation on the tenants, or the proposed dilution of their community where they go from being 100% of the local housing estate to less than 30%. This is public land, held for the benefit of the common wealth. Selling it for short term profit is akin to the folly of selling the family farm. If there is a need to demolish and rebuild, and money is needed from giving about 70% of the proposed new buildings to non public housing tenants, then the investors for the new development should be the government, so that any profit is kept in public hands, not syphoned off to profit the sort of developers who often end up in ICAC hearings. This project started under the auspice of the premier who chose to resign under scrutiny from ICAC, and I note the legal proceedings against her are still ongoing.

98 more social units is not enough

The 847 social housing units proposed for Waterloo South is far too low for a site of this size and development of this scale. This is an addition of only 98 social homes, while there are more than 1000 households on the waiting list for public housing in the inner city allocation zone. These are the people who need public housing right now; by the time the development is complete, there will be many more. Any development of public land should prioritise public housing.

Redfern-Waterloo needs more affordable housing for Aboriginal people

In addition to a desperate need for more public housing, Redfern-Waterloo needs more housing that is affordable to Aboriginal people and families. The Redfern Waterloo Aboriginal Affordable Housing Campaign, which is supported by the Redfern Waterloo Alliance of Aboriginal Community Controlled Organisations and allied organisations, demands that 10% of any housing developed on government land is devoted to social and affordable housing for Aboriginal people. This is the least that the government should do to address the decades of state-sponsored gentrification and displacement of Aboriginal people from this neighbourhood, which was once home to tens of thousands of Aboriginal people and so crucial to the movement for self-determination.

The promise of 30% social housing has been broken

When the redevelopment of the Waterloo estate was announced in December 2015, the Minister promised that 30% of new housing would be social housing. Under this proposal, only 28.2% of homes will be social housing – 57 fewer than promised. Nor will social housing make up 30% of the residential floor space of the proposed development – it will comprise only 26.5%. Furthermore, the proposal seeks approval for 3,012 total units plus 10% bonus floor space for design excellence, whereas the City of Sydney proposal was for 3,012 units inclusive of this 10% bonus for

design excellence. This is a cunning attempt to sneak in an extra several hundred units for private sale and is a further betrayal of the promised 30% social housing.

#### Bad economics leads to bad planning

The fundamental problem with this proposal is that the NSW Land and Housing Corporation is trying to redevelop Waterloo at no cost to the NSW Government. Good planning outcomes are not possible under these financial constraints: too many homes are proposed and too few of them will be affordable to people on low and moderate incomes. There is no consideration of the massive increase of demand on amenities such as schools and gyms and swimming pools and shops and child care with the planned massive quadrupling of the local population. The NSW Government and Commonwealth Government should instead fund the construction and acquisition of new public housing and the proper repair, maintenance and refurbishment of existing public housing. Yet even under the NSW Government's self-imposed constraints, more social and affordable housing and better planning could be achieved if the site is retained in public ownership, as shown by a recent report by Dr Cameron Murray and Prof Peter Phibbs for Shelter NSW and by the submission of Prof Bill Randolph and Dr Laurence Troy to the Waterloo South Independent Expert Advisory Panel. Climate Change is happening, along with increased likelihood of more pandemics

Climate Change keeps more heat in the atmosphere, so more energy, so more storms of greater intensity, making the wind tunnels formed by tall buildings and towers more severe. As creatures move to escape changing climates, formerly tropical diseases travel with them, for example, the Japanese Encephalitis now carried by local mosquitoes. As habitats are disturbed, and masses of animals of various species and from varying locations crammed together in stressful conditions for commerce, more pandemics will spread, and high towers proved catastrophic for residents in Melbourne recently. Higher density means higher transmission.

#### Complete reduction of green around buildings

Apart from the two proposed parks and the trees lining the streets, there is no green space around the buildings in the proposal, no room for the gardens and lawns currently between the buildings and the street, all around the buildings, where there is peace and birds and bushes and vegetable gardens and possums and butterflies. The proposal aims to build out to the street, and have many people live in rows of sunless tunnels.

#### It's not too late to make it right

I strongly object to the proposal for Waterloo South. The budget-neutral model it follows should be abandoned. It is patently obvious that it would lead to far too many homes for the site yet far too few social and affordable ones.

Furthermore, a thorough social impact assessment of the proposed redevelopment is yet to be commissioned, despite the persistent demands of community organisations over the past six years. The Land and Housing Corporation and Department of Planning should go back to the drawing board to find the most socially beneficial approach to the Waterloo estate rather than trying to make the quickest buck in the short run but not the long run.

Norrie  
Public Housing Tenant  
31/63 McEvoy St  
Waterloo NSW 2017

SUB-1630  
Michael Mackenzie-Shreenan  
mshreenan@counterpointcs.org.au  
Waterloo



**Submission**

**Planning Proposal: Waterloo Estate (South)**

Counterpoint Community Services Inc

April 2022

## About Counterpoint Community Services INC

Counterpoint Community Services Inc. provides a wide range of community support services in the Inner City and Southeast Sydney LGAs. We have operated in the heart of Waterloo since 1977, with a particular focus on working with social housing tenants and diverse communities.

We operate The Factory Community Centre in Waterloo, Counterpoint Multicultural Centre in Alexandria, Poet's Corner pre-school in Redfern, and act as the lead agency for many local grass-root groups and services, including the Redfern and Waterloo Social Housing Neighbourhood Advisory Boards.

Our Executive Officer, Michael Shreenan, also chairs the Redfern and Waterloo Groundswell collation consisting of local and peak body NGOs working together to resource residents through the Waterloo Estate redevelopment process. The chair of Inner Sydney Voice Regional NGO peak and co-chair of the Waterloo Neighbourhood Advisory Board resident lead Waterloo redevelopment group.

We have a community development team that is part-funded by the City of Sydney to support tenants through the redevelopment engagement process and numerous community groups. DCJ funds our community support team and hub staff to support a wide range individual residents and families. We support approximately 8,500 individuals annually.

All our funding or relationship with funders has had no bearing or influence on the content of this submission. We also remain apolitical despite continued engagement with local parliamentarians and other democratically elected representatives.

## Executive Summary

Counterpoint Community Services thanks the Department of Planning and Environment for the opportunity to comment on the proposal to rezone the southern portion of the Waterloo social housing estate. One of our critical responsibilities as community service providers is to support residents impartially and ensure the diversity of voices and opinions in Waterloo and its surroundings are considered. This submission is informed by our work with the community, including social housing residents and local service providers and non-government organisations. We aim to express the diverse views of the local community, while also providing a local lens that we hope will inform the final determination of the proposal.

The proposal would see the majority social housing precinct (on public land) rezoned to allow redevelopment of the estate into a high-density 'mixed-tenure' precinct. Our comments are concerning the land owned by Land and Housing Corporation, currently 749 dwellings. The proposal will see the density increase to a minimum of 3,012 dwellings (1,938 market housing, 847 social homes and 227 affordable homes). Given the developer meets the design excellence threshold, we can expect the development to deliver an additional 10% floor space ratio and therefore increase the density to 3,300-3,400 dwellings.

The development proposal is driven by the Government's Communities Plus policy whereby public land of social housing estates is sold to developers to fund the replacement of existing social housing stock and in some instances, a modest increase in social housing dwellings. This reflects the self-funding model of Land and Housing Corporation where rental income, and asset sales pay for the new construction of public housing<sup>1</sup>. Our submission will comment on the Communities Plus policy further, but we note that the planning proposal on exhibition is heavily weighted to the restriction of this policy and by extension, the views of planners, political and economic interests rather than the long-term public interest of current and future tenants.

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<sup>1</sup> Plan finalisation report – PP\_2020\_SYDNE\_004\_00, Sydney Local Environmental Plan 2012 Amendment 75 - 600-660 Elizabeth Street, Redfern of February 2022, pages 13-14.

Given what we have heard from the community and our own consideration of the planning proposal, we make the following comments and recommendations.

**1. Increase the amount of social and affordable housing**

Given the poor maintenance of current stock, we welcome the provision of replacement social housing on the site. However, the planning proposal does not optimise the delivery of social and affordable housing at 26.5% and 7% of GFA. Considering the arguments provided in this submission, the government needs to invest directly in additional social and affordable housing and the planning proposal should prescribe much higher targets.

**2. Conduct a Social Impact Assessment (SIA) NOW**

A SIA would assess the accumulative social impacts of the planning proposal. The failure to provide a SIA makes it difficult for stakeholders to assess the impacts arising from the planning proposal, and therefore make an informed opinion. A SIA report should be undertaken by DPE before determining the outcome of the planning proposal. It is our view that without a Health Impact Assessment, a comprehensive mitigation response and a guaranteed well-resourced Human Services Plan for the lifetime of this project the proposal is in danger of failing its stated objectives and vision.

**3. Reduce the proposed density**

The proposed density of the site at 3,012 dwellings and the likely addition of 10% following design excellence is viewed by many to be an inappropriate level of density, especially in the broader context of other significant developments in the area including Green Square.

**4. Improve solar and wind access**

The lack of technical studies that address potential impacts arising from the planning proposal, including wind and solar, makes it difficult to provide an informed opinion on the updated planning proposal. However, limited analysis suggests solar access is far below the accepted standard and the potential wind impacts are concerning.

**5. Reconsider the location of the community facility**

The community centre should be relocated from the far corner of the estate and to the large park as requested by the community. This will enable the community centre to function as a hub for the entire community, and as a central location of engagement and social connection.

**6. Reconsider the opening of Pitt Street to McEvoy Street**

The opening of Pitt Street to McEvoy Street via a left-in and left-out intersection should be reconsidered given the strong community opposition and safety concerns given its proximity to Our Lady of Mount Carmel Primary School.

**7. Ensure a Crime Prevention through Environmental Design (CPTED) study is undertaken**

The planning proposal pays little attention to CPTED and at best, offers token references and makes no genuine effort to link specific crime and safety issues specifically to various components of the development at specific locations. A CPTED study should be undertaken to ensure safety is considered.

Further to our previous input into the above proposal(s), below is our detailed response for your consideration.

**Local Context**

The needlessly protracted process to date, based on the professional and political debate over the last decade, has resulted in shameful and needless stress and anxiety and caused significant negative social and health impacts on Waterloo residents. These impacts have not been addressed nor acknowledged by decision-makers. We hope that lessons are learned from this before any other community is subjected to similar treatment.

We highlight that Waterloo's strengths lie in its diversity; there is no overwhelming consensus or agreement of the community on the Waterloo redevelopment. There are a wide range of views, with some community members in support, some opposed and others who are undecided and seeking more information.

Despite this diversity, the opinion that the planning proposal should maximise social and affordable housing is unanimous. With over 1,000 applicants on the social housing waiting list in the Inner City and over 50,000 applicants across NSW<sup>2</sup>, the government needs to maximise the opportunity to increase social housing in this development proposal. The benefits arising from the planning proposal, mainly the replacement of current social housing stock with a mere additional 98 social housing units and 227 affordable homes fall short of many of the community's expectations and opinions expressed during the government-documented consultations. The proposal fails to reach its stated objective of prioritising social housing and the direct investment as outlined in the NSW Housing Strategy<sup>3</sup>

Community concerns highlighted below are not new and stated from the commencement of the consultation that the current proposal or its predecessors have failed to address.

### **The Communities Plus Policy (CP)**

We understand that the planning controls proposed are constrained by the cost-neutral policy context the proponents are working within. The Communities Plus policy prescribes a ratio of 70:30 for all social housing estate redevelopments (70% being market housing and 30% being social housing). The majority private ownership is perceived to be necessary to counter stigma and the supposed demotivating impacts of concentrated disadvantage, although the proponent may not spell this motivation out.

We emphasise that Counterpoint is not supportive of the economic or social arguments outlined in the Communities Plus policy. Disposing of valuable public land to secure investment to replace existing housing stock and, in some circumstances, marginally increase housing is economically short-sighted and is an unsustainable housing policy for current and future tenants.

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<sup>2</sup> <https://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times>

<sup>3</sup> NSW Housing Strategy, Housing 2041, p.34.

The prescription of a ratio to all developments ignores the unique profile of each social housing estate that sits within its local context. Darcy and Rogers (2019)<sup>4</sup> found that the preference to provide additional social housing stock in cheaper, less connected, and underserved locations in the outer city compared to new stock in inner-city locations such as Waterloo will prove more costly and less efficient. They argue that optimising stock in inner-city locations will enhance the utility of “existing services and infrastructure including health, transport and education facilities required by disadvantaged social housing tenants”.

Access to housing is a human right<sup>5</sup>, and the Government needs to fulfil its role in ensuring socio-economically disadvantaged groups have access to adequate housing. The Australian Housing and Urban Research Institute<sup>6</sup> found that not only does investment in social housing support improvements in tenants health, safety, and sense of empowerment, but it also benefits governments by capturing savings in costs associated with health, justice and welfare services.

The government needs to value the benefits of directly investing in social housing and ensuring a viable future for social housing means establishing it as more than a sector of last resort for people. Social housing investment should rightly be seen as a key piece of social infrastructure that supports social inclusion, participation, place making and economic productivity. Hence, evaluating the financial feasibility of the planning proposal in terms of ‘cost neutrality’ (no cost to government)<sup>7</sup> rather than the tangible social and broader societal benefits of directly investing in more social and affordable housing on the site is a considerable policy failure. On this measurement alone, the planning proposal fails to provide a commensurate public return for the sale of this valuable public asset.

We want to see a thriving social housing sector that can provide good quality affordable homes to a wide range of households and guarantees that everyone has

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<sup>4</sup> Dallas Rigers and Michael Darcy (2019). Finding the Right Mix in Public Housing Redevelopment: Review of Literature and Research Findings, page 4.

<sup>5</sup> Article 11, International Covenant on Economic, Social and Cultural Rights (ICESCR).

<sup>6</sup> Jim Davidson, Nicola Brackertz and Tom Alves (2021). Return on investment for social housing in the ACT. <https://www.ahuri.edu.au/sites/default/files/documents/2021-09/AHURI-Prof-Services-Return-on-investment-for-social-housing-in-the-ACT.pdf>

<sup>7</sup> Independent Advisory Group Report, page 40.

the right to a home. Disposing of government assets that can be utilised for relatively small gain means today's perceived short-lived success will be tomorrow's deficit. The media has recently reported that since elected in 2011, the NSW government has sold off social housing to the value of \$3 billion dollars equating to 4,205 dwellings while only meeting 10% of its new social housing construction goals (2,393 dwellings)<sup>8</sup>. These measurements suggest that the CP policy has failed in its aims and should be dropped.

Counterpoint is also opposed to the unproven assumptions that seek to artificially engineer social mix in communities as per the Communities Plus policy. A mixed neighbourhood weighted to the high-end private market only hides and dilutes disadvantages and other systemic challenges rather than addresses the causes. We believe that the planning system needs to be strengthened and empowered to ensure that the people component of planning is viewed with equal vigour and 'enforcement' as the built environment controls.

### **Housing Mix**

Irrespective of our view of the broader implications of the Communities Plus policy, we make the following comments in relation to the planning proposal of Waterloo South.

If the Government is going to artificial engineer housing mix, a properly balanced mix of one-third social housing, one-third affordable housing, and one-third private should be the aspiration. Despite the target of 70:30 private to public dwellings being the accepted standard of social mix, the origin of the formula is "related to project exigencies rather than research evidence"<sup>9</sup>. The representation of 70:30 by bureaucrats as the 'sweet spot' of social mix is not supported by evidence.

The 'hot' housing market has meant that rents and house prices are far outpacing wage growth, locking many out of homeownership and into the unaffordable private rental market. Statistics provided by the Australian government show that 47.8% of low-income households spent more than 30% of their income on housing costs in 2018,

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<sup>8</sup> <https://www.theguardian.com/australia-news/2022/apr/16/more-than-3bn-of-social-housing-sold-by-nsw-government-since-coalition-took-power>

<sup>9</sup> Dallas Rigers and Michael Dacry (2019). Finding the Right Mix in Public Housing Redevelopment: Review of Literature and Research Findings, Page 3.

and therefore considered to be in rental stress<sup>10</sup>. Therefore, 7.5% affordable housing on public land is woefully inadequate to meet current and future housing needs. The planning proposal fails to assure genuinely affordable rents for essential workers such as those in aged care, community sector, childcare, nurses, teachers, and police. We are of the strong position that the planning proposal should seek a higher percentage of affordable housing. The Independent Advisory Group concluded that "10% affordable housing must be the target on this site"<sup>11</sup>. We suggest the planning proposal can be more ambitious than the financially feasible 10% suggested by the Independent Advisory Group. As argued in the IAG report<sup>12</sup>, the "demography, the clear need and the income circumstances of the population in this area" makes a strong case for affordable housing above 10%. The report noted however, that this cannot be achieved within LAHC's feasibility constraints.

Internationally, the NSW planning system is a global laggard when it comes to ensuring the supply of affordable housing. Compared to the UK which guarantees 20-40% of all new developments to be affordable housing, the NSW planning system's voluntary measures have only delivered 1,300 affordable housing dwellings between 2009 and 2017 (between 0.5% to 1% of Sydney's housing supply)<sup>13</sup>. Given that Sydney is among the least affordable cities to rent in the world, the 7.5% affordable housing provision on public land is unacceptable and must be increased.

The community is clear on its expectation for 10% of the entire site to be dedicated to Aboriginal affordable housing and 5 % to others — an easily achievable and reasonable ask. The community have been misled by many on this issue, and the proposal fails to address this. The proposal has no specific Aboriginal housing guarantee apart from the possibility that 10 % of the 7.5% affordable housing may be dedicated to Aboriginal people, representing only 0.75% of the site. Despite the acknowledgement of the strong connection the Aboriginal community has to the area, the planning proposal fails to address how this connection will be represented in both the built form and social infrastructure.

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<sup>10</sup> <https://www.housingdata.gov.au/visualisation/housing-affordability/low-income-rental-households-in-rental-stress>

<sup>11</sup> Independent Advisory Group Report, page 4.

<sup>12</sup> Independent Advisory Group Report, page 55.

<sup>13</sup> <https://theconversation.com/england-expects-40-of-new-housing-developments-will-be-affordable-why-cant-australia-94581>

The proposal also fails to provide any supported accommodation for homeless clients, transient communities, or aged and health supported accommodation units. The lack of care homes and housing for people living with disabilities to enable independent living is another example of the planning proposal not optimising the public asset for the public benefit.

The 28.2% social housing provided in the planning proposal is grossly inadequate and does not meet the Communities Plus target of 30%. As already discussed, the social housing waiting list is long, and some people are waiting for more than 10 years to receive a housing offer<sup>14</sup>. We note that since the redevelopment announcement, the community has felt strongly that the target should be 100% social housing for the estate. Our case managers support those sleeping rough and those who struggle to access secure housing. Miniscule increases to social housing will not address the pressing need for more social housing.

The amount of social housing is even less than 28.2% which is representative of front doors rather than gross floor area. The planning proposal designates 26.5% of gross floor area to social housing. This is highly problematic as one can draw the assumption that this will translate into lesser bedrooms and will therefore imperil the ability of larger families and those needing 2 or more bedrooms. Together, social and affordable housing represents only 33.5% of the gross floor area. That the remainder goes to the private market is not indicative that the proposal has given prioritisation to social housing, affordable housing, or a balanced provision.

We also highlight that the Redfern Waterloo Authority 'Contributions Plan' took financial contributions from previous developments from the area totalling \$24 million<sup>15</sup>. It was promised that these financial contributions would be invested in the local community to support the supply of affordable housing and social infrastructure. We ask that the NSW government uphold this promise and return the funds to Waterloo to contribute to this planning proposal and benefit the local community.

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<sup>14</sup> <https://communityhousing.org.au/our-impact/policy-priorities/#:~:text=More%20than%2050%2C000%20people%20are,%2C%20at%20worst%2C%20into%20homelessness.>

<sup>15</sup> Independent Advisory Group Report, page 55.

The planning system has a vital role in addressing affordable housing needs within the broader economic environment that determines house prices and affordability. Not maximising the opportunity to do so on public land is wasteful and irresponsible. The proposal objectives state it will prioritise the delivery of social and affordable housing in conjunction with the provision of market housing. The planning proposal on exhibition fails this objective.

**Proposal Objective: Enable the orderly Redevelopment of Waterloo Estate (South)**

The community was promised a 'masterplan' that would cover the whole of the Waterloo estate and the metro quarter. The separation/decoupling into precincts makes it extremely challenging to give input or analyse the proposal's collective impact on the community. This represents a highly problematic poor planning practice to building sustainable and thriving communities.

The proposal is based on a vastly different alternative plan to the original one submitted by the proponent (LAHC). Although the original masterplan of 2019 included a density and building heights that the community opposed, it did more accurately reflect community views expressed through the Options Testing consultation. That we see yet a different plan that doesn't reflect many of the consultation outcomes arising from initial consultations has left the community feeling cynical and apathetic to the planning process. One resident recently commented that "the government does what they want to do. It doesn't matter what we say".

The technical studies executed with limited community input were mainly based on the entire estate redevelopment rather than just Waterloo South; therefore, it is difficult to assess if the latest proposal will enable the orderly redevelopment of the estate. The technical reports that inform the newest proposal are problematic, with many gaps and a lack of clarity such as the exclusion of an adequate solar access study.

From our perspective, the proposal fails to address how the recommendations from the technical studies will be executed and enforced. This is particularly so regarding the commitments related to social infrastructure, placemaking, community

development, and recognition and retention of our communities' connection to Aboriginal people.

The compartmentalisation of decision making may make it easy for planners and developers. However, the lack of micro-detail in the proposal is problematic. When raised with planners, the advice has been that these issues "will be addressed by the design guide at the DA stage". This makes it difficult for stakeholders to respond from any genuinely informed perspective and adds to the consultation fatigue and frustration expressed by residents. It also confers greater uncertainty to what the future of Waterloo may look like, and whether issues identified will ever be addressed.

### **Social infrastructure (facilities and Services)**

A decent home and a vibrant community are essential components for a healthy and cohesive society. Secure housing is a step toward adequate access to health, education and employment and by extension contribute to achieving a sustainable environment and a thriving economy. However, we miss the mark before starting if the planning proposal fails to plan for the people and not just the property.

The planning proposal fails to provide a SIA and instead, relies on a Social Sustainability Report that not only fails to address likely social impacts arising from the redevelopment, but is narrow both in terms of its focus on social benefits and in terms of its treatment of selected topics. The Social Sustainability Report highlights several important issues from a baseline perspective but fails to deliver a deep dive into the rich history, assets, challenges, and complexity of the existing community and future social housing demographics. It also does not test if the current proposal would address these issues and lacks evidence-based decision making. The community facilities report also fails in this regard and is superficial at best as per the reason previously reported and ignored by both proponents and planners. Hence, the people component of this proposal has not been given the attention it should demand. A SIA would assess social impacts arising from the development, particularly the foreseeable social risks and social change and long-term distributive inequality impacts.

Further, the absence of a SIA means that it is difficult for any stakeholder to comment on the positive, negative, and accumulative impact of this project. Therefore, we don't know if there are sufficient measures in place to mitigate risks and maximize positive social outcomes arising from the buildings and their spatial context. We note that any intended commitments related to the soft element of social infrastructure are not enforceable either. Thus, the Waterloo South Gateway Determination Report does not appear to meet the Department's requirements for 'a high-level check' and 'a strategic merit assessment' of this planning proposal against 'potential environmental, social, economic and infrastructure impacts'<sup>16</sup>. The avoidance of a SIA suggests the planning proposal gives priority to developer financial feasibility considerations rather than the long-term social quality and value of the places where people live. Given the planning proposal proposes a major urban renewal that will displace the existing community and return a high-density development, the planning proposal should assess the social impacts (both positive and negative) before determining the outcome of the planning proposal.

Like housing, community facilities are more than just brick and mortar and failing to understand current strengths, needs and anticipate future needs in detail with all its shade of grey results in plans that will not be future proof or adequate.

The lack of a Health impact assessment and social impact study, despite being requested by the community from the commencement of this process, clearly indicates that the proposal, whilst may meet built environment demands, fails to plan for current and future Waterloo residents. We suspect this was not carried out, as a comprehensive study would shine a public light on the many failures and challenges of the current human service system that estate redevelopment alone won't address. Failure to do this has put any success the development may have in peril, which is ironic given the justification for the proposal when first announced.

Crime statistics provides insight into how the incidents of crime can affect the real or perceived safety of an area. Crime statistics are provided in the technical studies, but there is no analysis of crime data, and no implications or recommendations are

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<sup>16</sup> <https://www.planning.nsw.gov.au/Plans-for-your-area/Local-Planning-and-Zoning/Making-and-Amending-LEPs>

provided as it relates to the proposal. Yet, crime statistics have been used as a justification for the redevelopment by political leaders. It is a concern that no crime prevention design study has been undertaken with this proposal.

The impact of the process so far on tenants is widely known and accepted, it has been significantly detrimental, and no relocation or development has even commenced yet.

Whilst there is a much-welcomed human service plan currently being developed for the current needs of the Waterloo community, no plan or guaranteed resources are in place for the lifetime of this project; the promise of a concurrent well-resourced Human service plan for this process has failed to be materialised.

In addition, the lack of a developed governance framework for this proposal to ensure accountability, the delivery of commitments, and to ensure this project achieves its intended outcomes has also not been sufficiently scrutinized or addressed. For example, the social sustainability report makes clear the need for a government-community partnership approach to the development of the site, yet there is no commitment in place from any other agencies other than LAHC in relation to the recommendations within the SSR.

There is no assessment of current community engagement or governance.

Neither the social sustainability report nor the planning proposal addresses the suitability of the proposed building envelopes for the target residents. There is no mention of universal design principles as it relates to accessibility for disabled ageing residents. There is no plan in place to address the risk of conflict between exiting and a new mixed community. Furthermore, the equity impact of the proposal has not been assessed

There are no design standards that address existing well-known issues. For example, how measures such as soundproofing and double glazing could help reduce neighbour disputes, complaints, and social isolation.

There is no plan in place to address current issue of safe space/ wet space for 'street drinkers' which is an existing challenge for services, the drinkers, and current residents. This is before any new private market is added to the mix.

There is still no cohesive agreed employment strategy developed in the area, to maximise the benefits for current and future tenants.

### **Community Centre**

Prioritising a purpose-built well-resourced neighbourhood/community centre at an early stage of the development of new housing estates and suburbs would help support the existing community whilst helping to develop a strong emerging community and avoid isolation and disengagement. The current proposal disappointedly indicates this will be done last despite historic undertakings.

Counterpoint, like many other providers, is currently operating out of a building that is not fit for purpose and is under-resourced to deal with current needs, let alone impacts and needs arising during and after the redevelopment.

Section 94 of the Environmental Planning and Assessment Act 1979 requires developers to contribute to public spaces by making available physical space or contributing to the local council to provide public amenities. There is no specific requirement for developers or councils to provide funding for local community-led organisations for community development activities or services. The plan fails to address how this need will be met sustainably.

The proposed location of the new centre, at the furthest corner of the estate surrounded by a residential enclave, is a failure to understand the function, value, and significance to the community. Community centres need to be located within easy walking distance for all residents both within the Waterloo south precinct and the Central and North precincts. Hence, the location in the planning proposal is not an appropriate or accessible location for a community hub. It denies previous feedback from the community, who argues for it to be within the central park at the heart of the estate and as a focal point for the new community. We understand the controls might allow the centre to be relocated elsewhere than the location currently exhibited.

However, would it not be better to address this now rather than leave it to the decision of fate. We note with disappointment that Counterpoint was not consulted about the community centre before an agreement between the COS and LAHC was reached. This is despite Counterpoint being the existing generic provider in the area.

The management of relocations and future housing stock has not been researched, nor has the community been consulted in any great depth. The assumption that all residents will be happy to be transferred to community housing rather than remain with HNSW is flawed thinking and is a policy that is being imposed rather than one the community has sought. We would argue that a mix of landlord options and choices is as important as the building mix.

### **Density, building locations and heights**

The proposed density continues to be a significant concern that much of the community are not comfortable with. Considering the context of significant developments in the immediate area such as Green Square and the Botany Road corridor, the proposed density accounting for approximately 3,012 dwellings is far too high. It's also unclear what impact this will have on a social housing demographic with complex support needs and how this proposal plans to ensure the density will work well. Without a SIA, one can only guess.

Furthermore, the proposal and the studies do not test the impacts of density that is 10% bigger than suggested in the planning documents. Given the developer meets the design excellence threshold, we can expect the development to deliver an additional 10% floor space ratio and therefore increase the density to 3,300-3,400 dwellings. The Independent Advisory Group in advice to the Gateway determination said *"There is a general view by commentators on this proposed development that the density is too high... The IAG considers, however, that at this density, design quality, building quality, and urban amenity are of significant importance at development assessment stage and at the construction stage"*<sup>17</sup>. The IAG raised these concerns in relation to a planning proposal of 3060 dwellings and not the likely outcome of 3,300-3,400 dwellings. A SIA must be undertaken to assess the impacts of the density that will likely transpire given that the proposal does not test if the proposed

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<sup>17</sup> Independent Advisory Group Report (2021), page 47.

density is suitable for the priority allocations being made into Waterloo and the inner city where people often have complex and high needs.

There are a variety of different views as to the appropriateness of high-rises. Some community members are vehemently opposed to high-rises, others want to live on the highest floor. We note that LAHC's 2019 preferred masterplan had a considerable number of slimmer, taller towers, but fewer mid-rises (60% of buildings below seven floors) than in the planning proposal on exhibition. Counterpoint is more concerned about the density than built form, yet we suspect LAHC original proposal was more suitable to the target residents than the one currently exhibited. Yet again there no SIA to assess this.

We do note that the Independent Advisory Group found that the loss of revenue from the reduced number of taller towers is more significant than the savings in construction costs arising from building more mid-rises<sup>18</sup>. If taller towers would yield additional affordable housing than Counterpoint would provide conditional support.

Consideration suggested by the community for a purpose-built temporary accommodation unit was ignored. This is despite the fact it would result in a dramatic reduction of expenses currently being spent on private temporary accommodation, which is well known to be often substandard, inappropriate, and costly to the treasury.

We also feel that the proposal is unclear on the impact of bedroom volume in social swellings. There is a need to ensure a more balanced mix in terms of Bedrooms /occupancy rates within units. The current proposal might reflect the need for single units; however, we know the demand for larger family units fluctuates. We also know that planning for mixed communities needs to ensure the housing supply can enable this to happen and be future-ready. We need to encourage more families to return to Waterloo, and an increase in appropriate family size units would allow this to happen whilst also catering to the needs of the ageing population who will need carers.

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<sup>18</sup> Independent Advisory Group Report (2021), page 60.

There is concern that some buildings will become 'gated' precincts. Increasing segregation between the social housing residents and the private market was an issue the current community wanted to ensure didn't happen. How will the plan ensure a cohesive community as opposed to segregation and exclusion?

### **Parks and open spaces**

It is disappointing to see that the planning proposal on exhibition has not considered Options Testing feedback particularly in relation to parks and open space. We make the following comments:

- Green space in the proposal is at least one hectare less than that proposed under the original community informed preferred plan.
- The community endorsed a green boulevard along George Street which is missing from the planning proposal.
- Community gardens have been dropped without any justification by LAHC, the City of Sydney or DPE.
- Social corners were another feature that was enthusiastically endorsed by the community throughout Options Testing consultations and is missing from this planning proposal.
- The central park was the original location for the community centre as desired and requested by both residents and current providers.
- We are pleased to see that emphasis has been placed on tree retention.

### **Trees, Wind and Sunlight**

Increased tree canopy and retention of the existing canopy are welcomed. However, we would argue that if any existing trees are damaged during the construction, developers should be required to replace them.

Wind issue is a significant concern for residents and is currently a considerable problem on the site. Advice from City of Sydney urban planners suggests that wind cannot be solved through design excellence and that it is best to ensure wind impacts are solved at this stage. Furthermore, wind from tall buildings will be a problem, especially at the proposed tall building at Mt Carmel. The analysis also suggests that the large park will not be safe for standing or sitting.

We note that there is a lack of studies that investigate solar access because of the planning proposal. Limited analysis shows that due to the high density, streets will be dark, and less than 50% of all internal-facing dwellings in all blocks may comply with the minimum solar access requirements for apartment design of 2 hours in mid-winter. If social housing tenants are housed in buildings with poor solar access, this could have adverse health impacts, especially for those with poor mental health.

### **Street and traffic flow**

The community opposes the opening Pitt Street to McEvoy Street to create a left-in, left-out intersection. We support their view. The proximity to the local school, the current use of Waterloo estate as a rat run, and the fact that over 40% of car accidents happen at intersections are why this opening should be removed from the proposal. If it were to proceed with a traffic light control system to mitigate the risk of said crashes, it would be too close to other controls and would cause further congestion on already highly congested McEvoy Street.

In relation to the technical study that investigates transport impacts, the only report appears to be the Waterloo South Planning Proposal - Transport Study generated by Jacobs Group Pty Ltd (20 March 2020). We are disappointed to see that there isn't a second expert opinion so we can make a more informed opinion about the proposal, especially given the issue of traffic flow and the opening of Pitt to McEvoy Street is a big issue for the community.

The current re-routing of public transport (buses) through the estate, for example, onto Raglan Street, has increased perceived danger to pedestrians and unwelcome traffic.

The planning proposal expects that based on Sydney LEP 2012 rates, the future redevelopment of Waterloo Estate (South) could result in approximately 1,685 residential and 114 commercial parking spaces. This would equate to roughly 0.5 parking spaces per dwelling with no determination as to how much of these would go to each housing type. These parking levels, in our view, are woefully inadequate, the increase in residential and commercial facilities will increase existing problematic parking issues in the area.

Retaining the current cycleway through the central park rather than Cope Street as originally proposed again ignores current challenges and residents' long-held concerns around this arrangement.

### **Safety**

Both real and perceived crime in Waterloo have been long standing issues for years. It is disappointing to see that there is no separate technical report in relation to Crime Prevention through Environmental Design (CPTED). It is also surprising given that when the Waterloo redevelopment was announced in December 2015, then Housing Minister Braz Hazzard claimed that the redevelopment would have positive effect on crime, stating that where public housing had been redeveloped elsewhere crime rates and anti-social behaviour had fallen<sup>19</sup>. Hence, it is astounding that a SIA and a CPTED have not been developed for this proposal.

How can one have an informed opinion about the 'laneways' if there is no study in relation to their safety? From conversations with residents, the community like the convenience of laneways that cut through blocks to make it easier to navigate the estate but are concerned about the safety of the laneways and the lack of any crime mitigation strategies.

Based on available documentation, the planning proposal pays little attention to CPTED and at best, offers token references and makes no genuine effort to link specific crime and safety issues specifically to various components of the development at specific locations. The lack of studies in relation to safety is another illustration of how this planning proposal fails to investigate and address real and important issues.

### **Environmental factors**

Adverse weather conditions significantly impacts the Waterloo community and all strategies to minimise this should be pursued. It is unclear how the proposal will address the recommendation within the climate report. It is also very disappointing that NSW

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<sup>19</sup> <https://www.dailytelegraph.com.au/news/nsw/sydneys-notorious-mckell-tower-to-be-razed-for-new-waterloo-metro-station/news-story/443026ced767fee56425a2dbef458d38>

government has scrapped the Design and Place State Environmental Planning Policy (SEPP) which emphasised environmental standards and required all developments to mitigate and adapt to the risks of climate change. This is particularly alarming given that the Intergovernmental Panel on Climate Change (IPCC) warned in April 2022 that greenhouse gas emissions must peak by 2025 to give the world a chance of limiting future heating to 1.5C above pre-industrial levels. The SEPP must be restored.

Older people tend to be more sensitive to the health effects from climate impacts. People in poor health or with poor mobility and access – people with existing physical or mental health problems may have a lower capacity and therefore less resilience to adverse weather events and environmental impacts.

Social isolation – socially isolated people may not receive the help they need during flooding or extreme weather events as they lack the necessary support networks. The proposal does not outline how the above will be mitigated.

### **Community engagement performance**

Community engagement during this exhibition has been challenging given the context of the historic start and stop of the process to date and COVID.

We welcome the effort and attempts made by the planning team to work with stakeholders and provide adequate information.

However, removing independent resources to the community and the failure of DPE to heed much of the well-informed advice on maximising engagement during this process was a significant missed opportunity to maximise community ownership and influence over this redevelopment.

The inconstancy and inaccessible, disjointed and, in places, scant technical studies that underpin this proposal meant the engagement had been less than optimal. Telling or selling people a proposal is vastly different from consulting them on it and is an art the department has yet to master. Both planning and community engagement are complex. Engagement deserves more consideration than was afforded during this process. We will write a separate evaluation of this and share it with the department for future reference.

A simple comparison to the community engagement report 'Options Testing Consultation Report Key Findings' (2019)<sup>20</sup> would show the considerable difference between what the community reasonable asked for and what they have ended up with under this proposal. We strongly advise the Department of Planning and Environment to adopt the Compact for Renewal<sup>21</sup> as a strategy for how to best engage with tenants undergoing redevelopment, and encourage all agencies involved in social housing estate redevelopments to sign up to the Compact principles, including Land and Housing Corporation, the City of Sydney and the Department of Communities and Justice.

Despite our observations that the community engagement was far from optimal, and acknowledgement that some community advocates are seeking the planning proposal to be re-exhibited, it is the opinion of our Executive Officer that this would not be beneficial to the community due to confusion and already historical lengthy delays. However, we support the City of Sydney's request for an extension to enable more time for the community to respond to the planning proposal.

Once again, we thank the DPE engagement team for working with our own team during this exhibition period. We also thank all our residents and partners in the development of this response.

We appreciate your consideration of this submission and look forward to work with all stakeholders as the project evolves.

## **THANK YOU**

*For further info, kindly contact:*

Michael M Shreenan; Executive Officer  
Counterpoint Community Services INC  
c/o The Factory Community Centre  
67 Raglan Street, Waterloo NSW 2017  
Email: [MShreenan@counterpointcs.org.au](mailto:MShreenan@counterpointcs.org.au) Ph: 9698 9569 Mobile: 0413124615

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<sup>20</sup> Elton Consulting (2019). Options Testing Consultation Report Key Findings.

<sup>21</sup> Shelter NSW, Tenants' Union of NSW & City Futures (June 2017) Compact for Renewal – What tenants want from renewal accessed from the Shelter NSW website

SUB-1631  
Gillian O'Malley  
gomalley25@gmail.com  
Redfern

I support the City of Sydney submissions,

It expresses concern about the increase of up to 10% more floor space than our proposal in 2021. The additional increased floor space is not illustrated or tested in the planning proposal documents that are currently open for feedback.

It seeks to restore the requirement that at least 30% of gross residential floor space on Land and Housing Corporation owned land is for social housing and at least 20% is for affordable housing. We are also seeking at least 10% of social and affordable housing for Aboriginal housing.

It calls for targeted funding by the NSW Government to increase the amount of social and affordable housing in the Waterloo estate and to develop innovative funding and procurement models. This would allow for direct dealings with community housing providers to support the increase of social and affordable housing in the estate.

I strongly support going back to the per centage categories as proposed by the City of Sydney. Thank you

SUB-1632  
Jack Reid  
jackreid1069@gmail.com  
Waterloo

I am a resident of Lenton Pde, Waterloo, and I am concerned about the proposal for the redevelopment of Waterloo South.

Firstly, the density of the current proposal is 10% greater than what we were shown at the exhibition. The implications of this extra density, including for levels of sunlight, and noise, and the potential for wind tunnels, have not been tested as it was not part of the initial proposal. This warrants more attention before the proposal proceeds.

Secondly, the proposal we were shown claimed that 30% of dwellings would be for public housing, as per the Communities Plus model used in other areas of the state. We are now aware that this has been reduced to only 28%. This is an unacceptable failure to meet the targets set out by the NSW Government's Future Directions. Again, this should be rectified before proceeding.

Importantly, the increased density comes on top of a proposed density that was already worryingly high, and the reduction in social housing comes amidst a massive statewide shortage. The proposal in its current form risks causing a significant negative impact if it causes density to be increased beyond a reasonable level, and public housing provision to no longer be adequate to provide for the vulnerable in Waterloo.

SUB-1633

Name withheld

Dear Mr Alan Bright,

As local residents, we would like to submit our objection to the proposal to open Pitt Street from Cleveland Street through to Mc Evoy Street. The local traffic in our street has been steadily building up over the last 10 years and is already at levels not safe for local residents, especially young children. The new proposal to open Pitt Street for direct access to Mc Evoy Street will significantly impact the amenity of our residential area by creating a "rat run" to the CBD, Moore Park Precinct and broader Eastern Suburbs. We do strongly oppose this proposal and urge the planning committee to consider the devastating impact the increased developments in the area has had on the local traffic and residents' amenity when evaluating this project.

Thank you in advance for your time and consideration.

SUB-1634  
Robert Kennard  
cmoore@cityofsydney.nsw.gov.au  
Sydney



THE LORD MAYOR OF SYDNEY  
**CLOVER MOORE**

28 APR 2022

Alan Bright  
Director, Planning Proposal Authority  
Planning & Assessment  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Mr Bright

### **Waterloo South Planning Proposal**

I am writing on behalf of members of the community who have raised concerns about the proposal to extend Pitt Street to McEvoy Street as part of plans currently on public exhibition for Waterloo South.

The City of Sydney's submission, which was endorsed by Council on 11 April, has been submitted to your Department. I am providing these comments in addition to that submission.

Currently, the section of Pitt Street at McEvoy Street is closed to vehicular traffic. The Department of Planning and Environment (the Department) has advised the extension of Pitt Street is proposed with a left-in, left-out only arrangement, and that the intersection is still being investigated.

The City's submission recommends that the Department should revise the access and circulation plan to address future traffic arrangements for the precinct, including at this intersection.

Community members have recently contacted me concerned that Pitt Street will become a rat run, and that the increased traffic will impact on residents' health, amenity and pedestrian safety. I have received a petition with 93 signatures from a local resident, Mr David Ninham, requesting a cul-de-sac be created in Pitt Street at McEvoy Street to maintain the existing no-through status from McEvoy Street. Please see the enclosed cover letter from this petition.

The Department also acknowledged this issue has been coming through in submissions at the Waterloo Redevelopment Group meeting on 20 April.

***Given the concerns raised by the community, I ask that the Department carefully reconsider the proposal to open Pitt Street to McEvoy Street for vehicular traffic to prevent rat running into Pitt Street, which is currently achieved by a street closure at McEvoy Street.***

The City would welcome the opportunity to discuss traffic arrangements associated with the proposal and other issues raised in our submission. If you or your staff would like to speak to my office about these matters, please contact my Policy Manager, Maria O'Donnell, on 02 8974 4220 or at [modonnell@cityofsydney.nsw.gov.au](mailto:modonnell@cityofsydney.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink that reads "Clover Moore". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Clover Moore  
**Lord Mayor of Sydney**

Encl.

24 April, 2022

Dear Lord Mayor Clover Moore, and Councillors Chan, Davis, Ellsmore, Gannon, Jarrett, Kok, Scott, Scully and Weldon,

We write with reference to the Waterloo Estate (South) Plan which is available at: <https://pp.planningportal.nsw.gov.au/ppr/under-exhibition/waterloo-estate-south> . Below we refer to this as the “Plan” and page numbers refer to pages in the Transport Study contained within the Plan.

As you may be aware, the Plan intends to extend Pitt Street southwards to connect with McEvoy Street. This is “the only significant works proposed to the external road network as a result of the Waterloo South development” (p. 70), however we believe that it will adversely impact on the neighbourhood immediately north of Waterloo Estate, at Pitt Street Redfern.

Pitt Street has been closed at McEvoy Street for well over 30 years.

The Plan indicates at 6.7.5 that the proposed opening of Pitt Street at McEvoy Street is to allow all movements into and out of Waterloo South, and then at page 58, it indicates that opening up Pitt Street at McEvoy will “remove a significant number of right turn movements from the Botany Road/McEvoy Street intersection”. In our opinion, traffic management on Botany and Elizabeth Streets, as well as the use of “traffic calming measures including pedestrian crossings and threshold treatments, narrowing of the street and low speed limits” on Pitt Street Redfern (pages 61-62) are out of scope for Waterloo Estate Planning and they should not be making these decisions that will impact our neighbourhood at Pitt Street, Redfern.

We ask that Council implement a cul-de-sac in consultation with residents and rate-payers on Pitt Street Redfern in order to maintain the no-through status from McEvoy Street. This will not impact on the Waterloo Estate plan and will remove any false sense of security that traffic calming measures might provide.

Thank you for your support,

Regards,

David Ninham  
80 Pitt Street Redfern  
0422 470 344  
[nine.hams@gmail.com](mailto:nine.hams@gmail.com)

SUB-1635  
Grant Donohue  
thomasgrantfrancis2018@outlook.com  
Waterloo

GFD - Waterloo South Submission - 27.4.2022 - 4.10pm - Version 2 .

Please reply via non - online means , i.e typed and / or written to Grant Donohue B.Bus< Accg> ; PO Box 1052 , Strawberry Hill NSW 2012 .

Pros : I would like to thank , all of the NSW Government , hereafter Government & specifically , The Department of Planning , Industry and Environment, hereafter , The Department; especially the representatives who have made themselves available to the Waterloo - South Community , et al , Alan , Andrew , Anthony , Suzanne , Tuyen , Carrie , Marnie , Mark , { Russian Tenant Representative to assist in translation , Mila } & Representative for Chinese Community. Hopefully this includes all individuals , and sorry if any excluded , unintentionally. These individuals have carried out their tasks Excellently : and any following issues , problems and cons ; should be directed , and sheeted home to & by , the Executive of Government - Cabinet and ALL Ministers. Since the " supposed " planning process[es] , have been initiated : WE HAVE NOT SEEN ANY MINISTER[S] IN THE COMMUNITY.

Cons : 1] However , I am writing to express , my concerns , especially into previous questions I have raised & I was ASSURED would occur : that is , FULL and Detailed communication , and more so , input of , the FIRST PEOPLE's of Waterloo South : - The Gadigal People of Eora Nation , would proceed , as the starting point to communicating to the community to ensure an error was not made at this INITIAL POINT of a DIFFERENT PLAN by Government . My detailed : and understood by representatives of the department , question , was ; a NEW , fresh reaching out to the overall recognised body that represents these , vital yet overlooked individuals , Metropolitan Local Aboriginal Land Council , hereafter , MALAC . I would like the Department : to confirm and show evidence , via Formal Consultation Register ; that Printed , Named , Signed and Dated Information , hereafter Information , was sent to MALAC .Also : that this Information , was received back confirmed via signature , from an Authorised and Executive member[s] of MALAC . This information : should also have stressed ; the absolute need for TRUE & ONGOING consultation , AND THAT AN ABSOLUTE FINAL DATE FOR SUBMISSION , that is = i.e . [latinised] Friday , 29th April , 2022 was highlighted in this information . CON 1 .

Further , I cannot see any detailed Indigenous Heritage Items Register , to ensure protection of these items . Once bulldozed , built over and destroyed , ala , Rio Tinto with Jugong Caves : they are gone. CON 2 .

I also , note on , Waterloo South Planning Proposal Documents. Original Supporting Studies Part 6 [ Printed ] and hand - written , 2 of 2 . Waterloo Estate [ South ] Planning Proposal Authority . 4 . Aboriginal Cultural Heritage Study . 3.1 . Overview of Consultation Undertaking To Date . NB - Third , 3rd , Paragraph : " On 27 November , 2018 . Then moving to Table 3 - Stakeholder response . Stakeholder . Department of Environment , Climate Change and Water {DECCW} [ now DPIE - that is DEPARTMENT :- No response was received : SO DEPARTMENT COULDN'T EVEN REPLY TO CONSULTANTS TO GET ANY INFORMATION PUT FORWARD IN THE PROPOSAL GOING OUT TO COMMUNITY . If you , Department can't do this ; standard business practice , since a period approaching four [4] years ; HOW CAN YOU EXPECT COMMUNITY TO HAVE ANY CONFIDENCE IN ANY " COMMUNICATION " - Consultation , undertaken. CON 3 .

CON 4 . Our COMMUNITY , Waterloo , is a COMMUNITY . The Department , has NOT gone out to the COMMUNITY as a whole : its approach , again read ; EXECUTIVE , is to Divide and Conquer . The

community of the southern side of Wellington Street , are to be separated in this proposal : even though , their family members , lifelong friends and associates of our Community are on the Northern Side of Wellington Street . For the EXECUTIVES , and MINISTERS , of what was " Family and Community Services " under Department of Communities and Justice - fail in this basic aspect. CON 5 . The Government , also supposedly , sold the main assets , of Electricity " Poles and Wires " , to make our final position , the " envy of the world " . If this was the case : why is the body separated from any " lip-service " of assisting communities ; Land and Housing Community , hereafter LAHC forced by legislation , to be a " property developer " .

CON 6 . Waterloo South Planning Proposal Documents. Key Planning Documents. Waterloo Estate (South) Planning Proposal Documents. NSW Government | Planning , Industry and Environment . Waterloo Estate (South) Contents . 1. Background : NB - Page 7 . Last Blue italics Public Transport . " The site is a " : It should be noted , more accurately , by addition of correct wording , " steeply uphill " ; - walk to Redfern . .. Also it should be noted that where Redfern has 10 exposed stations , with only 1 badly signed posted , lift , at Northern furthest end of station , where its difficult for public housing tenants that struggle with debilitating conditions to use . This is in strong contrast to the North Shore Line , only servicing those lines which ALL have multiple Lifts on ALL stations to accommodate a healthier community . Perhaps , the Department should combine with its namesake entity , Transport , 227 Elizabeth Street , opposite Hyde Park , CBD , Sydney , to put more useful effort to assist the Waterloo community & greater Sydney by putting lifts in at ALL platforms ; rather than bulldozing this community . Better to fix the existing problems ; and see that things work as they should --- rather than a " pie - in - the - sky " proposal that sells out Waterloo community . So while I object to this proposal ; in the interests of putting forward suggestions , to clarify some I already have put.

1] Get the good folk at Sydney District Local Health Area , especially Shane Brown , to liase with, to get a disability - equipped , multiculturally & diverse language 24 - Hour staffed Medical Centre , with a separate Drug Injecting and Needle Exchange facility . Due to the high exposure of the main problems of the community these are a MUST . They should never close - always open , up to 366 days a year.

2 ] A 24 hour , 366 day [leap ] year , fully equipped , police station should be situated in the furthest south - eastern corner of what I think has been labelled Tower 4 . This is the one situated on the corner of Kellick & Gibson Street[s] . This should also be staffed with the most diverse of Officers : necessary to assist ALL folks ; yet minimum of Indigeneous , Chinese & Russian Communities .

3 ] Discussed with DPIE , yet also should make walking & cycling a priority : with separate , transparent - covered , divided pathways & bike paths , allowing for natural light to come in . Additionally , any street lighting should , face downwards to prevent light pollution [ Discuss with Professor Fred Watson & his partner , Marnie , as to how to do this ] . Also , see , for example , City of Sydney's Prince Alfred Pool where a metal , in - built bike pumps to assist in addition to Lock - up bike facilities.

4 ] Don't open Pitt Street to any through traffic .

So , in summary , I oppose to the proposal . The government should be FULLY funding 100% Public Housing.

Again , thank you for taking the time to read , and again kudos to all staff who have fronted up to explain proposal .

Any further issues , feel free to contact me & reply to Grant Donohue , PO Box 1052 , Strawberry Hills NSW 2012 . If needed , feel free to publish .

SUB-1636  
Marc Robinson  
marcr2020@gmx.com  
Waterloo

Hi,

I have concerns that I would like to address in a submission. In 2013 I moved into what was then the most violent and dangerous housing building in Sydney the John Northcott building. At the end of my time there I was home invaded. I was given a transfer and the next building also proved to be detrimental to my mental health. This current building which you are proposing to move us from is the best accommodation I have ever had. I have two bedrooms and two balconies and I have gardens planted on both balconies. We have a community here based on gardening please don't move us.

If the redevelopment is to go ahead, there should be much more social and affordable housing than what is proposed. The density proposed is also far too high and should be lowered.

SUB-1639  
Alex Cox  
alexcox23@me.com  
Redfern

28 April 2022

Dear Mr Bright

Re: Waterloo Estate (South) - PP-2021-3265

I am writing on behalf of my family to communicate in the strongest possible terms my objection to the development proposal for Waterloo Estate (South) to the extent that it involves the connection of Pitt Street to McEvoy Street. This submission builds on those of many of my neighbours, a petition sent to the Lord Mayor and numerous letter drop campaigns by various concerned residents.

On the whole, I believe that the redevelopment of the Waterloo Estate will contribute positively to the community and the lives of the vulnerable persons in need of affordable housing. However, I request that, as a condition of the development, an undertaking is given that Pitt Street and McEvoy Street are not connected without further steps to mitigate the likely significant negative impact on the Pitt Street community and on the general Redfern area.

In summary, a connection between Pitt Street and McEvoy Street would significantly increase traffic on Pitt Street. This would increase pollution, noise and the risk of collisions, which would significantly undermine the work taken to preserve the street as a conservation area. I therefore request that no connection to McEvoy Street is implemented, or a parklet is constructed to ameliorate the worst effects of any connection.

First, linking Pitt Street to McEvoy Street would channel traffic onto Pitt Street instead of larger and more suitable arterial roads nearby, turning Pitt Street unnecessarily into a rat run between Cleveland Street and McEvoy Street, two of the busiest arterial roads in the area. It would also induce CBD-bound traffic from the thousands of new apartments in Waterloo Estate onto Pitt Street, increasing traffic and creating significant delays on Cleveland Street from a higher number of right turns from Pitt Street toward Chalmers Street. While this route might not be quicker for road users than existing or planned alternatives, heavier traffic should be expected since route decisions are influenced by myriad factors and are not necessarily made rationally or on perfect information. Second, heavier traffic flow would have significant negative effects on community residents, including greater pollution, more traffic noise and a greater risk of collisions. I highlight the risk of collisions in particular given the large number of family homes on Pitt Street, the risks to the many children who attend the Redfern Occasional Child Care centre on Pitt Street, and the many elderly people who cross Pitt Street when commuting to Redfern Health Centre, the Aboriginal Medical Service and Redfern Station Medical Centre, among other nearby destinations. These factors, among others, should be expected to materially decrease the amenity and sense of "place" in the Pitt Street area.

This would be immensely disappointing both to local residents and members of the community generally, all of whom share an interest in preserving the sense and feel of a neighbourhood that has been designated for conservation due to its heritage elements. The desirability of Pitt Street's unique and beautiful architecture is contributing significantly to the revitalisation of Redfern, which is powering the transformation of Redfern Street into a more vibrant district for small businesses. This transformation will be undermined if greater car and truck volumes reduce the pedestrian

traffic in the area. In addition, the existing heritage buildings, many of which are over 130 years old, were not designed to withstand the vibrations from significant traffic; no new traffic connection should be implemented without commissioning or releasing a specific noise and vibration study confirming that no severe impacts on nearby heritage sites will follow. In any case, neighbourhood conservation should not be thought of on a building-by-building basis, but rather in the context of the area as a whole. The protection of heritage homes for their contribution to community amenity would be undermined by high traffic volumes immediately adjacent, particularly if the result is to incentivise homeowners to establish high hedges or walls to minimise noise.

Finally, it is promising that Waterloo Estate (South) could proceed without these negative impacts on Pitt Street and Redfern generally. The proposal to link Pitt Street and McEvoy Street could be discarded, or, if greater main road access to the redeveloped estate is required, the connection could proceed but a small parklet could be constructed in a suitable position on Pitt Street (North of Raglan Street) to block car traffic in both directions. The latter would add a new public space, improve pedestrian permeability and mitigate the traffic impact without blocking pedestrian or bike access to Redfern Street village from Waterloo Estate (and vice versa). Road-dividing parklets for traffic flow are common in Redfern, including on Great Buckingham Street, Telopea Street, Zamia Street, Kepos Street and Charles Street, among others. Either of these measures would significantly improve the planning outcome for local residents without materially impacting the Waterloo Estate (South) development as a whole. They are also entirely consistent with the emphasis of pedestrian, bike and train transport as alternatives to cars in the Waterloo Estate redevelopment plans.

For these reasons, my family and I strongly object to the connection of Pitt Street and McEvoy Street without further steps to mitigate the likely significant negative impact on the Pitt Street community and on the general Redfern area.

Thank you in advance for taking the time to consider our submission.

Kind regards  
Alex Cox  
104 Pitt Street, Redfern

SUB-1640  
Rebecca Reddin  
rebecca3reddin@gmail.com  
Waterloo

1. Solar access due to high densities and building heights is one concern – will there be overshadowing of other buildings at the expense of daily sunlight required? Will the buildings maximise winter and minimise summer sunshine? That is, will buildings have windows and light inputs facing winter sunrise and winter sunset (preferred)?

2. Another concern is regarding security issues resulting from the new social mix would such issues that are already happening within public housing reoccur within that mix? I take my reasoning from lived experience, having lived in social housing now for 18 years... Two examples of my lived experience means that I have experienced serious issues with fellow tenants (residing in the same social housing building) who were a) Intoxicated and threatened myself and my animal and did not care when a vicious animal that he brought in attached itself to my arm with blood flowing down etc. (alcohol free zone signs were later put up on my block, a great move on the part of council and police). b) living through their own personal hell and could see no way through (what I called grieving anger at the loss of their children by a govt authority) c) angry simply at my presence so were vicious to me verbally every time they saw me and got two others in the building to help them steal my mail over several years.

People coming anywhere near social housing in my view need to take out insurance for contents, theft, invest in cop cams both for the inside of the apartment but also for the car (garage or some kind of parking area security). And they will need to have some kind of plan against domestic violence – created by difficult neighbours, often sold on dealing in drugs and thus lacking living skills for living in the community.

3. As well as continuing on with great community workshops providing residents with a voice like the Milk Crate Theatre, and RedWatch meetings to provide community updates to residents in the area, and South Sydney Uniting Church to run art groups, playgrounds and outdoor gyms, I believe there is a critical need for architecture for social well being, namely (1) a “Pub with no Booze” having healthy drinks and good food, and in different sections of the “Pub” running activities for all the family... brain teasers; problem solving activities; karaoke etc. and (2) a 24/7 hub for domestic violence first (or second or third, if critical) incidence – a round building with sandstone bricks, and with a little moat. Able to take in animals with the owner/s (victims of DV) depending on the number of persons presenting at one time. Able to put a few people up for several hours until something is worked out for them – in different spots inside the building, on roll out mattresses.. Manned by people with mental health and first aid experience.. (3) a small common room for each level of the taller buildings or for the less high buildings, nearby, as public housing individuals find a local community centre with comfy couches and chairs as a safe space in which to meet and get to know other new tenants. (4) Return and Earn – please! At the local Woolworths Redfern because of cover and ready made parking (I wouldn't imagine more than 6 cars at a time to deposit recyclable items). We need this return and earn BECAUSE development will be creating more supermarkets and other retail which sell recyclable products (even milk cartons are 10c returnable now), and because my current lived experience of the issues to return and earn is that the Return and Earn on Euston road is generally flooded with rain, difficult to get to by foot, and you are fortunate if it is not full by the time you get there. The current Return and Earns do not seem to be under cover or if they are, they are easily flooded. It is too hard to Return and Earn easily when the Tomra centres are 15 – 25 kilometres away. I do not have a car.

SUB-1641  
Alan Morris  
alan.morris@uts.edu.au  
Eastlakes

I interviewed many public housing tenants in Millers Point. The displacement was extremely painful for many. Social ties were broken and the ability to age in place was often destroyed. My book, *Gentrification and Displacement: The Forced Relocation of Public Housing Tenants in Inner-Sydney* describes the trauma.

Waterloo is public land. The notion that 70% should be private dwellings and only 30% public is absurd. The land should be used to expand the quantity of social and affordable housing. The private dwellings should constitute at the most 30%.

One important question -what will happen to the tenants who are moved? Where will they live after they are moved?

The redevelopment plan requires a lot more consultation and should start from premise that the private dwellings should constitute no more than 30% of the development.

Also, anybody who is moved, should be relocated to an area nearby and be allowed to move back to Waterloo.

SUB-1642  
Andrew Wilkinson  
wilkoworks@gmail.com  
Redfern

27th April 2022

Dear Lord Mayor Clover Moore, and Councillors Cavan, Davis, Ellismore, Gannon, Jarret, Kok, Scott, Scully and Weldon,

I am writing in reference to the Waterloo Estate (South) Plan (<https://pp.planningportal.nsw.gov.au/ppr/under-exhibition/waterloo-estate-south>). This plan proposes to extend Pitt St southwards so that it connects to McEvoy St. I object strongly to the proposed connection of Pitt Street to McEvoy Street.

The proposed connection of Pitt St to McEvoy St would most certainly cause excessive traffic and safety concerns and problems for the whole of Pitt Street in Waterloo and Redfern, where there are already significant traffic issues, especially at the northern end of Pitt St. I live at the northern end of Pitt St and I have not received any notification about this important and significant proposed change to my street which will acutely impact the safety, amenity, liveability and the integral quality of the environment in my direct, immediate "village" community. A great many Pitt St residents and ratepayers, who will be impacted negatively, had no knowledge of this critical proposed change to their street, hence had no opportunity to put themselves forward to be consulted, contribute or object to this critical situation.

The proposed connection of Pitt St to McEvoy St would open up this area to excessive and harmful traffic and create a major "rat run" which would not only highly expose Pitt Street to substantial short cut traffic, but would also open this wider section of Redfern and Waterloo to rat runners, negatively impacting the community's safety, amenity, liveability and residential peace. Serious Contemporary Traffic problems have already been documented on Pitt St Redfern and very many actions and strategies have already been implemented to attempt to dampen and try to manage the impact of this traffic on the safety, amenity, and liveability of the present long term, existing, rate paying community and businesses. The repercussions of the proposed joining of Pitt St with McEvoy St would intensify and exacerbate the current significant, and officially verified, traffic problems in Pitt St. I object strongly to this.

There are three (3) Early Childhood Learning Centres/Crèches/Preschools on Pitt St which deserve special consideration and an important duty of care. The proposed joining of Pitt St with McEvoy St will cause future increased excessively high traffic frequency and expose these Childhood Centres to significantly reduced safety conditions.

The Waterloo Estate Plan will make this area, and Pitt St one of the most densely populated areas in Sydney. The impact of this proposed Pitt St and McEvoy St road connection needs to be seriously considered through thorough community consultation before creating a substantial thoroughfare and "rat run" inside this area which will cause substantial safety and amenity concerns for this extremely high density community.

Redfern and Waterloo have historically been renowned and documented for the poor planning of high density housing. Subsequent Councils have done what they can to lessen the impact of this poor and negligent planning, for example the extremely valuable and important efforts to reduce traffic impact (Pitt St has been closed to McEvoy St for well over 30 years). As a result, despite the poor initial planning Redfern and Waterloo have been able to flourish as a peaceful, healthy and

stable suburban community "Village". Present and previous Council's have validated the importance and crucial efficacy of these existing traffic control measures.

In the process of coping with the consequences associated with the poor planning of high density housing in their local community over 50years, Residents have come together to form a strong, tolerant, inclusive and civically supportive community. These residents have made great personal efforts and sacrifices to survive and attempt to redress these many past planning errors which were made without thorough, mindful consideration of the community, at great cost to our community.

Please support and value our community's strengths and efforts to tolerate and adapt to the impact of historically poor planning decisions. Please respect, value, hear, support and prioritise our valid and founded concerns regarding the proposed connection of Pitt St to McEvoy St. The long term rate paying residents understand the true and actual impact of further poorly conceived and potentially dangerous plans. This existing community of rate payers understand the delicate balance required to maintain safety, amenity, wellbeing, the quality of existence and the quality of the environment within their local residential community "Village".

Please act in "the (existing) community's best interest and seek to protect and deliver public benefit".

Yours sincerely

Andrew M Wilkinson 36 Pitt St Redfern, 2016

SUB-1643  
Michelle Manners  
mitziegirl332@gmail.com  
Redfern

27th April 2022

Dear Lord Mayor Clover Moore, and Councillors Cavan, Davis, Ellismore, Gannon, Jarret, Kok, Scott, Scully and Weldon,

I am writing in reference to the Waterloo Estate (South) Plan (<https://pp.planningportal.nsw.gov.au/ppr/under-exhibition/waterloo-estate-south>). This plan proposes to extend Pitt St southwards so that it connects to McEvoy St. I object strongly to the proposed connection of Pitt Street to McEvoy Street.

The proposed connection of Pitt St to McEvoy St would most certainly cause excessive traffic and safety concerns and problems for the whole of Pitt Street in Waterloo and Redfern, where there are already significant traffic issues, especially at the northern end of Pitt St. I live at the northern end of Pitt St and I have not received any notification about this important and significant proposed change to my street which will acutely impact the safety, amenity, liveability and the integral quality of the environment in my direct, immediate "village" community. A great many Pitt St residents and ratepayers, who will be impacted negatively, had no knowledge of this critical proposed change to their street, hence had no opportunity to put themselves forward to be consulted, contribute or object to this critical situation.

The proposed connection of Pitt St to McEvoy St would open up this area to excessive and harmful traffic and create a major "rat run" which would not only highly expose Pitt Street to substantial short cut traffic, but would also open this wider section of Redfern and Waterloo to rat runners, negatively impacting the community's safety, amenity, liveability and residential peace. Serious Contemporary Traffic problems have already been documented on Pitt St Redfern and very many actions and strategies have already been implemented to attempt to dampen and try to manage the impact of this traffic on the safety, amenity, and liveability of the present long term, existing, rate paying community and businesses. The repercussions of the proposed joining of Pitt St with McEvoy St would intensify and exacerbate the current significant, and officially verified, traffic problems in Pitt St. I object strongly to this.

There are three (3) Early Childhood Learning Centres/Crèches/Preschools on Pitt St which deserve special consideration and an important duty of care. The proposed joining of Pitt St with McEvoy St will cause future increased excessively high traffic frequency and expose these Childhood Centres to significantly reduced safety conditions.

The Waterloo Estate Plan will make this area, and Pitt St one of the most densely populated areas in Sydney. The impact of this proposed Pitt St and McEvoy St road connection needs to be seriously considered through thorough community consultation before creating a substantial thoroughfare and "rat run" inside this area which will cause substantial safety and amenity concerns for this extremely high density community.

Redfern and Waterloo have historically been renowned and documented for the poor planning of high density housing. Subsequent Councils have done what they can to lessen the impact of this poor and negligent planning, for example the extremely valuable and important efforts to reduce traffic impact (Pitt St has been closed to McEvoy St for well over 30 years). As a result, despite the poor initial planning Redfern and Waterloo have been able to flourish as a peaceful, healthy and stable suburban community "Village". Present and previous Council's have validated the importance

and crucial efficacy of these existing traffic control measures.

In the process of coping with the consequences associated with the poor planning of high density housing in their local community over 50years, Residents have come together to form a strong, tolerant, inclusive and civically supportive community. These residents have made great personal efforts and sacrifices to survive and attempt to redress these many past planning errors which were made without thorough, mindful consideration of the community, at great cost to our community.

Please support and value our community's strengths and efforts to tolerate and adapt to the impact of historically poor planning decisions. Please respect, value, hear, support and prioritise our valid and founded concerns regarding the proposed connection of Pitt St to McEvoy St. The long term rate paying residents understand the true and actual impact of further poorly conceived and potentially dangerous plans. This existing community of rate payers understand the delicate balance required to maintain safety, amenity, wellbeing, the quality of existence and the quality of the environment within their local residential community "Village".

Please act in "the (existing) community's best interest and seek to protect and deliver public benefit".

Yours sincerely

Michelle Manners 36 Pitt St Redfern, 2016

SUB-1644  
Richard Henderson  
richardhenderson@hotmail.com  
Redfern

Very disappointed that there is not a greater supply of public housing which is so important to the fabric and character of this area.

SUB-1645  
Raymond Carter  
pommiejackeroo@hotmail.com  
Redfern

As long-term resident [ 17 years ] of Pitt Street, Redfern I am very concerned in regards to the proposal by NSW Planning to connect McEvoy Street to Pitt Street as part of the traffic management plan for the new Waterloo Estate, and the resultant increase in motor vehicle traffic from McEvoy Street down through Pitt Street to Cleveland Street.

I have read in detail all the documentation available in the NSW Planning Portal and we are led to believe that there will be very little increase in vehicle traffic into Pitt Street when the 3012 homes plus a possible increase of 10% contingency as part of the overall process making a total of 3313 homes are completed.

In the last 5 years the incremental " rat race " traffic between Redfern Street and Cleveland Street is astonishing, at the evening peak hour, traffic stretches from the junction of Cleveland & Pitt Streets all the way back to Quirks Cafe making it almost impossible for residents in Pitt Street to join the traffic flow. I believe most of this traffic is trying to turn left onto Cleveland Street in order to seek access to Paramatta Road and thence in a westerly direction.

The majority of dwellings between Redfern Street and Cleveland Street are houses accommodating a variety of people from young children to seniors living in this area of significant Heritage importance.

We have two child day-care centres in this area of Pitt Street and as the level of vehicle traffic increases so does the risk of an accident involving young children.

Whilst I understand proposed traffic calming measures and lower speed limits may assist in providing a safer environment for residents, practical evidence in Pitt Street demonstrates that traffic calming measures have no effect on many drivers [ particular tradies in UTES ] that regularly exceed the 40Km limit by flying over the speed bumps to beat the lights at Cleveland / Pitt Street junction during low traffic conditions

We seek the support of City of Sydney to consider :

Making Pitt Street a One Way Two Lane Carriageway in a North to South direction [ Cleveland to Redfern Streets ] with amended traffic signals to provide smooth traffic flow out of Pitt Street.

The change would facilitate improved access [ in and out ] of the Australia Post Customer Car Park

There would be Improved & safer access for Australia Post large parcel vehicles

Currently there is dangerous congestion for vehicles trying to access the Australia Post Customer Car Park especially at peak times when traffic queues turning into Pitt Street from Cleveland Street.

Australia Post customers leaving the car park often ignore the Left Only turn signage and block traffic by illegally making a right turn to gain access onto Cleveland Street.

The proposed arrangement would reduce the "rat race" traffic at peak hours and provide a much safer and improved environment for the residents of Pitt Street and its environs.

It appears to be totally wrong to penalise the residents of Redfern and in particular those in Pitt Street because NSW Planning are to build between 3,012 and 3,313 dwellings in Waterloo for which we will suffer the traffic consequences in a street that is already heavily congested.

The Waterloo Development has prompted residents to trigger a review of the present increased traffic flow in Pitt Street prior to the commencement of the opening of the McEvoy & Pitt Street access proposal

Kind regards,

Raymond Carter  
Fitzroy Terrace  
12 Pitt Street  
Redfern  
NSW 2016  
0401 025 674

SUB-1646  
Flynn Wilkinson  
flyboywilko@gmail.com  
Redfern

27<sup>th</sup> April 2022

**Dear Lord Mayor Clover Moore, and Councillors Chan, Davis, Ellsmore, Gannon, Jarrett, Kok, Scott, Scully and Weldon,**

I am writing in reference to the Waterloo Estate (South) Plan

(<https://pp.planningportal.nsw.gov.au/ppr/under-exhibition/waterloo-estate-south>).

This plan proposes to extend Pitt St southwards so that it connects to McEvoy St.

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Serious Contemporary Traffic problems have already been documented on Pitt St Redfern and very many actions and strategies have already been implemented to attempt to dampen and try to manage the impact of this traffic on the safety, amenity, and liveability of the present long term, existing, rate paying community and businesses. The repercussions of the proposed joining of Pitt St with McEvoy St would intensify and exacerbate the current significant, and officially verified, traffic problems in Pitt St. I object strongly to this.

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The Waterloo Estate Plan will make this area, and Pitt St one of the most densely populated areas in Sydney. The impact of this proposed Pitt St and McEvoy St road connection needs to be seriously considered through thorough community consultation before creating a substantial thoroughfare and “rat run” inside this area which will cause substantial safety and amenity concerns for this extremely high density community.

Redfern and Waterloo have historically been renowned and documented for the poor planning of high density housing. Subsequent Councils have done what they can to lessen the impact of this poor and negligent planning, for example the extremely valuable and important efforts to reduce traffic impact (Pitt St has been closed to McEvoy St for well over 30 years). As a result, despite the poor initial planning Redfern and Waterloo have been able to flourish as a peaceful, healthy and stable suburban community “Village”. Present and previous Council’s have validated the importance and crucial efficacy of these existing traffic control measures.

In the process of coping with the consequences associated with the poor planning of high density housing in their local community over 50years, Residents have come together to form a strong, tolerant, inclusive and civically supportive community. These residents have made great personal efforts and sacrifices to survive and attempt to redress these many past planning errors which were made without thorough, mindful consideration of the community, at great cost to our community.

Please support and value our community’s strengths and efforts to tolerate and adapt to the impact of historically poor planning decisions. Please respect, value, hear, support and prioritise our valid and founded concerns regarding the proposed connection of Pitt St to McEvoy St. The long term rate paying residents understand the true and actual impact of further poorly conceived and potentially dangerous plans. This existing community of rate payers understand the delicate balance required to maintain safety, amenity, wellbeing, the quality of existence and the quality of the environment within their local residential community “Village”.

Please act in “the (existing) community’s best interest and seek to protect and deliver public benefit”.

Yours sincerely

Flynn M. Wilkinson

36 Pitt St Redfern, 2016

SUB-1647

Raymond Charles Rauscher  
rayc.rauscher@gmail.com  
East Gosford

We (Habitat Assoc. for Arts and Environment Inc (HAAE Inc) make this submission with comments to follow on alternative options and mixes of housing for the Waterloo Estate South.

Our material will be forwarded under separate cover using this submission site. Apologies as the additional material will be forwarded later on Friday 29 April, or the following day at the latest.

Dr Ray Rauscher  
Secy  
Habitat Assoc. for Arts and Environment Inc.  
Central Coast and Newcastle

SUB-1648

Name withheld

To Whom it may concern,

As a long time resident of Redfern I'm horrified to hear of the plan to sell Waterloo public housing to a majority of private investors and essentially displace all of the locals who have lived in the area for generations. I understand the appeal of making a ton of money from your developer mates, but they're honestly doing just fine without your help. The people you'd be displacing are genuinely vulnerable and need your help. We need more accessible public transport and affordable healthcare in this area to serve the people who already live there. Please have some humanity and preserve and upgrade the existing public housing instead of displacing more vulnerable Australians.

Sincerely,

████████

SUB-1649  
Penelope Harvey  
pennyharvey@bigpond.com  
Darlington

Public land should not be sold off into private hands. This is a matter of principle, but also land should not be sold when there is a huge shortage of public and affordable housing in this state. This land should be used to build public and affordable housing and not private housing. It could begin to bring down the numbers of people on housing waiting lists and start to abolish the shameful amount of homelessness in this city.

The proposal, in any case, is too dense without proper consideration for the quality of life of the residents.

Please do not go ahead with this proposal. Public land should not be sold off and should be used to build more public housing.

SUB-1650  
James Millar  
james.millar@syd.catholic.edu.au  
Sydney

29 April 2022

Mr Alan Bright  
Director, Planning Proposal Authority  
Planning & Assessment  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Mr Bright,

**Re: Waterloo Estate (South) Submission: PP-2021-3265**

Sydney Catholic Schools (**SCS**) is the owner and operator of Our Lady of Mt Carmel Catholic Primary (**School**) at 4 Kellick St Waterloo. The School is one of 150 operated by SCS in the Catholic Archdiocese of Sydney. SCS takes the opportunity to thank the Department for the opportunity to respond to the above Planning Proposal.

This submission is in **support** of the wholesale renewal of the precinct, however SCS seeks amendment to the scheme in response to the following key items:

- Previous engagements between LAHC and the Archdiocese/SCS have not been considered over the lengthy program of master planning and rezoning. Specific mention is made of previous discussions regarding the opportunity for co-location of community and education infrastructure in the precinct immediately proximate the Archdiocese lands.
- It is requested that due to the importance of this rezoning for the local community, that the Archdiocese and SCS are engaged in a more formal manner, rather than being considered in the same manner as any local resident or stakeholder.
- SCS would like to see the masterplan amended whereby the tower elements are considered to the northern parts of the site to ensure that the built form considers the school activities contained therein.
- Overshadowing to the public open spaces is minimised.
- SCS seek 15 min increment shadow analysis in order to adequately assess impact.
- SCS requests that solar impact to the school is reduced such that key outdoor areas are not impacted outside of key school hours of 9am-5pm
- SCS seeks amendments to the scheme that can be supported from a wind perspective, or further analysis from wind consultants to support the proposed scheme.
- SCS requests updated traffic analysis that considers the existing school movements and the impact of development upon same.
- SCS requests that the heritage reporting consider the impact of the proposed master plan on the listed School.



- SCS requests that community infrastructure proposed in the masterplan be clustered around Mt Carmel and Waterloo Park to allow for greater synergy and sharing of resources between the community facilities.

SCS declare that it has not made a political donation in the previous two years.

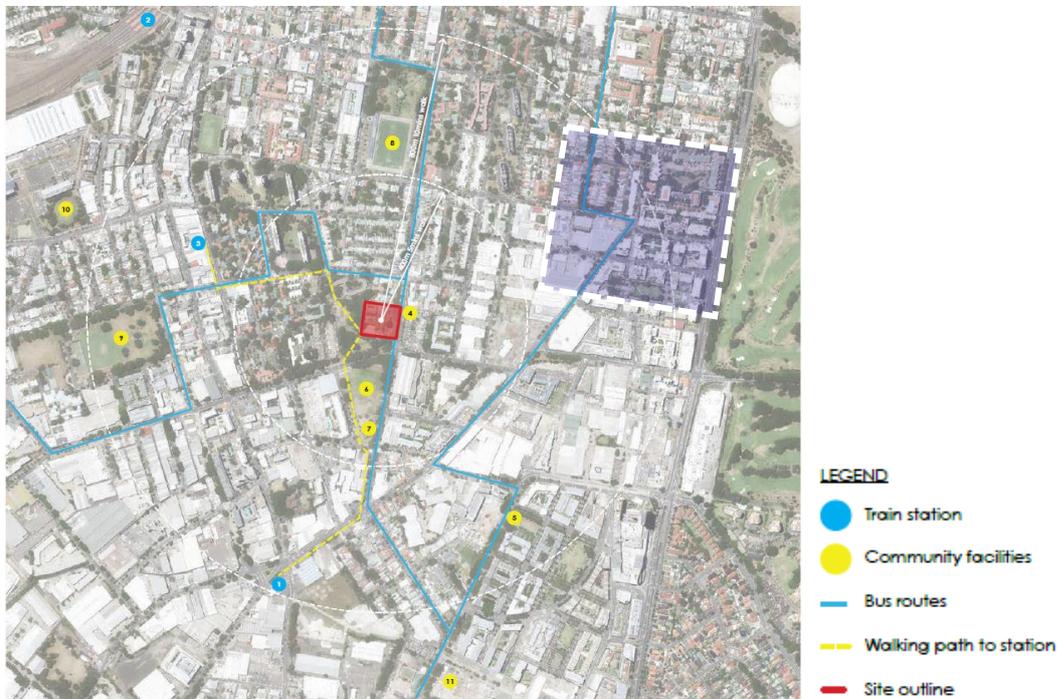
# 1. Introduction and Overview

## 1.1 The site – Our Lady of Mount Carmel

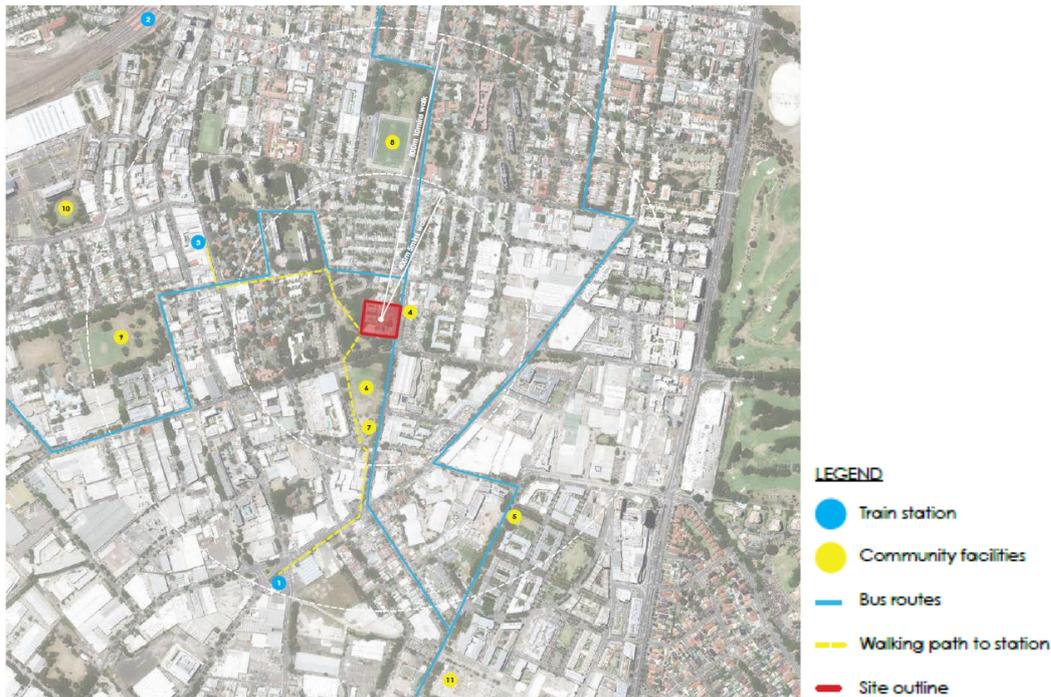
Our Lady of Mount Carmel School at 2-6 Kellick Street Waterloo (**the Site**) is known legally as Lot 1, DP86295. The Site is approximately 7,660sqm and sits as part Mount Carmel Reserve.

The School is currently a single stream primary school with roughly 130 students, however due to the considerable population growth in the precinct, SCS have undertaken initial architectural reviews to grow the school to include a 1,200-student secondary school for SCS.

*Figure 1: Site location*



*There are a significant number of community facilities nearby which are synergistic with the school use as shown in Figure 2 below. This, in addition to the significant renewal of the area, provides impetus for the intensification of schools and other infrastructure to leverage off the significant opportunities for co-location and economies of scale.*



*Figure 2: Proximate community and other infrastructure*

*Connectedness to public transport is important in the context of a secondary school. The subject site is well connected located within a 10 minute walking distance to Green Square Station, 15 minutes to Redfern Station, and 12 minutes to the proposed light rail at Waterloo.*

## 1.2 The Archdiocese, Parish and School

The Archdiocese of Sydney is bounded to the North by Broken Bay Archdiocese, to the West by Parramatta Archdiocese, and to the South by Wollongong Archdiocese. The Archdiocese is involved in many different agencies within Sydney to provide services, care and support to people in need, including aged care; education; health care; prayer, worship and liturgy; solidarity and justice; vocations and seminary; youth and young adults ministry.

The Archdiocese is divided into nine Deaneries each consisting of a number parishes, over which presides a dean appointed by a bishop. The duty of the dean is to watch over the clergy of the deanery.

The Parish of Sydney City South was formed through the merger of the Redfern Catholic Church with Rosebery and Waterloo. The new Sydney City South Parish comprises St Joseph in Rosebery, Our Lady of Mount Carmel in Waterloo, and St Vincent de Paul in Redfern with Fr Paul Smither as the parish priest.

The Legislative Assembly donated one acre of land of the area to the Catholic Church in 1858 and the foundation stone for the church was laid by Archbishop Polding on 15 August 1859. The story goes that Archbishop Polding's ship was caught in a storm off Freemantle. It was so severe that he thought he would die. He made a vow to Our Lady of Mount Carmel that he would build a church on the

highest hill he could find and dedicate it in her honour. There is significance therefore to the location, visibility and elevation of the church atop the hill.



**THE CHURCH OF OUR LADY OF MOUNT  
CARMEL.**

Perhaps no more beautiful and commanding a site upon which to build a house for the worship of the Most High God can be found in the whole world than that upon which the Church of our Lady of Mount Carmel has been erected at Waterloo, near this city. The Church is built upon one of the highest hills upon what is called the Mount Lachlan Estate, but which is now incorporated with the Municipality of Waterloo; and the ground upon which it stands, being an area of rather more than an acre, was generously given for the purpose by Sir Daniel Cooper, Knt., late Speaker of the Legislative Assembly. An additional acre has been leased from Sir Daniel for a period of 10 years, with the option of purchasing the fee simple at any time during that period; so that the whole area comprises upwards of two acres, which will be tastefully laid out as an ornamental garden by Mr. Guilfoyle of Double Bay, who has most generously offered his invaluable services for this purpose. The view from the doors of the Church is a most extensive one, embracing a large portion of the city of Sydney, the North Shore, South Head, Waverley, Coogee, Botany Bay, Cook's River, George's River, Newtown, and the neighbouring country, together with the Illawarra Range and the Blue Mountains in the far distance.

*Figure 3: Early view to Mount Carmel Church & newspaper article reporting the building of the church*

In terms of current heritage on Site, the Site includes a lineage of buildings, the oldest being the Church (1859.) Our Lady of Mount Carmel Waterloo is State Heritage Listed. The property is listed as a heritage item in the Sydney Local Environmental Plan 2012 and is also within the Waterloo Conservation Area.

*Grading of significance relative to this Site taken from the Outline Heritage Assessment and Conservation Strategy prepared by John Oultram Heritage & Design.*



**Figure 4: Heritage Significance analysis**

It is noted the area is a heritage conservation zone according to the Sydney LEP and includes the Waterloo Park & Oval including grounds and landscaping (Local Item I2079)

## 2. Social Infrastructure in the Precinct

### 2.1 LAHC Engagement

The Archdiocese has engaged with LAHC in the formulative processes of the subject masterplan and accompanying rezoning. Key meetings include:

- 24 March 2022: Fr Paul Smithers Parish Priest and Rector, Shrine of Our Lady of Mt Carmel met with LAHC representatives . key items discussed included:
  - This concept was a result of combination of NSW Government and the City of Sydney proposals. Previous discussions between the Archdiocese and LAHC regarding a proposed community cluster around Waterloo Park appear to have been lost.
  - In regards to the location of the tower closest the school, its location was considered best because of the solar impact on the surrounding buildings.
  - The heritage report for the proposal does not have regard to the Mt Carmel site nor does it take into consideration the impact on the school, church or presbytery – all of which are heritage items.
  - Concern that no improvements were considered for Waterloo Park.
  - Pitt Street is opening up to traffic onto McEvoy Street and no consideration was given to the presence of the school and traffic management.
  - Wind mitigation: no comment was made about trees as mitigation for wind.

## 2.2 NSW Department of Education Engagement

It is a statutory requirement for LAHC and other Government Agencies to formally engage with the NSW Department of Education, however there is no formal requirement for broader school provider engagement as part of any masterplan / rezoning process. This is despite the non-government school sector making up over 60% of all school enrolments.

The non-government school sector is made up of organisations including the Association of Independent Schools NSW and the SCS.

There is concern that despite the load that the non-government school sector carries in terms of enrolments, there is no formal engagement process. It is requested that due to the importance of this rezoning for the local community, that the Archdiocese and SCS are engaged in a more formal manner, rather than simply being considered in the same manner as any local resident or stakeholder.

## 2.3 Mt Carmel Secondary School Study

Recognising the growing need for education infrastructure in the region, SCS engaged Neeson Murcutt Architects Pty Ltd to test the block planning of a 1200 student secondary school at Our Lady of Mount Carmel in Waterloo.

This work followed a feasibility study (2016) aimed at increasing the Catholic educational offering in the southern Sydney area, across all age groups to accommodate the dramatic increase in local population that is expected.

The options considered:

- Over 11,000sqm of additional educational buildings;
- Adaptive re-use and refurbishment of over 1,400sqm of existing buildings;
- 2,800sqm of semi-basement car parking

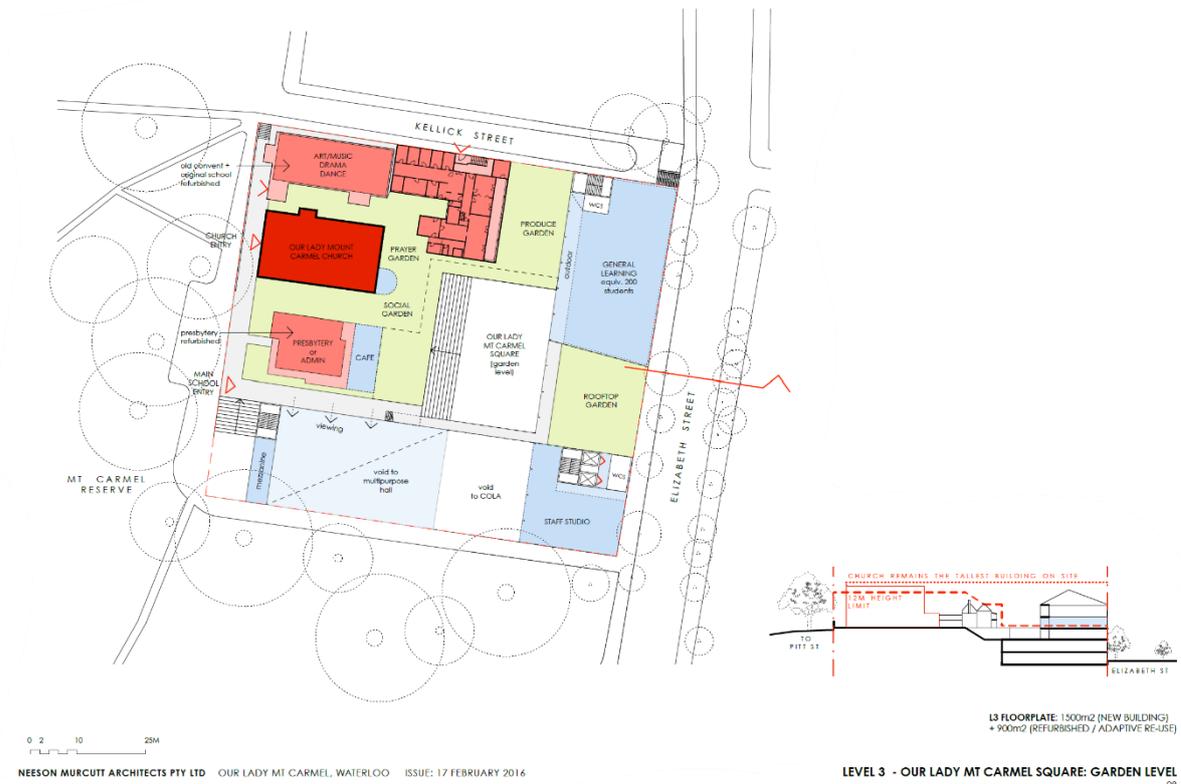


Figure 5: Redevelopment Option: Mt Carmel Secondary School Study – Level 3

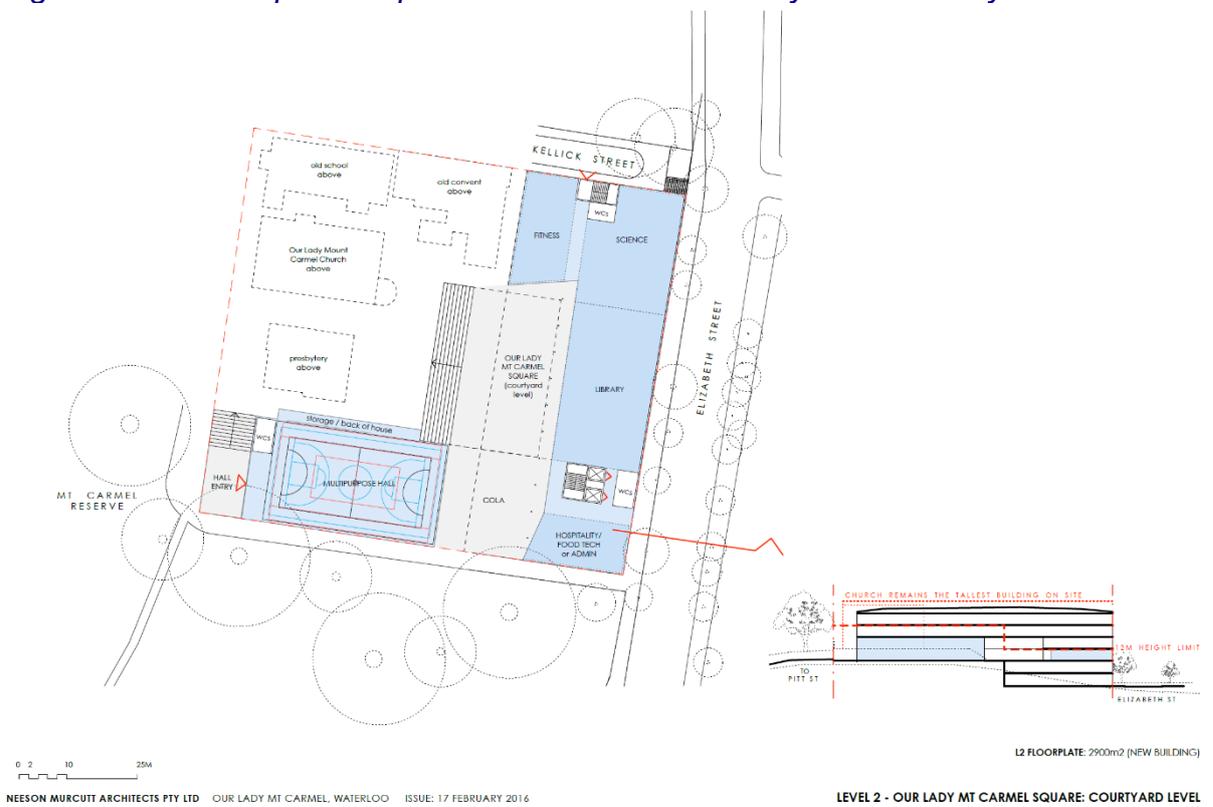


Figure 6: Redevelopment Option: Mt Carmel Secondary School Study – Level 2

### 3. Key Issues

The key issues raised in this submission have been detailed below

#### 3.1 Tower element

The block adjacent to Mt Carmel includes a built form that proposes up to 34m with a 126m tower element to the southern eastern part of the site. The proposed Height of Building Map is provided in Figure 5.



**Figure 5: Proposed LEP HOB control**

The Waterloo Estate (South): Design Guide 2021 (Draft) then provides finer grain detail to the proposed building heights, as per the below Figure 6. The critical element is the 27-storey tower element immediately north of the park and northwest of the school.



*Figure 6: Draft Design Guide Height in Storeys*

Building height of this scale can often create detrimental impacts on the surrounding land uses such as a reduction in solar access, and an increase in overshadowing. This is discussed further in the sections below, however key issues in regard to the tower elements are:

- the visual impact of such significant massing immediately adjacent the school.
- the location this density on Kellick Street, and subsequent increased residential density, is located distant to the main driver for this density – being the new Metro Station. There is little basis for the level of density proposed at this location.
- the tower will all overlook the existing school which is an unsuitable outcome in terms of privacy for students.

Importantly, no analysis of alternatives has been provided demonstrating how massing or tower locations can be reconfigured. All options presented in Section 4.1 of the Urban Design Review place significant massing on the corner of Kellick Street and Gibson Street rather than, say, along Wellington Street or Pitt Street

**Suggested amendment:**

SCS would like to see the masterplan amended whereby

- the tower elements are considered to the northern parts of the site to ensure that the built form considers the school activities contained therein.
- Overshadowing to the public open spaces is minimised.

### 3.1.1 Solar analysis

The placement of massing and built form along Kellick Street presents a major issue with regards to solar access. Relevant controls for solar access on neighbouring properties are founding in the City of Sydney DCP 2012 Section 4.1.3:

#### 4.1.3.1 Objectives

- (a) *Buildings are to be designed and sited to provide solar access to:*
- (i) private open space within the site and of adjoining dwellings;**
  - (ii) habitable rooms within the development and in adjoining developments;**
  - (iii) public open space including bushland reserves; and**
  - (iv) solar collectors of adjoining development.*

Further, the draft Design Guide nominates the following as it relates to solar impact:

- *Locality Statement – Principles: (12) Heights of buildings are to minimise overshadowing in both the public and private spaces and are not to generate uncomfortable wind effects at street level. Awnings and colonnades are to be incorporated along retail frontages to increase pedestrian amenity and help to minimise sunlight, rainfall and wind impacts.*
- *3.1.2. Principle 2 – The right type, height and scale of buildings for Waterloo: (3) Tower forms are limited to the southern part of the precinct near McEvoy Street to minimise overshadowing impacts to open space and surrounding residential properties.*
- *8.3. Building heights: Objective D: (d) Ensure heights and distribution of buildings on McEvoy Street minimise overshadowing of neighbouring properties to the south.*
- *8.5.2. Tall buildings: (1) Tall buildings are only to be located in accordance with Figure 12: Height in storeys to minimise overshadowing to existing and future planned public open space, communal open space and residential dwellings.*

We are of the opinion that the proposed master plan fails its own objectives through the resultant excessive overshadowing of the school and public open space areas. This results in an unacceptable impact on the school as well as the open space which is an important amenity for the school and its users.

Shadow analysis shows impact on the school during the winter solstice from approx. 12.30 – 5pm which includes parts of lunchtime and then after school play and care time until 6pm weekdays. This has not been addressed adequately in any of the reporting or environmental assessment.

### **Suggested amendment:**

- SCS seeks 15 min increment shadow analysis in order to adequately assess impact.
- SCS requests that solar impact to the school is reduced such that key outdoor areas are not impacted outside of key school hours of 9am-5pm

### **3.1.2 Wind analysis**

The Planning Proposal notes an unsatisfactory wind impact as a result of the Kellick Street tower. None of the supporting reports, nor the Planning Proposal itself make any mention of the existence of the school nor recognise the environment for children's recreation and learning.

If the proposed concept is unsupportable, then further testing is required, or the form / height / massing be amended. As it stands, the concept is unsupportable. The suggestions in the Arup Waterloo Estate (South) – wind assessment report is to (amongst other things) to keep taller buildings to the centre of the block. This has not been carried out. Further, the Arup report does not support the proposal, which states:

*“The preferred location of the additional tower on Kellick Street to the north-east of the site, Figure 2, is not ideally located from a wind perspective.”*

The Planning Proposal seeks to rely on vegetation for amelioration of wind impacts (P49), however this is not a supported position of the Arup report in support the Planning Proposal.

### **Suggested amendment:**

SCS seek amendments to the scheme that can be supported from a wind perspective, or further analysis from wind consultants to support the proposed scheme.

### **3.2 Traffic analysis**

The Jacobs Report (March 2020) in support of the original scheme noted the school and community facilities located near the Waterloo Precinct include Our Lady of Mount Carmel Primary School, Alexandria Park Community School and Green Square School. The report goes on to say that:

*“Safe access to these destinations is an important component of the Waterloo Precinct given the number of pedestrians using these facilities. The trips generated by these pedestrians may also involve crossing roads that carry high traffic volumes and freight trips such as Botany Road and McEvoy Street.”*

Notwithstanding this, there is no acknowledgement of the specific traffic and transport requirements of the school, nor provisions made to mitigate the impact of over 3,000 dwellings and allied land uses on the ongoing operation of the school

and the safety of its students. Specifically, there are key entries from Mt Carmel Reserve immediately south of the proposed development that have not been considered in the traffic and transport advice.

Whilst it is acknowledged that various streets will be upgraded during this process, no upgrades are proposed to Kellick Street or Gibson Street which will feature some of the densest towers proposed under the planning proposal, specifically Kellick Street which is defined by a narrow throughfare for vehicles and narrow pedestrian sidewalks.

Additionally, no consideration has been made towards the traffic characteristics of the school which includes an increase of traffic movements during the AM and PM drop off/pickup. Our Lady of Mt Carmel Catholic Primary should not be further disadvantaged due to the planning proposal and its lack of consideration for the school's operations.

**Suggested amendment:**

SCS requests updated traffic analysis that considers the existing school movements and the impact of development upon same.

### 3.3 Heritage analysis

'Our Lady of Mt Carmel School and Church' is of local heritage significance and listed as item I2088 under the City of Sydney LEP, it sits adjacent the Waterloo Park and Oval, also a locally listed item. Both items sit within a Heritage Conservation Area.

The Addendum Heritage Impact Statement prepared by Artefact and original Heritage Impact Statement by Urbis limits the scope of the impact to the visual impact created by the planning proposal. As detailed in the statement of significance, Mt Carmel's significance is also known for its social and educational uses. No assessment towards the impact of these uses have been provided.

The Planning Proposal lists, as part of the Built Form Objectives "*Building height and form will respond to the hierarchy of streets and open spaces and to key view corridors both over and within the locality. New development will also respond appropriately to the form and setting of heritage items in the neighbourhood.*" We are of the opinion that the current suite of documents has failed to demonstrate adequately how it has responded to these objectives.

It is considered that the impact of the building massing and height, including future shadowing and wind impacts created by the planning proposal has not been adequately assessed and has the potential to affect the operation of the school and therefore its ability to provide educational and social uses without impact.

**Suggested amendment:**

SCS requests that the heritage reporting consider the impact of the proposed master plan on the listed Mt Carmel School.

### 3.4 Community infrastructure clustering

The planning proposal is seeking to deliver a wide range of community spaces with particular focus to place these uses along George Street.

As discussed in Section 2.1, representative of the Archdiocese had already met LAHC staff to discuss the potential to co-locate key community and education infrastructure in the part of the site closest the existing school.

Mt Carmel offers significant community uses through educational and religious services, as well as other allied and ancillary uses. The location of community uses along George Street would therefore not allow any form of co-location of activities and uses to best utilise these assets. It is recommended that other community uses are facilitated adjacent to Mt Carmel and Waterloo Park to allow for greater synergy between the uses and deliver greater levels of public benefit.

**Suggested amendment:**

SCS requests that community infrastructure proposed in the masterplan be clustered around Mt Carmel and Waterloo Park to allow for greater synergy and sharing of resources between the community facilities.

## 4. Summary and Conclusion

We welcome the opportunity to meet with members of LAHC and the DPE to discuss the items contained within at your earliest convenience.

As discussed, SCS support the renewal of the area, however hope to work with all stakeholders to ensure the best possible outcome for both SCS, its users, and the incoming and existing community.

Please contact David Lyster Supervisor Planning and Property on [David.lyster@syd.catholic.edu.au](mailto:David.lyster@syd.catholic.edu.au) to organise a time to meet and discuss this submission.

Regards



**Glenn McLachlan**  
Director Finance & Property

SUB-1652  
Eoin Maher  
eoin.maher@gmail.com  
Erskineville

- Not enough public and affordable housing. The NSW Government is fudging the figures to appear that it is building more and better public housing, but the finer details suggest it will deliver the same – OR LESS – actually beds for people who need them. There must be large growth in public housing beds to address the 20 year wait list – ideally the whole site, but certainly much more than proposed. Proposed affordable housing of 7% will not make a dent in the affordable housing crisis.
- Include real community facilities for any new development. While a new park is planned, missing are all the other kinds of community facilities the thousands of new residents will need, including education, sporting and community centres. The NSW Government must be required to deliver these facilities, it owns all the land here and nearby where they could be built.
- Stop the selloff of public lands. Public land must be kept in public hands for future generations. Once we lose it, we never get it back. Use the land to protect and grow the public and affordable housing the city needs.
- Crucially, no matter what happens, the NSW Government needs to look after its existing tenants. Hundreds of public housing tenants live on the Waterloo Estate, and have been stuffed around for years with waves of announcements and draft plans. No change should happen without a clear commitment that existing tenants can first be moved into alternative quality, secure homes of their choosing in the area.

SUB-1653  
Andrew Walsh  
walshap@gmail.com  
Waterloo

Proposed Plan for Waterloo South Submission – Andrew Walsh, resident of Cope Street.  
Density

I believe that the density of the residential component is too high in general. I do not agree that 6 to 13 storeys are medium density. I would consider that a building with a maximum storeys of 6 to be medium density. Anything above 7 storeys is high density so I am concerned that the vast majority of the plan has too high density. Also, high buildings lead to wind tunnels on the streets. There are already sharp wind tunnels due to the high and narrow social housing blocks which are in Waterloo North and hence will remain for some time. Adding more high buildings in a north south direct, will increase the wind tunnels already experienced when the wind is coming from a southern direction.

Housing Mix

I support the mixing of private, affordable and social housing. I live in Waterloo and I can witness daily that having large areas of just social housing tends not be hugely beneficial to the people who live there. I would hope that a housing mix would encourage greater integration in the neighbourhood between all it's residents. Also, I would like to see the quality of housing improve greatly in the area. The current social housing blocks appear to be in a very poor condition. This poor housing condition leads to low morale and contributes to lack of pride in the neighbourhood. I have noticed that this lack of pride and morale can lead to rubbish been discarded on the streets instead of in bins. I would hope that this redevelopment would spruce up the whole neighbourhood and give people a neighbourhood to be proud of.

Main Park

I support the location and size of the main park. It should be well designed and be more similar to Prince Alfred Park than Belmore Park (both near Central Station). It will need good lighting, trees and amenities but also feel safe even at night. The park is an essential part of this urban renewal. Having lived in Erskineville previously and hence close to Sydney Park, I do miss not having a large park close by in Waterloo. I would like to see the park with amenities also. Personally, I like having some outdoor exercise equipment and an outdoor swimming pool in a park- just like Prince Alfred Park. Prince Alfred also has tennis courts and basketball courts, which I don't use but I like to see the community having plenty of healthy sporting activities available. Sydney Park recently had a skate park built, and overnight I witnessed scores of people using it. Clearly there was a pent-up demand. I noticed the statement that 'cars and bikes will only be allowed to travel around the park at low speeds'. I completely disagree that any cars should be allowed to enter the park. There are enough roads surrounding the park.

Footpaths and Cycleways

I support wide footpaths, cycleways and traffic calming. Ideally, most of the streets would have no car traffic. I completely support the removal of parking, or never including parking in the first place. Us residents will have a Metro Station at our doorstep. Coupled with wide footpaths and separated cycleways on the majority of streets, we do not require parking to clog up the remaining limited street and public space. The streets should be filled with wide footpaths, separated cycleways, benches, bins and small plazas for people to socialised with others instead of space for cars and

parking. I would like to see bicycle parking dotted all over Waterloo South and not just at the metro station, in particular the park and outside residential buildings so visitors have somewhere to park their bike.

#### Trees

I support the retention of every tree possible and the inclusion of many more along the streets and in the parks.

#### The 'Main Street'

I am aware that the metro station will have some commercial buildings but I would like to see more community buildings in Waterloo South. Buildings such as schools, a library, a post office and other buildings that create a main street feel. I see that George Street is considered the 'main street'. I am happy that the cycleway will remain, but what else defines George Street as the main street? It appears to be a main street with apartments only on each side. Surely a main street would include at least some amenities and shops such as a fruit and vegetable shop, a small grocer, a school, post office, a café, a bakery?

Thank you for the opportunity to submit my feedback on the proposed plan for Waterloo South.

Regards

Andrew Walsh.

SUB-1655

Name withheld

I am very interested to know how much the developer is paying for the site at Waterloo. We so often see the public land being sold well under market value to developers. I hope this is not going to be one of those instances.

My objection to the proposal mainly because all the units on site are made up entirely of social housing. The proposal does not provide 100% replacement and no plans have been made for the housing of the current tenants who are impoverished and cannot afford housing in the private rental markets. This proposal would render these people homeless.

We need more social housing not less. I think this will cause more problems in the long run.

SUB-1656  
Margaret Whalen  
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Alexandria

WATERLOO ESTATE SOUTH  
PP 2021 - 3265  
Submission

Margaret Whalen  
34/27 Wyndham St  
Alexandria 2015

Waterloo Estate South  
PP 2021 – 3265

I have not made any donations to a political party in the last 2 years.

I do not support the development as proposed.

1. The development:

I am perplexed as to why "design excellence" in the design of the Waterloo Estate is rewarded. I would have thought that design excellence was a minimum standard as should be a high BASIX target.

Also, why does this then increase the size of the development by 10%?

Does this 10% increase negate the benefits that the "design excellence" achieved?

Where is this extra development going to go?

Will that alter the footprint and impact studies?

It has become obvious over many years and many countries that design excellence provides rewards that are immeasurable. A healthy home is more likely to facilitate a healthy happier lifestyle. Given that these buildings are for social and affordable housing, I would have thought that it was even more important, that this is the base from which the design improves.

The development is high density.

Buildings are clustered, with overshadowing and potential wind tunnels.

Not all apartments will benefit from the basic sunlight requirements during winter.

Will those facing noisy streets be able to have cross ventilation at night during hot weather ?

Will the "green" courtyards survive with a minimal exposure to sunlight and circulating air ?

The proposed park, while not in this development, does not appear to include facilities for older children and teenagers. Where is the adventure playground (Darling Harbour), open basketball and netball courts, skateboard park??

2. What value policy?

NSW Government Future Directions Policy is that 30% of the floor space be for social housing. The current proposal delivers just over 26%.

This is not acceptable when there is a desperate need for social housing.

Will this increase when the development increases by 10%?

What about affordable housing which is reduced as well.

Affordable housing is one measure that will keep people from tipping into penury and dependence

on the government/tax payer. Among the untold benefits would be being able to afford to travel for job interviews, present well for job interviews, hold down a job, stable environment for children to attend school and do homework, greater chance of a healthier living style, less desperation in the adults and the list goes on. A minor investment by government for incalculable savings and benefits in the future.

Government land is being used for this development. Why is there not more affordable and social housing ? The minimum requirements have not kept up with demand, with waiting lists 100's long. Prevention is better (and cheaper) than (trying to effect) the cure.

### 3. Social Impact Statement:

Given the proposed mix of residents, a significant number of whom will have diverse, complex and demanding needs, a thorough assesment of how these people will live harmoniously is required. What definite support can be expected ?

Into this mix is private housing and student housing.

Were students considered when a previous SIS was done?

Students do not tend to become part of the greater community. Within themselves perhaps, but not their neighbours. Instead of student housing, let it become build to rent or rent to buy. Affordable housing.

Will the residents of the social housing and affordable units be able to afford the the cafes, child care facilities etc, or will they feel pushed out of their ownc(????) neighbourhood?

Alison Ziller expresses my concerns in way that I could not, and I urge you to consider the information she presents, and immediately agree to a SIS before proceeding further.

### 4. Conclusion:

No support for the current proposal as there is little demonstrable planning for those whom the developemnt is supposedly to benefit.

Support is being sought for the piecemeal development of the Waterloo Housing Estate. Waterloo Estate South needs to be evaluated as part of the total development, especially as the green space proposed adjacent to the Waterloo Metro will be servicing the total redevelopment.

Margaret Whalen

SUB-1657  
Anna North  
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Waterloo

## The Move to Waterloo

I probably lived in over 30 places in my life and I've never got used to moving it never gets any easier. I hate the limbo, the leaving forever the not knowing much about what, That feeling that everyone is looking at my stuff sitting out on the street.

Its even worse this time. I am moving into a public housing flat. This will be my very own "forever home" as the saying goes. I should be happy but I am ashamed and I am afraid.

The removalists arrive an hour early and immediately begin heaving my fridge, a table, a couple of chairs, boxes and suitcases and those two dollar Bangkok Gucci bags down the stairs and into a big old truck.

I watch them from a distance, wanting my possessions spectacle to end. They shove the final load into the truck and make space for me to sit in the cabin with them. Off we go.

As we cross town they tell me they are Persian, haven't been in Sydney long. They are brothers, live in Harris Park with relatives. They look bored and more like grunge fashion models than furniture movers, and the morning the traffic is hell.

We arrive, park the truck and start unloading. Two minutes later a woman comes out through the security door to introduce herself.

She fusses around the movers, telling them not to trample the grass, and to keep the gate shut between loads. This is Virginia. Maria comes out next, they welcome me and give me basic info about the block, names of residents, and ask if I need anything. They are kind.

My friend arrives with my puzzled cat in her cage.

The removalists have finished. We go upstairs and shut the door. It is quiet here and this accentuates the chaos of bags and boxes, the upside down chairs, the table and the books and the rest. My cat creeps out of the cage, slow motion style before jumping up on the table to get an aerial view. My friend leaves and we are alone. I sit and nearby, writing the the names of my new neighbours n a scrap of paper before I forget them.

Virginia, Maria and Ulysses, Audrey and Joan. Joe, Mercedes, Lydia, her mother and daughter, Tanya and her kids, Ria and Cathy, the wild girl who lives in Unit 9.

I had barely put my stable home in order when the letter from the Hon Brad Hazzard told us that he was excited to write and let us know Transport for NSW had announced a new Sydney Metro station at Waterloo, due to be completed by 2040.

Since that fateful day this community has been unable to feel that our homes are safe. We are in a limbo one day hopeful and resentful the next. Once again, my future is un-clear.

## The Most Beautiful Garden

The most beautiful garden in Waterloo was on a corner block just across the road from the Duke of Wellington hotel before that joint was turned into small one bedders and studios. There were fights back then, some real crackers.

Sometimes these fights spilled onto the road, and other times the blokes would jump the fence and hide out in the beautiful garden for a while. Someone said there were others who had dope and other stuff buried in there, under the frangipani tree. But it was all just gossip to me.

She lived and still does, on the ground floor and she spent hours in the garden. She put love and money and more love into it and created a place that everybody could enjoy, be proud of, somewhere to go, somewhere beautiful.

There was a mighty scarlet Bouganvillea that grew tall and strong and Maria used to park her car under it every afternoon.

There was an olive tree, a maple tree, lemon grass grew next to the mint and the basil and the parsley.

There were Birds Of Paradise, along the fence proud and exotic.

There were yellow Roses that have symbolised joy and light for centuries.

It was around Christmas 2014 that the pub started to get very rowdy. So many fights, white, indigenous, men and women ... they were all at it, because some of the girls were getting into dealing and the blokes didn't like it. Who knows, who cares, that was not my business. The cops were a regular feature now.

New Years eve got pretty messy that year as you'd expect and then there was that rumour that someone was murdered after he left the Duke and was heading down to the Cauliflower down near Botany Road.

After that the cops were all over Wellington Street, night and day. Under cover, motor bikes, cars, wagons, you name it. One night the guys patrolling saw the flash of a torch light coming from under a tree in the front of the beautiful garden. They arrested those two young kids for loitering and took them away. The silly buggers knew the garden was now a total no go zone, but they went in anyway. What were they thinking? They might have been looking for something, if you know what I mean. Next day, Rita and I got up early to go fishing down Georges River way. We left about 5.00 am passed the garden as usual. When we got home around two, the garden was gone. Bulldozed. Completely. Flat. It was all gone, front and back.

We didn't see Maria for months after that. She was sick. She was in hospital, for her heart. She recovered and came home.

About a year later I noticed a lone Bird Of Paradise, self sown but strong, growing by the fence again. There's a new garden now. but it will never be the same. Maria says that awful day taught her that her home is not her own it never was and it never will be.

Brenda

Brenda came to borrow 10 bucks from me yesterday. I was still in my pyjamas and I looked like hell.

She was too hesitant, and embarrassed to notice what I looked like. I offered her a sit down and looked in my walled to see what I could find.

I had the money so I gave it to her, no worries.

I sat down next to her and she felt better at ease and could see me minus the fog of shame now that the transaction had been made.

“Are you ok girl? You look terrible!”

I told her I was sad about the election, not that I should really care, but this time I really did and she saw that as plain as the tears in my eyes.

“Terrible wasn’t it. Come here, Can I give you a hug! you’ll be right!”

I could see that tears were forming in her eyes by then. She hugged me like a professional and when came out of it, she pulled the neck of her orange t-shirt up to her eyes and dabbed them dry with the grace of an old fashioned department student.

“I cry every day she said. “Down there. That’s why I come up here to borrow some mon-ey, so I can get out of here and do something. I told you that my niece died, she was murdered but I still see her, from my bathroom window, on the corner, she walks up John Street, and then she just stands there, looking in my window.”

When she was still around she told me that if she died first, she’d hang around me, and I said the same, that if I died first, I’d hang around her, but we were only mucking around, you know, but she musta been serious because I see her everywhere! She got me, she really did, were close, she was living with me when it happened, she’d gone back to Wagga just for the weekend It’d 8 months now and she’s still here nozing arround! Brenda smiles and her eyes go shiny. “Want to see a photo of her and her little ones?”

The phone comes out and there she is, and her kids, a boy and a girl in a massive spa in a garden out Marylands way.

SUB-1658  
Ray Rauscher  
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East Gosford

Gateway Determination Report March 2022 Waterloo South Renewal Submission  
Submitted by: Habitat Assoc. for Arts and Environment Inc.) (HAAE) 29 April 2022

Thank you for the opportunity to make this submission. The Association noted to the Department (28 April 2022 submission) that we would be making comments on the exhibited report. We now submit the additional comments as follows:

1. Allowance for Three (3) Towers at RL 126.4 (approx. 100 to 110 meters)

This height allowance would appear out of context with the surrounding built community and the lower scale of new buildings as proposed in the Gateway Report.

2. NSW Land and Housing Corporation (LAHC) and Sydney City Council

We note with concern that the NSW Land and Housing Corporation (LAHC) could not support the Sydney City Council planning proposal on Waterloo South Renewal. This was primarily because (as stated) LAHC considered the Council's proposal (i.e. housing and infrastructure needs) to not be financially viable.

As the report notes, given Council resolved not to forward the planning proposal for Gateway to progress, the Minister of Planning and Public Spaces appointed the Secretary of the Dept. as the Planning Proposal Authority (PPA) for Waterloo South Gateway Determination and public exhibition.

3. Social and Affordable Housing

A central issue of the planning of Waterloo South Renewal centres on the need to adequately design for the provision of social and affordable housing. The Gateway Report (P4 bottom) proposes housing units of 920 social housing and 613 affordable rental units (operating under a community housing organisation). This needs review as we understand the demand for these two types of housing would be greater than what is proposed.

4. Land Value Capture for Waterloo South Renewal

Given the above (numbers 1-3) our Association recommends the State look more closely at using value capture planning (VCP) principles for the whole of the urban planning for Waterloo South Renewal. This could apply to other future renewal sites under the State's consideration.

The recently released book *Renewing Cities with Value Capture Planning* (Rauscher 2021) devotes Chapter 3 (Inner City Renewal and Value Capture Planning – Greater Sydney's Central to Eveleigh Renewal Area (CERA) to Waterloo Estate Renewal (including Waterloo South). That Chapter can be directly accessed via Dr Ray Rauscher publications on Research Gate

<https://www.researchgate.net/search.Search.html?type=publication&query=ray%20rauscher>  
Or, directly as follows:

[https://www.researchgate.net/publication/348410380\\_Inner\\_City\\_Renewal\\_and\\_Value\\_Capture\\_Planning\\_-\\_Greater\\_Sydney's\\_Central\\_to\\_Eveleigh\\_Renewal\\_Area\\_CERA](https://www.researchgate.net/publication/348410380_Inner_City_Renewal_and_Value_Capture_Planning_-_Greater_Sydney's_Central_to_Eveleigh_Renewal_Area_CERA)

The above Chapter presents the means of meeting key planning needs of the Waterloo Estate

Renewal Area, including social, affordable and market housing. In addition the Chapter addresses how a value capture planning (VCP) approach can meet other needs (i.e. public and open spaces and sustainable transport). This can be done within a financially viable planning approach, including how developer provisions and/or levy alternatives can be utilised in a project such as Waterloo South. We are happy to address any issues further if called upon.

Dr Ray Rauscher  
Secy, Habitat Assoc. for Arts and Environment Inc.  
(Central Coast and Newcastle)  
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Note: Copy also uploaded as a file.

SUB-1659  
Bruce Judd  
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Waitara

I am not a local resident, but an Emeritus Professor of the University of New South Wales where I undertake research with the City Futures Research Centre. I have had a long standing relationship with the Waterloo public housing estate community, initially from 1995 to 2006 with the Waterloo-Redfern Community Development Project jointly funded by UNSW and the then Housing NSW, and more recent involvement in community engagement on the RWA's BEP2 proposal in 2012, and very recently this year with community capacity building with Counterpoint Community Services on the current Waterloo South proposal.

Based on this background of working with the Waterloo public housing community, and my participation in community capacity building, I have a number of concerns about the current proposal, as listed below.

1. Density, and its implications for public/social housing tenants: As the Independent Advisory Group has pointed out, the proposal represents a very high density (too high in their view) and could be 10% higher if design excellence is satisfied (undisclosed in information provided to the community). The impact of such high density on a community comprising high-income private residents and social housing tenants (many of whom have high/complex support needs) is uncertain. There are already problems between existing longstanding residents and those with mental health, substance abuse and anti-social behaviour issues. How this will translate into a much more dense and socially polarized demographic needs careful consideration and planning. For this reason, it is imperative in my view that a Social Impact Assessment should be undertaken prior to the adoption of this proposal in order to understand and address such issues.
2. Proportion of social housing: The policy of LAHC to provide 30% of social housing has not been met, whether measured by number of dwellings (28.2%) or proportion of residential floor area (26.5%). I believe the 30% policy should be fully met, which would provide additional social housing units in the proposal. In addition, the recommendation of the IAG that the 10% of affordable housing be taken from the 70% of private housing, rather than reducing the provision of social housing.
3. Social housing configuration: There is no suggestion in the proposal as to how social housing will be configured – ie in separate buildings, parts of shared buildings, or mixed within buildings and their social and management implications. This should be considered in a Social Impact Assessment.
4. Safety: There are a number of concerns about public safety in pedestrian laneways and public parks. A Crime Prevention Through Environmental Design assessment should also be undertaken at this stage to ameliorate potential problems.
5. Overshadowing: Given that the design presented on the online 'Waterloo south map' (based on the Draft Design Guide) indicates a variable set of building heights (2-5, 6-13 and 27-33 storeys) which will be open to interpretation by development proponents, it remains uncertain if adequate solar access will be available in public spaces and building courtyards. More precise building envelopes and shadow analysis are necessary to ensure this.
6. Car Parking: There is a concern about whether there will be an adequate allocation of car parking spaces for social housing.

SUB-1660  
Graham R McDonald  
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Paddington

Mr Alan Bright, *Director Planning Proposal Authority Waterloo Estate (South)*.

## ***Waterloo Estate***

Social and affordable housing with access to community facilities, parks, shops, and public transport.

The *NSW Government* invitation to the community seeking its feedback in the planning process identifies that the current proposal loses the opportunities to:

- 1. Create a pedestrian precinct** and to achieve a clear vehicular separation.
- 2. Address in genuine terms climate change**, in particular to reduce car dependence and its impact.
- 3. Redevelop in a coherent, systematised, and cost effective manner** while maintaining diversity.

These principal lost opportunities amongst others relate directly to the current proposal retaining the existing internal road grid. This grid is the legacy of another time and no longer relevant to today. In addition, it not only retains this grid but also extends it and increases overall the area it occupies. This decision therefore from the start imposes substantial rigid, detrimental impacts and constraints on any redevelopment and unnecessary given that the public authorities predominantly own the land.

By imposing such constraints not only fails to reduce but increases car dependence.

The current proposal consisting of numerous land parcels will generate complexity, inefficiencies in functions, construction, and costs. Each land parcel will require its own underground parking, entry/exist ramps and will be awkward to resolve. Further, this will create frequent pedestrian vehicular conflict.

The counter proposal is therefore to eliminate the existing internal road grid.

Given the development density, generates a substantial required number of car parking spaces and no alternative but to accommodate them below ground. However, rather than having separate land parcels, the counter proposal is to amalgamate them into one common below ground vehicular parking and servicing level from which each building will have its address entry, connected to ground level and the units floor levels above.

Access to this below ground vehicular level can be at an optimum minimum number of entry/exits and confined to discreet locations on the precinct perimeter.

By eliminating the existing internal road grid, frees up the use of the precinct land area and will considerably reduce the constraints imposed by what are arbitrary internal road boundaries.

### **1. Create a pedestrian precinct.**

The land area currently occupied by the existing internal road grid, therefore:

- Becomes available for recreation spaces, walking, cycling, and scooters without the risk of conflict with vehicles.

The removal of these internal road boundaries:

- Allows adjustment to locations that are more suitable and in the detailed design of public and recreation spaces.

## 2. Address in genuine terms climate change.

Removal of the existing internal road grid will then:

- Give priority to public transport access, walking, cycling, and scooters. Vehicular traffic is subservient and discreet. The result is a vast improvement in the quality of the precinct environment.
- Facilitate in the more suitable locations and adjustments of the housing accommodation positions. Further, this will thereby assist achieve more efficient solar access.

## 3. Redevelop in a coherent, systematised, and cost effective manner.

The numerous land parcels, each with its independent vehicular entry/exit below ground parking creates inherent complexity and compromises feasibility. This will be contrary to the underlying need to facilitate coherent, systematised, and cost effective design and construction.

Implicit in the design and construction of social and affordable housing imposes working to tight cost constraints. Therefore, the current proposal could deem as compromising this objective.

Removal of the existing internal road boundaries will:

- Benefit in removing the constraints on building locations. Therefore, their locations can be more equitably located across the precinct and its perimeter boundaries.
- Amalgamating below ground vehicular parking and servicing will facilitate systematising design, construction, and will assist achieve cost feasibility.

The attached aerial image could deem by consensus as the desired overall redevelopment coherent urban form. It encompasses low, medium and high stepped building forms predominantly running north south interspersed with green spaces and roof gardens. However, the fragmented approach in the current proposal would most probably compromise achieving this desired coherent outcome.

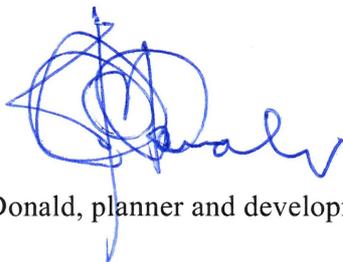
Rather than break up the precinct into numerous individual land parcels, it would assist to achieve greater feasibility by redeveloping the precinct as a whole, implement in stages and thereby achieve the desired outcomes of coherence, a quality environment and within reasonable costs.

The dedicated green zone rather than isolated, offers the opportunity for its integration and to create a civic urban space animated by diverse community facilities, restaurants, and retail.

Sustainable development, addressing climate change, and roof gardens all come at a cost. Are the government authorities at all levels willing to appropriately finance such objectives?

Given the criteria outlined in this submission would suggest the need to review (1) a planning framework. This could consist of establishing the design of and guided by an overall urban design master plan. And (2) a methodology in the detailed planning, design, and construction to ensure achieving the desired quality, cost-effective outcomes and could implement in stages.

At your service,



Graham R. McDonald, planner and development manager

grahamcd@bigpond.net.au

Copy: Hon. Anthony Roberts MP  
Minister for Planning and Homes

Lord Mayor – Councillor Clover Moore  
City of Sydney



*Waterloo Estate*

SUB-1661

Callum Cook

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Newtown

Public housing is so fundamental for the working class. Attacks on public housing are a direct attack on the poor of this country

SUB-1662  
Rosemary Cutrone  
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Sydney

Submission To NSW Government On The Planning Proposal For Waterloo Estate (South)

R.Cutrone 29th April 2022

There is a lack of data on the social impacts and other humanitarian aspects of the development proposal, relevant to the community that currently lives in Waterloo. How will the current plan affect vulnerable tenants and other nearby housing communities (such as the small but historical community of Woolloomooloo)?

Why isn't the true cost to the greater community being discussed? Doesn't the actual number of tax-subsidised tenancies increase when the number of fully-owned public properties diminishes? The broader community been systematically locked out of the social & affordable housing system through an incremental lowering of income thresholds, and also through discriminatory placement policies that prioritise the mentally ill and/or tenants with severe social issues who clearly need an assisted housing model of accommodation. What kind of of tenancies are planned and who is included in the development plan?

Public housing is an ever-diminishing asset & resource. Govt needs to expand the asset by delivering a fairer percentage of public/private housing and by returning a percentage of access to working people - particularly low-income creatives or professionals. Doing so would support diversity, boost creative & cultural capital, and enrich and enliven the inner city.

NSW govt needs a holistic 21st century approach to this development plan that authentically considers existing communities and the kind of community it wishes to encourage - not simply facilitate another sell-off of public land and housing assets.

SUB-1663  
Michael Carnuccio  
michaelc@communityhousing.org.au  
2016

Attention of:  
NSW Department of Planning and Environment  
Via online submission form

**Submission: PP-2021-3265 - Waterloo Estate (South) Planning Proposal**

The Community Housing Industry Association NSW (CHIA NSW) welcomes the opportunity to provide a submission on the planning proposal for the Waterloo Estate (South).

CHIA NSW is the industry peak body representing registered, not-for-profit community housing providers (CHPs) in NSW. Our members currently own or manage more than 51,000 homes across NSW for individuals and families who cannot afford to rent or purchase a home on the private market. Since 2012, CHPs have delivered more than 4,500 new homes across NSW, representing an investment of over \$1.6 billion.

More than 50,000 people are currently on the waiting list for social housing in NSW. Without significantly more affordable homes being built, some people will be left waiting for 10 years or more to be housed, forcing people to pay unaffordable rents, live in substandard housing, or, at worst, into homelessness.

The renewal of public housing estates provides an opportunity to increase the supply and quality of social, affordable and culturally appropriate housing. Increasing the amount of housing available to lower income households is an urgent priority in the City of Sydney, which has some of the highest housing costs in Australia.

In this regard, CHIA NSW welcomes the inclusion in the planning proposal of provisions aimed at securing a minimum amount of social and affordable housing in the precinct. This includes housing mix requirements for the government-owned land and affordable housing contribution requirements for privately owned sites. Such an approach will provide certainty to stakeholders and the community and support the establishment of a socially diverse and prosperous community.

However, while the proposal will increase the amount of social and affordable housing in the precinct, this increase will be relatively modest compared to the extent of need that exists. CHIA NSW's strong view is that a higher proportion of social and affordable housing can and should be delivered in the precinct. This submission outlines opportunities to strengthen the planning proposal to achieve a better balance of housing.

It is noted that the Independent Advisory Group (IAG) recommended, based on a conservative assessment of feasibility, that the redevelopment of the estate target at least 10% of total housing being affordable, in addition to 30% being social housing. The IAG concluded that the most financially feasible way this could be achieved, at no cost to government, is by setting aside land for 7.75% of dwellings/GFA to be delivered by the community housing sector, and for an additional 2.5% to be targeted as part of the assessment criteria for selecting a development partner.

Consistent with the IAG recommendations, CHIA NSW recommends that the planning proposal is amended as follows:

- At a minimum, the site-specific clause for the government owned land in the precinct require at least 7.75% of total dwellings or 7.75% of gross floor area to be provided as affordable housing, whichever is greater. This is consistent with Principle 1 in the IAG's Final Report.
- Restore the requirement that at least 30% of dwellings on the government owned land be for social housing. This is in line with the proposals from both Land and Housing Corporation and City of Sydney, is consistent with the aims of the Communities Plus Program, and is supported by the findings of the IAG.
- Maximising social and affordable housing needs to be included as a matter for consideration in assessing design excellence/FSR bonuses within the precinct. At a minimum, it needs to be explicitly clear that the minimum dwelling/floorspace requirements for social and affordable housing will apply to any bonus floorspace.
- Include within the Waterloo Estate (South) Design Guide a requirement for the Stage 1 (Concept) development application for the precinct to demonstrate how social and affordable housing provision has been maximised, including through:
  - The identification of land to be delivered by the community housing sector, which will enable the leveraging of additional supply.
  - Bonus FSR granted through the design excellence process, which could support higher levels of affordable housing provision.
  - Leveraging funding available via the Redfern-Waterloo Affordable Housing Fund.
  - Private sector developers partnering with the not-for-profit community housing sector.

CHIA NSW supports the requirement (at 15(j) in Section 4.1.1 of the planning proposal) that any affordable housing delivered is managed and owned by a registered community housing provider. This is consistent with the recommendation of the IAG that the maximum number of affordable homes be provided by the community housing sector as part of the precinct's redevelopment. It is also consistent with the NSW Housing Strategy, which aims to support the growth of the community housing sector.

CHPs are well placed to work with all levels of government and private developers to deliver affordable housing outcomes. CHPs can maximise the impact of government investment by leveraging their development capacity and financial benefits, including tax exemptions and lower cost finance available through the National Housing Finance and Investment Corporation. Not-for-profit CHPs will redirect the value of their tax exemptions and their developer margins into additional housing supply. In this way, the dedication of land in the precinct for delivery by CHPs will unlock opportunities for additional affordable housing.

CHIA NSW is generally supportive of the principles for the provision and design of social and affordable housing outlined in the Waterloo Estate (South) Design Guide, including the requirement for the end owner/manager of affordable housing to be engaged in its design. The requirement to maintain or increase existing levels of social housing for Aboriginal and Torres Strait Island people is also supported, as is the requirement that at least 10% of affordable housing be provided as culturally-appropriate housing. However, CHIA NSW notes that the IAG recommended at least 15% of affordable housing be reserved for First Nations people.

It is also noted that section 5 of the Design Guide is not consistent with the planning proposal as it allows affordable housing to be managed by either government or a CHP. CHIA NSW recommends that Section 5.5.5(1)(e) of the Guide be amended to remove reference to affordable housing being owned and/or managed by government, consistent with the intent of the proposed LEP site-specific clause.

CHIA NSW appreciates the opportunity to provide feedback on the planning proposal for Waterloo South. We would be happy to discuss any of the recommendations further with the DPE.

Kind regards,

A handwritten signature in black ink, appearing to read 'M. Carnuccio', written in a cursive style.

Michael Carnuccio  
**Senior Policy Officer**

# Political donations disclosure statement



NSW GOVERNMENT  
Department of Planning

Office use only:

Date received: \_\_\_\_/\_\_\_\_/\_\_\_\_

Planning application no. \_\_\_\_\_

This form may be used to make a political donations disclosure under section 147(3) of the *Environmental Planning Assessment Act 1979* for applications or public submissions to the Minister or the Director-General.

Please read the following information before filling out the Disclosure Statement on pages 3 and 4 of this form. Also refer to the 'Glossary of terms' provided overleaf (for definitions of terms in *italics* below). Once completed, please attach the completed declaration to your planning application or submission.

## Explanatory information

### Making a planning application or a public submission to the Minister or the Director-General

Under section 147(3) of the Environmental Planning and Assessment Act 1979 ('the Act') a person:

- (a) who makes a *relevant planning application* to the Minister or the Director-General is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by any *person with a financial interest* in the application, or
- (b) who makes a *relevant public submission* to the Minister or the Director-General in relation to the application is required to disclose all *reportable political donations* (if any) made within the *relevant period* to anyone by the person making the submission or any *associate of that person*.

### How and when do you make a disclosure?

The disclosure to the Minister or the Director-General of a *reportable political donation* under section 147 of the Act is to be made:

- (a) in, or in a statement accompanying, the relevant planning application or submission if the donation is made before the application or submission is made, or
- (b) if the donation is made afterwards, in a statement of the person to whom the relevant planning application or submission was made within 7 days after the donation is made.

### What information needs to be included in a disclosure?

The information requirements of a disclosure of reportable political donations are outlined in section 147(9) of the Act.

Pages 3 and 4 of this document include a Disclosure Statement Template which outlines the information requirements for disclosures to the Minister or to the Director-General of the Department of Planning.

Note: A separate Disclosure Statement Template is available for disclosures to councils.

**Warning:** A person is guilty of an offence under section 125 of the *Environmental Planning and Assessment Act 1979* in connection with the obligations under section 147 only if the person fails to make a disclosure of a political donation or gift in accordance with section 147 that the person knows, or ought reasonably to know, was made and is required to be disclosed under section 147.

The maximum penalty for any such offence is the maximum penalty under Part 6 of the *Election Funding and Disclosures Act 1981* for making a false statement in a declaration of disclosures lodged under that Part.

Note: The maximum penalty is currently 200 penalty units (currently \$22,000) or imprisonment for 12 months, or both.

## Glossary of terms (under section 147 of the *Environmental Planning and Assessment Act 1979*)

**gift** means a gift within the meaning of Part 6 of the *Election Funding and Disclosures Act 1981*. Note. A gift includes a gift of money or the provision of any other valuable thing or service for no consideration or inadequate consideration.

Note: Under section 84(1) of the *Election Funding and Disclosures Act 1981* gift is defined as follows:

**gift** means any disposition of property made by a person to another person, otherwise than by will, being a disposition made without consideration in money or money's worth or with inadequate consideration, and includes the provision of a service (other than volunteer labour) for no consideration or for inadequate consideration.

**local councillor** means a councillor (including the mayor) of the council of a local government area.

**relevant planning application** means:

- a) a formal request to the Minister, a council or the Director-General to initiate the making of an environmental planning instrument or development control plan in relation to development on a particular site, or
  - b) a formal request to the Minister or the Director-General for development on a particular site to be made State significant development or declared a project to which Part 3A applies, or
  - c) an application for approval of a concept plan or project under Part 3A (or for the modification of a concept plan or of the approval for a project), or
  - d) an application for development consent under Part 4 (or for the modification of a development consent), or
  - e) any other application or request under or for the purposes of this Act that is prescribed by the regulations as a relevant planning application,
- but does not include:
- f) an application for (or for the modification of) a complying development certificate, or
  - g) an application or request made by a public authority on its own behalf or made on behalf of a public authority, or
  - h) any other application or request that is excluded from this definition by the regulations.

**relevant period** is the period commencing 2 years before the application or submission is made and ending when the application is determined.

**relevant public submission** means a written submission made by a person objecting to or supporting a relevant planning application or any development that would be authorised by the granting of the application.

**reportable political donation** means a reportable political donation within the meaning of Part 6 of the *Election Funding and Disclosures Act 1981* that is required to be disclosed under that Part. Note. Reportable political donations include those of or above \$1,000.

Note: Under section 86 of the *Election Funding and Disclosures Act 1981* reportable political donation is defined as follows:

### 86 Meaning of "reportable political donation"

- (1) For the purposes of this Act, a reportable political donation is:
  - (a) in the case of disclosures under this Part by a party, elected member, group or candidate—a political donation of or exceeding \$1,000 made to or for the benefit of the party, elected member, group or candidate, or
  - (b) in the case of disclosures under this Part by a major political donor—a political donation of or exceeding \$1,000:
    - (i) made by the major political donor to or for the benefit of a party, elected member, group or candidate, or
    - (ii) made to the major political donor.
- (2) A political donation of less than an amount specified in subsection (1) made by an entity or other person is to be treated as a reportable political donation if that and other separate political donations made by that entity or other person to the same party, elected member, group, candidate or person within the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1).
- (3) A political donation of less than an amount specified in subsection (1) made by an entity or other person to a party is to be treated as a reportable political donation if that and other separate political donations made by that entity or person to an associated party within the same financial year (ending 30 June) would, if aggregated, constitute a reportable political donation under subsection (1). This subsection does not apply in connection with disclosures of political donations by parties.
- (4) For the purposes of subsection (3), parties are associated parties if endorsed candidates of both parties were included in the same group in the last periodic Council election or are to be included in the same group in the next periodic Council election.

**a person has a financial interest** in a relevant planning application if:

- a) the person is the applicant or the person on whose behalf the application is made, or
- b) the person is an owner of the site to which the application relates or has entered into an agreement to acquire the site or any part of it, or
- c) the person is associated with a person referred to in paragraph (a) or (b) and is likely to obtain a financial gain if development that would be authorised by the application is authorised or carried out (other than a gain merely as a shareholder in a company listed on a stock exchange), or
- d) the person has any other interest relating to the application, the site or the owner of the site that is prescribed by the regulations.

**persons are associated with each other** if:

- a) they carry on a business together in connection with the relevant planning application (in the case of the making of any such application) or they carry on a business together that may be affected by the granting of the application (in the case of a relevant planning submission), or
- b) they are related bodies corporate under the *Corporations Act 2001* of the Commonwealth, or
- c) one is a director of a corporation and the other is any such related corporation or a director of any such related corporation, or
- d) they have any other relationship prescribed by the regulations.

# Political Donations Disclosure Statement to Minister or the Director-General

If you are required under section 147(3) of the Environmental Planning and Assessment Act 1979 to disclose any political donations (see Page 1 for details), please fill in this form and sign below.

<b>Disclosure statement details</b>				
Name of person making this disclosure  Community Housing Industry Association NSW	Planning application reference (e.g. DA number, planning application title or reference, property address or other description)  PP-2021-3265 Waterloo Estate (South)			
Your interest in the planning application (circle relevant option below)				
You are the APPLICANT      YES / <input checked="" type="checkbox"/> NO      OR      You are a PERSON MAKING A SUBMISSION IN RELATION TO AN APPLICATION <input checked="" type="checkbox"/> YES / NO				
<b>Reportable political donations made by person making this declaration or by other relevant persons</b>				
<small>* State below any reportable political donations <b>you have made</b> over the 'relevant period' (see glossary on page 2). If the donation was made by an entity (and not by you as an individual) include the Australian Business Number (ABN).</small>				
<small>* If you are the <b>applicant</b> of a relevant planning application state below any reportable political donations that you know, or ought reasonably to know, were made by any persons with a financial interest in the planning application, OR</small>				
<small>* If you are a <b>person making a submission</b> in relation to an application, state below any reportable political donations that you know, or ought reasonably to know, were made by an associate.</small>				
Name of donor (or ABN if an entity)	Donor's residential address or entity's registered address or other official office of the donor	Name of party or person for whose benefit the donation was made	Date donation made	Amount/ value of donation
Community Housing Industry Association NSW ABN 86 488 945 663	Suite 5, 619 Elizabeth Street Redfern, NSW 2016	NSW Liberal Party	7/2/22	\$3,000
<i>Please list all reportable political donations—additional space is provided overleaf if required.</i>				
By signing below, I/we hereby declare that all information contained within this statement is accurate at the time of signing.				
Signature(s) and Date -				
Name(s)				
Michael Carnuccio, Senior Policy Officer, Community Housing Industry Association NSW				



SUB-1664  
Shane Dunsmore  
sharne@facttree.org.au  
Waterloo

## Background of The Fact Tree Youth Service

The Fact Tree Youth Service is located at 703 Elizabeth , Waterloo and was established in 1982 to support the young people and the families of the Waterloo and wider community. The Fact Tree has been a vital grass roots organisation that continues to provide essential support to community members. Our longevity and consistent support has seen the community through intense social, political and economic upheaval.

The Fact Tree has been involved in the consultation process of the Waterloo Redevelopment since it was announced in December 2016. Our organisation facilitated extensive youth consultation workshops in collaboration with LAHC and consultant groups (KJA) to get feedback from the local young people about the proposed Waterloo redevelopment project. Through our advocacy for the community in the consultation process it has become obvious that the lack of transparency and constant changing of deadlines and plans has caused a significant amount of anxiety and harm to the existing Waterloo residents and wider community.

The current Waterloo South proposal brings up a number of concerns that we do not believe serve the best interests of the community, (both current and future). Our concerns are outlined below:

- **Significant increase in Density without appropriate infrastructure planning:**  
The proposed density of 749 dwellings to 3012 dwellings has been the most opposed feature of this proposal from all community members. The density limits outlined has been vocally described in community feedback as ‘horrendous’ and ‘unsustainable’. It is also understood that under certain circumstances an extra 10% floor space ratio can be granted, which would translate to an increase to 3300-3400 dwellings. There is significant concern that there is not sufficient detail provided as to how the Waterloo South proposal will provide necessary and vital infrastructure for the proposed population growth. This includes childcare centres, community service facilities, health services, schools and parking. The proposed “retail spaces” do not do enough to outline how this proposal will be able to service such a highly densely populated area and the needs of its residents.
- **Sell off and use of Public Crown Land to accommodate the private rental market**  
The proposed mix of 847 social housing properties, 227 affordable housing properties and 1938 private market housing is unacceptable given that this proposal is being built on Public Land. To dedicate such a large percentage of dwelling to the private housing market when it is well documented that Sydney is suffering through one of the worst housing affordability crisis is short sighted and socially irresponsible. This proposal’s commitment to put profits at its forefront will have enduring negative impacts, both socially and economically. Anything less than 50% of the proposed dwellings being dedicated to Social and Affordable housing would be unethical.

- **No commitment to building appropriately sized properties for Social Housing tenants**  
The lack of detail as to how many bedrooms and the floor space in the proposed dwellings is another area of concern. Throughout this whole consultation process and numerous meetings with LAHC, DPIE, City of Sydney Council and Communities Plus, it has been requested numerous times to obtain information about the size and number of bedrooms being built in the apartments. None of the parties involved in the planning process have been open and transparent about the types of dwellings that are being built, in particular for social housing dwellings. Currently there are a large number of 3 bedroom apartments for families living in social housing in the Waterloo South area. If these social housing properties are not replaced with like for like dwellings, and instead replaced with studio or one-bedroom apartments, it will essentially push out a large number of First Nations families from the development and take away their 'right to return'.
- **Lack of transparency and commitment regarding the 'Right to Return' policy from LAHC for Social Housing tenants**  
The 'right to return' commitment that was originally promised by LAHC lacks transparency and detail. There are no clear guidelines for residents moving out about whether they will need to meet certain eligibility criteria to return to the newly built Social Housing dwellings and what this eligibility criteria will be. There is also no timeframe outlined as to when current Social Housing residents would be given the opportunity to 'return'. This proposal is essentially destroying a diverse community with a rich cultural connection and history to the area. There have been vague promises made to various community groups about a 'Right to Return' with no genuine plan as to how this will be implemented.

The Waterloo South Proposal has an opportunity to revitalise an area and community that has long been neglected by successive governments. Unfortunately, it is clear from this proposal that there is a lack of respect for the existing community which will be sacrificed for the sake of short-term profits for the State Government and property developers. This is clearly demonstrated by the number of dwellings that is proposed for the private housing market.

We ask that you consider the long-term benefits of creating a built environment that is more inclusive and more equitable for not just the current community, but future generations who can offer valuable contributions to the Waterloo community, outside of 'financial' profits.

Thank you for taking the time to consider our submission

The Fact Tree Youth Service

If you would like further information you may contact:

Sharne Dunsmore  
CEO of The Fact Tree Youth Service  
703 Elizabeth St Waterloo, NSW, 2017  
[sharne@facttree.org.au](mailto:sharne@facttree.org.au)  
(02) 9319 2708

SUB-1665  
Michael Moore  
michael.moore@sydneycatholic.org  
Sydney



## CATHOLIC ARCHDIOCESE OF SYDNEY

29 April 2022

Mr Alan Bright  
Director, Planning Proposal Authority  
Planning & Assessment  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Mr Bright

### **Re: Waterloo Estate (South) Submission: PP-2021-3265**

This submission has been prepared by the Catholic Archdiocese of Sydney (**Archdiocese**) in relation to the above Planning Proposal.

This submission is in **support** of the wholesale renewal of the precinct, however seeks amendment to the scheme in response to the following key items:

- Previous engagements between LAHC and the Archdiocese have not been considered over the lengthy program of master planning and rezoning. Specific mention is made of previous discussions regarding the opportunity for co-location of community and education infrastructure in the precinct immediately proximate the Archdiocese lands.
- It is requested that due to the importance of this rezoning for our parish and school community, that the Archdiocese and Sydney Catholic Schools (**SCS**) are engaged in a more formal manner, rather than simply being considered in the same manner as any local resident or stakeholder.
- The Archdiocese would like to see the masterplan amended on the block adjacent to Mount Carmel whereby:
  - The tower elements are considered to the northern parts of the site to ensure that the built form considers the school activities contained therein.
  - Overshadowing to the public open spaces is minimised.
- The Archdiocese seek 15 min increment shadow analysis in order to adequately assess impact on the parish and school.
- The Archdiocese request that solar impact to the school is reduced such that key outdoor areas are not impacted outside of key school hours of 9am-5pm.
- The Archdiocese seek amendments to the scheme to moderate wind impacts from the tower, or request further analysis from wind consultants to support the proposed scheme.

- The Archdiocese request updated traffic analysis that considers the existing school movements and the impact of development upon same.
- The Archdiocese request that the heritage reporting adequately consider the impact of the proposed master plan on the heritage listed Our Lady of Mount Carmel Catholic Church and School buildings.
- The Archdiocese request that community infrastructure proposed in the masterplan be clustered around Mt Carmel and Waterloo Park to allow for greater synergy and sharing of resources between the community facilities.

The Archdiocese hereby declare that they have not made a political donation in the previous two years.

## 1. Introduction and Overview

### 1.1 The Site – Our Lady of Mount Carmel, Waterloo

Our Lady of Mount Carmel Parish and Primary School at 2-6 Kellick Street Waterloo is known legally as Lot 1, DP86295 (the Site). The site is approximately 7,660sqm and sits as part Mount Carmel Reserve.

It is currently a single stream primary school with roughly 90 students, however due to the considerable population growth in the precinct, the Parish, Archdiocese & SCS have undertaken initial architectural reviews to grow the school to include a 1,200-student secondary school for SCS.

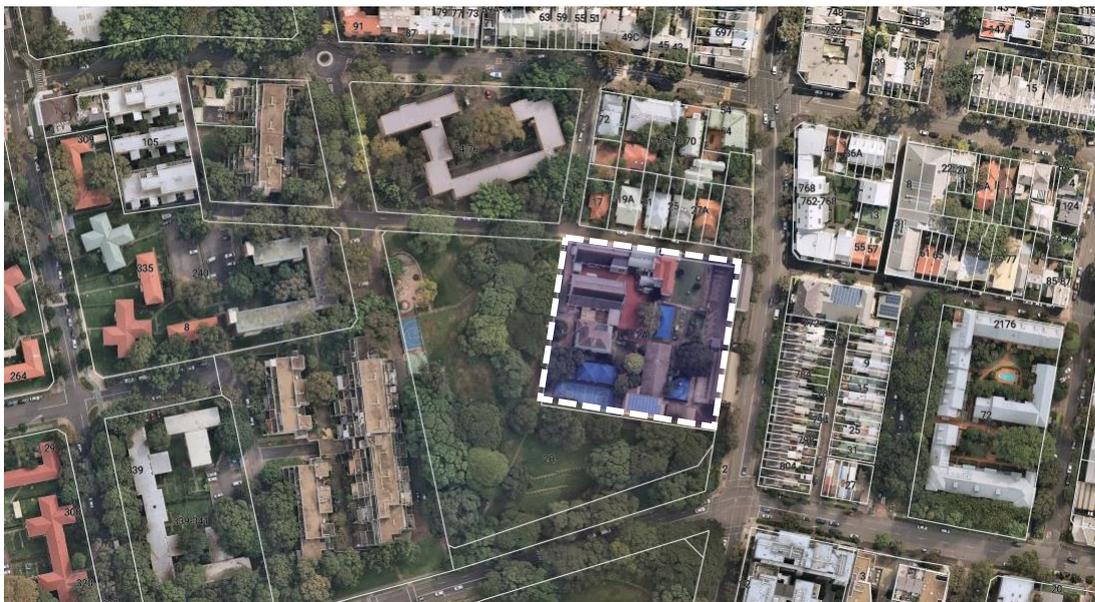


Figure 1: Site location

There are a number of community facilities nearby which are synergistic with the school use as shown in Figure 2 below. This, in addition to the significant renewal of the area, provides impetus for the intensification of schools and other infrastructure to leverage off opportunities for co-location of community services.

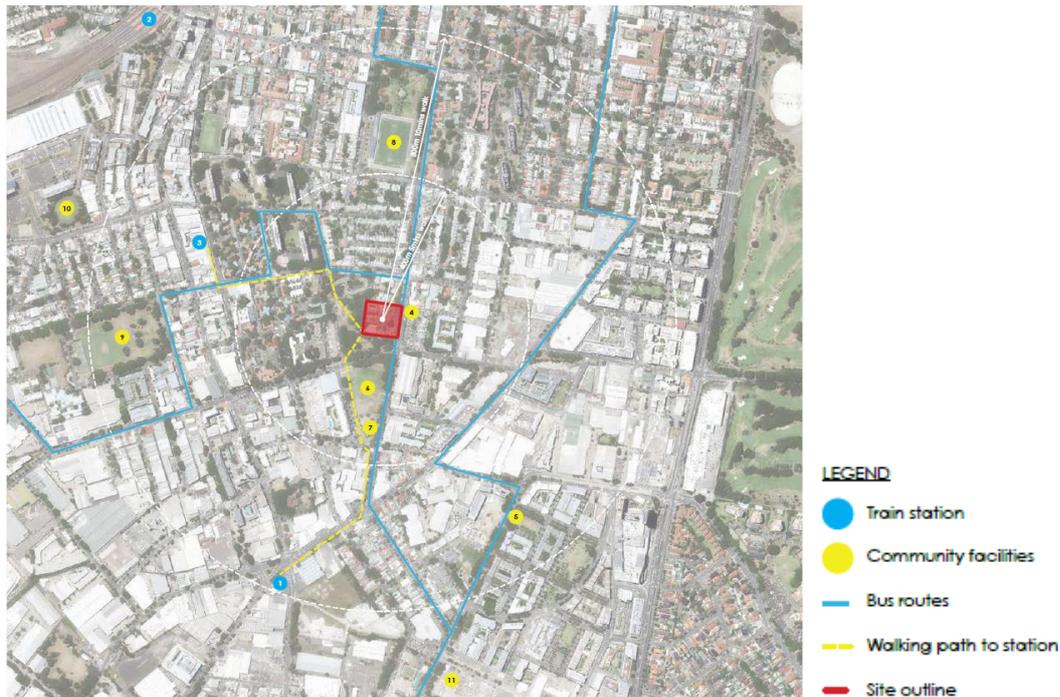


Figure 2: Proximate community and other infrastructure

Connectedness to public transport is important in the context of a secondary school. The subject site is well connected located within a 10 minute walking distance to the new Waterloo Metro Station & Green Square Station, and 15 minutes to Redfern Station.

## 1.2 The Archdiocese, Parish and School

The Archdiocese consists of 135 parishes and more than 150 schools. The Archdiocese is involved in many different agencies within Sydney to provide services, care and support to people in need, including aged care; education; health care; prayer, worship and liturgy; solidarity and justice; vocations and seminary; youth and young adults ministry.

The Catholic Parish of Sydney City South was formed through the merger of the Redfern Parish with Rosebery and Waterloo. The new Catholic Parish of Sydney City South comprises St Joseph in Rosebery, Our Lady of Mount Carmel in Waterloo, and St Vincent de Paul in Redfern with Fr Paul Smithers as the parish priest.

The Legislative Assembly donated one acre of land to the Catholic Church in 1858 and the foundation stone for the church was laid by Archbishop Polding on 15 August 1859. The story goes that Archbishop Polding's ship was caught in a storm off Freemantle. It was so severe that he thought he would die. He made a vow to Our Lady of Mount Carmel that he would build a church on the highest hill he could find and dedicate it in her honour. There is significance therefore to the location, visibility and elevation of the church atop the hill.



**THE CHURCH OF OUR LADY OF MOUNT CARMEL.**

Perhaps no more beautiful and commanding a site upon which to build a house for the worship of the Most High God can be found in the whole world than that upon which the Church of our Lady of Mount Carmel has been erected at Waterloo, near this city. The Church is built upon one of the highest hills upon what is called the Mount Lachlan Estate, but which is now incorporated with the Municipality of Waterloo; and the ground upon which it stands, being an area of rather more than an acre, was generously given for the purpose by Sir Daniel Cooper, Knt., late Speaker of the Legislative Assembly. An additional acre has been leased from Sir Daniel for a period of 10 years, with the option of purchasing the fee simple at any time during that period; so that the whole area comprises upwards of two acres, which will be tastefully laid out as an ornamental garden by Mr. Guilfoyle of Double Bay, who has most generously offered his invaluable services for this purpose. The view from the doors of the Church is a most extensive one, embracing a large portion of the city of Sydney, the North Shore, South Head, Waverley, Coogee, Botany Bay, Cook's River, George's River, Newtown, and the neighbouring country, together with the Illawarra Range and the Blue Mountains in the far distance.

Figure 3: Early view to Mount Carmel Church & newspaper article reporting the building of the church

In terms of current heritage on site, the site includes a lineage of buildings, the oldest being the Church (1859.) Our Lady of Mount Carmel Waterloo is State Heritage Listed. The property is listed as a heritage item in the Sydney Local Environmental Plan 2012 and is also within the Waterloo Conservation Area.

There has been continuous education at the site since 1876. Today, Mt Carmel Primary School supports around 90 students, with a high proportion of Indigenous students. The NAPLAN results from the school are the highest in the country for Indigenous students. Mt Carmel is has a number of locally significant heritage buildings and sits within a conservation zone.

The church is currently being restored by the parish as part of the ongoing custodianship of the site and conservation of its heritage items. The site is only growing in cultural significance with Eileen O'Connor, a former resident of the site, on the path to Canonization as Australia's second Saint.

The following grading of significance relative to this site has been taken from the Outline Heritage Assessment and Conservation Strategy prepared by John Oultram Heritage & Design.



Figure 4: Heritage Significance analysis

It is noted the area is a heritage conservation zone according to the Sydney LEP and includes the Waterloo Park & Oval including grounds and landscaping (Local Item I2079).

## 2. Social Infrastructure in the Precinct

### 2.1 LAHC Engagement

The Archdiocese has engaged with LAHC in the formulative processes of the subject masterplan and accompanying rezoning. Key meetings include:

- **24 March 2022:** Fr Paul Smithers, Parish Priest and Rector, Shrine of Our Lady of Mt Carmel met with LAHC representatives, key items discussed included:
  - This concept was a result of combination of NSW Government and the City of Sydney proposals. Previous discussions between the Archdiocese and LAHC regarding a proposed community cluster around Waterloo Park appear to have been lost.
  - In regards to the location of the tower closest the school, its location was considered best because of the solar impact on the surrounding LAHC buildings, pushing impacts onto Mt Carmel at its expense.

- The heritage report for the proposal does not have regard to the Mt Carmel site nor does it take into consideration the impact on the church, convent, school or presbytery – all of which are heritage items.
- Concern that no improvements were considered for Waterloo Park.
- Pitt Street is opening up to traffic onto McEvoy Street and no consideration was given to the presence of the school and traffic management.
- Wind mitigation: no comment was made by LAHC about wind mitigation.
- **21 April 2022:** Fr Paul Smithers and James Bichard, the Archdiocese's Director of Property and Infrastructure, met with two representatives from DPE.
  - The DPE representatives were keen to see the school and understand overshadowing and overlooking concerns from the tower onto outdoor gathering spaces.
  - It was a windy day (cold Southerly) and concerns around additional wind impacts from the new 27 storey tower with zero setbacks were outlined.
  - The recent heritage conservation of the church was noted.
  - The front of the site (corner of Gibson and Kellick Streets) as a gathering space for parishioners before and after mass, and school parents at pick up and drop off was discussed. Downdraft from the new tower without setbacks would make this important community gathering space an unpleasant place to linger.

## 2.2 NSW Department of Education Engagement

It is a statutory requirement for LAHC and other Government Agencies to formally engage with the NSW Department of Education, however there is no formal requirement for broader school provider engagement as part of any masterplan / rezoning process. This is despite the non-government school sector making up over 60% of all school enrolments.

The non-government school sector is made up of organisations including the Association of Independent Schools NSW and Catholic Schools NSW.

The Department of Education have informed LAHC that there is no demand for additional public school enrolments within the masterplan area due to the expansion of their Alexandria Park school nearby. The demand from population growth in the Estate in non-government schools (60% of total education supply) has not been addressed in the masterplan.

There is concern that despite the load that the non-government school sector carries in terms of enrolments, there is no formal engagement process. It is requested that due to the importance of this rezoning for the local community, that the Archdiocese and SCS are engaged in a more formal manner, rather than simply being considered in the same manner as any local resident or stakeholder.

### 2.3 Mt Carmel Secondary School Study

Recognising the growing need for education infrastructure in the region, Sydney Catholic Schools engaged Neeson Murcutt Neille Architects to test the block planning of a 1,200 student secondary school at Our Lady of Mount Carmel in Waterloo, and expansion of the primary school from 210 to 630 places (from one to three streams).

This work followed a feasibility study (2016) aimed at increasing the Catholic educational offering in the southern Sydney area, across all age groups to accommodate the dramatic increase in local population that is expected.

The options considered:

- Over 11,000sqm of additional educational buildings;
- Adaptive re-use and refurbishment of over 1,400sqm of existing buildings including heritage items;
- Celebrating Our Lady of Mount Carmel Church as the centre of the parish and education precinct;
- 2,800sqm of semi-basement car parking;
- Community outreach services and a café overlooking Waterloo Park.

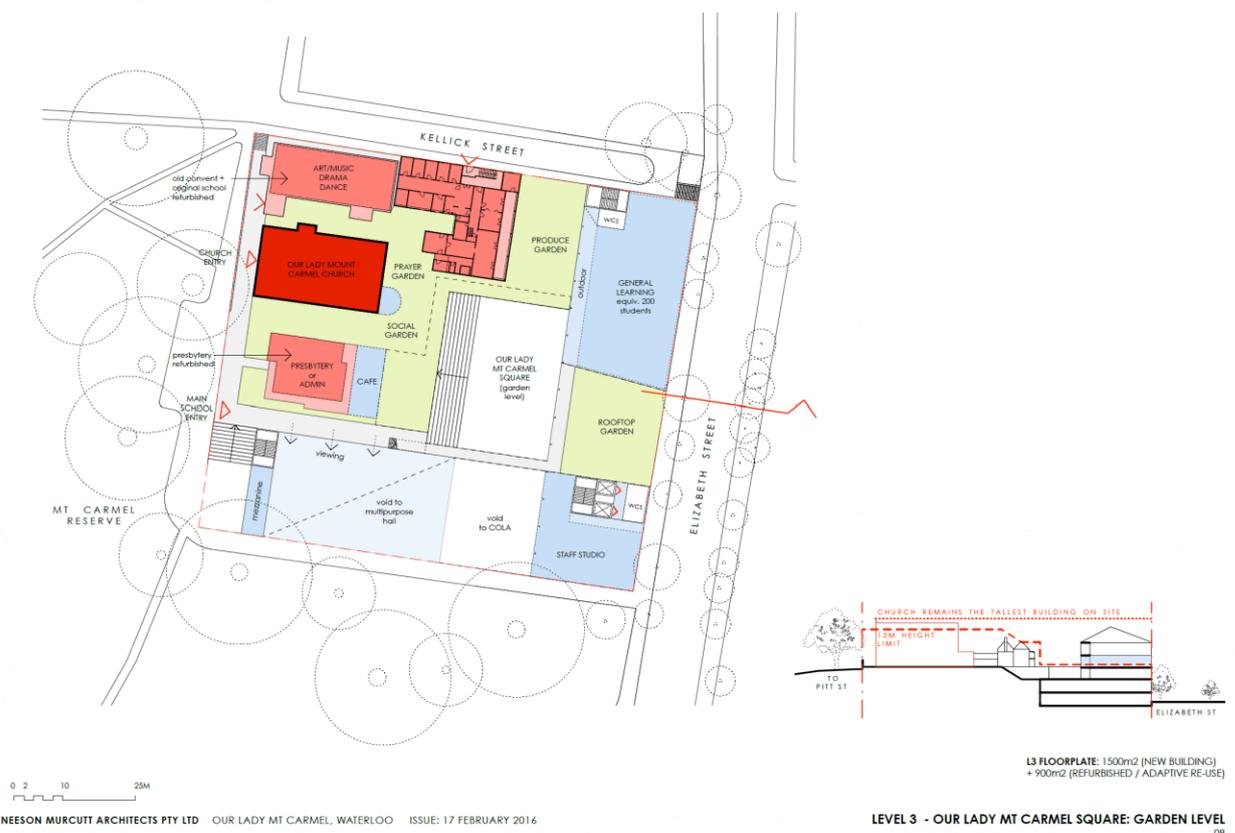


Figure 5: Redevelopment Option: Mt Carmel Secondary School Study – Level 3

Sydney Catholic Schools has been waiting for the exhibition of the masterplan and program for the delivery of the renewal of the Waterloo Estate before progressing the school masterplan and renewal in conjunction with the parish and Archdiocese.

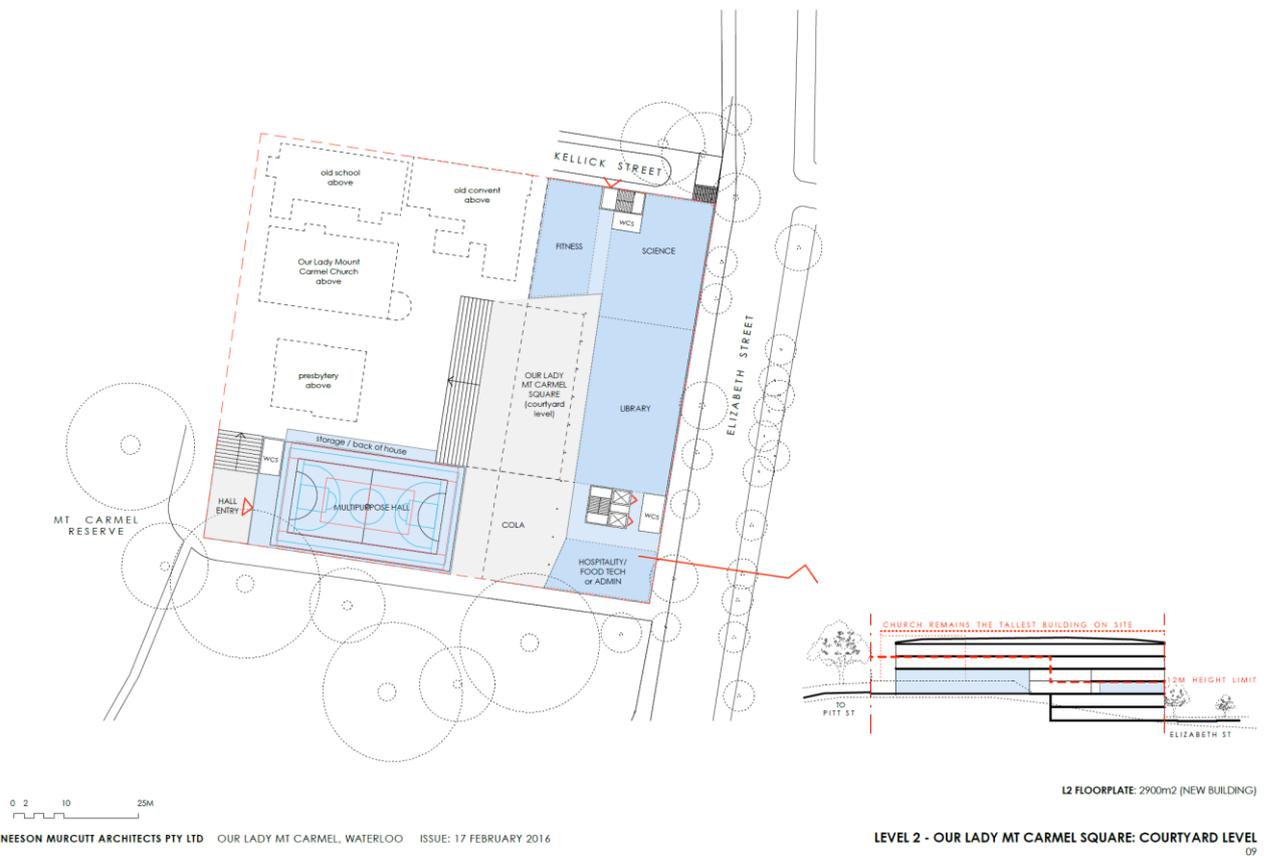


Figure 6: Redevelopment Option: Mt Carmel Secondary School Study – Level 2

### 3. Key Issues

The key issues raised in this submission have been detailed in the below.

#### 3.1 Tower element

The block adjacent to Mt Carmel includes a built form that proposes up to 34m with a 126m tower element to the southern eastern part of the site. The proposed Height of Building Map is provided in Figure 5.



Figure 5: Proposed LEP HOB control

The Waterloo Estate (South): Design Guide 2021 (Draft) then provides finer grain detail to the proposed building heights, as per the below Figure 6. The critical element is the 27 storey tower element immediately north of the park and northwest of the school.



Figure 6: Draft Design Guide Height in Storeys

Building height of this scale can often create detrimental impacts on the surrounding land uses such as a reduction in solar access, and an increase in overshadowing. This is discussed further in the sections below, however key issues in regard to the tower elements are:

- The visual impact of such significant massing immediately adjacent the school.
- The location this density on Kellick Street, and subsequent increased residential density, is located distant to the main driver for this density – being the new Metro Station. There is little basis for the level of density proposed at this location.
- The tower will all overlook the existing school which is an unsuitable outcome in terms of privacy for students.

Importantly, no analysis of alternatives has been provided demonstrating how massing or tower locations can be reconfigured. All options presented in Section 4.1 of the Urban Design Review place significant massing on the corner of Kellick Street and Gibson Street rather than, say, along Wellington Street or Pitt Street within the same block.

### **Suggested amendment:**

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- The tower elements are considered to the northern parts of the site to ensure that the built form considers the school activities contained therein.
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The placement of massing and built form along Kellick Street presents a major issue with regards to solar access. Relevant controls for solar access on neighbouring properties are founding in the City of Sydney DCP 2012 Section 4.1.3:

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Further, the draft Design Guide nominates the following as it relates to solar impact:

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We are of the opinion that the proposed master plan fails its own objectives through the resultant excessive overshadowing of the school and public open space areas (Waterloo Park). This results in an unacceptable impact on the school as well as the open space which is an important amenity for the school and its users.

Shadow analysis shows impact on the school during the winter solstice from approx. 12.30 – 5pm which includes parts of lunchtime and then out of school hours play and care time until 6pm weekdays. This has not been addressed adequately in any of the reporting or environmental assessment.

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Further, the Arup report does not support the proposal, which states:

“The preferred location of the additional tower on Kellick Street to the north-east of the site, Figure 2, is not ideally located from a wind perspective.”

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“Safe access to these destinations is an important component of the Waterloo Precinct given the number of pedestrians using these facilities. The trips generated by these pedestrians may also involve crossing roads that carry high traffic volumes and freight trips such as Botany Road and McEvoy Street.”

Notwithstanding this, there is no acknowledgement of the specific traffic and transport requirements of the school, nor provisions made to mitigate the impact of over 3,000 dwellings and allied land uses on the ongoing operation of the school and the safety of its students. Specifically, there are key entries from Mt Carmel Reserve immediately south of the proposed development that have not been considered in the traffic and transport advice.

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Additionally, no consideration has been made towards the traffic characteristics of the school which includes an increase of traffic movements during the AM and PM drop off/pickup. Our Lady of Mt Carmel Catholic Primary should not be further disadvantaged due to the planning proposal and its lack of consideration for the school’s operations.

**Suggested amendment:**

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'Our Lady of Mt Carmel School and Church' is of local heritage significance and listed as item I2088 under the City of Sydney LEP, it sits adjacent the Waterloo Park and Oval, also a locally listed item. Both items sit within a Heritage Conservation Area.

The Addendum Heritage Impact Statement prepared by Artefact and original Heritage Impact Statement by Urbis limits the scope of the impact to the visual impact created by the planning proposal. As detailed in the statement of significance, Mt Carmel's significance is also known for its social, cultural, religious and educational uses. No assessment towards the impact of these uses have been provided.

The Planning Proposal lists, as part of the Built Form Objectives "*Building height and form will respond to the hierarchy of streets and open spaces and to key view corridors both over and within the locality. New development will also respond appropriately to the form and setting of heritage items in the neighbourhood.*" We are of the opinion that the current suite of documents has failed to demonstrate adequately how it has responded to these objectives.

It is considered that the impact of the building massing and height, including future shadowing and wind impacts created by the planning proposal has not been adequately assessed and has the potential to affect the operation of the school and therefore its ability to provide educational and social uses without impact.

#### **Suggested amendment:**

- The Archdiocese request that the heritage reporting consider the impact of the proposed master plan on the listed Mt Carmel Church and School cluster of buildings.

### 3.4 Community infrastructure clustering

The planning proposal is seeking to deliver a wide range of community spaces with particular focus to place these uses along George Street.

As discussed in Section 2.1, representative of the Archdiocese had already met LAHC staff to discuss the potential to co-locate key community and education infrastructure in the part of the site closest the existing school.

Mt Carmel offers significant community uses through educational and religious services, as well as other allied and ancillary uses. The location of community uses along George Street would therefore not allow any form of co-location of activities and uses to best utilise these assets. It is recommended that other community uses are facilitated adjacent to Mt Carmel and Waterloo Park to allow for greater synergy between the uses and deliver greater levels of public benefit.

**Suggested amendment:**

- The Archdiocese request that community infrastructure proposed in the masterplan be clustered around Mt Carmel and Waterloo Park to allow for greater synergy and sharing of resources between the community facilities.

#### **4. Summary and Conclusion**

The Archdiocese welcomes the opportunity to meet with members of LAHC and the DPE to discuss the items contained within at your earliest convenience.

As discussed, the Archdiocese supports the renewal of the area, however, we hope to work with all stakeholders to ensure the best possible outcome for both the Archdiocese, the Parish and its School, and the incoming and existing Waterloo community.

Please contact James Bichard, Director of Property & Infrastructure on 0429 830 190 to organise a time to meet and discuss this submission.

Yours faithfully



**Michael Moore**

**Director of Finance,**

Attorney for the Trustees of the Roman Catholic Church for the Archdiocese of Sydney.

SUB-1666  
Julie Foreman  
juliefore@gmail.com  
Dulwich Hill

1. The proposal is 10% greater than figures provided to the community due to design excellence. However, the proposal does not test the 10% higher density to show how it might work
2. The density is just too high overall. And there is not sufficient attention to the social impacts of such density and support for community members living with disadvantage and low incomes
3. The proposal does not test if the proposed density is suitable for the priority allocations being made into the social housing properties in the Waterloo and inner city area.
4. A social impact assessment has not been conducted and it is critical that one is conducted. The impact on residents in the area with complex needs and living with disadvantage is significant. A social impact study must be conducted before determining the impact of the planning proposal.
5. There needs to be more social and affordable housing in the mix. It doesn't even meet LAHC own policy of 30% - the dwellings will only take up 26.5% of floor space. Given the crises in social housing there should be 50% social housing. The community should be getting greater value from this planning proposal. Increased social housing will pay dividends in savings in health, corrections and community services funding budgets over time.
6. More affordable and Aboriginal Housing is required in the proposal.
7. The impact on the existing vulnerable social housing community of Waterloo is significant and better consultation and decision-making processes with the community should be included in processes going forward. Fully funded community development, social policy and tenant advocacy positions should be made available and hosted in an independent community organisation

SUB-1667  
Robert Pulie  
robert.pulie@gmail.com  
Chippendale

The Waterloo Estate is currently in public hands, providing housing for those who are unable to afford private homes. Housing in Sydney is massively inflated due to federal legislation that promotes it as a financial asset rather than a need for all citizens. The NSW Government has not provided adequate public housing to accommodate the increasing number of people who cannot afford to buy or rent in such an inflated market. Selling off public assets to private developers and displacing hundreds of tenants will only exacerbate this problem. The Waterloo Estate should be kept in public ownership and improved for the existing tenants and to accommodate more of those currently waiting years, if not decades for a home.

Any development should not exceed 6 stories to allow for enough open space, light, vegetation and wildlife for the number of residents to be accommodated and to enable social connections between households, fostering a sense of community. Facilities for childcare and community activities and events must also be included.

SUB-1668  
Paul Smithers  
pp@citysouthcatholic.org.au  
Waterloo



29 April 2022

Mr Alan Bright  
Director, Planning Proposal Authority  
Planning & Assessment  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Mr Bright

**Re: Waterloo Estate (South) Submission: PP-2021-3265**

This submission has been prepared by the Catholic Archdiocese of Sydney (**Archdiocese**) and endorsed by the Parish of Sydney City South (Parish) in relation to the above Planning Proposal.

This submission is in **support** of the wholesale renewal of the precinct, however seeks amendment to the scheme in response to the following key items:

- Previous engagements between LAHC and the Archdiocese have not been considered over the lengthy program of master planning and rezoning. Specific mention is made of previous discussions regarding the opportunity for co-location of community and education infrastructure in the precinct immediately proximate the Archdiocese lands.
- It is requested that due to the importance of this rezoning for our parish and school community, that the Archdiocese and Sydney Catholic Schools (**SCS**) are engaged in a more formal manner, rather than simply being considered in the same manner as any local resident or stakeholder.
- The Archdiocese would like to see the masterplan amended on the block adjacent to Mount Carmel whereby:
  - The tower elements are considered to the northern parts of the site to ensure that the built form considers the school activities contained therein.
  - Overshadowing to the public open spaces is minimised.
- The Archdiocese seek 15 min increment shadow analysis in order to adequately assess impact on the parish and school.
- The Archdiocese request that solar impact to the school is reduced such that key outdoor areas are not impacted outside of key school hours of 9am-5pm.

- The Archdiocese seek amendments to the scheme to moderate wind impacts from the tower, or request further analysis from wind consultants to support the proposed scheme.
- The Archdiocese request updated traffic analysis that considers the existing school movements and the impact of development upon same.
- The Archdiocese request that the heritage reporting adequately consider the impact of the proposed master plan on the heritage listed Our Lady of Mount Carmel Catholic Church and School buildings.
- The Archdiocese request that community infrastructure proposed in the masterplan be clustered around Mt Carmel and Waterloo Park to allow for greater synergy and sharing of resources between the community facilities.

The Archdiocese hereby declare that they have not made a political donation in the previous two years.

## 1. Introduction and Overview

### 1.1 The Site – Our Lady of Mount Carmel, Waterloo

Our Lady of Mount Carmel School at 2-6 Kellick Street Waterloo is known legally as Lot 1, DP86295 (the Site). The site is approximately 7,660sqm and sits as part Mount Carmel Reserve.

It is currently a single stream primary school with roughly 90 students, however due to the considerable population growth in the precinct, the Parish, Archdiocese & SCS have undertaken initial architectural reviews to grow the school to include a 1,200-student secondary school for SCS.

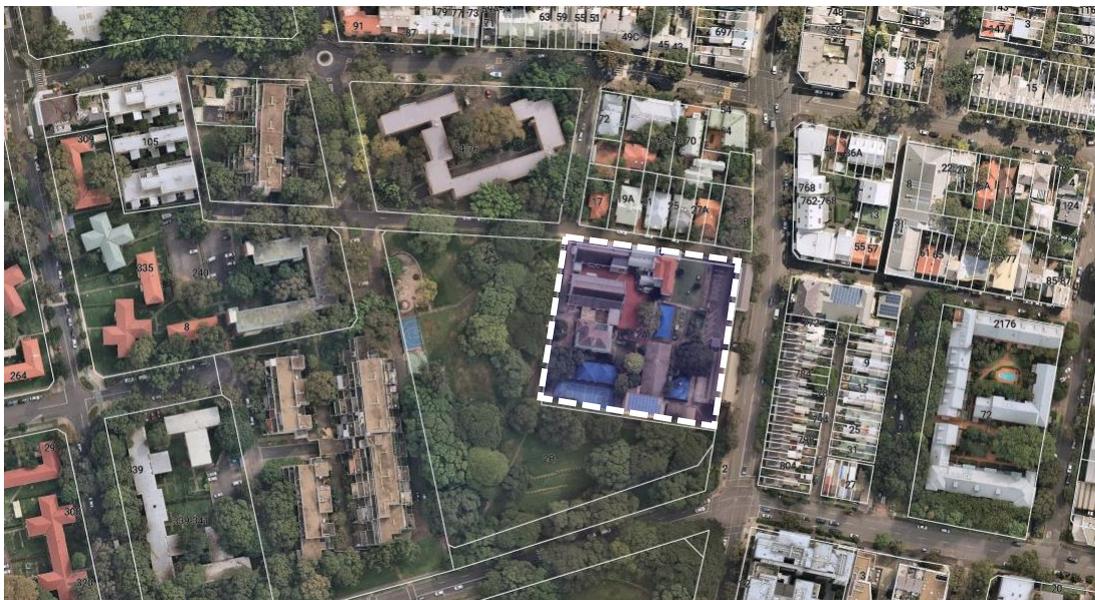


Figure 1: Site location

There are a number of community facilities nearby which are synergistic with the school use as shown in Figure 2 below. This, in addition to the significant renewal of the area, provides impetus for the intensification of schools and other infrastructure to leverage off opportunities for co-location of community services.

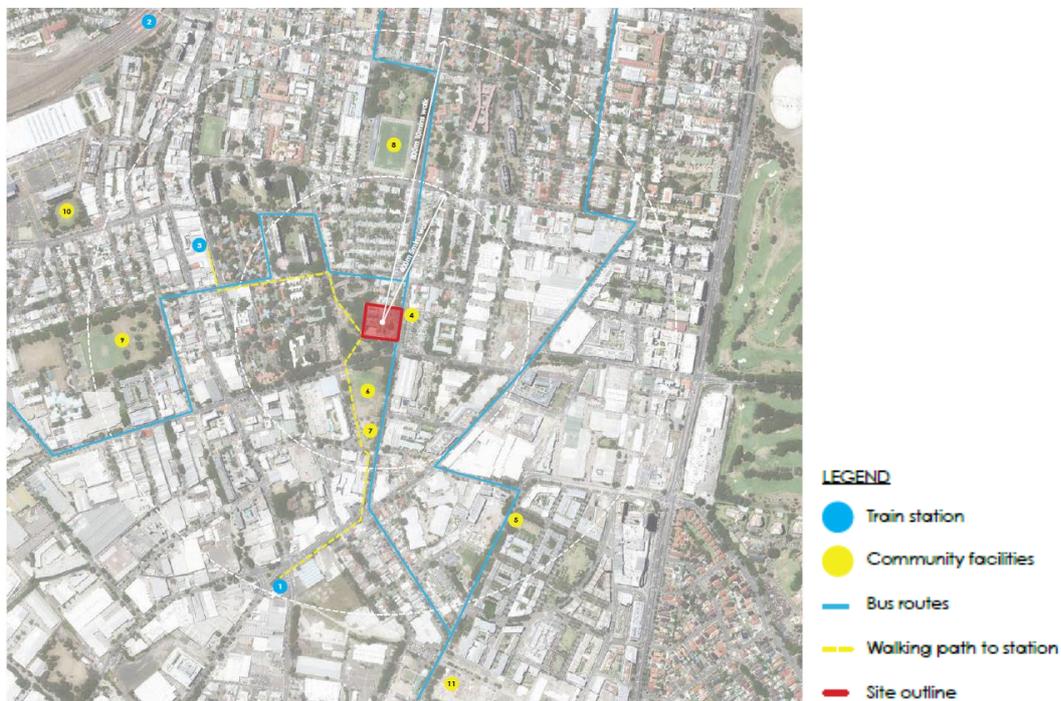


Figure 2: Proximate community and other infrastructure

Connectedness to public transport is important in the context of a secondary school. The subject site is well connected located within a 10 minute walking distance to the new Waterloo Metro Station & Green Square Station, and 15 minutes to Redfern Station.

## 1.2 The Archdiocese, Parish and School

The Archdiocese consists of 135 parishes and more than 150 schools. The Archdiocese is involved in many different agencies within Sydney to provide services, care and support to people in need, including aged care; education; health care; prayer, worship and liturgy; solidarity and justice; vocations and seminary; youth and young adults ministry.

The Catholic Parish of Sydney City South was formed through the merger of the Redfern Parish with Rosebery and Waterloo. The new Catholic Parish of Sydney City South comprises St Joseph in Rosebery, Our Lady of Mount Carmel in Waterloo, and St Vincent de Paul in Redfern with Fr Paul Smithers as the parish priest.

The Legislative Assembly donated one acre of land to the Catholic Church in 1858 and the foundation stone for the church was laid by Archbishop Polding on 15 August 1859. The story goes that Archbishop Polding's ship was caught in a

storm off Freemantle. It was so severe that he thought he would die. He made a vow to Our Lady of Mount Carmel that he would build a church on the highest hill he could find and dedicate it in her honour. There is significance therefore to the location, visibility and elevation of the church atop the hill.



**THE CHURCH OF OUR LADY OF MOUNT CARMEL.**

Perhaps no more beautiful and commanding a site upon which to build a house for the worship of the Most High God can be found in the whole world than that upon which the Church of our Lady of Mount Carmel has been erected at Waterloo, near this city. The Church is built upon one of the highest hills upon what is called the Mount Lachlan Estate, but which is now incorporated with the Municipality of Waterloo; and the ground upon which it stands, being an area of rather more than an acre, was generously given for the purpose by Sir Daniel Cooper, Knt., late Speaker of the Legislative Assembly. An additional acre has been leased from Sir Daniel for a period of 10 years, with the option of purchasing the fee simple at any time during that period; so that the whole area comprises upwards of two acres, which will be tastefully laid out as an ornamental garden by Mr. Guilfoyle of Double Bay, who has most generously offered his invaluable services for this purpose. The view from the doors of the Church is a most extensive one, embracing a large portion of the city of Sydney, the North Shore, South Head, Waverley, Coogee, Botany Bay, Cook's River, George's River, Newtown, and the neighbouring country, together with the Illawarra Range and the Blue Mountains in the far distance.

Figure 3: Early view to Mount Carmel Church & newspaper article reporting the building of the church

In terms of current heritage on site, the site includes a lineage of buildings, the oldest being the Church (1859.) Our Lady of Mount Carmel Waterloo is State Heritage Listed. The property is listed as a heritage item in the Sydney Local Environmental Plan 2012 and is also within the Waterloo Conservation Area.

There has been continuous education at the site since 1876. Today, Mt Carmel Primary School supports around 90 students, with a high proportion of Indigenous students. The NAPLAN results from the school are the highest in the country for Indigenous students. Mt Carmel is has a number of locally significant heritage buildings and sits within a conservation zone.

The church is currently being restored by the parish as part of the ongoing custodianship of the site and conservation of its heritage items. The site is only growing in cultural significance with Eileen O'Connor, a former resident of the site, on the path to Canonization as Australia's second Saint.

The following grading of significance relative to this site has been taken from the Outline Heritage Assessment and Conservation Strategy prepared by John Oultram Heritage & Design.



It is noted the area is a heritage conservation zone according to the Sydney LEP and includes the Waterloo Park & Oval including grounds and landscaping (Local Item I2079).

## 2. Social Infrastructure in the Precinct

### 2.1 LAHC Engagement

The Archdiocese has engaged with LAHC in the formulative processes of the subject masterplan and accompanying rezoning. Key meetings include:

- **24 March 2022:** Fr Paul Smithers, Parish Priest and Rector, Shrine of Our Lady of Mt Carmel met with LAHC representatives, key items discussed included:
  - This concept was a result of combination of NSW Government and the City of Sydney proposals. Previous discussions between the Archdiocese and

LAHC regarding a proposed community cluster around Waterloo Park appear to have been lost.

- In regards to the location of the tower closest the school, its location was considered best because of the solar impact on the surrounding LAHC buildings, pushing impacts onto Mt Carmel at its expense.
- The heritage report for the proposal does not have regard to the Mt Carmel site nor does it take into consideration the impact on the church, convent, school or presbytery – all of which are heritage items.
- Concern that no improvements were considered for Waterloo Park.
- Pitt Street is opening up to traffic onto McEvoy Street and no consideration was given to the presence of the school and traffic management.
- Wind mitigation: no comment was made by LAHC about wind mitigation.
- **21 April 2022:** Fr Paul Smithers and James Bichard, the Archdiocese's Director of Property and Infrastructure, met with two representatives from DPE.
  - The DPE representatives were keen to see the school and understand overshadowing and overlooking concerns from the tower onto outdoor gathering spaces.
  - It was a windy day (cold Southerly) and concerns around additional wind impacts from the new 27 storey tower with zero setbacks were outlined.
  - The recent heritage conservation of the church was noted.
  - The front of the site (corner of Gibson and Kellick Streets) as a gathering space for parishioners before and after mass, and school parents at pick up and drop off was discussed. Downdraft from the new tower without setbacks would make this important community gathering space an unpleasant place to linger.

## **2.2 NSW Department of Education Engagement**

It is a statutory requirement for LAHC and other Government Agencies to formally engage with the NSW Department of Education, however there is no formal requirement for broader school provider engagement as part of any masterplan / rezoning process. This is despite the non-government school sector making up over 60% of all school enrolments.

The non-government school sector is made up of organisations including the Association of Independent Schools NSW and Catholic Schools NSW.

The Department of Education have informed LAHC that there is no demand for additional public school enrolments within the masterplan area due to the expansion of their Alexandria Park school nearby. The demand from population growth in the Estate in non-government schools (60% of total education supply) has not been addressed in the masterplan.

There is concern that despite the load that the non-government school sector carries in terms of enrolments, there is no formal engagement process. It is requested that due to the importance of this rezoning for the local community, that the Archdiocese and SCS are engaged in a more formal manner, rather than simply being considered in the same manner as any local resident or stakeholder.

### **2.3 Mt Carmel Secondary School Study**

Recognising the growing need for education infrastructure in the region, Sydney Catholic Schools engaged Neeson Murcutt Neille Architects to test the block planning of a 1,200 student secondary school at Our Lady of Mount Carmel in Waterloo, and expansion of the primary school from 210 to 630 places (from one to three streams).

This work followed a feasibility study (2016) aimed at increasing the Catholic educational offering in the southern Sydney area, across all age groups to accommodate the dramatic increase in local population that is expected.

The options considered:

- Over 11,000sqm of additional educational buildings;
- Adaptive re-use and refurbishment of over 1,400sqm of existing buildings including heritage items;
- Celebrating Our Lady of Mount Carmel Church as the centre of the parish and education precinct;
- 2,800sqm of semi-basement car parking;
- Community outreach services and a café overlooking Waterloo Park.

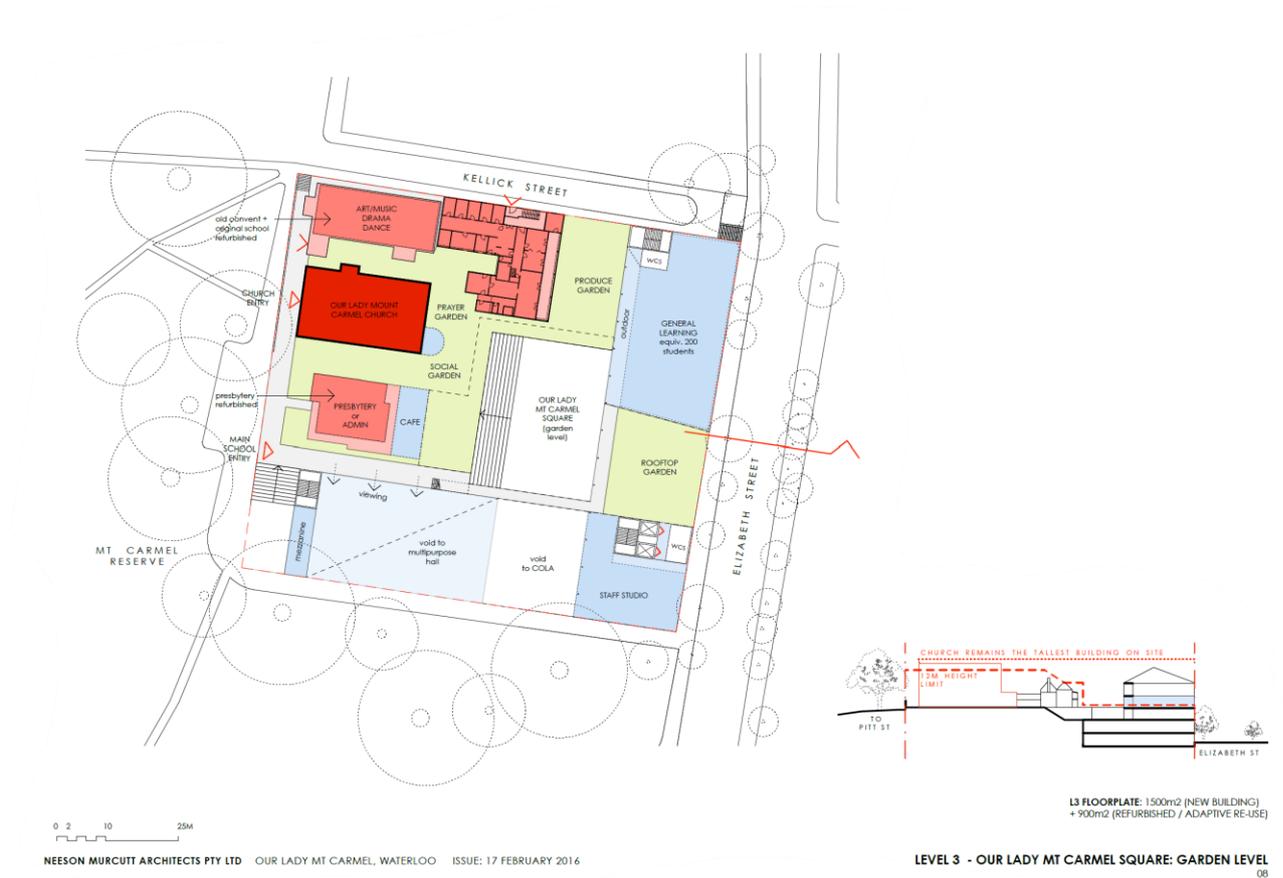


Figure 5: Redevelopment Option: Mt Carmel Secondary School Study – Level 3

Sydney Catholic Schools has been waiting for the exhibition of the masterplan and program for the delivery of the renewal of the Waterloo Estate before progressing the school masterplan and renewal in conjunction with the parish and Archdiocese.

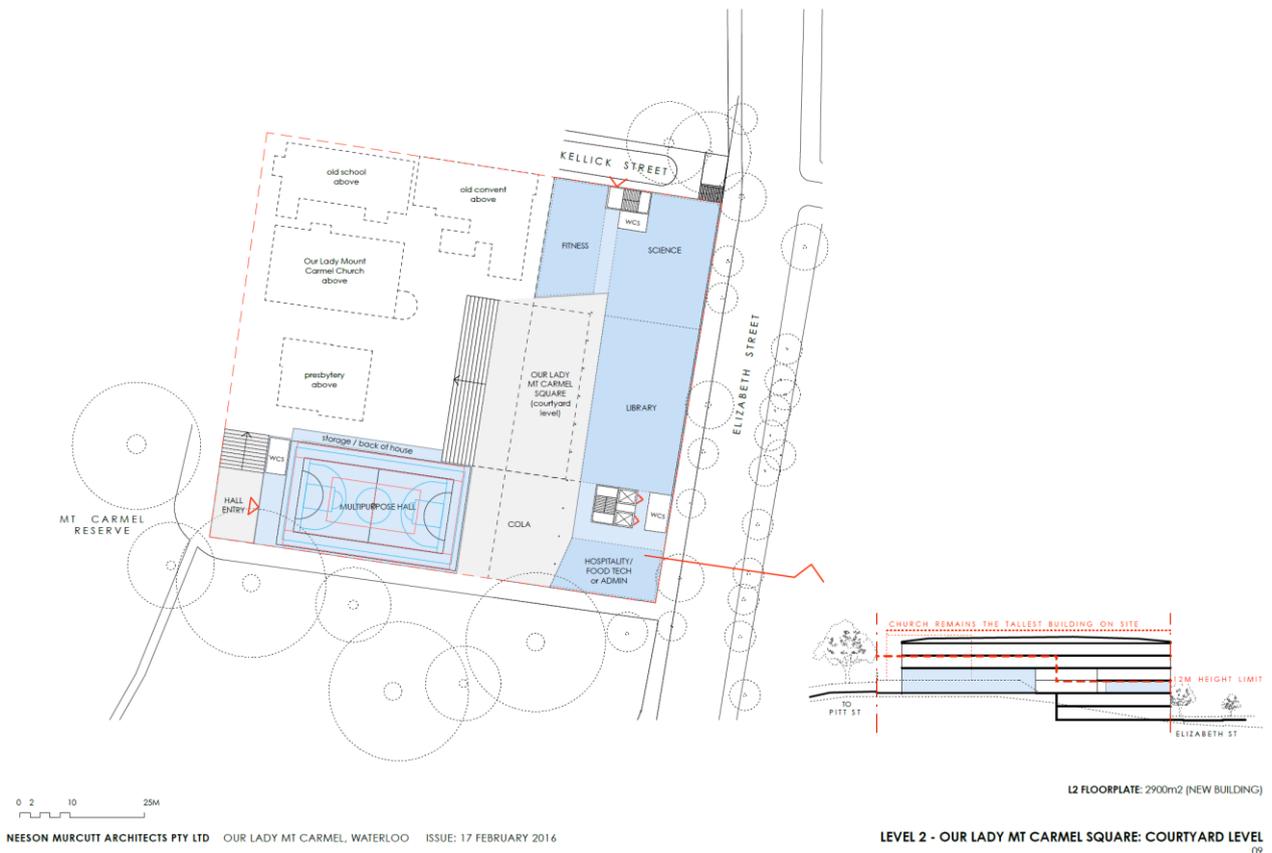


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'Our Lady of Mt Carmel School and Church' is of local heritage significance and listed as item I2088 under the City of Sydney LEP, it sits adjacent the Waterloo Park and Oval, also a locally listed item. Both items sit within a Heritage Conservation Area.

The Addendum Heritage Impact Statement prepared by Artefact and original Heritage Impact Statement by Urbis limits the scope of the impact to the visual impact created by the planning proposal. As detailed in the statement of significance, Mt Carmel's significance is also known for its social, cultural, religious and educational uses. No assessment towards the impact of these uses have been provided.

The Planning Proposal lists, as part of the Built Form Objectives "*Building height and form will respond to the hierarchy of streets and open spaces and to key view corridors both over and within the locality. New development will also respond appropriately to the form and setting of heritage items in the neighbourhood.*" We are of the opinion that the current suite of documents has failed to demonstrate adequately how it has responded to these objectives.

It is considered that the impact of the building massing and height, including future shadowing and wind impacts created by the planning proposal has not been adequately assessed and has the potential to affect the operation of the school and therefore its ability to provide educational and social uses without impact.

#### **Suggested amendment:**

- The Archdiocese request that the heritage reporting consider the impact of the proposed master plan on the listed Mt Carmel Church and School cluster of buildings.

### 3.4 Community infrastructure clustering

The planning proposal is seeking to deliver a wide range of community spaces with particular focus to place these uses along George Street.

As discussed in Section 2.1, representative of the Archdiocese had already met LAHC staff to discuss the potential to co-locate key community and education infrastructure in the part of the site closest the existing school.

Mt Carmel offers significant community uses through educational and religious services, as well as other allied and ancillary uses. The location of community uses along George Street would therefore not allow any form of co-location of activities and uses to best utilise these assets. It is recommended that other community uses are facilitated adjacent to Mt Carmel and Waterloo Park to allow for greater synergy between the uses and deliver greater levels of public benefit.

**Suggested amendment:**

- The Archdiocese request that community infrastructure proposed in the masterplan be clustered around Mt Carmel and Waterloo Park to allow for greater synergy and sharing of resources between the community facilities.

#### **4. Summary and Conclusion**

Myself and the Archdiocese would welcome the opportunity to meet with members of LAHC and the DPE to discuss the items contained within at your earliest convenience.

As discussed, the Parish and Archdiocese supports the renewal of the area, however, we hope to work with all stakeholders to ensure the best possible outcome for both the Archdiocese, the Parish and its School, and the incoming and existing Waterloo community.

Please contact James Bichard, Director of Property & Infrastructure on 0429 830 190 to organise a time to meet and discuss this submission.

Yours faithfully



**Rev Fr Paul Smithers**

Parish Priest &

Rector, Shrine of Our Lady of Mt Carmel, Waterloo

[pp@citysouthcatholic.org.au](mailto:pp@citysouthcatholic.org.au)

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SUB-1669  
Ned Cooke  
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Redfern

# Inner Sydney Tenants' Advice & Advocacy Service

Tenancy Advice (02) 9698 5975



29 April 2022

NSW Department of Planning and Environment

By upload: <https://pp.planningportal.nsw.gov.au/ppr/under-exhibition/waterloo-estate-south>

Thank you for the opportunity to provide comment on the Waterloo Estate (South) Planning Proposal. Please find attached our submissions on the Planning Proposal.

We would welcome the opportunity to meet with you to discuss our submission. To facilitate this, please contact Ned Cooke via [ned@rlc.org.au](mailto:ned@rlc.org.au)

Yours faithfully,

Katherine McKernan  
CEO  
Redfern Legal Centre

Ned Cooke  
Team Leader  
Redfern Legal Centre

# Inner Sydney Tenants' Advice & Advocacy Service

*Tenancy Advice (02) 9698 5975*

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SUBMISSION: WATERLOO ESTATE (SOUTH) PLANNING PROPOSAL

AUTHOR: Ned Cooke, Inner Sydney Tenancy Service Team Leader

DATE: 29 April 2022

## **1. Introduction: Redfern Legal Centre**

Redfern Legal Centre (RLC) is an independent, non-profit, community-based legal organisation with a prominent profile in the Redfern and Waterloo area. RLC has a particular focus on human rights and social justice. Our specialist areas of work are tenancy, consumer law, credit and debt, financial abuse, employment law and police and government accountability. By working collaboratively with key partners, RLC specialist lawyers and advocates provide free legal advice, conduct casework, deliver community legal education and produce publications and submissions. RLC works towards reforming our legal system for the benefit of the community.

## **2. RLC's work in tenancy**

RLC has a long history of providing advice, assistance and advocacy to the local community, with a key focus on the provision of information and services to public housing tenants and a strong emphasis on the prevention of homelessness. Since RLC was founded in 1977, tenancy has been one of our core areas of advice. Since 1995, RLC has been funded by NSW Fair Trading to run the Inner Sydney Tenants' Advice and Advocacy Service ('ISTAAS'). ISTAAS assists tenants living in the City of Sydney, Randwick, Inner West and Bayside local government areas through the provision of advice, advocacy and representation.

The Inner Sydney area has a significant number of people living in public housing and these tenants make up approximately 30% of all people advised by our practice. We are keenly aware of the issues faced by tenants facing relocation and redevelopment through our work providing City of Sydney funded tenants' advice services for tenants of the Millers Point relocations and Waterloo redevelopment.

Our submission is informed by the experiences of our clients, many of whom will be impacted by the proposed Waterloo Estate (South) redevelopment.

## **3. Executive Summary**

The proposal to upgrade and improve social housing stock in Inner City Sydney is welcomed. Every day our tenancy team speaks with tenants living in ageing, poorly maintained public housing with chronic maintenance issues. However, there is an opportunity for the proposed redevelopment to better meet the needs of existing social housing tenants and to enhance the delivery of social housing within Inner City Sydney.

On review of the proposal it is recommended that it:

1. Include an increased allocation of social, affordable, and Aboriginal housing on the site.

2. Meet the current and future housing needs of social housing tenants in terms of density, universal design and dwelling size and configuration through undertaking and implementing a Social Impact Assessment.
3. Incorporate a comprehensive plan to meet the ongoing support needs of social housing tenants including appropriate locating of a Community Centre that incorporates tenancy support services.
4. Include commitments to support the existing social housing community through the development of the site and any relocation of existing tenants, including appropriately resourced tenancy advice and support services.

#### **4. Response to specific issues**

##### **A. Social, Affordable and Aboriginal Housing**

###### *Social Housing*

The net increase in social housing dwellings under the proposal is inadequate in the context of the waiting list for social housing. In the Inner City (CS01) Allocation Zone, which includes the suburb of Waterloo, the current expected waiting time for a studio, a one-bedroom property or 3-bedroom property is 5 to 10 years. For a two-bedroom property or 4-bedroom property the waiting time is 10 or more years. At June 2021 there were 626 applicants on the waiting list for the CS01 Inner City Zone and 267 on the priority list.<sup>i</sup>

In NSW overall there are 44,127 people on the waiting list and 5,801 on the priority list.<sup>ii</sup> These numbers may reflect higher numbers of people as more than one person may be listed on an application. Additional impacts from the pandemic have left more people in urgent need of housing. In December 2021 the housing waitlist was more than 53,000 people, up from 49,000 before the Delta lockdown began, while NSW falls far behind other states such as Victoria and Queensland in social housing construction.<sup>iii</sup>

The current proposal would see an increase of less than 100 social housing dwellings on the Land and Housing Corporation (LAHC)-owned land on the site. This increase will not make a meaningful impact on the social housing waiting list. The proposed allocation for social housing is only 28.2% of dwellings, which does not even meet LAHC's own 30% target under the Communities Plus program.

Redfern Legal Centre through its Tenants' Advice and Advocacy Service sees the impacts of the shortage of social housing every day. The lengthy waiting list means that social housing is simply not a solution for people facing an unexpected crisis that impacts their ability to maintain a tenancy in the private rental market. It also inhibits the capacity of social housing tenants from taking steps to move out of social housing, because if they were to fail in the private rental market they would risk homelessness. The shortage of available social housing also affects people with a social housing tenancy who need to be transferred to a property that meets their changing housing needs as there is simply not the availability of stock.

We are familiar through our regular work with social housing transfer applicants that properties with certain features are in particularly high demand in the inner city – people who have reached the top of the waiting list, with clear needs to be housed in an area close to their supports and networks, may still wait months or years to be matched to a property that meets their housing needs. Common housing needs that are under-catered for in current housing stock include ground floor dwellings, dwellings with flat access and/or accessible bathrooms, dwellings in low-rise buildings or low-density areas, properties with gardens and space for pets, properties with space to park and charge mobility scooters, and larger family sized properties.

It is recommended that the proposal reconsider and increase the social housing allocation so that it at least meets the NSW Government target of 30%. The redevelopment of Waterloo should be a centerpiece project that not only meets the government's social housing targets, but exceeds them.

### Aboriginal housing

LAHC's draft design guide only specifies 10% of the total number of affordable housing dwellings on the site to be provided for Aboriginal and Torres Strait Islander Housing (or 0.75% of the total units to be built). The Aboriginal affordable housing target is 'aspirational' as it is only set out Design Guide. There is no defined target for Aboriginal social housing on the site. Given the history and cultural significance of the area as a home and meeting place for First Nations people a significant target for both social and affordable Aboriginal housing should be cemented within the planning proposal itself.

### Affordable housing

The proposed affordable housing allocation is also inadequate - only 7.5% of the dwellings on the redeveloped site, or about 227 units. Sydney "remains critically unaffordable to significant proportions of the renting population".<sup>iv</sup> The Independent Advisory Group Report concludes that even within the viability constraints, 10% affordable housing could be achieved in addition to 30% social housing on the site, noting that there is \$24 million available to contribute towards affordable housing sitting in the Redfern-Waterloo Affordable Housing Fund, and that an additional 2-2.5% could realistically be delivered through the tender process.<sup>v</sup> The IAG Report states that ideally, there would be more than 10% affordable housing on the Waterloo South site "due to the demography, the clear need and the income circumstances of the population in this area" but that this could not be delivered without government subsidy.<sup>vi</sup>

The low allocation of social and affordable housing on the Waterloo South site stems from an inflexible approach to the 'viability' of the project. The test for viability is that there be 'no cost to government'. The underlying premise is that this will maximise public benefit from the renewal. The assumption that 'no cost to government' is the best measure of public benefit when a public asset is being sold off should be robustly challenged as part of this exhibition process. There is no evidence that the resulting housing mix is optimal from a social and community perspective. There is also a real question of whether this framework

delivers the best financial return on public land assets, because it ignores the income generated in the form of rental return and capital gains.<sup>vii</sup>

There are a number of alternative tenure spreads that have been proposed, including by the City of Sydney and Counterpoint Community Services. At a minimum, Redfern Legal Centre supports the City's proposal to deliver 30% social housing, and 20% affordable housing on the site. With a more flexible approach to the financing of the project, a much higher yield of social and affordable housing could be achieved, such as the equal spread of social, affordable and private housing proposed by Counterpoint Community Services.

#### B. Meeting current and future housing needs:

Waterloo is one of the most prominent social housing estates in NSW. The current Waterloo South social housing community is primarily made up of older, long-term, single-person households. Approximately a third of people are on the Disability Support Pension. The proposal should ensure that the current and future needs of existing residents are met. This will require an approach that incorporates universal design principles and prioritises flexibility to allow existing tenants to age in place in dwellings that meet changing mobility and support needs.

The future demography of the social housing community on the site is not considered in depth in the exhibition documents. Because of existing tenants' right to return to Waterloo after the redevelopment, the social housing community will initially not be all too different to what it is now. But as new tenants move in, the make-up of the community will start to be shaped by the kinds of dwellings that are built and by allocation decisions made by the Department of Communities and Justice (DCJ). LAHC has very good data about what the Waterloo social housing community could look like in the medium-term because it knows, through DCJ's role administering the social housing waiting list, who the next 10-plus years of applicants are.

Evidence-based assessments need to be made about the dwelling sizes and configurations required to best accommodate a vibrant and sustainable social housing community in the medium- and long-term. While all newly constructed social housing must meet the needs of the existing community, and the right to return is an absolutely essential commitment, it is important that these considerations do not become constraints. For example, if the evidence shows that more 2- and 3-bedroom dwellings will be needed in the future, then it follows that some current tenants will return to larger units than they had previously. An initial period of under-occupancy would therefore need to be accepted and factored in to viability assessments.

From a broader design perspective, this proposal will also need to meet the needs of the future social housing community as a whole. There has been no Social Impact Study lodged with this proposal, meaning there is no adequate evidence base upon which to assess potential adverse consequences of the project on the community. The report that has been lodged in lieu of a Social Impact Study is a 'Social Sustainability Report'. We refer to the

submission of Dr Alison Ziller for an analysis of the shortfalls of this report. The proposal needs to engage with the unique character and needs of the existing community, and to realistically anticipate what future community needs will be.

Of particular concern is the omission of a thorough assessment of the potential risks associated with a development of this density where a significant proportion of social housing tenants will live in close proximity to private households. We note that the housing density allowed for in the proposal is extremely high, even before accounting for a possible 10% floorspace bonus for 'design excellence'. There has been no assessment of the suitability of this extreme density for social housing residents who will be living on the redeveloped site.

There is no plan in place to ensure a thriving mixed income community.

The viability of the planning proposal must be tested through a social impact and sustainability lens, not just from a budgetary point of view.

We endorse the recommendation made by Counterpoint Community Services and others to conduct a Social Impact Assessment Report before determining the outcome of the planning proposal.

### C. Meeting current and future support needs:

This redevelopment project will fundamentally change the character of Waterloo. While this will likely bring some positive outcomes, the planning proposal and the accompanying reports lack the evidence-based detail necessary to identify and manage the impacts of the redevelopment and maximise positive outcomes for the existing community.

The older demographic of the Waterloo South community will have increasing support needs.

As social housing increasingly becomes the housing option of last resort, it is to be expected that applicants, especially those on the priority waiting list, are more likely to have high support needs as well.

We have worked alongside a range of government agencies and NGOs to develop a Waterloo-specific Human Services Plan to support the community through the specific challenges of the Waterloo redevelopment project, address emerging service needs, and to plan for and implement a service structure for the community post-redevelopment. We endorse submissions including that of Counterpoint Community Services recommending guaranteed resourcing for this plan for the lifetime of the redevelopment project.

It is also noted that the current proposal commits to the building of a Community Centre which is welcomed, however, its proposed location is not considered accessible to the community. It is recommended that the Community Centre should be built early, located on the Central Park and include premises for support services such as Redfern Legal Centre.

D. The proposal should include commitments to support the existing social housing community through the redevelopment of the site and any relocations.

Even though no ground has been broken the Waterloo redevelopment project has already had a significant impact on the Waterloo community. Plans to redevelop the Waterloo estate have been discussed for many years but were officially announced in December 2015. Since that time, the community has been subjected to an at times confusing and frustrating process, with changing timelines and shifting parameters that have undermined the community consultation process.

Throughout this period, the prospect of tenant relocations has been lingering in the background. Based on our experience supporting tenants through the sell-off of Millers Point, it will be crucial to ensure that properly funded and resourced services, including a tenants' advice and advocacy service, are available to support relocating tenants. This need is widely acknowledged, for example in the "Compact for Renewal" prepared by the Tenants' Union of NSW, Shelter NSW and UNSW's City Futures Research Centre.<sup>viii</sup> The City of Sydney has also acknowledged this need and previously provided (now ceased) funding to Redfern Legal Centre in anticipation of tenant relocations in Waterloo.

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<sup>i</sup> <https://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-time>

<sup>ii</sup> *Ibid*

<sup>iii</sup> <https://www.smh.com.au/politics/nsw/nsw-social-housing-renewal-program-dwarfed-by-victoria-queensland-20211221-p59jf1.html>

<sup>iv</sup> Rental Affordability Index November 2021 Key Findings – SGS Economics & Planning  
[https://www.sgsep.com.au/assets/main/SGS-Economics-and-Planning\\_Rental-Affordability-Index-2021.pdf](https://www.sgsep.com.au/assets/main/SGS-Economics-and-Planning_Rental-Affordability-Index-2021.pdf)

<sup>v</sup> IAG report p55

<https://apps.planningportal.nsw.gov.au/prweb/PRRestService/DocMgmt/v1/PublicDocuments/DATA-WORKATTACH-FILE%20PEC-DPE-EP-WORK%20PP-2021-3265!20210629T080037.767%20GMT>

<sup>vi</sup> *Ibid*

<sup>vii</sup> Murray, C. K. and Phibbs, P. (2021) *Reimagining the Economics of Public Housing at Waterloo* p8  
[https://shelternsw.org.au/wp-content/uploads/2022/03/Reimagining-the-economics-of-public-housing-at-Waterloo\\_FINAL.pdf](https://shelternsw.org.au/wp-content/uploads/2022/03/Reimagining-the-economics-of-public-housing-at-Waterloo_FINAL.pdf)

<sup>viii</sup> *A Compact for Renewal: What Tenants Want from Renewal* <https://files.tenants.org.au/resources/what-tenants-want-from-renewal.pdf>

SUB-1670  
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Waterloo

I think this is a bad idea for the Aboriginal community in Waterloo as we have been here for ages and if you want to change it up renovate the houses for the people that live there if you want it new. You don't have to move everyone out keep the community there and just give us an update.

SUB-1671  
Eddie Ma  
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Sydney

# Waterloo South Planning Proposal

Public Exhibition Submission

29th April 2022  
Written By Eddie Ma



**VIGILANTI**

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## Who We Are

Vigilanti is a community-led design agency with a mission to help vulnerable communities design their own visions for a better, more equitable world.

Since March 2017, when the announcement of the State government's (**the Government**) plans to redevelop the Waterloo Public Housing Estate (**the Estate**) and the dedication of the Estate as a State Significant Redevelopment Precinct, we have been supporting the Estate's public housing tenant community (**the Community**) to understand and decipher the miriade of documents released during the Visioning, Options Testing, Preferred Masterplan and Waterloo South Planning Proposal stages.

Over the last 5 years, in partnership with the Waterloo Public Housing Action Group (**WPHAG**), we have been in constant communication with the Community, including conducting workshops and information sessions separate from the Government's official consultation activities, with the intention to build capacity in the Community to understand and interpret the plans for the future of their homes and better advocate for their needs so that it can be considered and incorporated into the Government's plans.

As a NSW registered Architectural practice, we have provided our expertise pro-bono to educate the community and, in that time, have gathered first-person accounts and feedback on how they would like to see their homes redeveloped in a fair and equitable manner.

Our submission is written with the lens of continuing to advocate for the changes that the Community has asked for throughout redevelopment consultation process, and translating them into recommendations that can be actioned into the Planning Proposal, to ensure the Estate is planned in an equitable manner that considers the needs of the Estate's vulnerable public housing residents.

## Summary of Recommendations

### 1. Housing Mix

1. Social Housing should make up **AT LEAST 30%** of total residential floor area, inclusive of existing private housing floor space, to ensure a balanced mix between social, affordable and private housing residents to realise the government's public promise to the community and create a truly mixed and diverse community, not one dominated by private dwellings residents and potentially expose vulnerable public housing residents to discrimination.
2. Allocate a minimum of 82,365 sqm of residential floor area for the provision of Social Housing, to ensure no loss to the existing amount of public housing floor area in Waterloo South.
3. Correct the proposed amendment to Sydney LEP 2012 (15)a Site Specific Objectives from "ensure a balanced mix of social and affordable housing and other housing" to "to prioritise the delivery of social and affordable housing, balanced with the provision of market housing"

### 2. Built Form & Density

1. Reduce the overall density target for the redevelopment, and redesign the planning proposal with a level of density and urban design that will meet the stated objective of providing high levels of amenity for residents and tenants, to the public domain and to open space.
2. Increase the area of land allocated to green open space to adequately service the projected population growth in the area from the redevelopment.
3. Reconduct the studies based on an up-to-date planning proposal that captures the reality of the impacts and risks of the resulting development, in particular the Urban Design study and Wind Report, and include the assessment of impacts on surrounding streets, dwellings and green spaces.

4. The planning proposal itself should result in a high amenity and low impact development, and should not rely on potential solutions that may or may not eventuate through a Design Excellence Process.

### **3. Parking Allocation**

1. Include a provision in the Sydney LEP 2012 that parking spaces must be equitably allocated based on the proportion of private, affordable and social housing in any development application with a shared car park.

### **4. Impacts of Future Developments**

1. All studies should be conducted based on a planning proposal for the entire Waterloo Estate, rather than separately for Waterloo South, Central and North, which will not adequately capture the impacts of the redevelopment of Waterloo Estate in its entirety.
2. If a separate planning proposal is still to be submitted for Waterloo South, estimates and allowances for the risks and impacts of the future redevelopment of Waterloo Central and North, and the resulting increase in dwellings numbers, population, traffic loads, and other risks should be included in the studies. The planning proposal should outline how future developments have been considered and addressed.

## Key Concerns

### 1. Housing Mix

The second stated objective of the planning proposal (page 29) is:

“to prioritise the delivery of social and affordable housing, balanced with the provision of market housing;”

There is a discrepancy between the Stated Objectives of the Planning Proposal, and the wording of 4.1.1 Intent of Planning Proposal (page 31) which states a site specific objective of:

“ensure a balanced mix of social and affordable housing and other housing”

This should be corrected to mirror the stated objective of the Planning proposal.

The differences in wording reflects the fact that the provision of social and affordable housing has been deprioritised over the provision of private housing in the Planning Proposal.

Throughout the redevelopment consultation process, the community has been publicly promised that the final outcome of the redevelopment will be 65% Private Housing, 5% Affordable Housing and 30% Social Housing, as quoted in the following documents released by the Government:

“A mix of housing targeting 30% social housing and at least 5% affordable housing” Waterloo Redevelopment Options Booklet pg. 5-8 (August 2018) & Options Testing Panels Option 1-3 (October 2018)

“There will be no loss of social housing. The redevelopment will deliver more and better social housing to the area.” Waterloo Redevelopment Options Booklet pg. 4 (August 2018) & Preferred Masterplan Booklet pg. 6 (January 2019)

For the last 5 years, the community has been assured and reassured that 30% of housing will be comprised of social housing dwellings, as well as a no loss of public housing (as social housing) and amenity. This was a key promise to the Community representing:

- There would be no loss of public housing after the redevelopment and that there would be enough housing so that every household has a right to return with no loss of amenity.
- They would have sufficient representation in the redeveloped Estate and not see their community dominated by private housing residents, exposing them to discrimination as a vulnerable community.
- A potential increase in social housing for any increased density to help alleviate the shortage of public housing in NSW and help provide more housing to other vulnerable households.

The planning proposal proposes private, affordable, and social housing, in terms of gross floor area (**GFA**), on LAHC owned land at a mix of 66.5% Private, 7% Affordable, 26.5% Social Housing.

As stated in the planning proposal, there are currently 120 privately owned dwellings in Waterloo South. The proposal states that “With the additional development capacity from the new controls, there is potential for 127 additional dwellings increasing total private dwellings to 247. (page 42)”, however no estimate of GFA was provided. We assume the amount of GFA on privately-owned land would need to at least double to accommodate the additional 127 dwellings.

When existing private housing dwellings, and the additional floor area on privately-owned sites are taken into consideration, the mix of GFA allocation will result in 69.8% Private Housing, 6.3% Affordable Housing, and 23.9% Social Housing after redevelopment.

## Planning Proposal Floor Space Mix

	Private Housing	Affordable Housing	Public/Social Housing	Total GFA (excluding non-residential uses)
Existing GFA	12,000 sqm	0 sqm	82,365 sqm	
Proposed GFA (LAHC- Owned Land)	145,904 sqm (66.5%)	15,358 sqm (7%)	58,142 sqm (26.5%)	219,404 sqm
Proposed GFA (Private-Owned Land)	12,000 sqm*	0 sqm**	0 sqm	12,000 sqm
Total GFA	169,904 sqm*** (69.8%)	15,358 sqm (6.3%)	58,142 sqm (23.9%)	243,404 sqm

\*minimum estimate. Actually GFA allowance not stated in planning proposal.

\*\*affordable housing contribution rates applicable to redeveloped privately-owned lots but have been excluded from the calculation as the exact amount of floor space is unclear.

\*\*\*includes existing private housing on privately-owned lots assuming all are redeveloped to maximum GFA allowance.

It can be clearly seen that the government's public promise for 30% Social Housing has not been realised and the amount of Public/Social Housing GFA will actual decrease by 30%.

This is one of the largest inner city public housing Estates and represents a large parcel of publicly owned land. The redevelopment of any public land should prioritise the provision of social and affordable housing to help relieve Sydney citizens of housing stress and take meaningful action to solve the current housing crisis.

### Based on the concerns outlined above we recommend the following changes be made to the planning proposal:

1. Social Housing should make up **AT LEAST 30%** of total residential floor area, inclusive of existing private housing floor space, to ensure a balanced mix between social, affordable and private housing residents to realise the government's public promise to the community and create a truly mixed and diverse community, not one dominated by private dwellings residents and potentially expose vulnerable public housing residents to discrimination.
2. Allocate a minimum of 82,365 sqm of residential floor area for the provision of Social Housing, to ensure no loss to the existing amount of public housing floor area in Waterloo South.
3. Correct the proposed amendment to Sydney LEP 2012 (15)a Site Specific Objectives from "ensure a balanced mix of social and affordable housing and other housing" to "to prioritise the delivery of social and affordable housing, balanced with the provision of market housing"

We propose the following floor space allocation that would action the government's promises and meaningfully increase housing affordability in Waterloo South.

### Our Proposed Floor Space Mix

	Private Housing	Affordable Housing	Public/Social Housing	Total GFA (excluding non-residential uses)
Existing GFA	12,000 sqm	0 sqm	82,365 sqm	
Proposed GFA (LAHC- Owned Land)	109,702 sqm (50%)	27,337 sqm (12.5%)	82,365 sqm (37.5%)	219,404 sqm
Proposed GFA (Private-Owned Land)	12,000 sqm*	0 sqm**	0 sqm	12,000 sqm
Total GFA	133,702 sqm*** (54.9%)	27,337 sqm (11.2%)	82,365 sqm (33.8%)	243,404 sqm

## 2. Built Form & Density

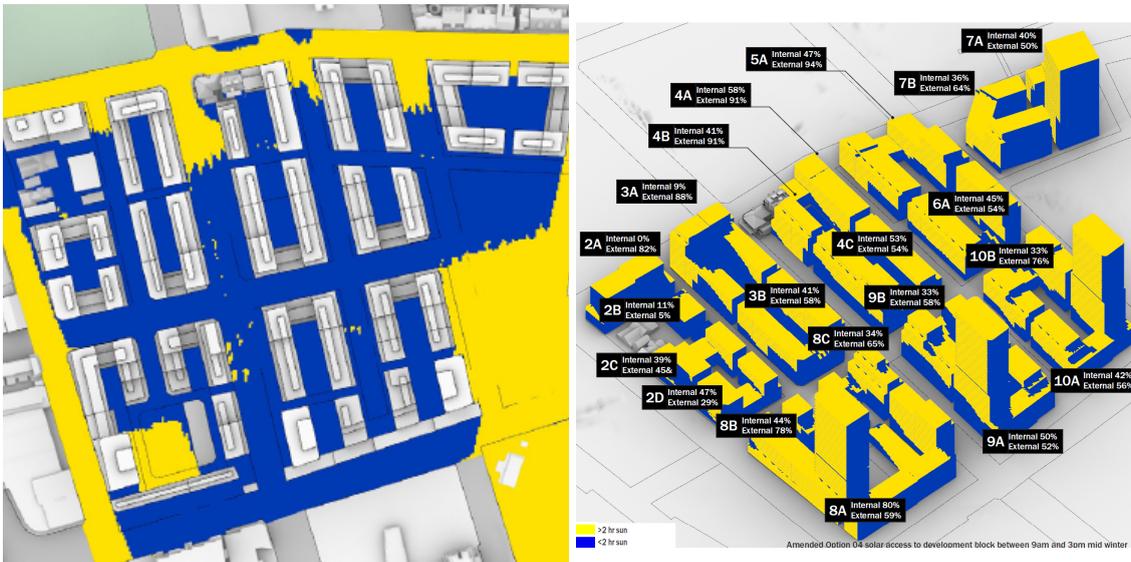
The third stated objective of the Planning Proposal (page 29) is to:

“ensure the built form provides high levels of amenity for residents and tenants, to the public domain and to open space;”

However, the accompanying studies conducted on the planning proposal highlights a number of issues that will likely result in a development would not meet this objective. All of these potential issues and risks are a result of the extremely high density proposed for the area, which the City of Sydney Council has described will be the “densest mass of development in Sydney”.

The impacts of this density as outlined in the studies include:

- Insufficient increase to public open green space (parks) to service the 375% increase in the number of dwellings (869 to 3259) and 352% increase in population in Waterloo South by 2032 (1719 to 6066 by City of Sydney’s estimates), as well as the future redevelopment of Waterloo Central and North, which have no plans to provide additional green space based on LAHC’s preferred master plan. (Social Sustainability Study)
- Insufficient access to sunlight to both residential dwellings and outdoor areas (Addendum to urban design report) with:
  - Less than 50% of internal facing units in all but one block (corner of McEvoy and Cope St) able to receive more than 2 hours of sunlight at mid winter, with one block resulting in 0% of internal units receiving direct sunlight.
  - 13 out of 20 blocks will result in less than 70% of external facing units receiving more than 2 hours of sunlight at mid winter, which is the minimum requirement of the State Environment Planning Policy 65 - Apartment Design Guide.
  - All streets will receive less than 2 hours of sunlight, resulting in cold, dark streets no conducive to a high amenity street level environment.



- Significant risk of wind conditions that are only safe for walking, and not safe for standing or sitting (Pedestrian Wind Environment Study) in the areas of:
  - The western half of the new park.
  - The new smaller park in the south west corner of Waterloo South.
  - The area around the proposed tower on the corner of Wellington & Kellick St (now Camelia Grove).

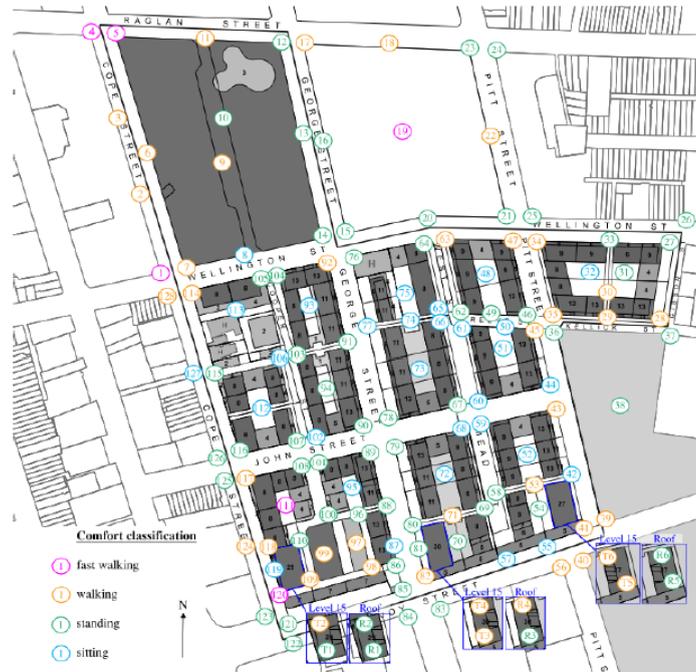


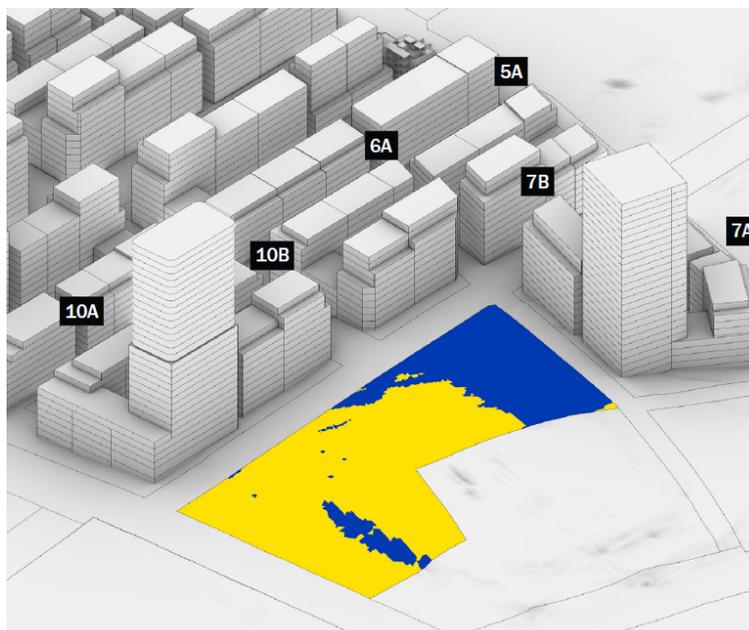
Figure 4: Summary of test locations and comfort classification

We note that there is significant inconsistency between all the studies. Some have been conducted based on the original LAHC planning proposal, some but not all were reassessed based on the City of Sydney planning proposal, none of which were conducted based on the current form of the planning proposal, in particular the Urban Design Study, which includes the solar access outcomes, and Wind Study, which outline the wind impacts.

The planning proposal itself should result in a high amenity and low impact development, rather than rely on the potential solutions to resolve these issues that may or may not eventuate through a Design Excellence Process.

Most of these issues could be easily resolved if good planning principles and reasonable density levels were the foundation to approaching the redevelopment. The planning proposal should ensure the objective of ensuring the built form provides high levels of amenity for residents and tenants, to the public domain and to open space is realised.

The impacts on surrounding areas and neighbourhoods as a result of a 300% increase in dwellings and population, increased building density, and high towers have also not been adequately assessed. The solar access and wind studies in particular have excluded assessing the impacts on surrounding areas, which will likely suffer reduced solar access to nearby dwellings, streets and green space, and potential wind impacts. 37% of Waterloo Park will already be overshadowed by the resulting tower at the corner of Kellick St. Surrounding areas may suffer similar impacts, which need to be studied and communicated to the community.



**Based on the concerns outlined above we recommend the following changes be made to the planning proposal:**

1. Reduce the overall density target for the redevelopment, and redesign the planning proposal with a level of density and urban design that will meet the stated objective of providing high levels of amenity for residents and tenants, to the public domain and to open space.
2. Increase the area of land allocated to green open space to adequately service the projected population growth in the area from the redevelopment.
3. Reconduct the studies based on an up-to-date planning proposal that captures the reality of the impacts and risks of the resulting development, in particular the Urban Design study and Wind Report, and include the assessment of impacts on surrounding streets, dwellings and green spaces.
4. The planning proposal itself should result in a high amenity and low impact development, and should not rely on potential solutions that may or may not eventuate through a Design Excellence Process.

**3. Parking Allocation**

The planning proposal proposes to apply the most restrictive parking rates in the Sydney LEP 2012 to Waterloo South. This is based on the assumption that residents will be encouraged to utilise public transport over private cars once the Waterloo Metro station is complete.

We support the encouragement of using public transport, green transport and a walkable city and the planning proposal will help to increase public transport use and walking in the city. However, the Community has often highlighted their need for private cars to attend hospital and doctor’s appointments, which can be difficult to access via public transport with physical ability limitations

Although we do not object to the application of restrictive parking rates in the planning proposal, the low amounts of parking that will be generated may result in precious and valuable parking spaces only allocated to high income private residents.

Additional provisions should be included to protect social and affordable housing resident’s rights to their proportion of parking spaces, ensure any parking spaces are allocated equitably based on the proportion of private, affordable and social housing.

In a previous submission to the Waterloo Metro Quarter OSD Development Application, we identified that parking spaces were not equitably allocated between private, affordable and social housing dwellings, with Social Housing dwellings only allocated 1 space per 8.75 dwellings, while Private and Affordable were allocated parking spaces at a rate of 1 per 2 units.

<b>Waterloo Metro OSD</b>	<b>Private Housing</b>	<b>Affordable Housing</b>	<b>Social Housing</b>	<b>Total</b>
<b>Dwellings</b>	126	24	70	220
<b>Parking Spaces</b>	55	12	8	75
<b>Spaces per Unit</b>	1 per 2.2 units	1 per 2	1 per 8.75	

**Based on the concerns outlined above we recommend the following changes be made to the planning proposal:**

1. Include a provision in the Sydney LEP 2012 that parking spaces must be equitably allocated based on the proportion of private, affordable and social housing in any development application with a shared car park.

**4. Impacts of Future Development**

Although the planning proposal and accompanying studies goes into great detail to outline the impacts of the Waterloo South redevelopment, there are key blind spots that result from not studying the redevelopment of the Estate as a whole and excluding the future redevelopment of Waterloo Central and North.

By excluding the future redevelopment of Waterloo Central and North, the studies are unable to assess:

- The total increase in population and dwelling density and whether there are adequate levels of green open space and parks to accommodate to the total population.

- City of Sydney estimates that the entire Waterloo Estate after redevelopment will result in a total population of between 10,945 & 11,542 by 2032. 4,879 to 5,476 will be a result of the future redevelopment of Waterloo Central and North.
- The Preferred Masterplan, which covers the entirety of Waterloo Estate, which the Waterloo South Planning Proposal is based on, has not allocated additional area for green open space and parks in Waterloo Central or North, meaning any allocation in Waterloo South will not only be servicing the residents of Waterloo South, but the future population of Waterloo Central and North as well.
- The potential solar access and wind impacts on the new park and Waterloo South from the future redevelopment of Waterloo Central and North. Waterloo North, in particular, lies directly north of the park and any high rise developments or towers would directly overshadow the park. A similar impact can already be seen from the proposed tower on Kellick St on Waterloo Park, which will overshadow 37% of the park at mid Winter.
- The potential increased impact on traffic loads on local roads once the entire Estate is redeveloped. The current Transport Study was conducted with only the increased dwellings from Waterloo South. The planning proposal proposes Pitt St be opened up to left-in left-out traffic to improve traffic conditions. It is unclear if additional changes to the local road network may be required to accommodate the increased traffic loads from future developments to access McEvoy St, which is a major concern for both residents of the Estate, and the surrounding area.

**Based on the concerns outlined above we recommend the following changes be made to the planning proposal:**

1. All studies should be conducted based on a planning proposal for the entire Waterloo Estate, rather than separately for Waterloo South, Central and North, which will not adequately capture the impacts of the redevelopment of Waterloo Estate in its entirety.
2. If a separate planning proposal is still to be submitted for Waterloo South, estimates and allowances for the risks and impacts of the future redevelopment of Waterloo Central and North, and the resulting increase in dwellings numbers, population, traffic loads, and other risks should be included in the studies. The planning proposal should outline how future developments have been considered and addressed.

SUB-1672  
Jenny Leong  
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Newtown



29 April 2022

## **Submission Waterloo Estate (South) PP-2021-3265**

**Prepared by Jenny Leong MP and Clr Sylvie Ellsmore on behalf of The Greens.**

We make this submission on behalf of The Greens noting that the proposed plan for Waterloo South comes some six years after the NSW government first announced that the Waterloo Estate would be redeveloped.

During this period Waterloo residents and community members have been notified that they will lose their homes, lived with the stress and uncertainty of the proposed redevelopment, have had to digest and respond to a large number of options and master plans as well as a change in the planning authority from the City of Sydney for three years from 2019-2021, to the Department of Planning and Environment. These changes and the drawn-out process has led to an unacceptably high level of anxiety and confusion for residents and the local community.

The Greens do not support NSW Land and Housing Corporation's Planning Proposal for Waterloo South which seeks to greatly intensify the land use on this site with a minimal increase in public and affordable housing.

It is essential we see a massive investment from all levels of government to increase public, social and affordable housing to address the growing housing and inequality crisis faced by so many in our communities.

### **Privatisation of Public Housing**

Since the redevelopment of Waterloo Estate was first announced in 2016, the chronic lack of public, social and affordable housing in Sydney and throughout NSW has intensified.

If this project proceeds, a government housing project of this size representing a once in a generation opportunity to address the housing crisis by significantly increasing the amount of public, social and affordable housing in Sydney, will be lost. Disgracefully, what is proposed is the large-scale privatisation of this publicly owned land with a very small increase in social and affordable housing - and a seeming loss of public housing.

We note that this proposal does not even meet the NSW Government's Future Directions policy and the Communities Plus formula of delivering 30% social housing in such redevelopments.

Along with many in the community, The Greens do not accept the privatisation of any part of this site and reject the proposal's mediocre plans to increase the existing number of social housing dwellings by 100. We are astounded that the massive increase in density which is proposed on the site from 739 units to between 3,012 - 3,300 units does not include a



significant number of public and affordable dwellings but offers only 847 social housing units and 227 affordable housing units.

### **Communities Plus doesn't work for community need**

The FACS Communities Plus formula which splits redevelopments of public housing in NSW into a 70 percent private / 30 percent social ratio represents a failure of the NSW Government to address the chronic lack of public, social and affordable housing in this state and to make the necessary investment to rectify this situation. The government's rationale to make the delivery of new social housing cost neutral and to provide a surplus (as is the case with all such developments in the inner city of Sydney), is one which is driving the wholesale loss of public land and the opportunity to use this land to address the current chronic lack of public and affordable housing in this area of Sydney.

The Communities Plus model has been challenged on economic and financial grounds in the November 2021 paper for Shelter NSW, '[Reimagining the Economics of Public Housing at Waterloo](#)' by Cameron K. Murray and Professor Peter Phibbs which states that, "To date, investment in new public housing has been considered as a cost only. But housing (even public housing) is an asset that generates a return over time in the form of rental income and capital gains. Ignoring these asset returns is a key economic issue with the LAHC self-fund development model."

The Greens reject the use of the Communities Plus formula and note that this proposal does not in fact even provide for 30 percent public housing but rather only allocates 26.5 percent of the residential floor space for this use. The very low number of new social housing dwellings is in stark contrast with the increased density on the site.

This proposal has taken the City of Sydney's design excellence 10 percent floor space bonus and added, rather than included it into the maximum floor space which was previously confirmed by the Minister's Independent Advisory Group. This has resulted in an increase of some 25,000 square metres of extra floor space on LAHC sites and an increase of 4,200 square metres on privately owned sites - with no design excellence requirements and no increase in public or affordable housing yields. This is an unacceptable increase in density on the site which appears to be a further attempt to increase the financial gain from the site at the expense of our community and public housing tenants and those many thousands of people on the public housing waiting list.

The government's claim that a better social mix is obtained by application of the Communities Plus model is not based on any research nor supported by peak housing organisations. This claim is also made redundant in this proposal as the buildings contain enclosed courtyards and are sealed off from public thoroughfares on the plan. The proposed through site links and easements are narrow and are not designed to accommodate social interaction but rather to offer minimum access for pedestrians and residents and maximum land for building footprints.



## **Need for a social impact assessment and detailed mapping**

The proposal does not include a social impact assessment or plan which would look at the existing and proposed density on this site and the existing and proposed residents in terms of the impacts of such an increase in density on the site and how these changes will work for the public housing community.

Key researchers have called attention to the lack of such a social impact study and assessment and the demography of the existing social housing tenants and those on the waiting list.

Social impact assessment and planning is particularly important at this initial stage given that the high density nature of the proposed new development will place diverse communities in very close contact and given that the Waterloo Estate public housing community includes a large number of public housing tenants with diverse and complex needs, including in the adjoining high density public housing. There is no precedent in Australia for creation of high level density of mixed housing with vulnerable communities, but overseas examples suggest a high risk of community conflict if not addressed at the stage of planning and design.

If it were to proceed, this development should prioritise the aim of achieving the best outcomes for public housing tenants and other future tenants rather than planning to generate the maximum profit.

The Greens support an independent social impact assessment and social impact management plan being conducted prior to locking in densities and building forms on this site.

## **Community facilities not adequately addressed**

In terms of community facilities and services for future communities more generally, it is noted that while the proposal includes much needed new green space, there is minimal or no planning for essential services and support that the thousands of new residents will need.

The City of Sydney and NSW Government's own reviews and policies identify unmet needs for sporting facilities in the local area, as well as for childcare and schools, and other growing unmet needs such as community centres.

A growing need for low cost accommodation for community services in the area has been identified through strategic land use reviews for the area, including the Botany Road Corridor, with the pricing out of community services through high private rents impacting existing residents, particularly Aboriginal and Torres Strait Islander residents, in Redfern and Waterloo.



It is unacceptable that no minimum floor space requirements are provided for non-residential floor space, community facilities, childcare or health services. These facilities and services will be crucial elements in this huge redevelopment and measurable minimum floor space areas must be included to properly plan for the needs of residents.

The studies accompanying this planning proposal seem to suggest future community facilities and services will or should be provided by other adjoining areas or developments. This was the same argument made in relation to the new development above the Waterloo Metro, which proposes significant new high density living and intensification of land use but has failed to plan for substantial community facilities or services.

The NSW Government must take responsibility for assessing and addressing the projected needs for the new residents with this proposal, including addressing community needs it has failed to make provision for in other major new developments on public land, or which have been approved as state significant developments for the local area. Addressing the cumulative impact of development, including community needs, must be considered when assessing the merits of the proposal.

### **Minimum 10% Aboriginal housing**

The City of Sydney's draft design guide recommended an allocation of at least 10 percent or more of the total number of dwellings for Aboriginal and Torres Strait Islander affordable housing. This number of affordable homes for Aboriginal people as distinct from public housing dwellings which are occupied by Aboriginal people is crucial so that this community can maintain its highly significant connection and links to this area.

The Greens support 10% of all housing being allocated as affordable housing for Aboriginal and Torres Strait Islander residents as an absolute minimum. This should not come at the cost of a reduction in other public and affordable housing on the site.

### **Lack of affordable housing**

The redevelopment should include a minimum of 30 percent of the private housing as affordable housing given the growing housing stress, low wage growth and accelerating cost of living rate.

The plan suggests that there will be only 227 affordable housing units which equates to only 7.5 percent of the dwellings, which is well below the 10 percent which was recommended by the Independent Advisory and the 20 percent which the City of Sydney had proposed in its earlier option for Waterloo South, however it is noted that the City of Sydney has since confirmed that this is a minimum, and more affordable housing should ideally be provided.

The number of affordable housing dwellings was also required to be included as part of the overall number of private dwellings which has not occurred. The fact that there is not even



30 percent public housing units indicates that some of this already inadequate quota has been used for affordable housing.

### **Sustainability and Climate Adaptation**

The development should support long-term sustainability and climate adaptation provisions and options to strengthen the resilience of the community in coming years and decades. The Greens support the City of Sydney's position that the requirements of the LEP and design guide should include a requirement that all development in Waterloo Estate (South) demonstrate environmental performance beyond the minimum prescribed by BASIX.

The Climate Change Adaptation Report which was prepared for NSW Land and Housing by AECOM in 2020, recommended 5-Star Green Star – Design & As-Built (Design Review certified) targets for all buildings, and specifically credits such as Wat-1 Potable Water Efficiency to reduce water demand for Waterloo South.

We support the City of Sydney's position that this proposal should also include a requirement in the planning controls that will facilitate the establishment of a water recycling facility as well as a stronger requirement that all buildings be dual reticulated.

We note that none of the maps in this proposal provide information on solar access to streets, open spaces, communal open space or deep soil zones. It is crucial that clear information is provided indicating how many hours of sunlight these areas will receive at various times of the year and that the density and building mass is adjusted to provide optimum access to sunlight for these areas.

Additionally, we note that issues have been raised with this proposal in relation to managing wind impacts at street level and that additional wind studies are necessary in relation to the 27-storey tower building proposed at Kellick and Gibson Street. The suggestion of using existing or future street trees to manage these impacts is completely unacceptable.

### **Inadequate time for community consultation**

Finally, it is important to note concerns about the lack of time and suitable information provided to the community to engage with the planning proposal. We are aware of a number of concerns from residents and community groups raising concerns about the lack of awareness and understanding about this proposal. After so many years of varied proposals and announcements, there is a very low level of awareness in the community that this is – finally – the formal opportunity to comment on the planning proposal.

We further note: Although eight weeks was provided, the planning proposal was released for consultation over a period which included Easter and the school holidays; documents on the website were either high level and summary or extremely detailed, with limited materials that



provided a clear and neutral overview of the proposal; details such as the increased density over and above earlier plans was not made clear.

We share the request of the City of Sydney Council and local residents groups in calling for an extension of time or readvertising of the proposal, with updated material to show the increased density and clear shape of the proposal.

### **Conclusion**

The Greens believe that housing is a human right - and that the NSW State Government has its priorities all wrong when it comes to addressing the housing crisis.

We do not support this project proceeding and are committed to working with local residents and the community to do all we can to prevent the privatisation of people's homes and public land in the interests of more profits for property developers.

Yours sincerely,

**Jenny Leong MP**

**Member for Newtown  
NSW Greens Housing Spokesperson**

**Cllr Sylvie Ellsmore**

**City of Sydney Council**

SUB-1674  
Warren Roberts  
community1@scfonline.org.au  
Marrickville

Warren Roberts - Aboriginal Community Worker Sydney Community Forum

My role in the community is in an advocacy capacity as the Coordinator of the Redfern Waterloo Affordable Housing Alliance of Aboriginal Community Controlled Organisations and Allies to let the NSW Government know that housing is a basic right and that we want action on making it affordable for Aboriginal people.

We will continue to advocate for:

1. 10% Aboriginal Affordable Housing in all government redevelopments in the Redfern Waterloo area.
2. An increase in Aboriginal Social Housing ensuring that any community housing provider must either be Aboriginal owned and managed or if not, work in partnership with an Aboriginal led organisation.
3. Aboriginal Jobs and Ongoing Employment Targets for Aboriginal employment and contracts for construction and for Aboriginal employment in the provision of ongoing services in all government redevelopments in the Redfern Waterloo area.

Whilst the above requests are a reasonable ask we have yet again been misled on the process of how this will be achieved. The proposal lacks transparency and dialogue with the community on the strategic direction of this proposal's communications.

The public exhibition 'to have your say' on this planning proposal did not have an intentional Aboriginal community consultation process in collaboration with our local Aboriginal services. Along with the complexities of Covid-19, Easter holidays, and public holidays the depth of voices of our community were not heard.

Reading the proposal there is an acknowledgement of the historical links of the Aboriginal community to the Redfern Waterloo area. This history cannot be measured in physical ways but through deep family connections. The proposal does not include a commitment of our above requests.

Similarly we are represented almost as symbols from historical pages, whereas the reality is we need a social community in which we can thrive for the next generations to come.

Once again the continued displacement of Aboriginal people cannot be overlooked and ratified by incorporating design concepts from Aboriginal Culture that would be simply symbolic and tokenistic.

SUB-1675  
LaVerne Belleair  
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Redfern

The Aboriginal Medical Service Cooperative Limited (AMS Redfern) oppose the selling of public lands, Waterloo South precinct, for the purpose of redevelopment of highrise and medium highrise/s. This was known as a working class area, has a pivotal importance to the local community people who were once the backbone of this city. It's close proximity to health care and social and emotional eminities makes this an important determinant of health component and this should be the basis of the Government's decision whether to turn this precinct into a commercial planning venture or retain and refurbish social housing for the people who have made the suburb so great!

The AMS, Redfern, has many constituents this could effect and if these plans were to to succeed, being dispossessed of their home/s could lead to civil unrest. Aboriginal people are concerned as history repeats itself being removed from home and family should they need to be relocated. Our elders, are dependent upon the local services and familiarity of the social and cultural, networks and could have detrimental effects if they were to be removed.

The policy of removal of Aboriginal children and families have been subjected to intergenerational trauma and so to the removal of families and people from their homes could have the same adverse affect.

In addition, the safety of high rises has not been taken into account, the size and location of the social housing tenants are disadvantaged due to their physical location. Waterloo is already over populated adding 4 high rises to the mix would exclude the serenity, commununal function and parkland you could have without erecting these buildings.

The AMS Redfern strongly disagree with selling public lands for commercial gains. Waterloo South Precinct should be retained for social housing that will contain parklands, court yard/balcony for each apartment. If not 100% social housing it should be 75% Social Housing to 25% Affordable Housing.

SUB-1676  
Matteo Salval  
farwestredferndwellers@gmail.com  
Sydney

Thank you for the opportunity of making a submission regarding the Waterloo Estate (South) planning proposal.

We are a small community group passionate about the quality of the public domain especially the local parks and green spaces. Through our local network we care for local verges, organise plant giveaways and plant trees.

We are very concerned about the fact that this proposal does not meet the NSW Governments Future Directions policy of delivering 30% social housing from such redevelopments. The current proposal only delivers 26.5% of the residential floor space as social housing. Even on a dwellings comparison it only delivers 28.2%.

Thank you

SUB-1677  
Jemima Mowbray  
jemima.mowbray@tenantsunion.org.au  
Haymarket

Please find attached submission regarding Waterloo South plan provided by the Tenants' Union of NSW.

For further information please contact Jemima Mowbray, Policy and Advocacy Manager, Tenants' Union of NSW on 8117 3700.

29 April 2022

Attention: Waterloo Project, NSW Department of Planning and Environment

## Submission on the Waterloo South plan, April 2022

Thank you for the opportunity to provide comment and feedback on the proposed plan for Waterloo South.

The Tenants' Union of NSW is the peak body representing the interests of tenants in New South Wales. We are a Community Legal Centre specialising in residential tenancy law and policy. We are also the main resourcing body for the state-wide network of Tenants Advice and Advocacy Services (TAASs) in New South Wales. This includes the Inner Sydney Tenants' Advice and Advocacy Service which provides free tenancy advice, assistance and advocacy for current public housing renters in the Waterloo South area.

Our brief comments on the Waterloo South proposal are informed by both our understanding of the inadequacies of our current housing system in delivering safe, affordable homes for everyone who rents their home, as well as the concerns of the local Waterloo South community directly impacted by the redevelopment of the site.

### Urgent need for genuinely affordable rental housing for those on low incomes

There is a pressing need for the NSW government to deliver new, additional non-market housing stock. The private rental market has demonstrated it cannot currently deliver housing that is genuinely affordable for those on low incomes, with the most recent Anglicare annual snapshot finding that only 1.6% of private rental properties across Australia would be affordable for a single person earning minimum wage, and very nearly zero for those relying on government income support.<sup>1</sup> The current waiting list in NSW for social housing – an imperfect measure of need – was just under 50,000 applicants at 30 June 2021.<sup>2</sup> This can only be expected to have increased over the past year.

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<sup>1</sup> Anglicare Australia (2022), *Rental Affordability Snapshot: National Report, April 2022*, [www.anglicare.asn.au/wp-content/uploads/2022/04/Rental-Affordability-Snapshot-National-report.pdf](http://www.anglicare.asn.au/wp-content/uploads/2022/04/Rental-Affordability-Snapshot-National-report.pdf), accessed 29/04/2022

<sup>2</sup> NSW Department of Communities and Justice (2021), *Expected Waiting Times*, [www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times](http://www.facs.nsw.gov.au/housing/help/applying-assistance/expected-waiting-times), accessed 29/04/2022

The Communities Plus program of redevelopment and renewal of existing public housing estates, of which the Waterloo redevelopment is a major project, promises to deliver new and additional social housing homes. The funding of the program essentially relies on the sale of public housing land, with developers asked to commit to redevelopment of sites on the basis they can build at a higher density than currently exists on the site and sell any private dwellings built on the land. In all cases, including the case of Waterloo South project, this is wholly owned public land.

The current proposed Waterloo South plan for redevelopment commits to delivery of 3,012 new homes on government owned land, and a minimum of 847 social housing homes. This would deliver 749 replacement new units of social housing, and an additional 98 new social housing units. The current plan suggests 337 affordable housing homes will be built. Overall the redevelopment provides just 28.25% of newly built homes will be social housing, 7.5% affordable housing and close to two thirds – 64.3% - will be private dwellings sold on by developers.

The Tenants' Union of NSW objects to the current Waterloo South plan. We are disappointed with the lack of ambition in the plan demonstrated by the commitment to such a small percentage of the new homes as social housing dwellings. We note and would like to add our support to the advocacy of many public housing tenants – directly impacted by the redevelopment and renewal plans – who have also provided feedback on the Waterloo South plan that 98 more social housing units is not enough.<sup>3</sup> We also encourage consideration of the alternative proposals for redevelopment of the Waterloo estates set out in research commissioned by Shelter NSW, including the recent report by Dr Cameron K. Murray and Professor Peter Phibbs: *Reimagining the economics of public housing at Waterloo*, and the April 2021 *Submission to the Waterloo South Independent Expert Advisory Panel* by Professor Bill Randolph and Dr Lawrence Troy.<sup>4</sup>

We would also like to highlight that the renewal and redevelopment of estates provides an opportunity for government to consider other forms of alternative, innovative, non-market housing that would deliver genuinely affordable rental housing. We have previously recommended consideration of how non-market housing models such as Community Land Trusts and rental housing cooperatives can be encouraged and supported in our submissions to the consultation on the NSW Housing Strategy in August 2020, and to the Regional Housing Taskforce in September of 2021.<sup>5</sup> While it may be too late in the process

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<sup>3</sup> Action for Public Housing (2022), *Waterloo South submission*, [actionnetwork.org/letters/waterloo-south-submission](https://actionnetwork.org/letters/waterloo-south-submission), accessed 29/04/2022

<sup>4</sup> Murray, Phibbs (2022) *Reimagining the economics of public housing at Waterloo*, Shelter NSW, [https://shelternsw.org.au/wp-content/uploads/2022/03/Reimagining-the-economics-of-public-housing-at-Waterloo\\_FINAL.pdf](https://shelternsw.org.au/wp-content/uploads/2022/03/Reimagining-the-economics-of-public-housing-at-Waterloo_FINAL.pdf), accessed 29/04/2022; Randolph, Troy (2021), *A Submission to Waterloo South Independent Expert Advisory Panel*, <https://bit.ly/3LvH24u>, accessed 29/04/2022

<sup>5</sup> Tenants' Union of NSW (2020), *Submission on the Housing Strategy for NSW*, August 2020, [https://files.tenants.org.au/policy/202008\\_TUNSW\\_Submission\\_NSW\\_Housing\\_Strategy.pdf](https://files.tenants.org.au/policy/202008_TUNSW_Submission_NSW_Housing_Strategy.pdf), accessed 29/04/2022, Tenants' Union of NSW (2021), *Submission to the Regional Housing Taskforce*, September 2021, [https://files.tenants.org.au/policy/202108\\_TUNSW\\_Regional\\_Housing\\_Taskforce\\_submission.pdf](https://files.tenants.org.au/policy/202108_TUNSW_Regional_Housing_Taskforce_submission.pdf), accessed 29/04/2022

for such models to be considered for inclusion in the Waterloo South plan, we encourage investigation of how such models could be incorporated within renewal and redevelopment plans in future similar projects.

### **Engage and support public housing renters impacted by the Waterloo South plan**

The redevelopment project set out in the Waterloo South plan will involve the displacement of the existing community, a community of public housing tenants with strong connections to their neighbours, local organisations and to the place itself.

We provide a copy of *A Compact for Renewal: what tenants want from renewal* as an attachment to our submission on the Waterloo South plan. The report, *A Compact for Renewal*, was undertaken with Shelter NSW and the City Futures Research Centre at the University of NSW and involved broad consultation with public housing tenants to set out clear principles for engaging with residents during redevelopment projects, highlighting the need for residents to be given every opportunity to influence and shape the renewal and redevelopment process and be consulted on how best to avoid, minimise and avoid damaging or disruptive impacts. A key theme underlying the document is that residents should be given choice wherever possible and as much control as possible over their circumstances, especially in relation to any relocation required and around the choice to return once redevelopment is complete.

We trust consideration will be given to impact on current residents by the Department and other relevant government departments and agencies throughout the planning process.

**Thank you again for the opportunity to provide feedback on the Waterloo South plan.**

For further information on anything raised within the submission, or otherwise contact:

**Jemima Mowbray**

Policy and Advocacy Manager, Tenants' Union of NSW

Email: [Jemima.mowbray@tenantsunion.org.au](mailto:Jemima.mowbray@tenantsunion.org.au)

Phone: 02 8117 3700

# **A Compact for Renewal: What tenants want from Renewal**

**Report from stage one of a project conducted by Shelter NSW,  
Tenants' Union of NSW and the City futures Research Centre UNSW**





## Compact for Renewal: What tenants want from Renewal

### Introduction

In 2016, Shelter NSW, Tenants' Union of NSW and the City Futures Research Centre at UNSW agreed to partner in a project to develop a Compact for Renewal between agencies undertaking urban renewal and social housing tenants affected by renewal. The Compact would represent an agreement about how urban renewal was to be conducted in social housing areas and how social housing tenants were to be treated and engaged. The need for a Compact arises from the variable experience of tenants to date with renewal and the widely varying policies and practices affecting tenants applied by agencies undertaking renewal.

It is widely recognised that renewal of public housing areas can be highly disruptive, cause high levels of stress and trauma and lead to significant adverse health impacts for social housing tenants. These effects are compounded because tenants are often highly disadvantaged and disempowered. Moreover, the renewal process is imposed from above; tenants typically have little or no say in the process. This compact therefore seeks to develop a set of ground rules that would make renewal less disruptive, traumatic and dislocating for tenants and would support their active involvement in the renewal project. Ideally, it will also increase the chances that tenants may feel able to lend their active support to renewal projects.

During 2016, a series of focus groups with social housing tenants was conducted to understand tenant's experience of renewal and to identify what tenants want and need from renewal. Focus groups were held in 8 estates in Sydney that have experienced renewal programs within the last 10 years or so or were scheduled to do so in the near future. Across these areas, the experience varies widely from generally positive through to the traumatic. The focus groups included a number of tenants who have been highly involved in the renewal processes in their area, some for 15 or more years. The focus groups thereby brought a wealth of experience and rich perspectives on renewal approaches and what works for tenants. A summary of the issues from these focus groups, reported under the 8 key questions asked, has been published as *Tenant's Experience of Renewal in Social Housing Areas*.

This document now seeks to draw on the issues raised by tenants in the focus groups to develop a comprehensive list of what tenants need and want from renewal projects.

The next stage in the project following this is to present these findings to renewal agencies in NSW, including Government and community sector agencies and seek their feedback on the extent to which those agencies believe they can deliver what tenants want. Subject to the willingness of agencies to engage with the project, we seek to negotiate a set of ground rules by which agencies agree to manage renewal projects in social housing areas. In this negotiation, the project partners emphasise their willingness to understand what's important for the agencies about the renewal process and to work through the list of what tenants want from renewal to identify a set of ground rules both parties are comfortable with.

The following are identified as the key things tenants want from renewal, under these headings:

1. Principles for renewal
  - *Respect for Tenants*

- *Acknowledgment that renewal has damaging and disruptive impacts*
- *Impacts will be mitigated and minimised*
- *Commitment to real engagement*
- *Tenants to receive a fair share of the benefits of renewal*

## 2. Implementing the Principles

- Relocation and resettlement
- Managing change and the adverse impacts of renewal
- Planning and setting up the renewal project
- Community engagement

## 1. Principles

***Respect for Tenants:*** While tenants understand their communities have a range of problems and issues, they want agencies to demonstrate respect for tenants, for their opinions and for their communities. They want them to talk positively about tenants and social housing communities and not speak of them using the language of disadvantage and deficit. They want officers to treat tenants with respect and consideration in all their dealings with them. They want officers to be ‘on their side’ and to strive to understand their circumstances, the challenges they face and the resilience they have shown in their lives so far. They want agencies to understand the many strengths of their communities including social and neighbourhood connections, friendships, support networks and community organisations that champion and serve the community. They want acknowledgement of their community’s efforts to support the most vulnerable and to address neighbourhood problems. And they want their community leaders to be accorded due respect for their past contributions and the contribution they can make into the future.

***Acknowledgement that Renewal has Damaging and Disruptive Impacts:*** Tenants want agencies to understand and acknowledge that renewal of an area will turn tenants’ lives upside down and, for most, involves significant losses. Moving house is one of life’s most stressful events, but when that move is not of your own choosing and is largely out of your control, the stress is multiplied. Extra stress is placed on vulnerable households and those with fewer supports or resources. Tenants want the impacts on their health, mental health and wellbeing to be recognised and addressed by agencies. They want agencies to also acknowledge the impact of the loss of their familiar community and the friendship, social and support networks in the community on which many rely. Tenants want the emotional toll and burden of change to be better appreciated by agencies and they want a real commitment by the agencies to mitigate the impacts and provide the support that tenants need to manage and cope with the scale of these impacts. They also want agencies to know that social mix has the potential for negative, as well as positive, implications for existing residents because it involves the loss of neighbours, community structures and networks that they value. The impact is exacerbated by the strongly held belief among long term tenants that their social housing home was provide for life

***Impacts will be mitigated and minimised:*** Tenants want agencies to do all in their power to avoid minimise and mitigate the adverse impacts of renewal on them. They want tenants and communities to be given every opportunity to influence and shape the change process and to be consulted about how best to avoid, minimise and avoid the impacts. They want tenants to be given choice wherever possible and as much control as possible over their circumstances. Agencies should also ensure a

significant level of support is made available to tenants to manage the physical and emotional impacts and to better cope with change.

***Commitment to real engagement:*** Tenants want a commitment by renewal agencies to genuine engagement and deep consultation with existing tenants within a renewal area. They seek acknowledgement that they are an important stakeholder and that their views and preferences should have an influence on projects. They want an acknowledgement that they know the existing area best and that their ideas and views can improve the design and implementation of projects. They want the agencies to listen deeply to tenant's views and preferences and to reflect back to them what they have heard. They understand that they will not get everything they ask for and that there are a range of other stakeholders whose views also need to be taken into account. But they want their views to be seriously considered in decisions by the agencies. Where the agency does not agree with the tenants, they want the agency to come to them and explain why.

***Tenants to receive a fair share of the benefits from renewal:*** In acknowledgement of the scale of the impacts on tenants of renewal, tenants believe they should get a fair share of the benefits. They understand that Government wants a number of things from renewal including a good financial return (in order to pay for new social housing) and improved asset values. Government may also seek reduced management, operational and service provision costs and to realign the social housing stock better to need. However, tenants want to experience a level of benefits that acknowledges the impacts on them. This 'offer' to tenants should include the opportunity for a better or new home, the opportunity (wherever possible) to stay in the same area and consideration of their needs in planning the housing style and size of the new social housing stock. It should include the needs of existing tenants/residents (not just new residents) being taken into account in the design of new open space, community facilities and services and provision of new opportunities (for example in skills, education, training and employment), wherever possible, to materially benefit their lives and future life chances. Tenants should be assured that the project will be managed such that the need for off-site relocation is minimised and where this is unavoidable, tenants want additional support to settle into the new neighbourhood, to connect to services and support networks, to manage the stress and impacts of change and to access opportunities.

## **2. Implementing the Principles**

### **2.1 Relocation and Resettlement**

- Tenants want adequate notice that their property is to be redeveloped and they will need to relocate to an alternate property. Tenants should normally have no less than 6 months notice of the need for them to move. Tenants can however elect to relocate earlier than 6 months, if such an opportunity is available.
- Tenants want agencies to select relocation officers for their superior ability to empathise and communicate with tenants. They want agencies to support staff to 'go the extra mile' on behalf of tenants and to measure success in rehousing by how satisfied tenants are with the process.
- Tenants want renewal projects to be planned to minimise the need for double moves. As far as possible, tenants should be able to move from an existing property into their permanent new property. Wherever possible, relocating tenants should be given the opportunity to relocate within the existing area, so they can continue to access existing services, supports and networks.

- Tenants want agencies to not move tenants to areas that may be redeveloped in the foreseeable future. At a minimum, agencies should flag the potential for future renewal with tenants so they can make a choice to move to this area or not. This should constitute 'reasonable grounds' for refusal of an offer of relocation.
- Tenants want those content to leave the local area to be able to choose the area they want to be relocated to. Where this is to a high need location or an area with little public housing stock, tenants want to be able to nominate a second preference in an area with more availability. They want housing officers to explain the choices and trade-offs available, and to assist tenants to consider their options. Under no circumstances should tenants be relocated to an area they do not wish to go.
- Tenants want agencies to explain early in the project the opportunities and limitations for tenants to relocate locally. If this opportunity cannot be extended to all tenants then selection/eligibility policies (for tenants to stay in the area) should be subject to consultation with affected tenants and their representatives.
- Tenants required to move as a result of renewal should have a very high priority on the Housing Register so they generally have first option for properties becoming available within their eligibility and area of choice.
- While tenants cannot expect to be allocated a property outside their eligibility (for example more bedrooms, even where they had a larger property prior to relocation), they should be able to expect that their particular needs and circumstances will be fully and sensitively considered when eligibility is determined and offers made.
- Where tenants have regular arrangements to care for grandchildren or have a carer or support person (who may stay in the home at times), tenants want these arrangements to be taken into account.
- Tenants should not be disadvantaged when moving to another social housing property. Overall, the replacement property should, all things considered, provide at least the same and preferably a better standard of amenity and convenience (even where it is smaller than the property they are moving from).
- Staff will endeavour to match tenant's requirements and preferences for the replacement property and will consider any improvements above the normal, if it will secure the tenant's likely satisfaction with the home.
- Agencies will provide support with sorting and packing where it is needed or requested. The frail aged and vulnerable households should be actively encouraged to access these services.
- Tenants want agencies to fund a service to assist households with sorting, downsizing and de-cluttering their goods, furniture and effects. This service should be made available to all households who need it and offered in particular to all frail aged, single parent and larger families. This offer should be made soon after notice is given because it may take many months to go through the process.
- Tenants want greater support from agencies to resettle in a new location. Officers should outline location options to tenants and supply them with good quality information about the locations on offer. This should include a map showing the location of social housing, shops, medical facilities, parks, playgrounds and children's services, youth, aged and community services, and transport routes. Tenants should be provided with reliable contact information and referrals to local services and have access to a service which can provide resettlement support to those who want it, including how to access necessary services and informal support networks.
- Agencies will ensure there is an accessible and adequately resourced, independent tenant advocacy service available within a renewal area. The service needs to provide both individual advocacy and broader advocacy, on behalf of tenants, in relation to the project as a whole. The individual advocacy service should be

available in all the major non English languages spoken in the area. Tenants should be provided with the relevant contact for the independent tenant advocate who can negotiate with officials on their behalf, should they wish. Tenants should be able to choose to have the advocate involved in any interviews or discussions with housing staff.

## **2.2 Managing change and the adverse impacts of renewal**

- Tenants want a comprehensive range of practical, emotional and professional support services to be available to tenants to assist them to manage change, community dislocation and the adverse impacts of renewal including physical illness, anxiety, depression, grief, loss and trauma. These should include a range of informal and community based supports, professional services, including counselling and referral to mental health services. These support services should be flexible and capable of being tailored to the individual needs of tenant households.
- Wherever possible, tenants want these services to be provided by respected expert and independent community services providers, preferring those already working with affected tenants.
- Tenants want agencies to acknowledge that grief and loss are significant issues for many tenants affected by renewal. Tenants want housing relocation staff to be trained to properly deal with grief, loss and trauma and specialist services to be made available, as part of a continuum of services, to manage their impacts.
- Recognising that renewal is likely to exacerbate pre-existing health and social problems, agencies should work with other agencies and funding bodies to ensure resources are available so that social and community services can meet increased demand.
- The value of community based practical and emotional assistance provided by trusted local and community organisations, including faith based organisations, should be recognised by agencies.
- Recognising the significant adverse impacts of a loss of choice and control in the renewal process, tenants want agencies to extend choice and control over as many aspects of renewal as possible. These aspects include choice in relocation areas, replacement homes and home improvements, and control in the timing of relocation to suit life circumstances, the packing up and moving process and being able to relocate close to family or support people, including neighbours.
- Tenants want agencies to support them in recognising and honouring the social history of the place being renewed and to provide assistance to tenants, with local organisations, to document its significance for future generations.
- Tenants want agencies to consult them about the management of construction, and work with them to develop better strategies to manage and mitigate disruption, service outages, road closures, noise, dust and vermin etc and to improve site safety.
- As a means of mitigating the impacts of change and loss, and extending the benefits of renewal, tenants want to be afforded new and improved opportunities to pursue their life goals and to take new directions, including in relation to skills, training and employment and community leadership

## **2.3 Planning and setting up the renewal project**

- Tenants want renewal projects to be planned (particularly in relation to density, house types and sizes) so that as many existing tenants as possible will be able to remain in the area, and to minimise adverse impacts.
- Tenants want agencies to conduct a social impact assessment (SIA) of the renewal plans to identify the social impacts and the strategies required to manage and mitigate those impacts. This should be a mandatory part for all renewal planning

processes. Existing tenants and local agencies working with tenants in a renewal area should be key informants for the SIA.

- Social planning for renewal should involve identification of the social and community structures and organisations that are valued within the existing community and developing, with those groups and tenants, a plan for retaining and transitioning them.
- Tenants want new parks and community facilities to be designed for all groups in the community, including old (mostly public) and new (mostly private) residents. Designs should encourage and facilitate social interaction across all groups. All residents, including children and young people and the aged, should be consulted in the design process, using highly engaging and innovative processes.
- Tenants want a social or community plan to be developed alongside a physical masterplan, setting out the community facilities, support services and community services which will be provided for the new community. The plan should aim to actively mitigate social impacts, build social cohesion in the new community and support old (existing) residents through the change process. The plan needs also to outline the strategies for retaining and transitioning valued community assets, including schools, child care and other services. In addition, it should outline the opportunities to be provided as part of the renewal project to support and assist tenants to build new skills, community leadership and capability, retaining and expanding volunteering opportunities and for tenants to take advantage of change to pursue new positive life goals.
- Tenants want a secure and respected community voice in the planning and management of renewal projects. A Community Reference Group is one model that has been effective in a number of renewal projects (that are well regarded by tenants). Agencies need to support the CRG in its role and in building its capability to provide considered advice to the project. Tenants also want support from agencies for a fully independent tenant group (tenant action group), which can represent tenants interests to the renewal agencies.
- Tenants want the renewal team to include staff whose job it is to engage with tenants, who are skilled in listening and who are 'on their side'. This team should include bi-lingual staff whose job it is to engage the main Non English speaker populations. They want a project director/leader to acknowledge them as key stakeholders, listen to them and to meet them as equals. They want project decisions to be informed by an understanding of the impacts on tenants and for the leader to ensure their needs and views are known and considered when decisions are taken.
- Tenants want an on-site office for the renewal project, a place where tenants are always welcome, where they can get information and their questions can be answered face to face. Tenants also want project information to be regularly disseminated and updated, through (say) a monthly newsletter or similar.

#### **2.4 Community Engagement**

- Tenants want renewal agencies to engage and consult tenants and the community regularly throughout the renewal project about all aspects of the project, including (but not limited to) initial design and policy parameters (where possible), the 'offer' to tenants, the community engagement plan, the rehousing/relocation plan, the social or community plan, social impact assessment, the urban masterplan, project staging, implementation and management, plan for mitigation of impacts, the tendering process and selection criteria for project partners. Consultation should be based on sound principles for engagement, such as those of the IAP2.
- An engagement plan should be prepared for the project and tenants want agencies to consult them on the plan before it is finalised. Officials should report back to the community on the plan at regular intervals and the key consultative body (CRG or similar) should be involved in reviews of the plan.

- Tenants want agencies to seriously consider the views and preferences of tenants in reaching project decisions. While tenants cannot expect that they will always get the decision they prefer (given there are other stakeholders and interests) they should be able to expect that their views will be carefully and seriously considered. Where decisions do not reflect tenant views, the reasons should be explained and tenants given the respect to fully understand and be able to question the decision.
- Tenants want a strong residents' voice in all aspects of the project design and implementation. Agencies should support and offer some resources for the development of an independent tenants' group (where it does not already exist) with a role in informing and mobilising tenants about the project. Agencies should engage with the group, by invitation, but not attempt to control or unduly influence it. Trusted local community groups and services should be encouraged to support the independent tenants group, while respecting its independence and autonomy.

*Information:*

- Tenants want agencies to commit to the provision of accurate and timely information throughout the process. Tenants should be provided with a reasonable timeframe and appropriate support to process and consider the information given and respond to it.
- Project information, including stages and timeframes, should be updated regularly. Tenants want written information to be in plain English and written with sensitivity and respect for tenants. Information should also be made available in all the main community languages spoken in the area.
- Tenants also value and want the opportunity for regular face to face communication with informed agency staff, through a local project office, street meetings, events and home visits. Tenants also expect their relocation coordinator to be in regular contact with them and to be able to provide accurate information and answers to their questions.

*Consultation:*

- Tenants want to be provided with a diverse range of ways in which they can be engaged and consulted. One key consultation body (existing or newly set up for the project) will provide one important vehicle for engagement. But there will be a range of other ways tenants can participate, including through one off consultation events/displays, street meetings, surveys, etc.
- Consultation should seek to reach out to all groups in the affected community, including harder to reach groups such as NESB, children and young people, single parents and seniors. Consultation approaches and techniques should be creative and varied to appeal and attract participation from the full range of population groups. Agencies should work with community partners to reach out to all groups, design consultation appropriate to each group and to encourage maximum engagement.
- The team conducting the community engagement should be continuously monitoring levels of engagement to identify groups who are not being actively engaged and designing new approaches that will attract those groups.

*Participation:*

- Tenants want opportunities to get involved in the engagement program, to contribute ideas, help run the processes and to do outreach into population groups. Tenants have a contribution to make to team planning processes and to the planning and implementation of community events. Tenants want support from agencies to assist participation and to build skills.

*Capacity building:*

- Tenants want support from the agencies and community partners to build their capacity, knowledge and skills to participate more fully and meaningfully. Targeted training, workshops and bus trips have been used successfully to build capacity in topics such as urban design, open space design, town centre design, community facilities design, master planning and house design. This capacity building will also build confidence and leadership among tenants to improve the level and quality of participation.

*Community events:*

- Community events offer opportunities to build community engagement and participation, bring the community together, disseminate information and promote social cohesion. These include community festivals, fairs, cultural celebrations, regular street markets and the like. Tenants want agencies to actively support and contribute to these events.

SUB-1678  
Name withheld



29 April 2022

Mr Alan Bright  
Director, Planning Proposal Authority  
Planning & Assessment  
Department of Planning and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Dear Mr Bright

### **WATERLOO ESTATE (SOUTH) PLANNING PROPOSAL – PP-2021-3265**

Thank you for the opportunity to make a submission in response to the exhibition of the Waterloo Estate (South) Planning Proposal (**'Proposal'**).

Mirvac supports the Government's commitment to the regeneration of the Waterloo Estate Precinct, however, cannot support the masterplan in its current form based on the following observations:

- The masterplan provides a highly prescribed and repetitive urban outcome that restricts flexibility for design innovation, place creation and changing market conditions;
- Proposed building envelopes will result in sub-optimal or compromised floorplate designs under the ADG, and may also hinder planning and delivery pathways;
- Many apartments will lack sufficient residential amenity, with issues relating to building separation, outlook, privacy, solar access, cross ventilation and access to quality communal open spaces; and
- The public domain is also compromised with limited provision for mature landscaping and a lack of solar access during winter months.

Further to the above, Mirvac respectfully suggest that additional consideration be given to the below items.

#### **The Masterplan**

Waterloo Estate South is an ambitious Proposal that seeks to establish the highest density residential precinct (dwellings per hectare) within the City of Sydney LGA. We commend the intent to create land use efficiency in proximity to the new Metro station, dedicate new and generous public open space, and prioritise a walkable street network. Together these are favourable urban design outcomes beneficial to high-density neighbourhoods.

Integration with the built form however, raises a number of concerns about the quality and efficiency of apartment design and desirability of public and communal spaces. The Proposal

offers a relatively rigid and repetitive urban structure that appears utilitarian in nature with long and narrow perimeter buildings. The result is poor precinct legibility, minimal variation in the urban experience and a potential lack of identity and sense of place. Mirvac recommends consideration for greater diversity in building typology, setbacks, and arrangement for a more varied and engaging urban outcome.

Local streets, small pocket parks and central courtyards will have limited amenity with minimal provision for mature landscaping and a lack of solar access during winter months. Taller towers along McEvoy Street will overshadow Waterloo Oval and existing residential dwellings to the south. This presents compromised place outcomes for local and future residents. Mirvac recommends implementing a greater diversity of scale and density throughout the precinct to enhance public domain outcomes.

### **Highly Prescriptive Built Form**

The masterplan provides building envelopes that are very detailed and highly prescriptive. This framework will likely result in a set urban and architectural solution that restricts flexibility for design innovation and future changes and opportunities. Mirvac recommends consideration for greater flexibility in planning controls to guide the desired bulk and scale and enable the market to deliver quality outcomes through the design excellence process.

### **ADG Compliance**

While ADG compliant floorplates are technically possible throughout the masterplan, many of the proposed envelopes will result in apartment layouts that are highly restricted and compromised in order to satisfy ADG design criteria. A number of apartment blocks challenge the acceptable building separation distances, cannot satisfy solar access requirements, and cannot accommodate sufficient deep soil planting. This will result in contrived floorplates with poor residential amenity to some apartments and minimal outlook and privacy due to cross viewing.

Satisfying the ADG through best practice and efficient outcomes whilst also delivering on design excellence will be challenging under the current Proposal. It will likely trigger a lengthy planning pathway and a reduction in yield. This will significantly compromise commercial viability of the proposed regeneration and therefore the delivery of value to the State.

### **Land Use Mix**

While we support the principle of an active ground plane with non-residential uses, we recommend greater variety and flexibility is permitted for ground floor uses to enable an informed market-led response at the time of planning and design.

### **Car Parks**

The proposed car parking allowance for the precinct is sought to be the most restrictive, Category A, parking rates. Category A rates are not supported and Mirvac requests City of Sydney LEP Category B rates be applied. Category A rates are typical of the Sydney CBD within an established global employment precinct serviced by light rail, trains, ferries, and buses while Waterloo Estate (South) is geographically separate with separate characteristics. Category A parking rates will significantly impact the demand for and value of the market apartments and alienates buyer groups (particularly young families) who rely on car travel as the primary mode of transport

## **Contributions**

Mirvac respectfully requests further clarity around the contributions payable. It is proposed that the successful proponent deliver, at no cost to Council or government, a significant amount of public infrastructure including open spaces, community facilities and new roads in addition to the social and affordable housing.

It is understood that the cost of delivering the public infrastructure will be offset against, albeit exceed the contributions payable. There are concerns regarding how this will impact the feasibility and Mirvac requests a draft Voluntary Planning Agreement or similar document providing clarity be released to the public as soon as possible.

We would welcome the opportunity to discuss the above items further with you.

Your sincerely,

A handwritten signature in black ink, consisting of a stylized 'D' followed by a horizontal line and a star-like flourish.

**Dominic Hunt**  
Project Director, New Business

SUB-1679  
Paul Whalen  
paulcwhalen@gmail.com  
Alexandria

Waterloo Estate South  
PP 2021 - 3265

I have not made any donations to a political party in the last 2 years.

I do not support the development as proposed.

1. The development:

I am unsure why "design excellence" was awarded for the design of the Waterloo Estate. I would have thought that design excellence as a minimum standard should be a high BASIX target.

Also, why does this then increase the size of the development by 10%?

Does this 10% increase negate the benefits that the "design excellence" achieved?

Where is this extra development going to go?

Won't that alter the footprint and impact studies?

It has become obvious over many years and many countries that design excellence provides rewards that are immeasurable. A healthy home is more likely to facilitate a healthy happier lifestyle. Given that these buildings are for social and affordable housing, I would have thought that it was even more important that this is the base from which the design improves.

This development is high density.

Buildings are clustered, with overshadowing and potential wind tunnels.

Not all apartments will benefit from the basic sunlight requirements during winter.

Will those apartments facing noisy streets be able to have cross ventilation at night during hot weather ?

Will the "green" courtyards survive with a minimal exposure to sunlight and circulating air ?

The proposed park, while not in this development, does not appear to include facilities for older children and teenagers. Where is the adventure playground (eg. Darling Harbour style facilities), open basketball and netball courts, skateboard park??

2. What value policy?

NSW Government Future Directions Policy is that 30% of the floor space be for social housing. The current proposal delivers just over 26%.

This is not acceptable when there is a desperate need for social housing.

Will there be a proportionate increase when the overall development increases by 10%?

What about affordable housing which is being reduced as well.

Affordable housing is one measure that will keep people from tipping into penury and dependence on the government/tax payer. Among the untold benefits would be being able to afford to travel for job interviews, present well for job interviews, hold down a job, stable environment for children to attend school and do homework, greater chance of a healthier living style, less desperation for the

adults, and the list goes on. A minor investment by government would deliver incalculable savings and benefits in the future.

Government land is being used for this development. Why is there not more affordable and social housing? The minimum requirements have not kept up with demand, with waiting lists 100's long.

Prevention is better (and cheaper) than trying to find a cure after the fact.

### 3. Social Impact Statement:

The proposal is for the Waterloo estate to accommodate a number of community groups, including:

- \* Social housing
- \* Affordable housing
- \* Market based residential housing
- \* Student Housing
- \* and Commercial/Retail companies

Given the proposed mix of these resident demographics, a significant number of whom will have diverse, complex and demanding needs, a thorough assessment of how these people will live harmoniously is required. And there needs to be a pro-active strategy and plan for making co-habitation work - it is unlikely to happen organically.

What definite support is proposed for this? Something has to trigger and facilitate a fundamental change in how different parts of the community live successfully together.

For example, Students do not tend to become part of the greater community. Within themselves perhaps, but not their neighbours. The Redfern/Waterloo area has seen a large number of Student housing developments over the past several years. With the change in teaching methods and less "need-to-attend" brought about by the current pandemic, I question whether there is sufficient demand for this proposed Waterloo Estate student accommodation. Instead of student housing, have the Planners considered options for generating more affordable housing through programs like build-to-rent or rent-to-buy.

Will the residents of the social housing and affordable units be able to afford to use the cafes, child care facilities etc, or will they feel pushed out of their own neighbourhood?

It is likely that many of the current social and affordable housing residents will never return to the estate because of the passage of time, the breakdown of their established social networks caused by the move, and the trauma of re-relocating their lives again. The next generation of social and affordable housing residents in the Estate may bring with them a higher level of resentment towards the "more well off" residents in the student and market-driven areas.

A SUCCESSFUL SOCIAL INTEGRATION VISION, STRATEGY AND PLAN is a critical factor in the success of this development. Failure to develop and implement this in collaboration with the various community groups impacted will be a key inhibitor to the success of the project.

With an undertaking this ambitious and complex the very first step should be to win the hearts and minds of the people being impacted by it.

I can't recall seeing any such Vision, Strategy and Plan in the proposal.

I would also support the input and concerns expressed by Alison Ziller and I urge you to consider the information she presents, and immediately agree to a SIS before proceeding further.

#### 4. Conclusion:

I do not support the current proposal as:

- \* There appears to be no Vision, Strategy and Plan which has the input and support of the impacted community groups (future residents) - and which can lead to a shared view of the desired future state.

- \* There is little demonstrable planning for those whom the development is supposedly to benefit.

- \* This proposal seeks support only for the development of the Waterloo Estate South component, whereas I believe it should be proposed in the context of the complete Waterloo Housing Estate development. In my opinion this is a piecemeal approach will likely lead to a confusion and re-work as future stages are proposed and implemented.

This is critical, as the green space proposed adjacent to the Waterloo Metro will be servicing the total redevelopment, and needs to be considered at every stage.

Paul Whalen  
34/27 Wyndham St  
Alexandria 2015

Waterloo Estate South  
PP 2021 - 3265

SUB-1680

Name withheld

Waterloo South Development - McEvoy/Pitt Streets (Planning Proposal PP-2021-3265)

I have lived in [REDACTED] in Pitt Street for the last 15 years. [REDACTED] is one of the 15 properties in the street listed on the Heritage Act Register. Pitt Street is basically residential with very little commercial activity, it also contains 2 child care centres. However in about the last 4 years it has become a "rat run" with traffic moving north frequently banked up from the Cleveland Street traffic lights to outside 40 Pitt and sometimes as far as the corner of Wells Street.

The opening of Pitt Street at McEvoy to just left turning vehicles along with traffic from within the development will only increase the rat run congestion. I understand that opening Pitt Street is necessary in order to provide access to/from the Development however the resulting traffic congestion/rat run will not be solved by traffic calming measures between the Raglan St and Cleveland St intersections.

I believe that traffic in Pitt Street should, as far as possible, be restricted to local traffic. This could be achieved by:

Leaving Pitt Street from McEvoy to Redfern Streets two way thus allowing an entry/exit to the Development,

Make from Cleveland to Redfern Streets one way in a southward direction. This would:

prevent vehicles from the busy Post Office and Australia Post parcel depot from turning right within around 50 metres of the Cleveland St traffic lights thus causing significant blockages due to the stop/start nature of vehicles at the lights.

allow large Australia Post parcel trucks easier access to their depot.

allow development of left and right turning lanes at Redfern St easing what can, at times, be a dangerous intersection.

[REDACTED]

SUB-1682  
Ron Hoenig  
heffron@parliament.nsw.gov.au  
Rosebery



29 April 2022

The Hon. Anthony Roberts MP  
Minister for Planning  
Minister for Homes  
GPO Box 5341  
SYDNEY NSW 2001  
By email: [office@roberts.minister.nsw.gov.au](mailto:office@roberts.minister.nsw.gov.au)

My dear Minister,

Please find below my submissions on the Waterloo South Precinct Redevelopment Proposal ("Proposal"). I note Proposal falls wholly within my Electorate. I do not support a proposal for the redevelopment of the Waterloo precinct that evicts thousands of social housing residents, many of whom are vulnerable, sells public land and assets to private businesses, and forces social housing tenants out of the area.

Equally, I cannot support a proposal which will have the effect of handing over the assets and administration of public and social housing to non-government organisations and social housing providers. If it is the intention of the State Government to sell its public assets and hand the management of a small proportion of newly built residential towers and infrastructure over to social housing providers in an attempt to absolve itself of its responsibilities under the *Housing Act 2001* (NSW), the *Disability Discrimination Act 1992* (Cth) and the Common Law I cannot support Proposal. I cannot support an attempt by the State Government to remove itself as landlord, with "landlord's liability", for its tenants (see *NSW Department of Housing v Hume* [2007] NSWCA 69).

Anecdotally, I am told by constituents residing in Waterloo that the Department of Land and Housing no longer offers 10-year leases to tenants. Instead, residents are offered year to year leases. I cannot support this proposal if it means the government will terminate, or refuse to renew, thousands of rental agreements so that people can be offered new leases with private housing providers.

I cannot support a proposal that does not guarantee every single person currently residing in social housing (including public housing administered by the Department of Lands and Housing) the same or better living standards, at the same rate of rent, as they currently enjoy. The State Government promises "...current residents of the Waterloo Estate (South), who will be rehoused during the redevelopment, have a right of return into the new housing".

It is unclear, however, on the current proposal whether every tenant who currently resides in social housing (public housing included) in the Waterloo precinct is guaranteed a home in the new development, a home similar to the one they currently reside in, and which costs the same amount they are currently paying, or even when that offer will be made. It is unclear whether tenants will enjoy the Minister as their landlord, a Minister with duties and responsibilities over and above those of private companies, or a private landlord who raises their rent regularly, and runs social housing like any other business, for profit.

Proposal offers "dwellings" but says nothing of how many bedrooms those dwellings will contain. Proposal proposes 847 social housing homes. This figure is meaningless without identifying how many dwellings, precisely, are needed to meet the housing needs of every single resident currently residing in the Waterloo Estates. The relevant questions are, how many people currently reside in social housing in the Waterloo Estate? How much space does each resident currently have (square meters and rooms)? What are the residents currently paying in rent? Will each and every one of those residents be in the same, or better, position (financial, living, social) once residing in the new development? A right to return is meaningless unless people are able to accept the offer.

It should also be noted that, as Justice Lloidy-Jones of the Federal Magistrates Court found in *Douglas v Department of Housing* [2011] FMCA 1028, "About half...[of people in public housing] has some form of disability". If the intention is to ultimately hand over the residents of Waterloo to non-government private companies, what guarantees are there that the private sector will be able to care for these people better than the government could? Ongoing enquiries into aged care service providers, and allegations of grave neglect, understaffing, and razor thin profit margins, might provide a stark warning to a Government determined to place vulnerable people under the care of business concerned with profit margins and business interests. If a more local analogy is required to make the point, consider the private COVID-19 testing clinics that closed over the Christmas and New Year period, or anecdotally, closed each day once they reached their quota, precisely when people needed them most

Would you kindly take my concerns into your considerations and provide me with a written response at your earliest convenience.

Yours sincerely,



**Ron Hoenig MP**  
**Member for Heffron**

SUB-1683

Name withheld

Don't demolish the Waterloo public housing

SUB-1684  
Beryl Ford  
fordb54@bigpond.com  
Redfern

Waterloo is an area of public housing and land, supplying homes for the lower social economic groups. We read frequently that homeless is on the increase. The increase in housing markets indicates that this is only going to get worse which means we can not afford to loose any social housing/public land to private control. An increase in homes should all remain in social housing.

Because this group is economically on the lower end of wealth there is a need to supply parks, free recreational areas, schools and medical centres and maybe workshops in the arts, a well know area to promote emotional well being.

When a society is content with its lot there is less anti social behaviour, people enjoy a better life (we only have one) and may progress to finding attributes in their capacity to achieve skills that benefit both them and society.

I submit that the Waterloo development should remain in the public domain and be enhanced by the development of Waterloo.

SUB-1685  
Jose Perez  
jm68.perez@gmail.com  
Redfern

Thank you for the opportunity to comment.

After looking over the plans I believe that the traffic management is not planned properly. Opening up Pitt St at McEvoy st will exacerbate the already disastrous traffic jam that occurs in afternoon peak.

As it is traffic regularly backs up to the Rachael foster site from Cleveland St.

The Waterloo station will not provide sufficient transport for the expected residents, by the time trains come in to the station they will be almost at capacity. A better integrated transport system needs to be worked out. For example currently the closest hospital is RPA yet without a private car you need to walk for 40minutes or catch a taxi/rideshare or spend around 40 minutes on public transport to go into the city or out then transfer to another route and come back into the hospital. For an elderly or unwell person this is silly considering the hospital is barely 2 kilometers away.

The parkland is great. I appreciate that greenspace has been allocated at the size it has. I hope this gets duplicated in the North development.

Considering that prices for affordable accommodation in the inner city for essential workers is almost non-existent I believe a greater proportion should be allocated to it and social housing. I appreciate that it will be the full price properties will be funding this I believe that there is an opportunity to create a future capacity here that won't be available in the future. Look at it as a hand up not a handout.

I again thank you for the opportunity to comment.  
Kind regards  
José Pérez

SUB-1686  
Parker Craig  
pluvzparis@gmail.com  
2038

protect public housing

SUB-1687  
Siobhan Bryson  
siobhanbryson@yahoo.com.au  
St Peters

## **Brief Submission**

### **Waterloo Estate South Planning Proposal**

#### **Siobhan Bryson**

The impact of the long drawn out process around this redevelopment, with stops and starts and changes of responsibility over the past few years, plans and counter plans, consultations that have commenced and then stopped and then started again, over at least 10 years, the level of fatigue and disillusion around this process cannot be overstated.

The complexity and technical nature of planning controls is something that is beyond the average person's ability to navigate and understand let alone comment on. Ultimately, what is important is the liveability of the redevelopment, the quality of life that existing and future tenants of the estate will be able to have, safety and community cohesion, and most importantly, the quality of life of the vulnerable social housing tenants who will suddenly be in a minority in their own community.

Given the history and significance of this place for Aboriginal people, it is imperative that that the design of this redevelopment caters appropriately for Aboriginal people to make sure that Redfern continues to have a thriving Aboriginal community. I don't see anything in these plans that gives me confidence that this will be the case.

I am writing this very brief submission to highlight a few key points:

1. In line with the Aboriginal Affordable Housing campaign demands, I support a target of 10% affordable housing for Aboriginal people as part of this redevelopment. Not 10% of the 7.5% allocation of affordable housing that is being proposed, but 10% of the total number of dwellings being built.
2. I realise that this point might not be relevant to this stage of the planning, but I am going to say it and keep saying it: The size of the dwellings that are being built should be adequate to accommodate the families who currently live in Waterloo, and who are being promised a right of return. The fabric of this vibrant community must be maintained and the residents must be catered for appropriately and respectfully. Building predominantly one and two bedroom units and studios might reap big profits for the developers, but it will not accommodate the needs of the community.
3. Less than 30% social housing in the proposed redevelopment is unacceptable. In the current context with over 50,000 people on the waiting list for social housing, we need much more than 30% social housing. I would like to see a minimum of 50% social housing in the mix.

4. I totally disagree with selling public land to private developers for very minimal gains in public housing. There must be massive public benefit gained from selling public land. The idea that a redevelopment such as this one should be cost neutral for the Government when they should be investing heavily in social housing so that everyone's human right to access housing is met. It is the responsibility of the government to ensure the housing needs of the community are met, and it is particularly important to ensure we look after the most vulnerable in our society.
5. Dealing with the many aspects of a massive redevelopment such as this one in anything but a holistic way is problematic. Just considering planning controls without considering the social impacts of those controls for example, is fraught. There should be a comprehensive social impact assessment undertaken alongside or prior to setting planning controls.
6. Reconsider the opening of Pitt Street to Mc Evoy Street: I back resident's concerns about opening Pitt St to Mc Evoy Street. The risk of this becoming a rat run are high and safety concerns are very real.
7. Move the community Centre to a more centralised location: The location of the community centre needs to be changed to a more central location as outlined in the Counterpoint submission

SUB-1688

SUB-1689

Name withheld

*Multiple submissions received from an individual or organisation, are counted as one submission.*

The fact is there are over 1000 households on the waiting list for housing in the inner city and over 50000 in the state of NSW!

with this being the largest housing commission in inner city I can only describe the proposed plan as a disgusting money hungry move made by people that are so far from reality it's sad!

I believe a redesign of the existing housing and surrounding area would be welcome but the relocation/removal of hundreds of venerable people is a crazy, heartless and disgusting act!  
To conclude I am strongly against the plans proposal and plead the current plan does not go ahead.

SUB-1688

SUB-1689

Name withheld

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To conclude I am strongly against the plans proposal and plead the current plan does not go ahead.

SUB-1690  
Rhiannon Cook  
rhiannon.cook@vinnies.org.au  
Lewisham



Mr Alan Bright  
Director, Planning Proposal Authority  
Planning & Assessment  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

29 April 2022

Dear Mr Bright,

**RE: Waterloo Estate (South) planning proposal PP-2021-3265**

On behalf of the Waterloo Conference of the St Vincent de Paul Society, we are writing regarding the proposed plan for the redevelopment of Waterloo Estate (South).

The Waterloo Conference - a group of St Vincent de Paul Society NSW member volunteers – has been active in the Waterloo estate for many years. We provide financial and social support to hundreds of residents in the estate on an ongoing basis. In the 2020-21 financial year the Conference assisted 572 people and distributed \$52,117 in financial assistance. The year prior, it assisted 919 people and distributed \$191,308 in financial assistance. In addition, we provide in kind support in the form of household essentials such as whitegoods, furniture and bedding, as well as social and emotional support.

We are writing to highlight concerns about the impact of the proposed redevelopment on the lives of current residents, suggest ways in which any negative impacts can be mitigated, and make recommendations so that the redevelopment results in better outcomes for more people experiencing poverty and exclusion.

**Impact on current tenants**

The redevelopment of the Waterloo area was announced more than six years ago. Since then, many of the people assisted by the Society in this area have lived with ongoing uncertainty about the future of their homes. They have been unsure if they will need to relocate, and if so, for how long; and they have not known what this might mean for them in terms of access to their children's schools, to employment opportunities, and to the health and social services on which they currently rely. Further, many of our clients have neighbours and friends who help them out in many different ways, and trusted relationships with the services that support them. They are concerned that they will lose these networks which they see as their community.

Such uncertainty would take a toll on any individual or family. Many of the people we assist have complex physical, social and health challenges, and this process has created even more disruption in their lives. That the redevelopment process will have particularly impact First Nations people, many of whom have strong and deep connections to the area, as access to a range of specialist support systems, should also be acknowledged.



To reduce the impact of the proposed redevelopment on current tenants, and offer reassurance that their needs will be met throughout the redevelopment process, we would like to see tenants given clear information about how they will be impacted, together with reassurance that:

- Any social housing tenants required to relocate during the redevelopment process will be given the right to return,
- Where possible, tenants should be given the option to relocate within the existing area so they can continue to access existing services, supports and networks,
- The full relocation costs of any tenants required to move will be covered by the NSW Government,
- Tailored support will be made available to any social housing tenants required to relocate outside the Waterloo area, to help people find and link with services and supports and navigate their new environment;
- The housing needs of existing tenants will be factored into the redevelopment. This should extend beyond dwelling size and physical accessibility, to concerns such as height, fear of confinement in small spaces such as lifts, and social relationships,
- Existing tenants will be able to have their say about the allocation process following the redevelopment.

UNSW's City Futures Research Centre, in partnership with Shelter NSW and the Tenants' Union of NSW have previously consulted with social housing tenants affected by renewal projects to inform the development of a Compact for Renewal.<sup>1</sup> These findings should underpin how the NSW Government works with tenants in the Waterloo Estate (South), and all parties should be required to demonstrate how they will implement the recommended principles throughout the redevelopment process.

### **Ensuring the redevelopment meets the needs of social housing tenants**

Many of the people we assist are concerned about how the redevelopment will work for them. Specific concerns include increased living costs (e.g. higher electricity bills due to air-conditioning) and new social challenges following changes to the socio-economic profile of the community.

To reduce energy costs for current and future tenants, the redevelopment should ensure excellence in the environmental performance of new dwellings. We support the City of Sydney's recommendation that the LEP and design guide require that all development in Waterloo Estate (South) demonstrate environmental performance beyond the prescribed minimums.

More broadly, the St Vincent de Paul Society NSW supports strengthening the National Construction Code's energy efficiency requirement from 6 stars to 7 stars. We have applied this standard to the 502 social and affordable housing units we delivered through the NSW Government's Social and Affordable Housing Fund, and our tenants now benefit from homes that are easier to maintain at a healthy temperature at a lower cost. The Waterloo Estate redevelopment is an opportunity to similarly demonstrate best practice and provide long-lasting benefit to future residents and the environment.

To help support community cohesion, and enhance opportunities for connection following the redevelopment process, the plans should also ensure public spaces are accessible to all residents, and that any outdoor spaces have adequate sunlight and wind safety and amenity.

We would also like to emphasise the need to invest in community development and place-making initiatives. This must be supported by suitably qualified professionals, recognising the challenges some social housing tenants experience in relation to linking into community and building social connections.

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<sup>1</sup> Shelter NSW, Tenants' Union of NSW and City Futures Research Centre UNSW (2017) A Compact for Renewal: What tenants want from Renewal.



### **Increasing the number of people assisted as a result of the redevelopment**

The goal of the redevelopment process should be to ensure better health and social outcomes for more people. We are concerned that this goal is not being realised.

Already, the redevelopment process has had – and will continue to have – a significant negative impact on the lives of people already marginalised in our community. If the plan proceeds in its current form, the redevelopment process and the disruption it has caused, will only yield a relatively small increase in social housing units (fewer than 100 units). At the same time, it will see valuable land, located close to services, shops and employment and education opportunities, transferred from public to private ownership.

With more than 50,000 applicants on the NSW social housing waitlist, an acute shortage of affordable housing, and rapid growth in homelessness, this is a missed opportunity to provide more people with a safe, secure and affordable place to call home.

Further, the current proposal allocates only 7.5% of the expected 3012 homes to affordable housing – approximately 227 homes. Given that as the National Rental Affordability Scheme winds up, approximately 1,239 affordable housing allocations in the suburbs surrounding Waterloo will cease,<sup>2</sup> much more must be done to address what will be a significant increase in need over the next few years.

We therefore support the City of Sydney's recommendation that at least 30% of residential floor space be committed to social housing, and 20% to affordable rental housing. We note that this recommendation is in line with the NSW Government's own target for large redevelopments as stated in the *Future Directions for Social Housing in NSW* strategy.<sup>3</sup>

We also urge the NSW Government to consider applying a more innovative commercial and funding model, as outlined by Shelter NSW,<sup>4</sup> so that the redevelopment process does not result in the permanent loss of a valuable public asset that could be better leveraged for long-term public good.

Thank you for the opportunity to share our views on the future of the Waterloo Estate. Should you have any questions about this submission, please contact Rhiannon Cook via email at [Rhiannon.cook@vinnies.org.au](mailto:Rhiannon.cook@vinnies.org.au).

Yours sincerely,

Jenny Cunningham  
President  
Waterloo Conference,  
St Vincent de Paul Society NSW

Pamela Madafiglio  
Secretary  
Waterloo Conference,  
St Vincent de Paul Society NSW

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<sup>2</sup> This includes 828 affordable homes in Chippendale, 211 homes in Camperdown, 87 homes in Eveleigh and 113 homes in Zetland. Australian Government (2020) [National Rental Affordability Scheme Quarterly Performance Report](#), 31 March 2020.

<sup>3</sup> NSW Government (2016) *Future Directions for Social Housing in NSW*, p. 9. Available at <http://www.socialhousing.nsw.gov.au/?a=348442>

<sup>4</sup> Murray, C.K. and Phibbs, P. (2021) [Reimagining the economics of public housing at Waterloo](#). A report for Shelter NSW.

SUB-1691  
Edie  
ediecoo@ymail.com  
Redfern

I do not support private developments on public land. We are in the middle of a serious shortage in social and affordable housing and Sydney is so unaffordable.

Do not develop public lands other than to expand social and affordable housing and public amenities.

We need to ensure there is also culturally appropriate Aboriginal housing managed by an Aboriginal housing provider to ensure self determination and the significance of this area as an Aboriginal community after the genocidal removal and assimilation practices at the hands of former government policies. We need to do better to ensure Aboriginal people and communities continue to have a secure presence and allowed to be self determining in what this looks like. Work with the local Aboriginal community controlled sector to support self determination modelling.

Prioritising the return of existing and long term community is also crucial.

I urge government to stop prioritising private developers on public lands.

SUB-1692  
Stanley Hsieh  
hsieh.stanley@gmail.com  
Redfern

Increased traffic on Pitt st will have impact on Pitt st and Redfern residents including:

1. Increased traffic on Pitt st posing risk on children - there are at least 3 childcare centres on Pitt st (and my kid goes to one of them) which will have increased traffic risk. Alex park community school and Sydney inner school students are also affected by increased traffic on Pitt st as families there are zoned for these schools
2. Valuation impact - increased traffic negatively affects property valuation and affected resident will need to be compensated for any valuation deterioration as a result of increased car traffic.

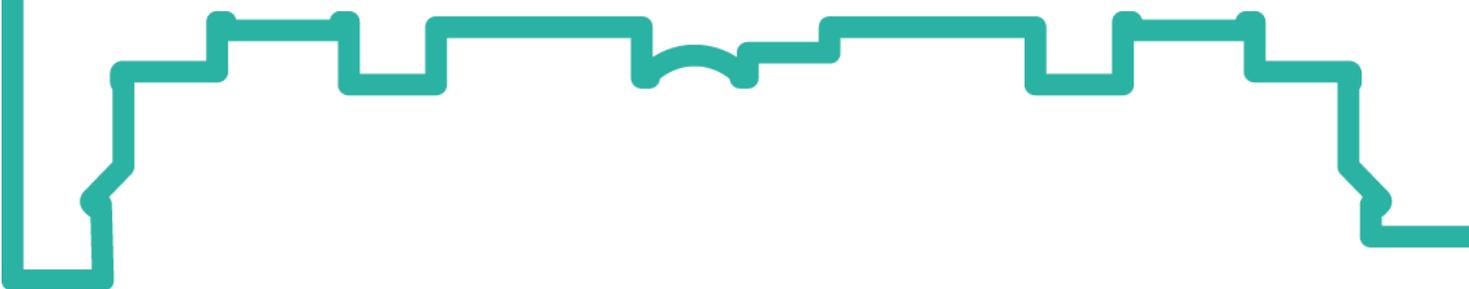
SUB-1693  
Cathy Callaghan  
cathy@sheltersnsw.org.au  
Sydney



# Public Exhibition of the Waterloo Estate (South) Planning Proposal and draft Waterloo Estate (South) Design Guide

## SHELTER NSW SUBMISSION

29 April 2022



## About Shelter NSW

Shelter NSW has been operating since 1975 as the state's peak housing policy and advocacy body. Our vision is to create a sustainable housing system that provides secure homes for all.

We pursue our vision through critical engagement with policy and practice and thought leadership. We provide systemic advocacy and advice on policy and legislation for the whole NSW housing system to resolve housing inequality.

We are especially concerned for low-income households which struggle to afford good-quality and well-located housing in the private market.

Shelter NSW is concerned about the housing crisis in NSW and the rising trends in homelessness; housing rental stress as well as the impacts of poor-quality housing, particularly on low-income households. Lower-cost properties are being steadily replaced with new ones at higher rents, and new concentrations of disadvantage have been created across our major cities and towns as low-income households are displaced. We advocate solutions that aim to make the housing system work towards delivering a fairer housing system for all.

We have an established interest in the development of social and affordable housing, including policies and practice around public housing estate renewal and associated property development. We have also been involved in the *Groundswell* coalition. *Groundswell* comprises a number of local community organisations from the Redfern and Waterloo area including REDwatch, Inner Sydney Voice, Tenants' Union of NSW and Shelter NSW. It acts as a point of liaison between NSW Government agencies and community members regarding the development of the broader Waterloo and Redfern. Our Senior Policy Officer Cathryn Callaghan also co-chairs the (resident-led) Waterloo Redevelopment Group (WRG).

Shelter NSW welcomes the opportunity to make a submission and thanks the Department of Planning for the opportunity.

## Executive Summary

The NSW Government ('the Government') is proposing to redevelop the Waterloo South housing estate which currently consists of approximately 749 public housing and 125 private dwellings. The proposal would see the loss of valuable public land and a vastly denser future precinct of over 3,000 dwellings<sup>1</sup> with just 28.2% social housing dwellings (26.5% of residential floorspace, about 847 dwellings) and 7.5% affordable rental dwellings (7% of residential floorspace, about 227 dwellings).

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<sup>1</sup> The availability of an additional 10% floorspace may add as many as 330 additional dwellings to the site. The eventual number of units to be delivered could be as high as 3300-3400.

The proposal to redevelop the Waterloo South Estate is '*one of the state's most significant redevelopment projects*' according to the NSW Government. We agree. There is a lot at stake for the current and future public/social housing residents; private residents (owners and renters); local communities and their affiliated community and public sector service network; and the broader City of Sydney and state.

The proposed development is on NSW public land, home to hundreds of public housing tenants and a long-standing Aboriginal community. As such, we believe the NSW Government has the responsibility and opportunity to build an exemplar community – one where people from all walks of life, cultures, ages and incomes can prosper; supported by a network of social, government and public services and facilities; living in well-built and designed homes, buildings and public spaces. This vision we contend, is worthy of direct Government investment, innovative thinking and whole-of-government planning rather than the narrow zero-sum game of 'financial feasibility' (the latter forcing many stakeholders commenting on this proposal to argue on the margins of planning and technical policy).

The City of Sydney has identified that it needs 14,000 additional affordable and social dwellings by 2036. This proposal could see as few as 100 additional social and 227 affordable housing dwellings delivered on the Waterloo South site over the predicted decade of its development. Unknown at this stage is how many additional tenants will eventually be offered social housing as a result of this development.

Given the massive disruption to current tenants, the cost of managing and advancing the proposal and the loss of a major public land asset we suggest that the proposal fails to stack up. On this basis we cannot support the proposal in its current form.

We believe there is a significant requirement that the proposal makes a substantial and far greater contribution to increasing the stock of social and affordable housing in the Sydney Local Government Area (LGA) – commensurate with a large and growing unmet demand and the capacity of Government to drive a better outcome in the broader public interest. We note that this aspiration is shared by many including elected local government representatives, independent committees, community and resident groups.

If it is to be privatised, this site needs to work harder for the people of NSW. And if the density of the site is to be substantially increased care must be taken to create a place where large numbers of vulnerable people and lower-income people in general can reasonably live.

The Government requires its Land and Housing Corporation (LAHC) to be self-funding. This has given rise to the public/private partnership '*Communities Plus*' model where LAHC sells valuable public land and dwellings in order to fund the expansion and upgrade of existing and new social housing stock across the state. It is our strong view that this business model, driven by NSW Treasury in particular, within which financial feasibility analyses for sites like Waterloo South are shoehorned, is holding the state back. It puts a cap on the ambition for these types of public housing renewal sites. Shelter NSW has recently released new research, calling on the NSW Government to rethink its traditional approach to public housing estate renewal. In this submission we will refer to that research and call on the NSW Government to

take a more innovative and long-term commercial public housing estate renewal approach in order to preserve valuable public land assets, while delivering more social housing.<sup>2</sup>

At Shelter NSW, we also advocate for Affordable Housing - in addition to social housing, not instead of it. It responds to an important group that is often overlooked – financially stressed renters in the insecure, private residential housing market (renters who otherwise generally don't qualify for social housing). And it also caters for important key workers, including many from the government's own workforces who are best placed if they live and work in the same area. Currently, these key workers (including from the Aboriginal community) are being displaced from the city and the communities they serve. We believe the Government has the opportunity to assure more affordable homes in the Waterloo South area for these types of workers.

What is clear, is that the *Communities Plus 70:30* approach (slightly modified in the case of Waterloo South) results in the dilution of social housing in any area. In this case, the dilution is amplified by the large increase in density. The combined proposed proportionate reduction of social housing communities across the Sydney LGA, including that of the future Elizabeth Street site, should be understood to be proposals that actively reduce the proportionate representation of lower socio-economic people in the local area and in doing so, changes the character of these suburbs entirely.<sup>3</sup> In Waterloo itself this includes a significant and long-standing Aboriginal and Torres Strait Islander population.<sup>4</sup> On any measure this development, as it stands, will continue the process of gentrification and displacement often associated with urban renewal projects, undermining the broader vision of Sydney that we share with many others: where people from all walks of life, cultures and incomes can reasonably live in diverse, well-supported communities.

Having focused on the relatively low proportion of social housing in the future Waterloo South precinct it is critical to understand that there will a significantly (and hopefully increased) number of social housing tenants living in what will be a very dense, high rise precinct.

The NSW Government acknowledges that's its tenancy populations are increasingly vulnerable, requiring significant support. While Shelter NSW does not assert that high-rise living is, by definition, unsuitable for lower income people, it is well understood that the downsides of this type of living are most keenly felt by that cohort. This is especially acute for those experiencing the compounding challenges associated with poor mental or physical

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<sup>2</sup> Murray,C. & Phibbs,P. (2021) *Reimagining the economics of public housing estate at Waterloo – a report for Shelter NSW* [access via shelternsw](#)

<sup>3</sup> Rogers D. & Darcy, M. (July 8, 2020) [Public housing renewal likely to drive shift to private renters not owners in Sydney](#), *The Conversation* online article

<sup>7</sup> Rogers & Darcy *ibid* analysis indicated that the proposed Waterloo redevelopment projects for example, would likely reduce the entire suburb's proportion of social housing dwellings from 30% to about 17%. Private renters might rise to be more than 50% of households; challenging suggestions in the original research that the benefits of the social mix were based on owner-occupied and public housing neighbourhoods not on a transient renting population.

<sup>4</sup> HillPDA Consulting, *Waterloo South Housing Diversity & Affordability*, prepared for Department of Planning, Industry & Environment March 2020. In 2016, 227 residents (or 6.2%) identified as Aboriginal and/or Torres Strait Islander, a far higher proportion than the 1.2% for the City of Sydney

health; loneliness and isolation. It is our firm view that if the NSW Government proceeds with this development it needs to formally and transparently justify (to the people of Sydney) that a precinct of this density and social makeup can support such a large, vulnerable population. Furthermore, we call on the Government to actively assess and commit the necessary funds that will be required to support the: successful relocation and return of current public housing tenants; the rapid influx of many thousands of new residents (social, private owners and renters) and the growth of a vibrant, supportive community, building on the cultural, social and community heritage of the suburb of Waterloo.

In this submission we will be calling on the NSW Government to:

- **increase its commitment to social and affordable housing to: one third social housing, one third affordable rental housing and one third private housing** commensurate with the current and growing demand for social housing and to support key community, public and social sector workers (nurses, teachers, police, paramedics, social workers, legal officers including from local Aboriginal services) to remain living in the area
- **commit at least 10% of social and affordable housing to the Aboriginal community**
- **commit to demonstrating a superior environmental performance in the redeveloped estate** (beyond minimum compliance prescribed by BASIX) to support the health and well-being of lower-income residents, reduce energy bills and generally increase the long-term resilience of the community
- **apply a more innovative commercial, funding and tendering model to the development of this site reducing the need to sell a large tract of valuable public land to private developers and enabling the involvement of the community housing sector**
- reconfirm how a future estate of this density can, initially and over time, support a vulnerable social housing community **by commissioning a Social Impact Assessment (and risk mitigation plan) as part of the planning proposal** (i.e., before the DA stage). And, in the case where the risks are high and or unmitigated, be prepared to **adopt a lower density for the site.**
- **Develop, implement and fund a Human Services Plan spanning current relocation and post development and beyond** - commensurate with a much larger Waterloo South population as well as the complexities that will arise from establishing a 'mixed' and predominantly lower-income community in a high-rise built environment.
- **Formally adopt the Compact for Renewal** as a means of ensuring best practice tenant engagement in the relocation and resettlement process.

## Scope and approach of our submission

- **Our submission is for the attention of the NSW Government (not just the Department of Planning).** While we understand that the proposal is being made by the NSW Department of Planning and environment, we will in the main, address our recommendations to the NSW Government – landlord of the current tenants; asset owner of the current public land and housing and provider/funder of many public and community services required to support such a large new development and community.
- **Given the focus of Shelter NSW, this submission will primarily focus on the social and affordable housing provisions described in the proposals.** We note however, that our affiliated community and resident organisations (within *Groundswell*, for example) as well as many local residents will provide valuable insight into factors such as public space, amenity and overall design. We encourage the consent authority to take heed of their feedback – as they represent a genuine source of information from a long-established diverse community. As residents they stand to be most-impacted by the proposed development. And of course, public housing residents, with a ‘right of return’ to the estate have keen interest in its development. In particular we endorse the submission made by Counterpoint Community Services which has consulted deeply and widely.
- **Over time the planning for the broader Redfern-Waterloo area has moved from the broader area to smaller elements.** This planning proposal for example, only considers Waterloo ‘South’ with North and Central subject to separate future proposals. Similarly, there are other active proposals for Government-led developments at the nearby 600 Elizabeth Street Redfern, Waterloo Metro and in nearby suburbs such as South Eveleigh and Glebe. While we appreciate that this may be easier for planners, financiers and future developers we do think this approach has restricted a more fulsome consideration of the cumulative opportunities and risks presented by the Waterloo South proposal. **In this submission we will often refer to data and considerations for the broader Sydney LGA.**

## 1 The stock of Social and Affordable needs to grow in the City of Sydney

In the decade 2006 – 2016, the City of Sydney reports that while the stock of social housing increased by 841 dwellings, the proportion of social housing stock compared to total households actually reduced from 11.7% to 9.2%.

According to the City of Sydney Housing Audit<sup>5</sup> as at June 2020, there were:

- **9,630 Social** (including public) housing dwellings representing **8.1% of private dwellings** in the city (compared to 9,397 in 2007)
- **1,028 Affordable** rental housing dwellings representing **0.9% of private dwellings** in the city (compared to 447 in 2007).

Other evidence of unmet need for housing across NSW and Sydney:

- **Demand for social housing.** According to the Government's own social housing waitlist data<sup>6</sup> there was on June 30, 2021, 626 approved applications on the general social housing waiting list and 267 on the priority list in the 'inner city'. Wait times for one bedroom or studio time are one to ten years with wait times for two-bedroom units extending to ten plus years.
- **People seeking homelessness services being turned away.** As detailed in our Shelter NSW Pre Budget Submission<sup>7</sup>, close to 50% of the over 47,000 people seeking accommodation assistance from the Specialist Homelessness Sector (SHS) in NSW during 2020-21 were turned away<sup>8</sup>. This has steadily worsened since 2015-16 where 15,471 or 34.2% had the same experience. Over the last decade, each year, at least 45,000 people present at SHS services seeking help (with Aboriginal & Torres Strait Islander people consistently overrepresented at nearly a third of all SHS clients). Many of these SHS service operate in the City of Sydney and report the lack of medium-long-term social housing as a key barrier to resolving client needs.
- **(NRAS) Commonwealth scheme ending.** The National Rental Assistance Scheme (NRAS)<sup>9</sup> is expiring across the country<sup>10</sup>: 906 have already expired in NSW with a further 5,639 properties due to expire by 2026. Many of these properties will be in the City of Sydney.

<sup>5</sup> City of Sydney (1 June 2020), *Housing for All – Local Housing Strategy – Technical Report* at p 46

<sup>6</sup> Department of Communities and Justice [Expected waiting times | Family & Community Services \(nsw.gov.au\)](#) accessed 27 April 2022. Allocation zone CS01. Note each application represents a household.

<sup>7</sup> Shelter NSW (2022) *Prebudget Submission to NSW Department of Treasury* available at [www.shelternsw.org.au](http://www.shelternsw.org.au)

<sup>8</sup> Productivity Commission (2021) *Annual Report on Housing and Homelessness*

<sup>9</sup> This is a Commonwealth & State program. Eligible NRAS applicants from low-moderate incomes attract a contribution for each approved home; rent is set at least 20% below the prevailing market rates

<sup>10</sup> Commonwealth Government (June 2021) [nras-quarterly-report-30-jun-2021.pdf \(dss.gov.au\)](#) at p3

– **Rental Stress (households paying more than 30% of income on rent) is chronic and widespread in Waterloo South.** According to a March 2020 report prepared for the Department of Planning, Industry and Environment on housing diversity and affordability in Waterloo South<sup>11</sup>, 43% of the renter households within the study area were experiencing rental stress (that is, paying 30% or more of their household income on their rental repayment). Importantly, the report notes that *the housing affordability challenge in Sydney is affecting more than just the socially disadvantaged or low income earners.... Households on very low or low incomes cannot afford to rent a 1 or 2 bedroom apartment in the Sydney LGA. Households on a moderate income could afford a 1 bedroom but not a 2 bedroom apartment and, as a red flag for social harmony and equity (we think) only more affluent households will be able to afford 2 or 3 bedroom dwellings....If left unabated the housing affordability gap will continue to widen.*

The NSW Government, via the Greater Sydney Commission released the *Greater Sydney Region Plan: A Metropolis of Three Cities and its Eastern City District Plan* in 2018. That plan required relevant Councils including the City of Sydney to prepare a 20-year local housing strategy. The City of Sydney released that plan<sup>12</sup> identifying the following targets, reflecting overall City targets: that of all private housing, 7.5 per cent will be affordable housing and 7.5 per cent will be social housing;

**Table 1:** adapted from *City of Sydney Housing provision to 2036*

<b>Housing in Sydney LGA</b>	<b>Total 2016</b>	<b>2016–2021 (0–5 year) target</b>	<b>2022–2026 (6–10 year) target</b>	<b>2027–2036 (11–20 year) contribution</b>	<b>Total 2036</b>
<i>Affordable</i>	835	+2714	+2714	+5428	11,690
<i>Social</i>	9,716	+494	+494	+987	11,690
<b>Total Dwellings</b>	<b>117,429</b>				<b>173,429</b>

The Independent Advisory Group (IAG) expert panel noted in its 2021 report<sup>13</sup> that *in the Waterloo precinct, there should ideally be more affordable housing than the 10% proposed due to the demography, the clear need and the income circumstances of the population in this area.*

<sup>11</sup> HillPDA Consulting (March 2020), *Waterloo South – Housing diversity and Affordability*, prepared for the Department of Planning, Industry and Environment at p 56

<sup>12</sup> City of Sydney (2020) *Housing for All – Local Housing Strategy* access [Local Housing Strategy](#)

<sup>13</sup> Independent Advisory Group (2021) *Waterloo South Report* at p 55

## 1.1 Key and Essential Workers suffering acute housing stress across Sydney – especially in the inner city

Recent research by Gilbert, Nasreen and Gurrán<sup>14</sup> has highlighted the extent to which key workers in Sydney are struggling to find appropriate and affordable housing. These include teachers, nurses, community support workers; ambulance and emergency officers; delivery personnel and cleaners. These are the very types of workers needed to support the large and growing residential populations and commercial operations that exist across the Sydney LGA.

The report has found that twenty per cent of key workers across Sydney experience housing stress, with much higher rates in inner subregions. Concerningly, the report notes that difficulties accessing appropriate and affordable housing is extending well beyond households traditionally considered in need of welfare into moderate incomes brackets. They found that there are no LGAs in the Sydney metropolitan region with a median house price that is affordable to an early career registered nurse, and only a few LGAs having affordable unit prices. (Refer *Appendix A* for more detail)

Community sector organisations operating in the inner city have noted to Shelter NSW that their effectiveness is greatly enhanced by having its workers deeply involved, at best, living within or close to the communities they serve. We can reasonably extrapolate this to apply to the broader public sector (police, teachers, nurses). The reality is for those occupational groups however, that not only will they be unlikely to be able to afford to live in the Sydney LGA, they will likely be forced to live in the very outreaches of Sydney or in satellite cities such as Wollongong or the Blue Mountains enduring lengthy commutes into the inner city each day or night depending on rosters.

## 1.2 Aboriginal people are currently well-represented in Waterloo

Waterloo is a critically important cultural and historical home to Aboriginal people – both for local residents as well as connected communities across Greater Sydney and NSW. According to a report prepared for the Department of Planning<sup>15</sup> the Waterloo Precinct has a significant Aboriginal and Torres Strait Islander population. In 2016, 6.2% identified as Aboriginal and/or Torres Strait Islander, a far higher proportion than the 1.2% for the City of Sydney. Additionally, this group has a high concentration of middle aged adults with evidence of young families, with a high proportion of children aged 10 to 14 years. Other Government data<sup>16</sup> points to a large representation of Aboriginal people amongst the current Waterloo Estate tenant population (around 10%)

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<sup>14</sup> Gilbert, C., Nasreen, Z. and Gurrán, N. (2021) *Housing key workers: scoping challenges, aspirations, and policy responses for Australian cities*, AHURI Final Report No. 355, Australian Housing and Urban Research Institute Limited, Melbourne, <https://www.ahuri.edu.au/research/final-reports/355>, doi:10.18408/ahuri7323901.

<sup>15</sup> HillPDA Consulting (March 2020), *Waterloo South – Housing diversity and Affordability*, op.cit. at p 33

<sup>16</sup> Cited in the cited in the Waterloo Metro OSD proposals (*Environmental Impact Statement Appendix AA - Social and Economic Assessment [SSD-10437 Southern Precinct]. Appendix A*

Shelter NSW endorses the position of the City of Sydney<sup>17</sup>, in its *Housing for All: Local Housing Strategy (2020)*:

*The Strategy... highlights the need to support Aboriginal and Torres Strait Islander people maintain ties to the local community. This includes ensuring suitable social and affordable housing managed by Aboriginal community housing providers and led by Aboriginal people and organisations as a continued expression of self-determination. The Strategy notes that when the Redfern-Waterloo development area was established in 2004, one of the objects of the legislation was to promote, support and respect the Aboriginal community in Redfern-Waterloo, having regard to the importance of the area to the Aboriginal people*

In other Waterloo precinct consultations<sup>18</sup> concerns expressed by Aboriginal people have been documented. These include concerns that the extent of change and failure to ensure low-cost housing will in a practical sense displace Aboriginal people from the local area. By extension, Aboriginal people have called on the Government to ensure a *proportion of affordable housing should be targeted to Aboriginal people who are being forced out of the area.*

Shelter NSW supports the campaign [Aboriginal Affordable Housing Campaign](#) which calls for 10% of any housing developed on Government land be devoted to Aboriginal people and for affordable housing programs.

## Recommendations:

- **increase commitment to social and affordable housing to: one third social housing, one third affordable rental housing and one third private housing** commensurate with the current and growing demand for social housing; to address homelessness and chronic and widespread rental stress; and to support key community and social sector workers (nurses, teachers, police, paramedics, social workers, legal officers including from local Aboriginal services) to remain living in the area
- **ensure at least 10% of the total stock of social and affordable housing is dedicated to Aboriginal people** (the latter managed by an Aboriginal Community Housing provider) in order to prevent further displacement from the area and to support an ongoing vibrant community.
- **give special consideration for affordable housing to key workers** from the health, education, justice and community sector that currently and will in the future provide support to an expanded inner city community including Waterloo.

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<sup>17</sup> Ibid.

<sup>18</sup> Ibid at p162

## 2. Supporting a future hi-rise Waterloo South Community with many lower-income renters

According to AHURI research by Easthope et al<sup>19</sup>, 10% of the Australian population lives in an apartment (and increasing), mainly in capital cities (85%). Our interest at Shelter NSW is with the 39% of households living in high-density apartments from lower income households.<sup>20</sup> And while we are not against high rise living *per se* we note the research finds that these lower-income households, *over-represented compared to other dwelling types are disproportionately affected by challenges associated with apartment living*. Importantly these researchers have noted that, *“it’s not just the buildings, high-density neighbourhoods make life worse for the poor”*<sup>21 22</sup>

The experiences of apartment living for lower-income apartment residents are influenced by factors such *infrastructure provision, urban design, building design and management, neighbourhood amenities and facilities, and ongoing place management and community engagement*. Tensions can arise from a variety of sources – whether it be noise, conflict over shared spaces like gardens and laundries or the management of safety and security issues. And of course, these tensions are in many cases landing on people already stressed by the pressures of poverty, insecure work and any number of personal or health circumstances.

Navigating these issues is difficult for most people, but lower income renters whether social, affordable or private, have less flexibility and capacity to simply move if the situation becomes untenable. This is especially the case in a tight rental market with limited options for low-income people (let alone those with families, disabilities, carer responsibilities or other complicating factors).

Darcy and Rogers<sup>23</sup> observed in 2019 that higher density inner city areas have a higher proportion of private renters. Their 2020 research into the demographics of the suburb of Waterloo for example, revealed that *63% of private dwellings in the suburb of Waterloo (according to the 2016 census) are privately rented – double the Greater Sydney proportion*. While Waterloo is already a dense suburb dominated by renters this planning proposal will see that phenomena amplified, and, along with it, a potential escalation of the downsides of high-

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<sup>19</sup> Easthope, H., Crommelin, L., Troy, L., Davison, G., Nethercote, M., Foster, S., van den Nouweland, R., Kleeman, A., Randolph, B., and Horne, R. (2020) *Improving outcomes for apartment residents and neighbourhoods*, AHURI Final Report 329, Australian Housing and Urban Research Institute Limited, Melbourne, <http://www.ahuri.edu.au/research/finalreports/329>, doi: 10.18408/ahuri-7120701

[Improving outcomes for apartment residents and neighbourhoods—Executive Summary \(ahuri.edu.au\)](http://www.ahuri.edu.au/research/finalreports/329)

<sup>20</sup> Easthope, H., Troy, L. & Crommelin, L. (2017) AHURi research funded by Shelter NSW *Equitable Density: The place for lower-income and disadvantage households in a dense city* sourced from UNSW City Futures Research Centre:

<https://cityfutures.adu.unsw.edu.au/research/projects/equitable-density-place-lower-income-and-disadvantage-households-dense-city/>

<sup>21</sup> Easthope, H., Troy, L. & Crommelin, L. (2017) *It's not just the buildings, high-density neighbourhoods make life worse for the poor (theconversation.com)* article in The Conversation published 22 August, 2017 accessed 28/4/22

<sup>22</sup> Easthope, H., Troy, L. & Crommelin, L. (2017) *This is why apartment living is different for the poor (theconversation.com)* article in The Conversation published 21 August, 2017 accessed 28/4/22

<sup>23</sup> Darcy, M. & Rogers, D. (2019) University of Sydney, The Henry Halloran Trust [Social Mix discussion paper](#) at p9

density apartment living. Furthermore, they forecast that the Waterloo South estate redevelopment would reduce the overall suburb's proportion of social housing dwellings from 30% to about 17%; private renters might rise to more than 50% of households and about 30% of households in the suburb would be owner-occupiers<sup>24</sup>.

At Shelter NSW, our focus is on people from the bottom two quintiles of household income Australia-wide. We are concerned that the failure to provide enough social and affordable housing across the entire suburb of Waterloo will see many thousands of lower income renters exposed to the insecurity and unaffordability of the private rental market as illustrated this month in the 2022 *Anglicare Rental Affordability Snapshot*<sup>25</sup>.

Beyond issues of affordability, we are also concerned that this development, effectively outsourced to the private sector, will not directly address the needs and concerns of future lower-income renters. And not just as ribbons are cut but over time as the Waterloo South community ages and changes. As Easthope et al note<sup>26</sup> *underpinning the high-density development of Australian cities is a policy orthodoxy that privileges market-led housing delivery and a reduced government role in direct housing provision and management... policy interventions directed at lower-income apartment residents have been limited*. They also note the narrow focus of developers, often catering more for investors when designing new apartment buildings leading to limited variation in apartment designs and sizes available.

We agree with and support the observation of Counterpoint Community Services in their submission, that the proposal does not anticipate or provide *any supported accommodation for homeless clients, transient communities, or aged and health supported accommodation units*. *The lack of care homes and housing for people living with disabilities to enable independent living is another example of the planning proposal not optimising the public asset for the public benefit*. We and they expect more from a government-led proposal. Furthermore, we note the Government's high focus on providing social housing studio or one-bedroom apartments and hope that this will not exclude larger dwellings required to support families to stay and grow in Waterloo (including the high number of Aboriginal families in the current precinct).

As noted by Easthope et al, successful high-density redevelopment needs to consider the impact on lower-income and vulnerable residents of factors at the building, neighbourhood and metropolitan scales. Given the risks of creating a future, denser precinct that makes *'life worse for the poor'* we encourage the Government to step in at this early stage and ensure the Waterloo South development puts lower-income people front and centre. Failure to attend to *the needs of lower-income high-density residents risks undermining the prosperity and cohesion of Australian cities in future years*<sup>27</sup>

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<sup>24</sup> Rogers. & Darcy. (2020) <https://theconversation.com/public-housing-renewal-likely-to-drive-shift-to-private-renters-not-owners-in-sydney-133352> article published on the online journal The Conversation, accessed 28/4/22

<sup>25</sup> Accessed 28/4/22 <https://www.anglicare.asn.au/research-advocacy/rental-affordability/>

<sup>26</sup> Easthope et al (2020) op. cit. Executive Summary at p3

<sup>27</sup> Easthope et al (2017) article in The Conversation op. cit.,

We are of the view that if the NSW Government proceeds with this development it needs to formally and transparently justify that a precinct of this density and socio-economic makeup can support such a large, lower-income renting population (including vulnerable people in social housing). Furthermore, we call on the Government to actively assess and commit the necessary funds required to support the: successful relocation and return of current public housing tenants; the rapid influx of many thousands of new residents (social, private owners and renters) and the growth of a vibrant, supportive community, building on the cultural, social and community heritage of the suburb of Waterloo.

## Recommendations

- reconfirm how a future estate of this density can, initially and over time, support a vulnerable social housing community **by commissioning a Social Impact Assessment (and risk mitigation plan) as part of the planning proposal** (i.e., before the DA stage). And, in the case where the risks are high and or unmitigated, be prepared to **adopt a lower density for the site.**
- **develop, implement and fund a Human Services Plan spanning current relocation and post development and beyond** - commensurate with a much larger Waterloo South population as well as the complexities that will arise from establishing a 'mixed' and predominantly lower-income community in a high-rise built environment.
- **ensure lower-income residents (overwhelmingly renters) whether in social, affordable or private dwellings are a key focus of future precinct, building and dwelling design considerations** (taking account of the overlaying housing diversity and adaptability needs that arise from disability, cultural considerations, family size and the desire to age in place).

### 3. Environmental performance of the Waterloo buildings and homes

Across the general community there is a deepening realisation of the cost of living with rising temperatures and energy-inefficient homes and appliances; a challenge disproportionately felt by lower income households. These households have the least financial ability to adapt and respond<sup>28</sup> and spend a disproportionately large part of their disposable income on energy costs (6.4% versus 1.2%).<sup>29</sup> Beyond the financial impacts, these households are challenged to deal with the health and well-being impacts of rising temperatures and rising energy costs<sup>30</sup> Whether as private or social/affordable housing renters or low-income homeowners, these households often have little control over the energy efficiency of their homes and little financial capacity to upgrade old, inefficient appliances such as water and space heating/cooling systems.

Shelter NSW supports the recommendation made by the City of Sydney seeking to apply a BASIX 'stretch bonus' to relevant residential development in order to ensure a superior environmental performance. We support the city's assertion that the state government ought to be leader in this space especially given what is likely to be a large, predominantly low-middle income residential population which relies on well-built, designed and maintained buildings and dwellings in order to mitigate the impacts of climate change and rising energy costs.

As an aside, Shelter NSW supports proposals to renew the *NSW Appliance Replacement Offer program* to support lower-income households to replace inefficient appliances. This program ended in June 2021 and provided concession card holders access to a 40-50 per cent discount on a new fridge or television. This provided average savings on energy bills of \$325 per year.<sup>i</sup> This program should be renewed and extended to include other appliances such as portable air-conditioners and washing machines.<sup>31</sup> Funding for this program might be considered in the context of more general rebate programs currently offered by the NSW Government as a means of assisting low-income households to reduce their energy use in the first instance (and therefore reducing energy bills). Shelter NSW notes the opportunity offered by the future relocation of the current Waterloo public housing tenants to potentially offer this program (with relocation or return as determined by the tenant).

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<sup>28</sup> Deloitte (2021), *The economic impacts of the National Low-Income Energy Productivity Program*, report prepared for the Australian Council of Social Service [Link to report accessed 27 Jan 2022](#)

<sup>29</sup> Australian Energy Regulator 2019, *Affordability in retail energy market*, Commonwealth of Australia, Canberra.

<sup>30</sup> Grey, C.N.B. et al 2017, 'Cold homes, fuel poverty and energy efficiency improvements: A longitudinal focus group approach, *Indoor and Built Environment*, vol. 26, iss.7, pp.902-913. doi:[10.1177/1420326X17703450](https://doi.org/10.1177/1420326X17703450)

<sup>31</sup> NSW Government 2018, 'Appliance replacement scheme slashes power bills', media release, 30 July, accessed 9 November 2021,

## Recommendations

- **commit to demonstrating a superior environmental performance in the redeveloped estate** (beyond minimum compliance) to support the health and well-being of lower-income residents, reduce energy bills and generally increase the long-term resilience of the community
- as part of the public housing tenant relocation (from Waterloo) program and eventual growth of the new precinct, **incorporate a general appliance replacement program directed to lower-income households.**

### 4. Need for a more innovative and commercial business model

Shelter NSW has recently released new research calling on the NSW Government to rethink its traditional approach to supplying social housing across the state – an approach that we assert, is holding back its key agency LAHC and compromising the delivery of enough social housing to make a material difference to the housing crisis in NSW<sup>32</sup>. In our public commentary<sup>33</sup> we have observed that the *Communities Plus* model has become so entrenched (we believe) it has stymied creative thinking about how a project like the Waterloo South development could be delivered for the greater public good.

This research challenges the perceived requirement of Government to sell public land assets in order to fund more social housing. Rather, it asserts that retaining and leveraging public land could actually deliver more social housing in the long-term. It explores by way of illustration for Waterloo South, an alternative *model whereby 50% of new dwellings are public housing, 25% are retained by LAHC as build-to-rent housing at market prices, and 25% are sold by LAHC to the private market ... using low-cost leverage to generate positive cashflow and maximises exposure to long-term capital gains for LAHC.*

In a similar sense, Professor Bill Randolph and Dr Laurence Troy<sup>34</sup> in their submission to the Waterloo South Independent Advisory Group (IAG) have asked why the adoption of a private sector model, *as the only mechanism through which either plan is enacted* has not been debated? They make a strong case for a Not-for-Profit renewal of Waterloo South as a clear and viable alternative to the public-private partnership development model pursued under the current *Communities Plus* scheme. Under their proposal, delivery of a substantial component of Affordable Housing by the Community Housing sector would open new possibilities for the commercial, financial and operational delivery of the project.

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<sup>32</sup> Murray,C. & Phibbs,P. (2021) [https://shelternsw.org.au/news\\_items/reimagining-the-economics-of-public-housing-estate-renewal-and-the-role-of-government-new-research/](https://shelternsw.org.au/news_items/reimagining-the-economics-of-public-housing-estate-renewal-and-the-role-of-government-new-research/))

<sup>33</sup> Morton, R (March 5 2022) The Saturday Paper [Exclusive-leaked-documents-show-public-housing-plan-halved](#) (paywalled)

<sup>34</sup> Randolph,B. & Troy,L. (2021) [Appendix A Submission to the Waterloo South Independent Assessment Panel.pdf](#)

This would, we suggest, also challenge the treatment of this project as a 'superlot' in the tendering process rather than as a series of smaller staged parcels (the former only really attractive and viable for very large private developers). Given the complexities of the site including the requirement to relocate hundreds of current tenants it seems that a staged development will be required anyway. Why not formalise this in order to reduce the project and development risk and create more possibilities for collaboration especially, with the Not-For-Profit community housing development sector?

Higher proportions of social and affordable housing at Waterloo South have been deemed to be financially unfeasible under the current business models adopted by the Government . Given the size and significance of the Waterloo South Estate development and the opportunity to leverage this site (well-located to transport, education, employment and human services) there is, we believe, a strong case for a more innovative funding and development model as well as an extra case for additional targeted Government funding. This would ensure the delivery of enough social and affordable housing on this site to make a real difference to the NSW social housing waiting list and to address the costly homelessness crisis the NSW Government is otherwise required to respond to.<sup>35</sup>

## Recommendations

- **apply a more innovative commercial and funding model to the development of this site** reducing the need for LAHC to sell a large tract of valuable public land to private developers, enabling a far greater proportion social and affordable housing on the site
- **if necessary, apply additional targeted Government funds to ensure sufficient social and affordable housing is actually delivered** balanced against funding that is already required to support homelessness services and other costs that emerge due to a lack of social housing (within the areas of domestic violence response; health; and corrections)

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<sup>35</sup> As an aside, the Independent Expert Panel noted in its report at p55 that *the Redfern-Waterloo Affordable Housing Fund holds \$24m and is potentially available to contribute towards affordable housing on this site.*

## 5. Compact for Renewal – what tenants want from renewal

The eventual transfer processes connected with the current *Communities Plus* projects in the Sydney LGA will be very disruptive to the lives of existing tenants. The disruption has already begun for the current Waterloo South public housing residents. Years ago. They are already feeling the impact of being told that they will need to leave their current homes and community. Some are employed and wonder how this renewal will affect their employment. Many are highly engaged in the social and community networks of the suburb and their neighbourhood and wonder what will happen when they move. Many worry about how they will maintain practical access to trusted doctors and other support services they have come to rely on. Some are houseproud and wonder how their personal investment in their homes will be recognised and compensated.

With the benefit of having observed the progress and impact of a number of *Communities Plus* renewal projects, Shelter NSW encourages the NSW Government to actively engage and support community members, but especially current residents in the design of their future homes and community. We have heard directly from public housing tenants who have or are already part of an estate renewal project in other parts of Greater Sydney. They have told us what works well, and what doesn't – for residents and the overall project.

Shelter NSW recognises that the level of engagement we are advocating for requires the partnership between the Departments of Planning, LAHC and the Department of Families, Communities and Justice (DCJ), the 'landlord' of any current and future social housing residents across the life of the project. We offer the [Compact for Renewal](#)<sup>36</sup> as a template for how the NSW Government might best engage with the Waterloo South community from this early stage right through to relocation and possible return. Additionally, we ask that the compact be formally considered.

## Conclusion

At Shelter NSW we sense the government's frustration with the progress of this project. But still, we call on the government to rethink its approach, unshackle LAHC and work on the basis that the Waterloo South proposal should be seeking to produce a much fairer and accessible community with much more substantial outcomes for more affordable, diverse and accessible homes. To do otherwise risks at best, sub optimising, and at worst, creating a stressed hi-rise community that will, in the long-run be difficult and expensive to support.

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<sup>36</sup> *Compact for Renewal – What Tenants Want from Renewal*. These are the principles for a proposed *Compact for Renewal* between agencies undertaking urban renewal and social housing tenants affected by renewal. The Compact is the result of consultations with social housing tenants under a project carried out by Shelter NSW, Tenants' Union of NSW and the City Futures Research Centre at UNSW

## Appendix A - Key workers and the rental crisis

Although there is no commonly accepted definition for ‘key worker’ industries in Australia<sup>37</sup>, research by AHURI to date has demonstrated that workers in lower paid (yet essential) professions are increasingly being priced out of the very same suburbs and LGAs in which they are required to work. For instance, the following Table<sup>38</sup> makes it clear that in Greater Sydney, few LGAs are ‘affordable’ to rent in for critical workers such as laundry attendants, delivery drivers, early career emergency workers, and childcare educators:

Table 2: Number of LGAs with affordable median rent—Sydney

	Weekly wage	Annual Equivalent (full-time)	Indicative salary for	Affordable median rent (number of LGAs)		
				1 bedroom	2 bedrooms	3 bedrooms
Q2 (low)	\$ 790	\$ 41,080	Laundry worker	2	0	0
Q2 (low-mid)	\$ 960	\$ 49,920	Commercial cleaners, delivery drivers, fire and emergency workers (early career)	11	0	0
Q2 (mid)	\$ 1,150	\$ 59,800	Enrolled nurse, ICT Support technicians, child carer,	17	6	0
Q2 (high)	\$ 1,350	\$ 70,200	Social worker, aged and disability carer, community welfare worker	23	18	5
Q3 (low)	\$ 1,500	\$ 78,000	RN/midwife (early career), tram and train driver	27	19	12
Q3 (mid)	\$ 1,850	\$ 96,200	Teacher (early career)	39	28	20

Source: Authors; salary and rental price information derived from Australian Government 2020 and NSW Department of Communities and Justice 2020.

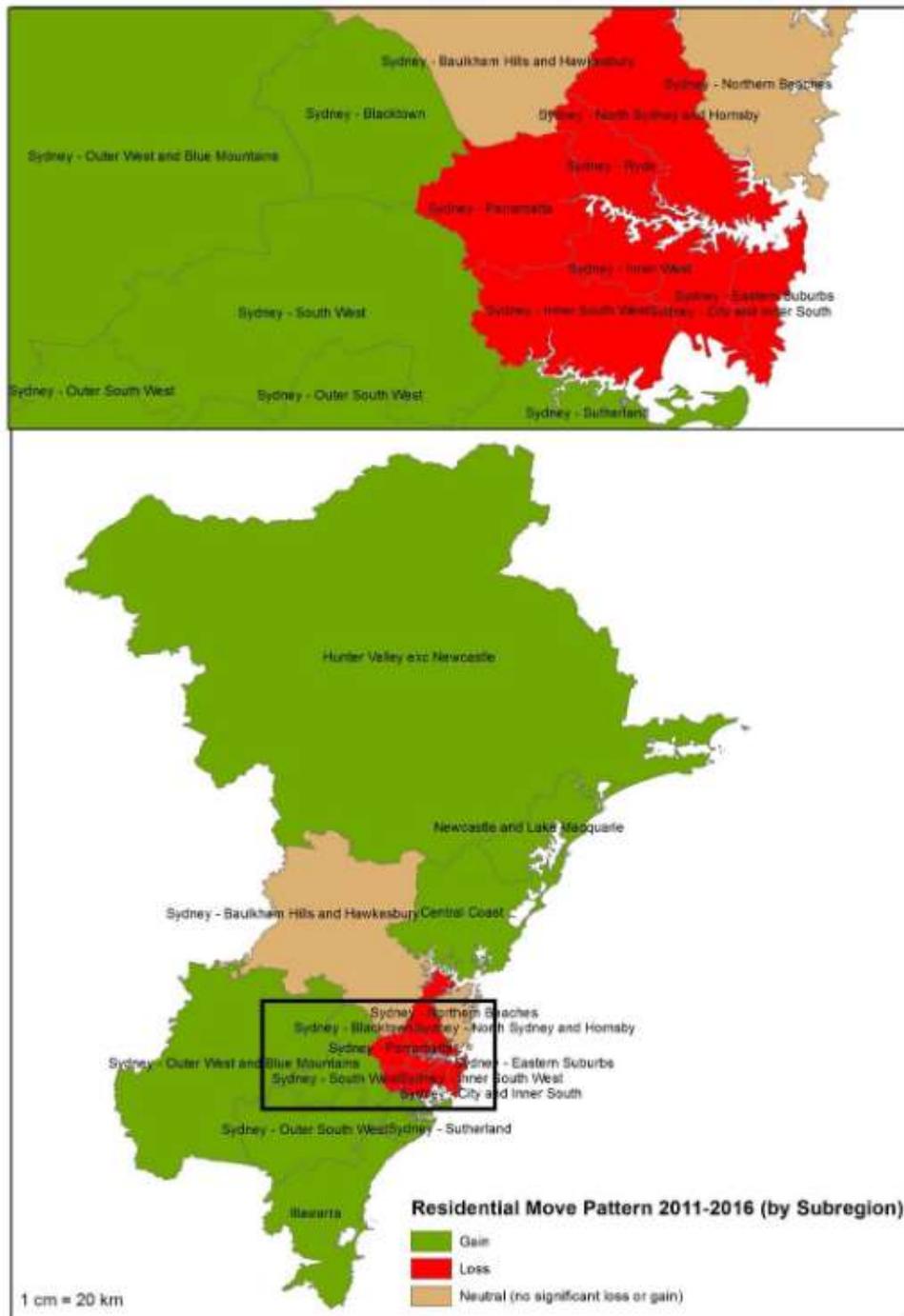
Note: There were 43 LGAs included in our analysis.

<sup>37</sup> Gilbert, C., Nasreen, Z. and Gurran, N. (May 2021). *Housing key workers: scoping challenges, aspirations, and policy responses for Australian cities*. AHURI Final Report No. 355. Retrieved from <https://www.ahuri.edu.au/research/final-reports/355>

<sup>38</sup> Ibid, p. 31

Of particular concern is the 2011-to-2016 trend of key workers, such as nurses and aged care workers, needing to move further afield from their places of employment (i.e., inner city key workers needing to move to outer suburbs)<sup>39</sup>. This trend is likely to have worsened since 2016, as the cost of renting has increased by 10+ per cent across Sydney in the past 12 months alone<sup>40</sup>:

Figure 27: Key workers residing in each subregion in 2016 relative to 2011—Sydney



Source: Authors; data derived from ABS 2016q.

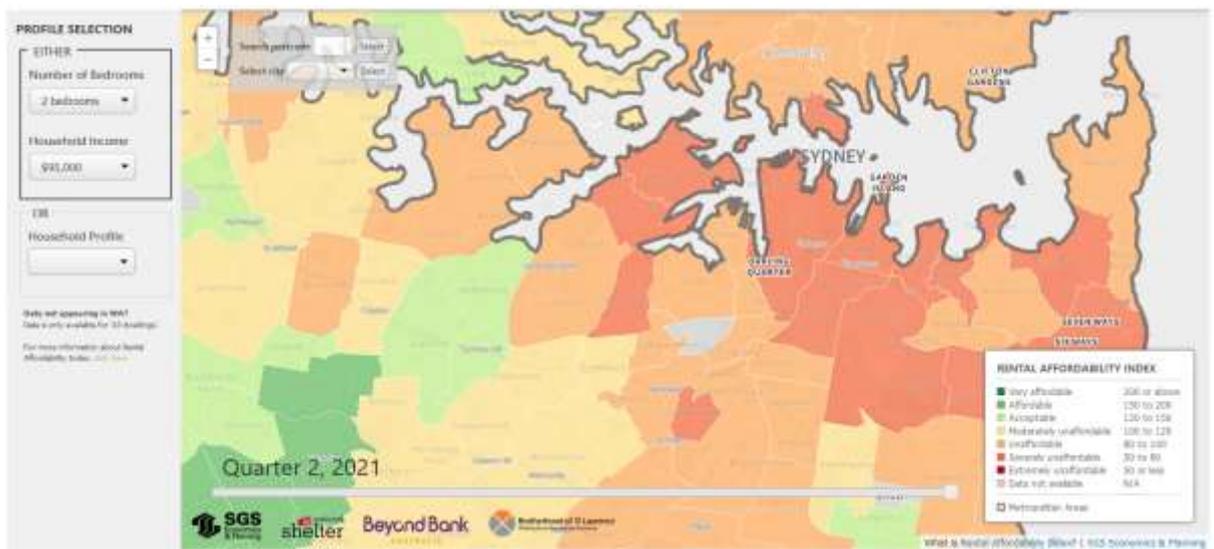
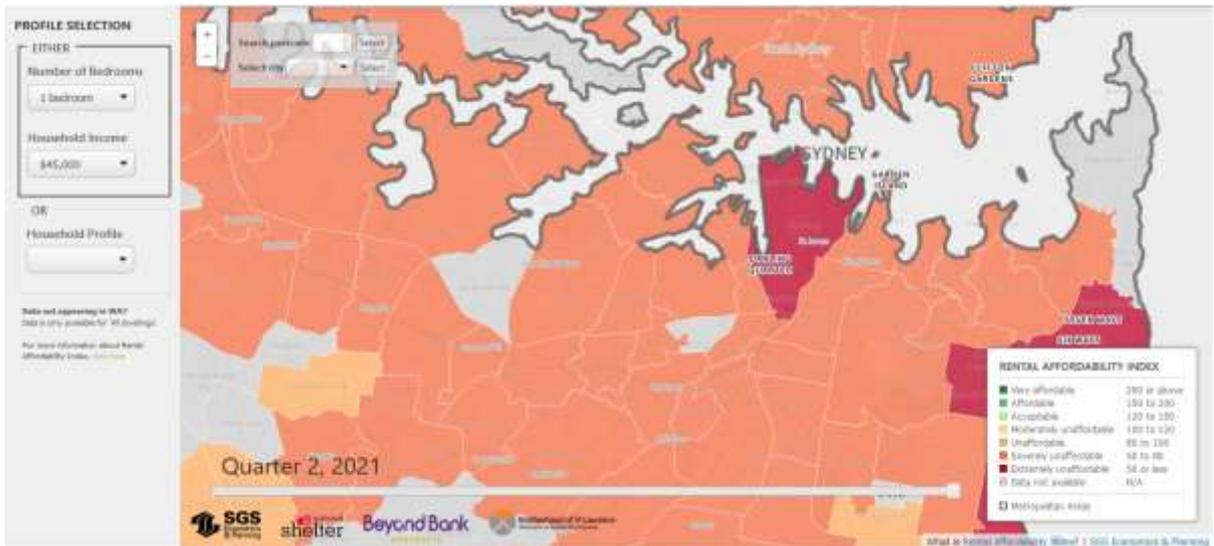
<sup>39</sup> Ibid, pp. 64-65

<sup>40</sup> SQM Research. (April 2022). *Weekly rents: Sydney*. Retrieved from <https://sqmresearch.com.au/weekly-rents.php?region=nsw-Sydney&type=c&t=1>

Abundant affordable, below-market rental housing is necessary to reverse the trend of key workers having to commute long distances to perform jobs – or having to altogether abandon performing critical work in affluent suburbs. The latest *SGS Economics Rental Affordability Index*<sup>41</sup> found low to middle income key workers in the following locations face “unaffordable to severely unaffordable” renting constraints:

Suburb, postcode	Household profile	Annual income	Rental affordability Index (50 or less = extremely unaffordable, 200 or more = very affordable)
Redfern, 2016	Single-income, single-person, 1-bedroom dwelling	\$45,000 (akin to full-time laundry worker)	80 (severely unaffordable)
	Dual-income couple, no dependents, 2-bedroom dwelling	\$95,000 (akin to 2x full-time early career emergency workers)	88 (unaffordable)
Waterloo, 2017	Single-income, single-person, 1-bedroom dwelling	\$45,000 (akin to full-time laundry worker)	52 (severely unaffordable)
	Dual-income couple, no dependents, 2-bedroom dwelling	\$95,000 (akin to 2x full-time early career emergency workers)	84 (unaffordable)
Alexandria, 2015	Single-income, single-person, 1-bedroom dwelling	\$45,000 (akin to full-time laundry worker)	54 (severely unaffordable)
	Dual-income couple, no dependents, 2-bedroom dwelling	\$95,000 (akin to 2x full-time early career emergency workers)	84 (unaffordable)
Glebe, 2037	Single-income, single-person, 1-bedroom dwelling	\$45,000 (akin to full-time laundry worker)	60 (severely unaffordable)
	Dual-income couple, no dependents, 2-bedroom dwelling	\$95,000 (akin to 2x full-time early career emergency workers)	81 (unaffordable)

<sup>41</sup> SGS Economics. (November 2021). *Rental Affordability Index: Key Findings*. Retrieved from <https://www.sgsep.com.au/sgs-lab/rental-affordability-index> [interactive map]



SUB-1694  
Susan Wittencoom  
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Redfern

I write as a NSW Registered Architect (5521) and a signatory to the Australian Architects Declaration of a Climate & Biodiversity Emergency.

Sustainable, social and affordable housing must be the priority on public land.

Waterloo must deliver at least 30% of residential floor space which would substantially lift the number of social housing units delivered. I cannot support a proposal that does not at least meet the government's own set target, which is already woefully short of the Council ambition for 50% social and affordable housing.

I support the Independent Advisory Group's recommendation that the density should remain as proposed in the City's Planning Proposal. I am concerned that the scale of the development is growing by stealth. The Sydney City Council's assessment of the submission flags a 10% increase in floor area, with DPE citing this as the potential uplift from a design excellence process. Any potential uplift must be taken into account and only be achieved within the Planning Proposal Building Envelopes. It cannot be dangled in front of the development sector as a windfall for design when so many social safeguards have been overlooked.

I support REDWatch's recommendation that DPE should commission an independent Social Impact Assessment (SIA) to assess if the density proposed is appropriate for future social housing land use. The SIA look at what should be included in a Social Impact Management Plan (SIMP). The SIMP should look at how to manage the impacts of the proposed development and how to mitigate its impacts. It should also ensure that everything necessary to deliver a successful project at the density determined is independently established in the public domain and a requirement of any Concept DA stage.

There must be a commitment to verifiable sustainability targets and note - with disappointment - that the minimum ambition is to exceed the BASIX commitments for water and energy by not less than 10 points for energy and 5 points for water.

Where is the vision that Sydney City Council has set out in its strategic planning for a Sydney that is green, global and connected?

It is incredibly frustrating that in 2021 the State Government has set out a series of Planning Principles that placed climate and country at the heart of the planning system, only to revoke them in 2022 when the development industry has complained at the inconvenience of more sustainable solutions. There is no time left. The obstacle is the way. We need to focus on sustainable, affordable, inclusive housing solutions, not work around them.

SUB-1695

Ian Mcmaugh

budwise@bigpond.com

Redfern

The proposed Waterloo project is outrageously over scaled and transparent in its motive of PROFIT MAKING . The project must be scaled back to incorporate respect and maintenance of the patrimony and integrity of the Redfern /Waterloo community . In particular I would like to object to the opening up of Pitt St at McEvoy St , a measure that would create ridiculous amounts of traffic and would essentially rip the soul out of Redfern/Waterloo . The traffic congestion on the northern end of Pitt St is already a problem and often grid -locked on account of the inefficient entry/exit at the Australia Post car park. A series of chicanes would certainly be a welcome addition to dissuade overuse of Pitt St. Already we have major thoroughfares : Gibbons St, Regent St , Chalmers St, Elizabeth St . Another one would be an absolute nightmare .

SUB-1696  
Karyn Brown  
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Waterloo

## REGARDING THE SOUTH WATERLOO PLANNING PROPOSAL

### DENSITY

The proposed density of this plan is too high. It appears not to take into account recent surrounding developments at Green Square and the Botany Road corridor. The rather rapid population increase in the broader Waterloo area has already put local infrastructure and amenities under pressure.

Open space, in particular, is vital to most apartment dwellers and existing parks are well-used. During recent COVID lockdowns the parks were crowded. Although the proposed park appears generous it will be overwhelmed by the increase in population.

I am astonished that the disastrous pandemic has not led to a rethink on density, in light of lessons learned on contagion and quarantine. There is no reason to think there won't be more pandemics and this should not be ignored.

The proposed density of this plan is also not real. The plan proposes 3,012 dwellings but by the arcane magic of design excellence it will increase by 10% to more than 3,300. This seems dishonest.

### SOCIAL AND AFFORDABLE HOUSING

Although too many dwellings are proposed for the site, there are not enough social or affordable units. An increase of 98 social housing units is not very much. There are 1000 people on the waiting list for inner city public housing already and it is reasonable to assume there will be more by the time they are built.

The plan is for 28.2% social housing. This means front doors only. Gross floor area is just 26.5% which means smaller units and fewer bedrooms. There is no information on types of homes. Will there be bedsits? Will there be larger units for families, or are they to be excluded forever? There is no information about the number of new-build bedrooms compared to the number to be demolished.

The plan is for 7.5% affordable housing on the site. The community asked for at least 10%. The Independent Advisory Group concluded that 30% social and 10% affordable housing was feasible within the given financial constraints. This was ignored. 7.5% percent is nowhere near enough to meet current and future housing needs. Essential workers such as those working in aged care, childcare, nursing, teaching, policing, cleaning, hospitality and the community sector need secure and genuinely affordable housing. The plan ignores this.

Taking the 10% increase into account, social dwellings are at best only 25.6% of the total, and affordable dwellings just 6.8%. This is a poor return to the public for the permanent loss of valuable public land, and ignores the very great need for much more social housing and much more affordable housing in the inner city. Many social housing tenants have high needs and proximity to services is vital for a reasonable standard of living.

## ABORIGINAL AND TORRES STRAIT ISLANDER HOUSING

There is no amount of housing earmarked for indigenous people and families. The community asked for 10% and expected at least some given the historical connections of indigenous people to the area. This should be guaranteed, culturally appropriate and purpose-built in consultation with ATSI people. This would be a more robust and sincere acknowledgement of country than a few words uttered at a gathering.

## COMMUNITIES PLUS

The Communities Plus model is for 70% private housing and 30% social housing. The private majority is touted to inspire and motivate their poor neighbours. There is no good evidence for this. While there may have been apparently good results from this model in other areas it is more likely that the increase in population made the area more viable for commercial service providers to operate, resulting in greater amenities. Not from social engineering. None of it applies to Waterloo. Waterloo public housing is already a minority in the suburb and no tenant lives more than a block away from private housing. Given that 40% of social tenants are on the age pension and 30% on the Disability Support pension it is hard to see what they can be motivated to do.

For six years the community and many agencies have asked for more than the proscribed 30% social housing and have been told that the numbers were non-negotiable and could not and would not be changed. They have been changed though, to less than 30% social housing, which wasn't enough in the first place.

The policy of net zero cost is ingenuous at best. The cost of the very modest increase in public housing is actually the permanent loss of scarce inner-city public land. The main benefits going to developers and property investors.

Housing is a basic human right. An investment property is not.

## TRAFFIC

I object to the proposed opening of Pitt St at McEvoy St. There is Our Lady of Mt Carmel primary school nearby and a children's playground and outdoor exercise equipment on Pitt St. Speed humps were installed for safety after several near car vs child collisions, that was with the road closed. The community is unanimous on this issue and have consistently objected to it since it first appeared in an earlier plan. There is already a peak hour rat run through the estate, creating problems for pedestrians. Another entry point will bring more through traffic. It is confusing that this would be opened when several roads off McEvoy St in Alexandria have recently been blocked off.

The proposed parking levels are, in my view, inadequate at 0.5 spaces per dwelling. The increase in residential and commercial activity will increase existing parking problems in the area. The oft-repeated theory that the Metro station will negate the need/want for private vehicles is somewhat wishful thinking rather than reality.

## PEOPLE

The planning proposal only deals with buildings, not the people who will be living in them. It gives no consideration to the social infrastructure needed to support current and future residents. The demography of the (majority) private residents is completely unknown so it is admittedly difficult to anticipate their needs. Therefore, I have concerns that the private component will be largely short-term occupancies as those who can will move to better-serviced neighbourhoods, or are pushed out by rising rents. This will impact the sense of community that currently exists and is a part of what makes Waterloo livable.

There is no consideration given to the issues that face current residents, such as noise, anti-social behaviour and social isolation. I don't believe the people paying market rents will be as tolerant or sympathetic towards our neighbours as we are.

There have been no social impact studies done on the effects of this development on the thousands of people who currently live on the Waterloo estate.

## COMMUNITY CONSULTATION

For six years residents have attended consultations, workshops, information sessions etc. Every point raised by me above was raised over and over again in these settings, yet none were incorporated in the plan, we were completely ignored. The Independent Advisory Group was ignored. Although we are referred to as stakeholders, I personally feel more like a lab rat, and I deeply resent that.

## START AGAIN

The only motivation for this plan has always been to build as much as can be gotten away with and thereby maximise profit. This benefits very few people in the long or short term. There are enough investment properties in Sydney and not enough affordable properties. There is little security of tenure in the private rental markets. The private rental market has changed since the 20th century and is now a long term prospect rather than a short term stopgap between the family home and owning one's own home as home-ownership is increasingly unattainable. There is not enough public housing. There are grandmothers living in cars.

Given the current housing crisis, every housing development, but especially on public land, should start planning based on what is actually needed most and how it can be delivered. It really is a crisis and needs urgent and ongoing funding from state and federal governments. It will not go away. It will not fix itself.

SUB-1697  
Name withheld

## **Objection in response to Waterloo South**

I live locally and make the following comments:

### **1. Changes to the Gateway Determination**

The density has been increased. In short, the proposal is an overdevelopment of the site.

Moreover the Minister at the time of that the initial Gateway Determination was made specifically included a number of provisions. A number of requirements were consequently removed without proper consultation or feedback; no doubt to advance the interests of the Crown to the determinant of the public interest.

This includes the condition *'The planning controls are to require LAHC to participate in the Design Excellence process to promote high quality outcomes. However, this should not entitle LAHC to additional floor space or height in the Gateway Determination.*

Subsequently this was changed in January this year by an Officer in the Department following internal review, with the provision now reading: *'The planning controls are to require LAHC to participate in the Design Excellence process to promote high quality outcomes'*.

### **2. Independent Expert Review**

The initial Gateway Determination followed a detailed review by an Independent Advisory Group. As a consequence, any amendments to the Gateway Determination requirements should be considered by external experts independent from the Department given the application is made on behalf of the Crown with the Department also the approval authority. A Peer Review is insufficient.

Moreover the appointment of the Secretary as the Principal Planning Authority, and more recently Michael Cassel as the new Secretary who invariably has a conflict of interest, only serves to reiterate the need for the expert review to be totally independent from the department.

Further, the absence of the additional density being tested only prompts further concern.

### **3. Location of Open Space**

The provision of the open space is poorly placed. Instead it should be central to the precinct.

#### **4. Master Plan**

The redevelopment of Waterloo Estate South should be considered within the context of one master plan for the estate as a whole; ie the Southern, Central and Northern, along with the Metro Precinct.

Open space, facilities, traffic management and massing need to be considered on a whole of precinct basis, so the existing and future plans are properly considered and fully understood.

#### **5. Massing & Scale**

The massing and scale is a poor outcome. In particular, poor separation and overshadowing will not only impact the precinct but also adjacent areas.

This includes spoiling the vista and aspect from Waterloo Park/Oval, and overshadowing the much needed public domain, as well as the nearby local heritage areas.

Moreover the failure to have sufficient building separation or provide adequate solar access will see poor internal amenity and ignores requirements under SEPP 65, which were specified as provisions in the Gateway Determination. In short, the increased massing is a 'dog's breakfast'

#### **Mature Tree & Canopy Removal**

While some trees have been retained along McEvoy Street in the updated Urban Forest report, the removal of a number of other mature canopies along McEvoy should be avoided at all cost.

#### **Poor Consultation**

The project is complex and requires thorough and detailed planning. Yet key reports are missing. Notably too while the Gateway Determination specifies the detail should be in '*plain English*', this is not provided in terms of a number of key reports.

Further, the Gateway Determination failed to specify consultation with local community groups despite the intent of the Department's own guidelines in terms of community participation.

Moreover the failure to properly consult with the community when there are significant changes to previous plans and enable more time for the community to respond particularly when key reports are missing and there are already inherent challenges within the community, makes a mockery of the planning and governance process.

For example, where is the social impact assessment, contamination report or solar impact assessment in terms of the open space? Further where are the updated reports that

consider the additional density, when the previous density was already considered a risk in terms of achieving good design and environmental outcomes?

## **6. Poor Planning Outcome**

The proposal in its current form is a poor planning outcome that disadvantages both the existing public housing tenants, future residents and the local community.

The proposal should showcase the best planning outcomes and be an exemplar for the government. Instead it's not. Rather it's a proposal driven by sellable floorspace to the detriment of the existing and incoming community. If built it will be an urban blight.

SUB-1698

Name withheld

Access to housing is a human right. The Government needs to ensure that, not only private buyers, but also socio-economically disadvantaged groups have access to adequate housing. This is, presumably, part of the reason this project was devised.

The proposed density suggested in the planning documents of 3,012 dwellings and with the likely addition of 10% floor space ratio (provided the developer meets design excellence threshold) could increase the density to 3,300-3,400 dwellings. This is too great a level of density, particularly considering the development of the Metro towers (which has been allowed to be considered separately); City of Sydney Botany Road Precinct Plan, etc. in the immediate vicinity. This will have some impact especially on the social housing population which has complex needs for support. The community was promised a 'masterplan' that would cover the whole of the Waterloo estate and the Metro quarter. The separation/decoupling into precincts means it is very difficult to analyze or provide input about the proposal's collective impact on the whole community, beyond the footprint of the planning proposal. This represents very problematic poor planning practice for building sustainable and thriving communities.

A Social Impact Assessment (SIA) needs to be carried out Now by the Department of Planning & Environment. A SIA would assess social impacts arising from the development, particularly the foreseeable social risks and social change and long-term distributive inequality impacts. Avoiding providing an SIA suggests this planning proposal prioritizes developer financial consideration at the expense of long-term social quality and value of places where people will live.

The Social Sustainability Report provided, while referring to the rich history, assets and challenges of the existing community, does not appear to address any likely impacts from redevelopment and the terms of its focus on any social benefits and its treatment of selected topics is narrow. The planning proposal is an urban major renewal. It displaces the existing community and in its place would return a very high-density development. Therefore the planning proposal must provide an assessment the social impacts Prior to determining the outcome of said proposal.

A Crime Prevention through Environmental Design (CPTED) study should be undertaken The planning proposal pays little attention to CPTED and at best, offers token references and makes no genuine effort to link specific crime and safety issues specifically to various components of the development. This is despite the problems that have occurred in the past in large developments. Will technical studies be provided prior to any finalization of this planning proposal, concerning the possible impacts of wind and solar? These studies should also be included, particularly about solar and the effect of climate change. Lack of sufficient light and the effect of wind on high buildings must be considered in any planning proposal.

SUB-1699

Name withheld

■ Please remove my personal details for publication

Additional Comments to my previous Objection:

- where is the revised Visual Impact Assessment. The Hassell Report dated October 2020 does not adequately address?

- given a number of key reports are missing, will these be made public with sufficient time, with the public properly notified and sufficient time for feedback?

SUB-1700  
Jamie Madden  
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Waterloo

I have reviewed the plans and object to the opening of Pitt at to McEvoy street an unbridled opening would undoubtedly cause problems to our quiet local streets.

Also I object to this plan on public land not delivering a full 30% public housing, Make it 30% and you will have my support

I'd also like to see strong requirements placed on developers for high quality building design, sustainability in building products, fine grain streets, and use of progressive local architects and indigenous architects.

I'd also like to request that the major park be completed early in the project to provide local private residents with some immediate upside for suffering the years of building works in neighbourhood. Do the right thing and future generations will applaud you, this is public land and the public deserves an exceptional result from your work.

SUB-1701  
Geoffrey Turnbull  
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Redfern

**REDWatch Submission on Planning Proposal Waterloo Estate (South)**  
**PP-2021-3265**

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## Introduction

This submission is made on behalf of REDWatch Incorporated (REDWatch). REDWatch was set up in 2004 with the following objects in its constitution:

*REDWatch is a group of community residents and friends from Redfern, Waterloo, Eveleigh and Darlington who support the existing diversity in these areas and wish to promote sustainable, responsible economic and social development.*

*REDWatch recognises the importance of the Aboriginal community to the area.*

*REDWatch has been formed to:*

1. *Monitor the activities of the Government (local, state and federal), the Redfern Waterloo Authority, and any other government instrumentality with responsibility for the Redfern, Waterloo, Darlington and Eveleigh area, to ensure that:
  - (a) *The strategy benefits a diverse community*
  - (b) *Communication and consultation is comprehensive and responsive*
  - (c) *Pressure is maintained on authorities**
2. *Provide a mechanism for discussion and action on community issues.*
3. *Enhance communication between community groups and encourage broad community participation.*

*This may involve: Holding regular meetings; Holding community forums and other events; Establishing a website; Communicating with the community through other means; Meeting with government representatives and authorities; Cooperating with other community organisations; And any other means the association deems appropriate*

REDWatch makes this submission on the Planning Proposal: Waterloo Estate (South) in line with its objects.

REDWatch welcomes the opportunity to comment upon this planning proposal.

## The government context

Currently under the Future Directions Policy social housing redevelopments are expected to be self-funding. That model uses the sale of around 70% of the land to pay for replacement stock and maybe add a few extra units on supposedly 30% of the land – although in Waterloo South it is probably only 26.5% of the land. Taking a redevelopment cycle of about 70 years, even at 30% land retention each time, the rebuild area in 70 years would be 9% of the current land and at 140 years less than 3%. PANS-OPS height restrictions would cut in well before 140 years. This is clearly a short term policy that is not repeatable as it sells off government-owned land that will be required for low income housing and services into the future. The subsequent resumption of this land is likely to be almost impossible.

REDWatch is firmly of the view that the current sell off of '70% to build 30%' model is short term and robs the public of sites that will be needed to address low income and housing equity needs into the future. It is for this reason that REDWatch does not support the current LAHC redevelopment model and encourages political parties to adequately fund housing for those people who cannot afford the prices of the private housing market.

In terms of the government and LAHC's stated desire to make mixed tenure communities, this would not sound as hollow if the government also used other government owned land to create mixed developments with 30% social housing and not just market housing. For some reason social mix seems only to be applied to those marginalised in the housing market.

REDWatch welcomes research like that from Dr Cameron K. Murray and Professor Peter Phibbs on [Reimagining the economics of public housing at Waterloo](#) for Shelter NSW. That research suggests far better ways, which alienate less land during redevelopment, for governments to leverage their housing

assets. If nothing else, such approaches close the funding gap for governments to fund low income housing without selling off the land.

REDWatch's comments in this submission are based on developments happening with a paradigm we do not support, but nevertheless we seek to try and argue for the best possible outcomes for the provision of low income housing, be it social or affordable within this very blinkered approach.

**REDWatch also urges the government and LAHC to reimagine the Future Directions policy in light of Dr Cameron K. Murray and Professor Peter Phibbs work so that more social and affordable housing can be delivered to meet the shortfalls in both these tenures.**

## Aboriginal Housing

REDWatch supports the Redfern Waterloo Aboriginal Affordable Housing Campaign's aims of:

1. 10% Aboriginal Affordable Housing In all government redevelopments in the Redfern Waterloo area.
2. An increase in Aboriginal Social Housing ensuring that any community housing provider must either be Aboriginal owned and managed or if not, work in partnership with an Aboriginal led organisation.
3. Aboriginal Jobs and Ongoing Employment with targets for Aboriginal employment and contracts for construction and for Aboriginal employment in the provision of ongoing services in all government redevelopments in the Redfern Waterloo area.

REDWatch has worked closely with Aboriginal and local organisations in this campaign. Gentrification has driven many people who associate with the Redfern Waterloo Aboriginal community out of the local area and yet many people who still work within the community have to travel long distances to return for work, sport or community activities. For a long term viable Aboriginal community, there is a need for Aboriginal Affordable Housing within the Redfern Waterloo Area. For the Aboriginal community to be a part of a vibrant future Redfern and Waterloo, the provision of sufficient social and affordable housing is essential.

**REDWatch requests that 10% of the Waterloo South redevelopment be dedicated as Aboriginal Affordable Housing in line with the Redfern Waterloo Aboriginal Affordable Housing Campaign's request for Aboriginal Affordable Housing to be delivered on all Government controlled land in the Redfern Waterloo area.**

## The planning context

The Waterloo Estate was declared a State Significant Precinct on 18 May 2017 at which point almost identical study requirements were issued for precinct studies for both Waterloo Estate and Waterloo Metro. Many studies were initially undertaken for both precincts and tailored to the relevant Precinct Proposal. In May 2018 the Metro Site was decoupled from the Waterloo Estate and a SSP exhibition for the Metro was undertaken.

In November 2019 The City of Sydney Council was made the Planning Proposal Authority (PPA) of the Waterloo Estate site and Council issued its own Planning Proposal Lodgement Checklist. Some differences between Council and LAHC over the future of the existing high rise buildings on the estate saw these areas excluded from the LAHC proposal and a planning proposal just for Waterloo Estate South was lodged with Council in May 2020. Most of the supporting studies had been prepared for the earlier combined SSPs.

Council then rejected the LAHC proposal and prepared its own planning proposal for Waterloo South based on an earlier alternative proposal developed by Council. The new proposal increased the size of the earlier Council proposal to match the yield required by LAHC and pushed for a significant affordable housing contribution in addition to the proposed 30% social housing. LAHC and Council could not however agree on contributions arrangements for Council's proposal and the Planning Minister set a deadline for the standoff between Council and LAHC to be resolved.

When it was not resolved, the Minister removed Council as the PPA and made The Secretary of the Department of Planning Industry and Environment (DPIE) the PPA. This role was passed to the section of the Department responsible for SSDA Assessments to avoid a potential conflict of interest for the Secretary, as the Secretary was also responsible for the proponent, LAHC.

The new PPA then submitted the Council proposal for Gateway Determination, where the Minister had arranged for an Independent Advisory Group (IAG) to advise on areas of difference between Council and LAHC. The Gateway determination requested a number of changes and simplifications to the Council proposal and these were undertaken by the PPA. The modified proposal is now being exhibited.

This is the first exhibition opportunity the community has had to comment on any of the three Waterloo South proposals and the agreement struck between various government parties around density.

In the process of undertaking this submission we have identified that not all the original LAHC supporting studies and documents relevant to the proposal were placed on exhibition. The omissions included:

- Population and Demographic Study
- Public Art Plan
- Geotechnical and Contamination Study
- Feasibility and Economic Benefits Letter of Assurance

## Lack of clear explanation of the scope and impacts of the proposal

The consequence of these changes in the preparation of the planning proposal has resulted in a highly complex set of documents going on exhibition. Some studies relate to work undertaken across two precincts for totally different concepts to this exhibited planning proposal. Council in effect kept the earlier work and updated studies that dealt with its proposed built form. The DPIE PPE followed Council's lead and changed the reports that related to the changes it was asked to make by the Gateway determination. As a consequence it was exceedingly difficult to even work out what studies, documents and diagrams actually related to this exhibited proposal.

This problem could have been addressed in part, by producing Planning Proposal Documents that contained all the material relevant to the exhibited proposal. This did not happen however, and the PPE took the Council route of only changing the bits they were asked to change.

Of particular concern to REDWatch is, not even for the baseline proposal of approximately 3012 dwellings, was there clear and comprehensive testing of the planning proposal. The key environmental assessment of the amount of sunshine reaching parks, streets and courtyards of the exhibited proposal was not assessed. Questions have also been raised with REDWatch by Council officers about whether the apartment solar access diagram for mid-winter accurately reflects the exhibited proposal.

## The 10% Design Excellence increase not modelled

Another major concern was when REDWatch was alerted in early April that the figures being used by the PPA excluded the 10% design excellence provision. The increase for design excellence is designed to be compulsory, which means that it is highly likely that the number of units will be between 3300 and 3400 on Council's figures, rather than the 3012 publically referenced.

The IAG said "having tested multiple options, the density should remain as proposed in the [City's] Planning Proposal." The PPA has not substantiated any reason for overruling the IAG advice; advice that was in line with comments made by the Government Architect when the Council proposal came before the Central Sydney Planning Committee.

The planning proposal does not test the 10% higher density to show if or how it might work. Council has advised REDWatch that making its increase in density to match LAHC's yield required substantial testing.

There is no indication if this testing has been done for the 10% increase proposed, which is likely to be much harder to accommodate without adverse impacts on amenity.

Council has also advised REDWatch that its work in the design guide has not been updated to show the likely outcome from the proposed density increase.

***REDWatch cannot support the proposed 10% design excellence increase in density which has not been tested in the proposal or shown to work without creating adverse impacts.***

## No “clear and easy” presentation of the proposal

*The NSW Planning Proposals: A guide to preparing planning proposals* states: “A planning proposal is a document that explains the intended effect of a proposed local environmental plan (LEP) and sets out the justification for making that plan. It will be used and read by a wide audience including those who are responsible for deciding whether the proposal should proceed, as well as the general community. It must be concise and written in language that is clear and easy to understand. It must also be technically competent and include an accurate assessment of the likely impacts of the proposal. It should be supported by technical information and investigations where necessary”.

Further, the *NSW Local Environment Plan Making Guideline* states, “The planning proposal should be drafted to ensure that a wide audience including departmental staff, authorities and government agencies, councils, stakeholders and the community, can clearly understand the scope and impacts of the proposal.” page27

REDWatch and our advisors did not clearly understand the scope of the proposal until Council undertook its assessment and found that the 10% was added onto figures used in the proposal. This was halfway through the exhibition period. Those without access to this advice should have been able to take the PPA’s presentations and materials at face value as “concise and written in language that is clear and easy to understand”. Regrettably this was not the case, so almost all people will have taken the 3012 dwellings as the likely outcome of the proposal and think that this density is what needs to be assessed and not a 10% larger development which did not have its likely impacts disclosed or tested.

As pointed out earlier, because the PPA did not provide, as part of the proposal, a summary of all the information necessary to assess the planning proposal and because of the mixed relevance of the studies provided, it was not even easy for the community to understand impact of the pre-design excellence proposal.

REDWatch would normally argue in this circumstance that the proposal should be withdrawn, errors in the documents fixed (Council has listed many of these in its submission), the proposal properly tested and then be re-represented to the community in an easy to understand way. We are however aware we are dealing with a fatigued community from a long drawn out process who are unlikely to welcome a re-exhibition.

The PPA needs to undertake much more work on this proposal. It is not clear to REDWatch what the best path forward is to fix and test the proposal and get further feedback before the planning proposal is passed back through the Gateway for determination and LEP drafting.

***REDWatch cannot support the planning proposal in its current form, in fact we cannot even assess its likely impact because the information necessary for this has not been made available in the exhibited proposal.***

## Consultation is flawed with submissions likely to be based on incorrect information

REDWatch has worked with the Planning Proposal Authority (PPA), other parts of government and the community to try and ensure the community is widely consulted. The discovery mid-way through the

exhibition that the planning proposal summaries and presentations did not disclose the likely outcome of the proposal, nor test the likely impact of the increased proposal, throws into question the validity of the consultation as submissions are based on the incorrect information and assessments provided to those making submissions.

Given the objects of the *EP&A Act* include “(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment”,

***REDWatch submits that the Ecologically Sustainable Development (ESD) precautionary principle should be applied and support for the planning proposal, based on incorrect information, should not be used to support the rezoning. In this case the social considerations of ESD are likely at risk if the proposal were to proceed with further assessment, as important issues are missed.***

## Density is very high before the extra 10%, so needs special handling

The Independent Advisory Group (IAG) in advice to the Gateway determination said “There is a general view by commentators on this proposed development that the density is too high. ... The IAG considers, however, that at this density, design quality, building quality, and urban amenity are of significant importance at development assessment stage and at the construction stage.”

REDWatch shares the general view that the density, before the 10% design excellence increase is probably already too high. Council’s initial proposal was for a lower density before it decided it needed to match what LAHC required. While the IAG thought the Council density was workable, it did recognise that this level of density places special importance on design and building quality and urban amenity. The Social Sustainability study also raises a number of issues it considers crucial to the project’s success. In both cases however, the delivery of these crucial areas are kicked down the road, to either the contract or DA stage where they are potentially subservient to the planning controls.

If even the density proposed before the 10% is to deliver a successful outcome, REDWatch has been advised that it will be essential for a number of interventions to be made to ensure the best chance of a successful development. REDWatch is concerned that the rezoning pushes the density so high that its success is contingent on outcomes that have not been adequately set at the planning proposal stage.

It is of particular concern, for example is that the PPA has already proposed to drop the Council requirement for high performing buildings. In addition the identified wind impacts around the four towers, especially at Mount Carmel, have been left to the design excellence process, whereas Council says in its experience, wind impacts are seldom solved through this process.

It is the intent of a planning proposal “that identified potential impacts can be readily addressed during the subsequent LEP making stages”. It is also the intent to “identify the potential environmental, social, and economic impacts of the proposal and outline proposed mitigation measures and justification.” (*Local Environmental Plan Making Guideline* pages 72&73).

Booting the necessary mitigation down the road does not deal with it adequately during the LEP making process. In REDWatch’s view the planning proposal should proactively set out in the determination those things that need to happen if the density proposed is to work, not just for the developer and builder, but also for the community who will live there through the life of the buildings. This is part of assessing “the suitability of the precinct for any proposed land use” and “the implications of any change in land use” set out as what the Department needed to assess under the *State Significant Precinct Guidelines (2016)* that initially applied to assessing this project.

In one way this happens with a DCP or a Draft Design Guide, which, while not enshrined in planning law, do indicate what is expected to happen as advisory documents. Other areas such as the proportions of space for different uses are set in the planning controls. Ideally areas requiring mitigation to ensure success

should be set-at the strategic planning / LEP time or the land use should be limited to what the LEP can ensure will work.

***REDWatch urges the PPA to be specific about what has to happen to make the higher density work for everyone who is to live within the area of the development. If the mitigation needed cannot be guaranteed then high density, which is dependent on such mitigation, should not be proposed.***

## Social and economic effects not identified in the planning proposal

As stated earlier the *EPA Act 1979 No 203* specifies in Object (b) “to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment”. The Department review of a planning proposal is also to typically “undertake an assessment of potential environmental, social, economic, and infrastructure impacts of the proposal”. (*Local Environmental Plan Making Guideline* p39)

As part of ecologically sustainable development, social considerations should have equal weight alongside economic and environmental considerations. It is illuminating that the planning proposal does not specifically refer to either social impacts or social effects.

In addressing the key matters for consideration, when demonstrating the justification for a planning proposal (proposal Section 5.2-5.5 pp 61-76) the key social question is “Q9. Has the planning proposal adequately addressed any social and economic effects?” The planning proposal answers this question not with a detailed response, as happens in other areas of the key matters check list, but with the following response “Yes. The social and economic impacts of this Planning Proposal are discussed in Section 5.1 – Development Outcomes”. This is the same approach taken by the Council proposal and to some extent by the LAHC proposal which at least had a section on the Social Sustainability in the section referred to. Dr Alison Ziller in her submission goes into the short comings of the Social Sustainability Study.

One is always suspicious when the answer refers to the overall section within the report. In the case of the PPA proposal the section of the report referred to has 15 sub points dealing with development outcomes, planning controls and the entire substance of the planning proposal. Within the Development Outcomes section of the report there is no mention of social effects (the question) or social impacts (the answer).

The Social Sustainability Study and a Social Baseline Study get referenced only twice in the planning proposal. Once in relation to community facilities (that we will address later) and once in relation to school estimates. It is as if continuing to provide social housing on the site is a sufficient answer to addressing all social effects.

Regarding “Q7. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?” Proposal p75. This question is usually taken to refer to threatened flora and fauna rather than the human species. It is important to understand in this development that there is a vulnerable population of social housing tenants living in this critical government created habitat and that the impact of the development on this population has not been assessed under either Q7 or Q9 on the checklist.

The supporting studies are primarily focused on the environmental side and the economics of the development have been raked over by Council, the IAG and the PPA at the request of the Gateway. The social considerations however are inadequately tested for the social housing land use proposed which under the State Significant Precinct Guideline is one of the areas required to be assessed for “the implications of any change in land use”.

***REDWatch submits that there is no evidence in the planning proposal that the proposal has adequately addressed social effects or impacts, especially on the vulnerable population living on the estate. As this assessment is a key requirement of a planning proposal, REDWatch submits that the PPA should***

***undertake an independent SIA to assess potential impacts and propose how any identified impacts can be readily addressed / mitigated.***

## Suitability of proposed density not tested for public / social housing use

The proposal redevelops part of an existing 100% public housing estate and proposes that there will be more social housing tenancies after the redevelopment on about 30% of the land area. As social housing is an expected land use then the proposal's suitability for this land use needs to be assessed. In addition the change of the use of some land from social housing to other uses needs to assess the impact of the change on the continuing social housing population.

Central to this assessment is that the current social housing population is a distinct community which has been fashioned by public housing allocation policies over decades. Public housing was originally built for working people who were not expected to be able to buy their own home. While some of the aged public housing community is from this era, the move since 2005 to short term leases and the policy of public housing being used as housing of last resort, means that almost all allocations into Waterloo come from the priority housing list rather than from the wait list. Over a couple of decades the makeup of public housing has changed significantly. In the future this change is expected to continue, as the older working class public housing tenants pass on.

The social housing, post the redevelopment, will have a higher concentration of disadvantage than now. This change will see more people with complex, multiple diagnoses like drug and alcohol problems coupled with mental illness in social housing. This concentration of need is a direct consequence of a lack of public housing properties and the priority allocation by government to those most in need.

In short this is not a "normal" community. It is a community of vulnerable people who often find life and their living situations difficult, either because of their own circumstances or because of the impact on them of their neighbours' difficulties. There is no assessment of how land use at the proposed density and proximity to well off people, able to buy or rent at expensive inner-city rates, will impact high needs public housing tenants.

The Waterloo Human Services Action Plan is looking how to improve services for tenants in regular contact with the justice system; those who are involved in anti-social behaviour incidents and people whose tenancies are at risk. Other parts of the human services plan will focus on safety and wellbeing, including the interaction with those with drug, alcohol and/or mental health issues. By no means are all these issues unique to social housing, but they are concentrated in social housing as a result of government policy decisions.

As an example, tenants who are likely to try to attempt suicide are allocated housing at ground level, the question has been asked at the Waterloo Redevelopment Group whether there will be enough ground floor units to accommodate those deemed at risk in higher buildings. Possibly the original LAHC proposal that may have put private housing in the towers, but had more lower rise buildings may have provided better outcomes for the evolving social housing than the current proposal for 6-13 storey buildings. We don't know. Because the plan hasn't tested the implications of the changes or the different proposals for suitability for future social housing use, it's impossible to know.

LAHC seems driven by the financial opportunity to renew stock and raise funds for more social housing, rather than investigating the suitability of the development for high needs social tenants. Densities that work for a "normal" or "average" 70% of the private community may not be the same as what is needed for those who will be the public housing community in the next 10-20 years and beyond.

LAHC's own assumption on the demographic change for the redevelopment has not been disclosed and the in the Demographic Study the authors note that "forecasts are based on key assumptions provided by the Land and Housing Corporation NSW ... Changes to these assumptions would result in different forecast

results” (page 6). It is not possible to test LAHC’s assumptions for the change in makeup of social housing even in a general demographic context because they have not been made public in the study.

Regrettably the Demographic Study was one of the studies not placed on exhibition, although it was referenced by a number of other studies. REDWatch has accessed it from its archives.

**REDWatch submits that given the particular nature of social housing populations and its changes, driven by priority allocation for those with highest need into public housing, there needs to be an assessment of whether or not the density being proposed is appropriate for the likely population makeup of the social housing 10 to 20 years in the future. Failure to do so, and to put in place measures to mitigate social consequences, may result in a redevelopment that does not meet the needs of the 30% social housing tenants who will live in the new development.**

## A Social Impact Assessment (SIA) was not conducted and is needed

Many of the problems we have identified above would have been looked at if there had been a SIA undertaken by LAHC. Requests were made for both a Social Impact Assessment (SIA) as well as a Health Impact Assessment (HIA). Instead LAHC argued that a Social Sustainability Report (SSR) would cover the same ground, but it has not. At a basic level the SSR has not assessed the likely social impact on the existing community, nor assessed the likely impact of the development on future social housing tenants. The SSR has not identified if the identified potential impacts can be readily addressed during the LEP-making process.

Council in its Planning Proposal Lodgement Checklist correctly requested a SIA, but then wrongly agreed with LAHC that the SSD already undertaken for LAHC would suffice (SSR page 7-8). Like the PPA proposal, the Council planning proposal that went to Gateway, only references the SSR as it related to community facilities and schools. There was no assessment of site specific merit relating to the social impact of the proposal on the resident social housing community, nor the required outline of proposed mitigation measures and justification.

As a result no SIA has looked at the impact of the project, especially on the public housing community who already lives on the redevelopment site nor any assessment of what is needed to mitigate the impact on that vulnerable community.

While there will be a requirement for a SIA at the DA stage, this is a couple of years away and much of the damage to the community will have already happened without a mitigation strategy in place. Already the prolonged six year period since the initial announcement has left present tenants in a state of limbo and anxiety about when they will be relocated. Relocation will definitely will be well underway before the SIA is undertaken at the DA stage. LAHC will also have entered into contracts with the developer delivering the redevelopment.

Sydney Local Health District undertook their own Health Impact Assessment (HIA) of the impact of the period from the announcement in 2015 and found significant early impacts well in advance of relocations and the redevelopment. While LAHC representatives sat on the steering group with local community representatives, including REDWatch, the release of the final report has still not been agreed by LAHC, DCJ and SLHD. The name of the final report has been changed from a Health Impact Assessment to address LAHC concerns that the HIA name infers impacts from its Waterloo project that LAHC does not necessarily recognise.

The planning proposal is however about assessing if there are social impacts and then proposing mitigation. Irrespective of whether LAHC does not want the project to be seen to have impacts, it is the planning system role under ESD to investigate and integrate relevant economic, environmental and social considerations. Such requirements, as we have earlier pointed out, are part of the DPE planning proposal

guidelines and so are a part of assessing the appropriateness of a particular land use and suitable controls for that use.

This area of the planning proposal is lacking and it needs to be investigated before any decision can be made on the planning proposal. For a more detailed analysis on the limitations of the SSR and the need for a SIA please see Dr Alison Ziller's expert submission.

**REDWatch Requests that the PPA undertake a Social Impact Assessment to address the inadequacies in assessing the social impacts of the planning proposal and its supporting studies. Ideally the SIA should recommend an initial Social Impact Management Plan (SIMP) to manage any mitigation required to issues identified in the SIA.**

## Social Sustainability Outcomes not protected

Another area of concern to REDWatch is that some areas were identified in the Social Sustainability report as essential to the success of the project, but these have not been identified in the planning proposal nor raised as items that should be guaranteed. In most cases these are left for the proponent to agree with the developer, even though they are essential to the success of the project. Some of these should be identified in a SIA and implemented through a Social Impact Management Plan (SIMP).

Spaces for programs are identified in the planning proposal, but the proposal is totally silent on what activities are to happen in these spaces, and the community more broadly, to make the community and the facilities work.

Below are some of the areas considered essential to the success of the project in the Social Sustainability report that are not guaranteed:

- “To support the ongoing integration of the new community, implementing a placemaking program early in the redevelopment as part of the procurement process will be essential, as is the need to ensure these initiatives are reviewed and adapted regularly as the community and place evolve.” page 70
- “.....it is essential that a future Community Facilities Plan considers assumptions around costs and responsible parties for delivering and maintaining key facilities and ongoing programs. This includes management, maintenance and operating costs for all community facilities and open space, as well as responsibilities and ongoing costs of placemaking and community development activities.” page 58
- “Consultation with the community and key stakeholders such as the Redfern Police Area Command and City of Sydney emphasised the importance of ongoing community service delivery to support individuals, as well as the community as a whole. Many felt this was an essential prerequisite for the successful integration of social and market housing residents.” page 70
- “Consultation with the City of Sydney, State Government agencies and local service providers has consistently emphasised the need for a whole-of-government approach to the planning and delivery of essential community services. A whole-of-government approach for human services planning will need to be undertaken by the future proponent, and will be procured as part of the redevelopment procurement process.” page 74
- “The role that local service providers play in supporting current social housing residents was widely acknowledged by the community as part of the consultation for the redevelopment. Service providers' deep knowledge of and long-standing relationships with the community and individuals within it, were considered key existing strengths and essential elements to maintain.” page 73

**REDWatch proposes that these and other areas essential to the success of the rezoning to a high density precinct be examined by the SIA and given effect through a SIMP.**

## LAHC Policy of 30% social housing has not been met by proposal

*Future Directions for Social Housing in NSW (2016)*, the policy document driving the Waterloo South states: “Over the next 10 years the NSW Government will: ... d) Ensure large redevelopments target a 70:30 ratio of private to social housing to enable more integrated communities (generally with an increased number of social housing where practicable).” (page 9) This government policy has not been met in the Waterloo planning proposal.

In addition LAHC has continually told the community that any affordable housing would come out of the 70% private housing, not at the expense of the social housing.

The PPA in determining its Affordable Housing recommendation has done two things. It has decided, for a reason not specified, to propose 10% of the housing uplift as Affordable Housing. This has then been added on top of the 30:70 social private breakdown. As a result the social housing has pushed the level of social housing below the government’s Future Directions policy of 30%.

It is essential, given the alienation of public housing land in the development, that at least 30% of the development is social housing in line with the government’s policy.

**REDWatch recommends that the PPA should rework its proposal, so that no less than 30% of the site is social housing in line with the Future Directions policy and that affordable housing comes out of the private 70% allocation.**

## The Planning Proposal Authority should calculate the social housing as 30% of residential Gross Floor Area.

The PPA frames the social and affordable housing controls in terms of % of residential floor space. Currently social housing only constitutes 26.5% of residential floor space. On the 600 Elizabeth Street site Council was successful in gaining 30% of the residential floor space as social housing. If 30% of the residential floor space was to be delivered as social housing at Waterloo, 959 social housing units could be delivered on the pre 10% uplift figures. This would be an increase of 112 units over the figures proposed as the base case in the current planning proposal and higher with the 10% uplift.

While we note that the Future Directions policy is silent on whether the 70:30 relates to dwellings or percentage of residential GFA, we also note that the intention of the policy is to deliver “an increased number of social housing where practicable”, and if that is not possible in a large inner city estate like Waterloo, it is not possible anywhere. It should be possible to deliver more than the 98 unit base increase.

**REDWatch submits that as for 600 Elizabeth Street Redfern, the PPA should set the social housing 30% as the percentage of Residential Gross Floor Area (GFA) not as a percentage of dwellings so that the Future Directions policy is met and the maximum social housing yield under the policy is achieved.**

## The financial constraints need to be reassessed in light of the proposed 10% increase

The financial assessments both by the IAG and the PPA have been based on the stated dwelling numbers and floor space. However the PPA has then added the design excellence bonus on top of the figures used in the financial assessment. Given that the design excellence process is compulsorily on all buildings under the proposal, it is highly likely that the yield will be 10% higher than what has been used for the base financial case. This impacts calculating the feasibility of the quantity of social housing and its interaction with the affordable and market housing.

A 10% uplift on top of the figures used for assessing financial feasibility goes close to covering half the usual 20% developer’s margin. This opens up space for increasing the quantity of the social and affordable housing that can be funded by the redevelopment.

REDWatch has agreed with the IAG that the pre-uplift density should not be increased and has further argued that there needs to be a separate assessment of whether the density proposed is appropriate for social housing land use. In this context REDWatch needs to point out that if the proposal is to proceed with the extra 10% added to the base line then all the financial assessment must be redone.

In a recent study on [Reimagining the economics of public housing at Waterloo](#) for Shelter NSW, Dr Cameron K. Murray and Professor Peter Phibbs demonstrate ways that LAHC could leverage its property to move well beyond the 70:30 approach that is present policy. Changing the way LAHC goes about developments could have a big impact on the quantity of social and affordable housing that can be delivered.

**REDWatch submits that if the 10% bonus on design excellence goes forward, as proposed by the PPA, the financial feasibility needs to be updated and that the extra income coming from that uplift must be channelled into increased social and affordable housing and not into extra income for LAHC or its builder / developer.**

### Affordable Housing has been reduced by the Planning Proposal Authority

“The IAG concludes that this redevelopment can support 10% affordable housing in addition to the 30% social housing” (page 55). The IAG “recommendations ... demonstrate that 7.75% affordable housing can be achieved with a reasonable expectation of financial feasibility and an additional 2.25% potentially achieved through the tender process”.

This has been reduced by the PPA to 10% of uplift, which equates to 7.5% of dwellings and 7% of residential GFA, with the GFA figure written into the proposed controls. 7.5% is lower than even the 7.75%, let alone taking into account the 2.25% that should be possible in the tender process. It is the lower risk associated with developing a government owned site that would probably provide the extra 2.25% that the IAG thought would be achievable through the tender process.

On the 600 Elizabeth Street site, Council’s social housing analysis was close to delivering 10% social housing but the Council request was cut back to 7.5% in its proposal to ensure that the developer got the average 20% margin. At the Central Sydney Planning Committee meeting the Government Architect argued 10% was probably feasible given the lower risk associated with developing a government owned site. LAHC did not question the figures, it simply opposed putting affordable housing into the 600 Elizabeth Street development because it wanted to use the surplus from the Redfern site to build social housing in other parts of NSW (Determination report).

As mentioned above, the paper by Dr Cameron K. Murray and Professor Peter Phibbs shows that more conventional approaches to development and financing would make it possible to deliver much more social and affordable housing from a development like Waterloo South.

As the IAG report notes, there is a high demand for social and affordable housing in the inner city. It is almost impossible to get into Waterloo from the waiting list as almost all allocations are given to those with priority. It should not be possible for LAHC to use inner city redevelopments as fundraisers for other parts of its property portfolio, at the expense of social and affordable housing being added in the inner city. Neither the PPA, nor the Gateway, should preference controls that deliver a planning uplift to LAHC that increases its funding base instead of delivering social and affordable housing, especially when other viable models are available for leveraging LAHC assets.

As we said at the start of this submission, ideally Government should be funding the much needed social and affordable housing rather than selling off scarce real-estate that will be needed in the future for housing and facilities as populations grow. If it must sell off its assets to provide such housing it needs to leverage its assets much better than it currently does. Under the Murray & Phibbs analysis there would be no problem in reaching the 20% affordable housing proposed by the Council.

**REDWatch submits that it is not up to the PPA to ensure a profit to LAHC, a state government corporation. The planning proposal must assess the proposal on its merits and at least 10% affordable housing seems supported by both the IAG and Council analysis on the baseline case under current LAHC operations. The 10% increase in yield proposed from the additional design excellence and the changes proposed by Murray & Phibbs shows that much greater affordable housing could be delivered on the Waterloo South site.**

## Community Facilities for existing community organisations not assessed

Community facilities are assessed via the GHD Social Baseline Study, the Elton Social Sustainability Study and the Council requested CRED Community Facilities Peer Review. REDWatch has a concern that the community facilities studies do not assess the adequacy of existing community facilities to meet the needs of the social housing community. This is particularly important for the current community, but also for the increase in support needs in social housing anticipated as government allocates more people from the priority list.

There seems to be an assumption in the facilities studies that the existing community is adequately serviced by the existing services and that the only driver for increased use is that generated by the increased, largely private, population. While CRED notes (in section 4) that LAHC owns premises within the wider Waterloo Estate redevelopment foot print which would need to be replaced, CRED and the other consultants do not assess the suitability of the facilities of services that work with the public housing communities, nor what those services may require to continue to service the social housing community into the future.

Many of these services also operate from LAHC or Council owned properties. The CRED report specifically mention Counterpoint, which operates from a LAHC owned property that is not fit for its current purpose. These services and their needs were not covered by the Community Facilities Peer Review brief, and hence this has not been assessed or factored into extra community facilities needed.

The Social Sustainability Report says: “The role that local service providers play in supporting current social housing residents was widely acknowledged by the community as part of the consultation for the redevelopment. Service providers’ deep knowledge of and long-standing relationships with the community and individuals within it, were considered key existing strengths and essential elements to maintain” (p.73). These local services are crucial to support social housing tenants, but their facility needs have not been assessed.

It is important to understand that many of the services for social housing tenants are funded by the Department of Communities and Justice (DCJ) and that this funding does not cover rent. As a result these services are dependent on peppercorn rents from LAHC, and to a lesser extent Council, to operate. LAHC has previously tried to impose market rents on these properties to boost its revenue, but unless DCJ pays the increases incurred, the agencies would cease operations. The Community Facilities studies should also have assessed the surrounding services funded to support the public housing community and ensured that there was suitable space for those organisations provided within the redevelopment, even though they are currently in LAHC premises outside the specific redevelopment area.

In addition, as the base line studies were done for the whole of the Waterloo Estate and the peer review also seems to have been scoped over the entire Waterloo Estate, it looks as if the proposed community facility in the south west corner of Waterloo South is intended to potentially service all three stages of the redevelopment. If that was the case, it would be important that the only community facility should be centrally located on the estate as it was supported by the community, in the initial LAHC proposal. Relegating it to the extremity of the site will not make it easily accessible.

**REDWatch requests the PPA undertake a facilities assessment of NGOs providing mainly government-funded support to public housing tenants in the surrounding area to ascertain what facilities space is**

**required for these agencies to provide ongoing support for social housing tenants within the Waterloo redevelopment.**

## Crime Prevention & Cross Block connections

While REDWatch welcomes the approach of breaking up large blocks and making the site more permeable, REDWatch has major concerns about the current form of these narrow cross site links, especially as they are likely to be screened to preserve the privacy of the private open spaces through which they pass. There are significant Crime Prevention Through Environmental Design (CPTED) issues to be assessed here and much more work is needed to ensure a safe outcome.

From conversations with residents, the community like the convenience of laneways that cut through blocks to make it easier to navigate the estate, but are concerned about the safety of the laneways and the lack of any crime mitigation strategies.

Drug related issues happen across the entire community, however there is a concentration of people with drug, alcohol and mental health issues in public housing due to government allocation policies. It is hence even more important in a social housing development that good CPTED assessments are made initially and ongoing monitoring through safety audits and place management to ensure a safe community.

Safety concerns also need to be addressed in relation to open space and this needs to be done in a way that works for the entire community. Those with money can street drink by using outdoor seating at a licenced establishment. Others will need to do that in a park. There has to be space for both in the community. Alcohol free zones have not worked to remove long-time street drinkers and so the planning proposal has to ask the question – Where can the street drinkers go? – Rather than assume they will not exist. Providing a dedicated space contingent on it being looked after under a community development framework can be a good way of handling this complex issue in a community development context.

**REDWatch welcomes the PPA announcement to undertake a CPTED review and encourages the PPA to take the wider Social Impact Assessment lens to this and other issues that REDWatch would expect to be identified through an independent SIA.**

## Solar access to parks, streets and courtyards

It is disappointing that there is not a proper public assessment of solar impacts on streets, parks and courtyards in the planning proposal. While the Council proposal was assessed, the exhibited proposal was not. Part of the disagreement between LAHC and Council was the different built forms. While orientation of apartments and building go some way towards addressing solar access, the continuous block form proposed can also result in dark streets and places that does not happen in the more mixed built form proposed by LAHC.

It is a major short coming of the planning proposal that it did not make such a fundamental solar assessment available. There is a belief that streets will be dark and uninviting. How much sunlight a space get will determine if plants can grow and thrive.

On the basis of the apartment solar access diagrams it seems that courtyards will get very little sun, limiting their planting and recreational possibilities. This will be significantly further impacted by the PPA proposal when 10% more floor space be added into what is shown as the de facto reference scheme in the design guide.

It is particularly concerning that a 13 storey building has been proposed on Wellington Street between George and Cooper Streets, which will block the sun to the courtyard there. It is highly unlikely that the large trees shown in the artist's impressions in this location are likely to exist, let alone thrive, in this narrow sun-deprived area. We also note that large trees as shown, would require a deep soil planning on top of what is proposed in the design guide as a one storey building.

While the rest of the blocks have smaller buildings to the north, those buildings are narrow and will only allow solar access for a short period of time. This could be improved by buildings on the north-east and north-west of these blocks also tapering towards the north. This will be difficult to do with the 10% extra density proposed added in.

This not only impacts plants, but also whether apartments facing the courtyards can achieve the two hours minimum mid-winter solar access under regulations for apartments. The Hassell design study ranks as poor the apartment solar access assessment inside the building courtyard spaces. Less than 50% of the internal facing dwellings in all blocks may comply with the minimum apartment solar access requirements. Wider buildings, possibly as a result of the need to absorb extra floor space, will require good solar access for lower floor shaded apartments as it is unlikely they will get solar access from the east or the west on these building faces.

REDWatch is further concerned that solar testing the de facto reference proposal may not be particularly useful as it does not incorporate the extra 10% of residential GFA proposed. In perspective the 10% increase equates to an extra floor of space on the main development blocks which has to be fitted somehow into the floor plates of these buildings as the controls say that the bonus does not entitle any height increase. The likely consequence is that already narrow courtyards will become narrower and decrease sun access further.

This illustrates the point made by Council planners to REDWatch that when you increase the density / floor space you have to work much harder to make it work. There is insufficient evidence in the base proposal that crucial areas like sun access have been properly assessed and none whatsoever that indicates the impacts for a 10% increase have been assessed. Council, for example, has said that it is doubtful that the bonus residential GFA will fit within the design guide envelopes.

Finally there is a question as to whether the Council's de facto reference scheme, shown in the design guide, is in fact a likely or a preferred outcome from the planning controls. Not only has the floor space been increased by the design excellence bonus since it was put together, the LEP height controls and floor space ratio maps have been changed to allow for a much wider range of options than the more prescriptive maps proposed by Council. It is likely that the resultant development will look nothing like the design guide scheme, as LAHC's developer will be given controls that have not properly been tested for adequacy against a reference proposal derived from them.

**REDWatch submits that the PPA needs to get an independent review of the proposed controls, including the design excellence floor space bonus, to ensure that good solar access is achievable for the likely built form given the proposed controls.**

## Mitigations of Wind Impacts

Wind is a significant concern for residents and is currently a considerable problem on the site. REDWatch shares Council's concerns about wind impacts from the tower buildings, especially at Mount Carmel. The community was told that design would address the wind impacts from the 18 storey buildings opposite Redfern Station, but at the DA stage it did not happen.

It is imperative that during the planning proposal stage, wind impacts are addressed for all tall buildings, especially those on elevated sites. The Mt Carmel area has been assessed in the wind study material as having an unacceptably high wind impact. Resulting wind impacts have been noted in the proposal, but their remediation has been left to be addressed as part of the design excellence process, risking that it will not be properly assessed then. Council advises REDWatch that wind is seldom properly dealt with as part of a design excellence process.

Ideally the proposal should include all that needs to happen to make the site fit for the proposed built form at its control height and FSR. This was the approach taken by Council with its building gaps, but that space

was used for more units, rather than left as the mechanism for wind mitigation. Wind mitigation must not be left to the design excellence process, wind needs to be mitigated with or without the extra 10% floor space.

**REDWatch proposed that the PPA should form the controls to ensure that wind impacts are brought to within acceptable specified levels irrespective of design excellence. In essence the wind assessment needs to be able to trump design considerations on the tower to ensure that wind impacts are actually dealt with.**

## Noise Mitigation in units

Noise mitigation is usually talked about in terms of external noise from traffic or aircraft or industrial noises. This is certainly an important consideration along McEvoy Street and there we support Council's proposal for narrower buildings allowing natural ventilation on the non-traffic side of their tenancies.

REDWatch wants to take the opportunity to also emphasise that one of the most persistent complaints we hear from public housing tenants is about people noise from public spaces inside and outside buildings as well as the noise generated by neighbours. Given current social housing allocation policies, allocations happen into any available unit irrespective of the disruption that might be caused. Social housing tenants often can end up with a new noisy or troubled neighbour replacing someone who has passed on. While this problem is not limited to social housing, it is likely to be more prevalent.

**REDWatch proposes that the sound proofing of apartments should be such that social housing tenants can still have "the quite enjoyment" of their tenancies they are entitled to, even if a noisy or troubled tenants is allocated next door.**

## Opening of Pitt Street to McEvoy Street

The main report that investigates transport impacts is the Jacobs Transport Study and a brief Jacobs Addendum done in response to the Gateway determination. The planning proposal suggests the opening of Pitt Street at McEvoy with a left in and left out intersection. The main Jacobs Traffic report says "Although through traffic volumes on Pitt Street north of McEvoy Street are likely to be very low, the proposed layout would reinforce the role of Pitt Street as a primarily local street and discourage through-use of the new access" (Page 62). Jacobs' modelling indicated 230 vehicles per hour in morning peak and 293 per hour in evening peak by 2036.

The proposal to open McEvoy to Pitt Street has been a major issue raised by residents for a number of reasons. One of the major concerns is that it is in close proximity to Mt Carmel Primary School with a rise that restricts visibility. A speed hump has previously been installed in this no through road in response to speeding cars using this road, creating risks for young primary school children.

Given the congestion on the surrounding main roads on Elizabeth, Regent and McEvoy Streets there is a major community concern that opening up to McEvoy will create an alternative rat run through the estate towards Redfern.

**REDWatch submits that given the consultants see this as a very low traffic street and the community concern about this intersection being opened up even on a left in left out basis, that the PPA should assess if this opening is crucial to the success of the development, and if not, it should be withdrawn from the proposal or the necessary mitigation strategy put in place to address all the issues identified.**

## Parking

Parking is always a contentious issue in the inner city, especially so where there are a mix of generations with different experiences and expectations of transport.

The planning proposal expects that based on Sydney LEP 2012 rates, the future redevelopment of Waterloo Estate (South) could result in approximately 1,685 residential and 114 commercial parking spaces. This would equate to roughly 0.5 parking spaces per dwelling with no determination as to how many of these would go to each housing type. While some in the community are of the view that less parking is better, especially given the proximity of the planning proposal to the Waterloo Metro, others have raised concerns that the proposed parking is woefully inadequate, especially to support future retail, community facilities and parking for carers / nurses.

REDWatch supports the reduction of private car spaces in the inner city as a traffic reduction measure. While home buyers and private renters can mostly choose if a location with low parking suits them, social and affordable housing tenants are in a different position. Some older tenants have grown up with private car usage and removing their car is equated with the end of their independence. For some low income workers in affordable housing, access to a car may also be part of their employment.

Tenants with cars fear that when they move into a new unit they will not have a spot for their car nor a safe place to leave it. Currently public tenants have access to parking which they fear may disappear. DCJ and LAHC need to do a proper audit of car ownership among tenants to ensure that tenants are not targeted through this change.

REDWatch has historically championed centralised parking in buildings where parking spaces are not sold with particular units, but rather allocated / leased out as needed. REDWatch also supports the provision of care share spots and in the precincts that will house social housing tenants in particular, the provision of spaces for care workers, disability parking and community transport. Managing parking on a site wide basis allows for parking to be retrofitted with charge points or to be repurposed for different uses as car usage patterns change.

REDWatch notes that the Transport study makes no assessment of the likely need for “serve” trips in Waterloo i.e. “trips undertaken for the purposes of accompanying another person undertaking a trip, for example a carer”. There is also no assessment of the need for parking spots for in home care, community nurses and other services under My Aged Care or the NDIS that are more likely needed for social housing tenants.

**REDWatch proposes that given the high number of people on disability pensions and people receiving support services in the 30% social housing that a study should be undertaken to ensure that the essential transport necessary for the delivery of in home support services, community transport and disability transport be properly factored into the provided parking rather than just a calculation based on parking spaces per unit size and the proximity to public transport. This assessment should include a study of public housing car ownership that may realistically need to be accommodated in the rebuild.**

## Parks & Open Space

REDWatch has also heard concerns raised by residents about parks. While efforts to retain the existing canopy is welcomed, REDWatch has heard from community members that the proposed parks and open space are not adequate nor are reflective of previous community consultations (Options Testing Consultation Report Key Findings, 2019). The following issues have been raised:

- Green space in the proposal is at least one hectare less than that proposed under the preferred masterplan (2019).
- The community endorsed a green boulevard along George Street which is missing from the planning proposal.
- Community gardens have been dropped without any justification by LAHC, the City of Sydney or DPE.
- Social corners were another feature that was enthusiastically endorsed by the community throughout Options Testing consultations and is missing from this planning proposal.

- The large central park was the original location for the community centre as desired and requested by both residents and current service providers.

There has also been concern about the size and overshadowing of the small park. These concerns should be noted and addressed if they have not been received in submissions elsewhere.

## Conclusion

REDWatch has heard concerns from a broad cross-section of the community throughout the statutory exhibition in workshops, public meetings and DPE led engagement activities. This has been a very difficult consultation, in part because of the layered nature of the various modified proposals, partly because the planning proposal did not summarise the proposal, partly because the PPA did not fully test the planning proposal and then present the findings to the community in an easily accessible way. The 10% icing that was found to be on the planning layer cake meant that what people relied on in the report was not the likely outcome of the proposal given that 10% had been added without the impact being assessed.

Through this process we have tried to understand the proposal to the best of our ability as non-planners and to provide feedback on the issues identified in the community and by ourselves and our advisors.

We have made a number of recommendations throughout the report as to what we think needs to happen to address the issues identified. We encourage the PPA to seriously consider the issues raised and our suggestions for addressing them.

The Waterloo South Planning Proposal is like few others. Firstly it has an existing long term residential community that calls the place home, it is not an ex-industrial site being turned over to a housing development. The community is also a vulnerable disadvantaged community in the heart of a gentrifying city, the existing population demographic is the product of government public housing allocation policies over a long period of time. Those same allocation policies will see the makeup of social housing change further in the next 10-20 years as the old working class public housing cohort is replaced by those accessing what is seen as housing of last resort for the most needy.

All this means that the planning proposal should proceed with caution and make sure that the issues facing this community are properly assessed and addressed. This is the role of a planning proposal and those who assess the applications – to assess the precinct for the proposed land use and understand the implications of any change in the land use and the controls.

In this case REDWatch urges the PPA to undertake additional studies, like the Social Impact Assessment to understand the social impacts of the proposal and to seek to mitigate those impacts so that the final controls, when passed into law, will work for the marginalised 30% part of the future community as well as for those who can pay high mortgages and rents.

REDWatch thanks the PPA staff for their work during the exhibition and we look forward to improvements in the proposal resulting from the exhibition.

For Further Information, contact:

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On behalf of REDWatch Inc

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*REDWatch is a residents and friends group covering Redfern Eveleigh Darlington and Waterloo (the same area originally covered initially by the Redfern Waterloo Authority). REDWatch monitors government activities in the area and seeks to ensure community involvement in all decisions made about the area. More details can be found at [www.redwatch.org.au](http://www.redwatch.org.au).*

SUB-1702  
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Glen Wolter  
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Waterloo

*Multiple submissions received from an individual or organisation, are counted as one submission.*

Without prejudice

Glen Wolter  
63 Wellington Street  
Gadigal Country  
Waterloo NSW 2017

29 April 2022

Dear Mr Bright,

**Re: Planning proposal for Waterloo Estate (South) [PP-2021-3265]**

I am writing in relation to the planning proposal for Waterloo Estate (South) (**the proposal**).

For the reasons in Appendix A, I object to the proposal.

My objection primarily relates to the proposed approach to redeveloping Block 7, especially the introduction of a “fourth” tower on that block.

The documents to which I refer in those reasons are listed in Appendix B.

I have not made any reportable political donations in the previous two years.

Thank you for considering my objection to the proposal and the reasons for it.

Kind regards,  
Glen Wolter

## Appendix A

1. The fact that the additional technical reports have adopted the so-called DPIE scheme, for which Hassell has been the main proponent, as their point of reference could easily leave the impression that proceeding with this scheme — including the disagreeable proposed Block 7 tower — is a foregone conclusion. I respectfully remind the Authority that this is not so: it of course remains subject to consideration of the submissions provided during exhibition.
2. The anticipated project timeline, as set out in the exhibited Planning Proposal (49, p. 81), which appears to be highly truncated, gives me further cause for concern. It is imperative that the public submissions during exhibition are given due regard and that no corners are cut in recasting the proposal in light of them.
3. Block 7 and people who live adjacent to it will sustain all of the downsides of this redevelopment but none of its upsides.
  - a. Wellington Street is already widely used for rat running between Botany Road and Elizabeth Street. Wellington Street will become an increasingly busy thoroughfare, including because of transport-related proposals, such as the redirection of the 355 bus service along Wellington Street. This will contribute to increased noise and air pollution for the local community. Increased traffic impacts should be equitably spread across the site and the adjacent area.
  - b. Under an earlier proposal, Block 7 would have hosted a community room. The original Social Baseline Study recommended that community rooms be distributed throughout the precinct (28, pp 116–7). The community room has been removed from Block 7 to make way for further residential development (see 36, p. 18 and 49, p. 44).
  - c. The community rooms will be “secure and tenant-only” (28, pp 116–7). Residents of the adjacent Waterloo heritage conservation area, who by and large consider themselves to be part of the Waterloo South community, would be excluded from using these facilities, because of a boundary arbitrarily drawn around the Precinct.
  - d. Block 7 has one of the largest residential floor areas and the equal lowest indicative non-residential floor area — zero (see 36, p. 18 and 49, p. 44). In distributing services and facilities across the Precinct, the authorities have completely overlooked Block 7.
  - e. The original Social Baseline Study recommended that retail and entertainment areas be included on the fringe of the development site to encourage connections between neighbours (28, p. 99). There are no activated frontages on Block 7. There are no active frontages proximate to Block 7.
  - f. As at February 2022, there is no ground level setback provision for the Wellington Street edge of Block 7, where the proposed development would interface with existing terrace houses within the Waterloo heritage conservation area (34, p. 49), except where the retention of high-value trees has insisted upon it (39, p. 54). Note that the Department’s project brief to Hassell required Hassell’s review to give specific attention to setbacks and heights along the perimeter of the precinct where it transitions with areas outside and, in this context, referred to Block 7 specifically (34, p. 6).
  - g. For the primary upper level setback along this edge [Wellington Street edge of Block 7], a minimal setback of 3m only has been used (39, p. 55).

- h. As at February 2022, there is no upper level setback provision for the proposed Block 7 tower (39, p. 55). This risks delivering a stout and visually imposing built form at a crucial heritage interface. It is no answer to say that this can be addressed at the design stage — provision was made for significant setbacks along McEvoy, where the other proposed towers are located in advance of exhibition (ibid).
  - i. The square proposed footprint of the proposed Block 7 tower is unlikely to allow for a slender and elegant design in the same way as the elongated proposed footprints of the proposed towers along McEvoy Street. A location less encumbered by high-value tree retention than the Kellick Street/Gibson Street corner of Block 7 should be identified within the site that would allow the fourth tower to be as slender and elegant as its counterparts.
  - j. The proposed Block 7 tower has been justified on the basis that it represents a redistribution of floor space to improve solar access across the site generally. It is inequitable that the amenity of community members adjacent to Block 7 should be so significantly traded off to provide minor improvements in amenity to others. Any adverse impacts should be distributed equitably across the whole site.
  - k. Query whether the proposed Block 7 tower represents a redistribution of floor space across the site only. While the documents are somewhat opaque on this point, it seems that there may be a windfall of additional floor space. It is incumbent on the Department to make a plain disclosure on this point, especially if the amenity of adjacent community members is going to be so significantly traded off to achieve it. The justifications for the high density, etc. have been given in terms of feasibility in a context where redevelopment must entail no cost to Government; but, if a yield higher than feasibility plus a reasonable buffer is being sought, these justifications are inadequate and a better justification should be given.
  - l. In many other parts of the estate, a four-storey maximum has been introduced for north-facing parts of the perimeter blocks to enable better solar access to the interior courtyards. This is yet another benefit that Block 7 has been deprived of.
  - m. Block 7 has the dubious honour of being identified, by its surrounding streets, in the February 2022 version of the Draft Design Guide as the location of both tall buildings and higher medium-rise buildings (36, p. 49).
4. Much attention is given to the interests, needs, etc. of the Precinct's residents and tenants, but almost none is given to other members of the community, including those who live just outside of the boundary arbitrarily drawn around the Precinct.
5. Much of the communal space is proposed to be removed to the rooves of the redeveloped buildings (into "communal landscape zones"), such that they will not be accessible by other members of the community.
6. The addendum Urban Design Report briefly considered the interface between Block 7 and Gibson Street (to the east of the block) (34, p. 127). It suggested that the "significantly different condition" on Block 7 would be mitigated by the primary orientations of the adjacent residential terraces being away from the tower to the north and south. Note that this is not true of the Wellington Street terrace houses, within the Waterloo heritage conservation area (see 38, p. 32), whose primary orientation would be towards the tower to the north.
7. The original Noise and Vibration Assessment observed that noise levels exceeding the highly noise affected criterion (>75 dBA) may be experienced at residential properties around the boundary of the proposal. The predicted noise impacts at my property appear to be 81 dBA.

This is obviously unacceptable to me. The listing of available noise mitigation measures is not adequate comfort, without the formulation of a comprehensive and specific plan, is little comfort.

8. The quality of the original Noise and Vibration Assessment is questionable. A crucial noise logger at noise monitoring location L4 on Wellington Street was amateurly deployed such that it (foreseeably) captured the noise produced by a group of feeding rosellas (22, p. 25). Instead of re-deploying the noise logger, the contractor asks the community to take its word that there was no material difference between this location and others within the site (*ibid*).
9. The original Noise and Vibration Assessment disposes of the important matter of construction vibration impacts by simply stating that “a detailed construction vibration assessment is not possible at this stage” (22, p. 47). This is unsatisfactory. In order to give proper and meaningful feedback, the community needs to be provided with more information and analysis on this point.
10. In relation to the potential impact of construction, attention appears to be given primarily or exclusively to residents and tenants within the site (see, e.g., 25, p. 13 and 28, p. 69). If the impact of construction on other members of the community, including those in the adjacent Waterloo heritage conservation area, is considered at all, it is surely an afterthought.
11. The Department was appointed as the Primary Planning Authority in order to resolve the deadlock between Council and the LAHC. To the extent that those parties were already aligned on a point, the Department should not have sought to disturb that alignment by making contrary proposals. The IAG Final Report noted that those parties had agreed that a lower built form should be concentrated upon (p. 26), the Department should not now seek to depart from that by proposing a fourth tower. The fourth tower appears to be a solution in search of a problem.
12. To the extent that the Department has erred by making contrary proposals, in the sense that it has acted outside the parameters placed on its discretion by the terms of its appointment as the Primary Planning Authority and by the terms of the gateway conditions, the contractors who prepared their addendum technical reports on the basis of the so-called DPIE scheme will have also erred. This includes the Financial Feasibility Assessment prepared by Savills (35) and the addendum Heritage Impact Assessment prepared by Artefact (38).
13. The technical reports should be prepared anew on the basis of the City of Sydney scheme as modified by the IAG’s recommendations on building heights, etc.
14. The addendum Urban Design Report includes a number of significant alterations with significant adverse consequences on the apparent initiative of the urban planner that produced it, Hassell. I query whether this was permitted within the terms of its engagement as set out in that document (34, p. 3) or formed part of its task under the gateway conditions (1, p. 3).
15. While the Department asked Hassell to take a “broad and holistic” approach, it was asked to conduct a *review* — this suggests that it should have been primarily or exclusively turning its mind to earlier proposals and solutions, in particular the IAG recommendations and (all of, not a select few of) the technical reports (*ibid*).
16. Though the content of the addendum urban design assessment required by the gateway conditions was not to be limited to the points set out in the second row of Table 1 of the Gateway Determination, it is clear from the language of the points that “the revised scheme” to be assessed was taken as settled — e.g. Hassell was charged with *updating* the overshadowing diagrams *for that scheme*, not *producing* overshadowing diagrams *for a new scheme entirely of its own*.

17. The addendum Heritage Impact Assessment does not adequately address the recommendations of the updated technical studies, as required by the Gateway Determination. This will be further detailed below.
18. The Department should, in any case, reject the recommendations made by Hassell and adopt the recommendations made by the IAG. The IAG's methodology was characterised by extreme diligence (see 2, p. 13). By comparison, Hassell's addendum Urban Design Report was, especially in relation to the most material issues, a mess. This will be further detailed below.
19. The Department has seemed to rely on an unsustainable and reductive interpretation of the phrase "Use the Waterloo IAG storey height map as a guide" to justify its wild departures from the IAG's height map. It is clear from other expressions within the Gateway Determination, such as where the Minister required an addendum report on wind to be produced "to address the amended proposal including the building envelopes recommended by the IAG" (1, p. 4), that it was the Minister's expectation that the IAG's height map would be followed. That is, the Minister accepted the advice and recommendations of the IAG on, at least, this point. It is inadequate that "the IAG height map was considered" (44, p. 4). In taking this approach, the Department erred in its efforts to fulfil the conditions of the Gateway Determination.
20. The IAG knew that there were two (primary) available options to achieve the "very high" FSR sought to achieve feasibility: (i) higher street/courtyard walls, or (ii) towers (2, pp 39,41). In fact, they were aware of but did not accept the LAHC's earlier proposal for a tower to be built on Block 7. Especially since the Minister appears to have accepted the IAG's approach to height and typology (1, p. 4), the Department should have followed the IAG's informed election for the first of these options. The purported need for the fourth tower was created by Hassell's (insubordinate, unauthorised) decision to ignore this election and reduce the height street/courtyard walls across the site (34, p. 37).
21. Even if this were permitted, it remains the case that density should be more evenly spread equitably across the estate and not concentrated on Block 7.
22. The Department has not adequately explained why it was prepared to adopt the advice and recommendations of the IAG on some points — its analysis is relied on prominently in, e.g., the adopted Financial Feasibility Assessment produced by Savills (35, p. 14), where it is used to purportedly "debunk" the Council's feasibility analysis and justify "very high" density across the site.
23. By Hassell's own admission, any redistribution of floor space resultant from its "review" would need to promote neighbourhood amenity, including via wind impact amelioration. Yet, despite the availability of the addendum Wind Report to it, it adopted as its preferred location for the proposed fourth tower that Arup strongly argued is not ideal and gives rise to significant safety concerns from a wind perspective (42, p. 4). In fact, it does not address "issues of wind" in detail in its analysis (34, p. 153).
24. The addendum Wind Report identifies the "additional tall tower in the north-east corner" [i.e. the proposed Block 7 tower] as the most important change in the so-called DPIE scheme created by Hassell from a wind safety perspective (42, p. 2). In that context, it notes that a "tall building in this elevated location is exposed to all prevailing strong wind directions" and that "the significant increase in building massing" nearby locations would be expected to "exceed the safety criterion" (42, p. 4).

25. The addendum Urban Design Report states that, where a change has caused a reduction in yield, that yield has been replaced “in other areas of the precinct where amenity impacts are lessened”. However, it is clear that serious amenity issues, which are out of proportion with the amenity improvements elsewhere, including some that Hassell failed to give due regard, are created by the introduction of the proposed Block 7 tower.
26. By Hassell’s own admission, the proposed height and built form within the site should provide a considered contextual response at the site’s junctions with heritage items and heritage conservation areas (34, p. 75). Unfortunately, it has omitted the crucial junction between the site and the Mount Carmel Church and School from its analysis, such that it cannot be said to have provided the necessary “considered contextual response”. This heritage item is omitted from Hassell’s list of heritage site interfaces and is cropped from/not identified by number on the illustrated heritage map.
27. Hassell’s failure to recognise the existence of the Mount Carmel Church and School as a heritage item with which the planning proposal interfaces (34, p. 141) is likely to have informed its flawed recommendation re massing on the following page (34, p. 142). The “axonometric” illustrating the recommended massing, like many of the relevant diagrams, crops out Mount Carmel Church and School.
28. The conclusion that Hassell did not recognise the existence of the Mount Carmel Church and School is further supported by its observation that the planning proposal “accommodates the specific heritage items within the area [broadly construed, as Hassell’s list includes the Waterloo heritage conservation area, for example] by having a lower form (generally two storey) interface to them” (34, p. 141). On the very next page (34, p. 142), it (contradictorily) recommends a 27-storey massing adjacent to the Mount Carmel Church and School.
29. The “independent” peer reviewer also seems to have been unaware of/given insufficient consideration to the Mount Carmel Church and School heritage items. He says that he supports the tower because of its transition in scale to the adjacent conservation zone but makes no mention of the other crucial heritage interfaces (34, pp 151, 154).
30. Aside from the fact that Hassell should have but did not consider this crucial heritage interface in its analysis, which may have been material in it identifying Block 7 as its preferred location for the proposed fourth tower, the map could easily have misled the public, who should have been given an opportunity to properly understand and comment upon the potential heritage impact of the proposal.
31. The addendum Urban Design Report falsely attributes the benefits of its proposed scheme. For example, it says that tree retention on Block 7 results in a gain of 3,035m<sup>2</sup> of building area. This is patently not the case (34, p. 89). The gain in building area is attributable solely to the inclusion of the proposed fourth tower on that block. (The result is that a member of the public seeking to argue against this gain in building area is at risk of being seen to argue against tree retention — an unsatisfactory result.) Similarly, the addendum Urban Design Report attributes the improvement for Waterloo Park’s solar access (which, considering it is a “marginally improved outcome” appears to be overtouted throughout the documents) to the inclusion of the proposed Block 7 tower. This outcome is attributable solely to the reduction of the height of Block 7B along Kellick Street from 13 to 11 storeys, which could be achieved without the introduction of the proposed tower. To the extent that there needs to be a redistribution of the lost yield, it could also be redistributed to a tower in another location on the site or, better still, equitably across the site — that is, it does not ineluctably lead to the conclusion that the proposed Block 7 tower need be introduced. This false attribution could have discouraged some members of the community providing feedback that they otherwise would have.

32. Importantly, the addendum Urban Design Report does no analysis of whether the tower caused worse overshadowing outcomes to other adjacent heritage interests, including the Mount Carmel Church and School — presumably it does. The artificial construction of the solar access diagrams, which only show overshadowing within the borders of the park and fail to even indicate the presence of the Mount Carmel Church and School within the area shown, deprives the public of important information about the true overshadowing effects of this reconfiguration of Block 7 on the adjacent heritage interests.
33. The Urban Design Report offers no explanation as to why the four “potential tower locations” are the only options explored. Even if the “pros and cons” analysis were to be limited to four potential locations, surely locations that do not give rise to concerns about “building separation” (such as, it would seem, Options A and D) should have been chosen. Other locations, especially the corner of Pitt St/John St (on the northern side of John St), have a lot to be said for them: they have most/all of the listed pros and few/none of the listed cons — e.g. by being along the westerly edge of Waterloo Park, it would be more proximately located to the existing tower cluster and would less materially overshadow the adjacent (heritage-protected) Waterloo Park. It would also allow east-facing living rooms overlooking the park [south-facing living rooms overlooking the park in the proposed Block 7 tower would create non-compliance].
34. The Urban Design Report “pros and cons” analysis lacks diligence and robustness. The “cons” listed for (“preferred”) location D have just been copied and pasted from location A and are not even applicable — there is literally no risk that the proposed tower would overshadow the “pocket park” in the southwest of the site (34, p. 123). Far from being a mere typo, this error has infected analysis in technical reports that relied on it: the addendum Heritage Impact Assessment took this to mean that Hassell was only concerned with overshadowing by the proposed Block 7 tower of the “*southwest pocket* of the neighbouring park”. Of course, the overshadowing would be in the north of the neighbouring (Waterloo) park, in the immediate vicinity of the crucial heritage interfaces. Through its lack of diligence, Hassell has put the quality and reliability of the addendum Heritage Impact Assessment in question.
35. In any case, on any reasonable view of the “pros and cons” analysis as presented, potential locations B and C are clearly preferable to potential location D. This is so, even without taking into account Hassell’s failure to consider the heritage interface with Mount Carmel Church and School at potential location D and the adverse wind impacts that would be expected by building a tower there. One cannot help but wonder whether Hassell was seeking to reason to a “desired” outcome, being the placement of a fourth tower on Block 7.
36. The “pros and cons” analysis as presented omits a number of crucial considerations — primarily “cons” of potential location D. This is especially the case of the anticipated adverse wind impacts outlined in the addendum Wind Report (42). By its own admission, Hassell did not address “issues of wind” in detail in its analysis (34, p. 153). By extension, these issues cannot have been considered in detail by the “independent” peer reviewer either. The Department should not adopt the recommendations flowing from this analysis in circumstances where one of the most crucial elements — wind — has not been addressed in detail. Why did Hassell selectively choose to eschew detailed analysis of “issues of wind” when it considered other of the technical elements covered in the supplementary reports, including solar access, overshadowing, etc? Could it be because addendum Wind Report (42) expressed specific and worrisome concerns about Hassell’s preferred location for the fourth tower? I recall that the relevant gateway condition required this additional urban design report to “[a]ddress the recommendations of updated technical studies”. This represents an ostensible failure on the part of Hassell to do so.

37. In any case, some of the listed “pros and cons” are highly subjective. The “dominant line of towers” referred to in the “cons” list for tower location C (34, p. 122) could just as easily be described as a “pro”, with it producing a desirable “compositional pairing” with the existing towers in the north (11, p. 23). By comparison, the omitted “cons” such as negative wind impacts likely to be produced by positioning a tower at potential location D are highly objective, and should have been both considered and given significant weight.
38. Some of the “cons” listed for other potential tower locations should have also been applied to potential location D. For example, a listed “con” for potential location B is that the nature of the block would require “specific design attention” — this is obviously also true of potential location D, as the February 2022 version of the Draft Design Guide, along with other documents, makes clear (36, p. 74).
39. (In seeking to demonstrate that the peer reviewer was adequately credentialed to undertake a review, the Urban Design Report set out all of his connections to Hassell and the UDR process. I am not aware of any definition of “independent” that would cover this sort of close relationship between the peer reviewer and the proponent of the draft.)
40. Hassell’s analysis should have given greater weight to the fact that placing the fourth tower in its preferred location would create a highly onerous competitive design process, with solar access, tree retention and wind all required considerations (36, p. 74). More to the point, experts have indicated that at least some of these issues would need to be *extremely closely* considered. Other than the blocks immediately adjacent to McEvoy, which give rise to special noise issues, no other block on the whole site would require three of the four listed matters to be considered during an eventual competitive design process. Block 7 is patently not the right location for any eventual fourth tower.
41. The methodology and resultant conclusions of the addendum Heritage Impact Statement (38) are highly flawed. This document was prepared as a gateway required study. The relevant gateway condition required that a report be prepared “to address the amended proposals [sic] building envelopes and relations to heritage” and to “[a]ddress Ministerial Direction 2.3” (1, p. 3). Ministerial Direction 2.3 required the addendum report to “address the impact of the amended building heights on the heritage significance of these adjacent properties [being Heritage Items and Heritage Conservation Areas]” (2, p. 32). There were other applicable requirements, objectives, principles of this nature, too.
42. First, as mentioned above, the building envelopes to be addressed should have been those of the Council’s proposal, submitted as the planning proposal, as amended in light of the IAG’s recommendations (see, e.g., the Regional Plan objectives re heritage at 2, p. 27, which refer to “*Council’s* amended building envelopes”).
43. Second, it was inappropriate for the contractor, Artefact, to take a comparative approach (which is not what was required), especially where it used for the basis as its comparison the long-since jettisoned original LAHC proposal and the original Heritage Impact Statement which had already been identified as being insufficiently robust in its analysis of the heritage interfaces at the edge of/outside the site. Taking this approach led to absurd conclusions, which cannot be reasonably relied on, such as that the introduction of a 27-storey tower on Block 7 (where both Council and the IAG would have had a maximum 13-storey form instead) produced a *reduction* (!?) in visual impact to the Waterloo Park and Oval, Mt Carmel Church and School, and the Waterloo heritage conservation area. This could and should have been avoided by adopting a non-comparative methodology, as the relevant requirements seemed to call for (or simply applying common sense).
44. (The IAG report preceded the Gateway Determination. The Gateway Determination identified that the original Heritage Impact Statement (13) had not adequately considered the potential

impacts on heritage items and the conservation areas adjacent to the site. Had the IAG had the benefit of adequate analysis of these potential impacts, it might have recommended a lower built form on Block 7 than it did.)

45. In any case, key aspects of Artefact's analysis is clearly at odds with its conclusions. At p. 55 of its addendum Heritage Impact Statement (38), Artefact writes "[t]he dominance of very high storey buildings on the southern end of the study area has will have visual impacts on the heritage conservation Waterloo Heritage Conservation [sic]". How can it be that a more-elevated building of the same height more proximate to the heritage interests not produce the same (or a worse) heritage outcome?
46. There are also some contradictory conclusions. In relation to heritage interests within the site, Artefact concludes that there will be an increased visual impact "due to the increase in height of the proposed buildings directly adjacent to those items" but does not reach the same conclusion re the placement of the proposed Block 7 tower adjacent to heritage interests just outside the site. This is very weak and unconvincing analysis, which, if accepted, could have very negative heritage impacts on the area's important (and protected) heritage.
47. The establishment of a heritage conservation area represents a reciprocal agreement between the landowners and the relevant authorities to take requisite care of the heritage. As one such landowner, I invest much time, energy and money into living up to my end of this bargain. Further, I am to some degree encumbered, however happily, in how I am able deal with my property as a result of its inclusion in the heritage conservation area. I call on the authorities to now live up to their end of this bargain by giving adequate care and attention to the area as it prepares its final plan for Waterloo South.
48. It would seem that the Department proposes to address the wind impacts identified by Arup at the design stage. This is unsatisfactory. Especially considering that Arup has expressed serious concerns about public safety if the development were to proceed as proposed, particularly on Block 7, it is not appropriate to leave this issue over to so late a stage in the process, by which time the public's opportunity to provide important feedback will have been exhausted. It has also not been possible to provide detailed feedback on this point in the present submission, though I would have wished to, because of this deferral.
49. In relation to its approach to mitigating the worrying anticipated wind impacts around Block 7, the Department has a "Catch 22": it relies (too) heavily on the dissipating effects of the (newly) retained trees around the block to avoid the "fails" on wind comfort and safety (10, p. 87 and elsewhere), which would be close to the safety limit even without the inclusion of the proposed fourth tower there (42, p. 2), but it has also been warned that wind (particularly downdrafts) will have an adverse impact on those same trees (21, p. 45).
50. The Department must protect those trees at all costs since, if they are lost, public safety will be an even greater concern. In any case, because they are "not permanent", Arup argues that they "should not be relied on to mitigate safety concerns" (42, p. 4). The Department should reduce the intensity of the Block 7 development and increase the size of the tree retention zones on that block.
51. Further important advice on the approach to tree retention appears in various of the technical reports.
  - a. The original Urban Forest Study advised that, in order to achieve and increase the targeted canopy coverage, mature trees would need to be given sufficient space around them and said that, to achieve this, it would be "necessary to minimize buildings, level changes, water quality ponds or service trenching through any areas retaining trees" (21, p. 6).

- b. The original Climate Change Adaptation Report advised that trees should be treated as “a multi-tasking asset that provide shade, traffic calming, wind amelioration, environmental services, fauna connectivity and aesthetic benefits” and “make the streets more inviting and contribute to people wanting to use them for activities” (29, p. 39).
- c. The addendum Urban Forest Study identifies a series of potential “indirect impacts” on trees, such as changes in hydrology and water movement within the soil, wind tunneling, and shading, which “would subject trees to ongoing development impact” (37, p. 16). This report makes clear that such impacts should be considered especially where “mature, established trees are proposed to be retained” (ibid).

These statements make very clear the importance of taking a cautious approach to defining tree retention zones, etc.

- 52. I submit that, across the exhibited documents, it is clear that the retained trees will be expected to do a lot of “heavy lifting” — they will be used in wind amelioration, to approve visual amenity, as a means of transitioning across heritage interfaces, etc. I query whether too much reliance is being placed on the successful retention of the identified trees, and the plural function that they will thereafter serve, especially where the exhibited documents make clear that they are only “theoretically retainable” (37, p. 33) and have finite “safe useful life expetanc[ies]” (37, p. 19).
- 53. The original Climate Change Adaptation Report identifies a medium-grade risk of “extreme wind events” that will cause debris to fly off into pedestrian areas (29). It would seem inappropriate, in those circumstances, that such a significant built form as the proposed fourth tower, so likely to cause significant adverse wind impacts giving rise to safety concerns, would be placed so close to a primary school to and from which young children and their guardians travel by foot every day.
- 54. Waterloo Park at 3pm (primary school finishing time) on winter solstice would have just 8% solar access — this is when students are most likely to want to use the park for post-school extracurricular recreation. The Department should recall that “[s]chools and education facilities play an important role in community building and encouraging social connections within communities” (25, p. 60).
- 55. It would appear that Waterloo Park at 3pm (school finishing time) on winter solstice will have negligible solar access — this is when students are most likely to want to use the park for post-school extracurricular recreation. The Department should recall that “[s]chools and education facilities play an important role in community building and encouraging social connections within communities” (25, p. 60). This is a good to strive for more than the bare minimum required solar access for Waterloo Park. The lowest-possible built form should be adopted for Block 7, as the block immediately north of Waterloo Park.
- 56. Waterloo Park is home to a number of listed trees and the southeast corner of Block 7 is home to a number of high-value trees, which under the proposal will be retained. There does not appear to have been adequate consideration whether the sunlight access under the proposal will be sufficient for the health of those trees.
- 57. The material on the “Hilltop Village” concept rightly observes that this part of Waterloo is characterised by its heritage interface with Mt Carmel Church and School and Waterloo Park (15, p. 122). The built form should not be permitted to “overwhelm or dominate” (13, p. 205) these interfaces.

58. The proponents for this and the other towers seek to refer to the existing towers at the north of the site as a precedent for this form in the area (e.g. 12, p. 48). However, Block 7 materially differs from the remainder of the site, in particular:
- a. There are no “broad road reserves and substantial setbacks” (12, p. 33);
  - b. The streets are not “generous in dimensions” (ibid) — in fact at some places in the exhibited documents, Gibson and Kellick Streets are treated as mere laneways (14, p. 136); and
  - c. The buildings are not “within a park-like setting of well-maintained open space” (12, p. 33).

In any case, the existing towers are acknowledged to be “visually dramatic”, which makes replicating them on Block 7, characterised by its three critical heritage interfaces, highly inappropriate.

59. At many points in the supporting reports, especially those concerned with assessing heritage impacts, it is observed that the proposed development would replace the existing urban environment, which already deviates from the two-storey scale of the surrounding terrace houses. But this should surely be treated as a matter of degree. At present, on Block 7, a 15m height limit applies and there are quite significant setbacks to many of the crucial interfaces. This is very different to a nearly 125m-tall tower.
60. There is some acknowledgement of this within the exhibited documents. The original Heritage Impact Statement, for example, provides “Notwithstanding that there already exists a disparity in scale between the HCAs and the existing building stock, the expanded and more densified development proposed [LAHC] will increase the existing disparity in scale between Waterloo South and the pedestrian scaled HCAs in the vicinity” (13, p. 203). This is an appropriate and realistic assessment of the situation.
61. In any case, it should not necessarily be assumed that the existing development surrounding the heritage items and conservation areas is adequately sympathetic to them. The Development Control Plan provisions developed as part of the original Heritage Impact Statement included an acknowledgement that the heritage values of the Precinct and its setting could be enhanced by means of “removing unsympathetic surrounding development” (13, p. 204). That is, the previous development could well have erred in its response to heritage.
62. Documents provided to the public for the purposes of consultation during exhibition period (including hard copy documents that were available by request) omitted the adjacent heritage items — this was misleading, as it would cause the public to think that the only potential heritage impacts would occur within the site itself. The Department should have provided, e.g., a comprehensive map like 34, p. 21. This was also the case with the materials shown during the presentation posted to Vimeo.
63. In the context of acknowledged consultation fatigue, the “six-year mark” is not an appropriate time to revive the proposal of a tower already jettisoned at an earlier stage, against IAG advice and community feedback (15, p. 8). A key learning from the undertaken community engagement was that heights should be reduced (ibid). It is in other ways obviously a late stage at which to offer the chance to provide feedback, e.g. the further technical documents were produced on the basis of a plan with the tower, instead of the IAG’s recommended building heights. The issues with this approach are set out above. The proponents of this redevelopment had many earlier opportunities to include and allow consideration of a fourth tower.

64. The exhibited documents (e.g. 12, p. 5) acknowledge that the proposal will impact on views from immediately surrounding streets. In the case of Block 7, those streets are largely in the Waterloo heritage conservation area or mark the perimeter of significant heritage items. I submit that, contrary to the conclusion ostensibly reached in the exhibited documents (e.g. 12, p. 19), new elements *would* alter the fundamental composition of important views to the site, especially from the south and east. *Rose Bay* should have been applied more specifically to Block 7 and closer analysis should have been done. Among other things, the Department should keep in mind if it undertakes or commissions this analysis that Waterloo Park has been described in the exhibited documents as “critical to the visual amenity and character of the region” (12, p. 21).
65. The original Visual Impact Assessment acknowledges that close views from the east do not have the capacity to absorb change (12, p. 133). The drafter of that report seeks to dismiss this as the “inevitable result of a major redevelopment”, but gives no consideration to whether there is a better solution that would more equitably distribute this “inevitable result”. As such, the Department should neither accept nor adopt this highly subjective conclusion. The majority of the critical heritage interfaces arise in the east, so this is the last place that should bear in such a concentrated way the adverse (even if inevitable) results of redevelopment. All three exposed sides of Block 7 are considered “critical interfaces”.
66. The original Heritage Impact Statement rightly observes that “[g]reater development opportunity in terms of scale and density therefore exists in the parts of Waterloo South which do not interface directly with listed items or HCAs” (13, p. 184). There are other expressions of this same idea:
- “Height in less sensitive areas allows for lower heights adjacent to heritage conservation areas, and heritage items” (15, p. 147); and
- “Height provided in less constrained areas to allow for lower heights to more critical interfaces” (15, p. 186).
- This is sound advice which Hassell appears to have been determined not to follow. The Department should accept and adopt this sound advice by appropriately modifying the planning proposal.
67. The original Social Baseline Study refers to a solution for heritage interfaces in the nearby Dank Street South Precinct: building a public plaza around the surrounding heritage-listed buildings (28, p. 23). This type of considered approach should be adopted in relation to the heritage items within and adjacent to the site.
68. A different approach appears to have been taken, in terms of assessing the adequacy of accommodations in surrounding built form, to Mount Carmel than other heritage items without any real justification. In those circumstances, the public could reasonably assume that the Department is (or instead the contractors that it has commissioned to produce the required technical reports are) seeking to actively justify the tower.
- a. For example, in relation to the John St terraces, the original Heritage Impact Statement noted that a maximum four-storey built height had been imposed for the width of the urban block as a “direct response to the terrace heritage item”, which is similar in scale to the ones lying adjacent to Block 7.
  - b. For example, in relation to the Duke of Wellington, the addendum Urban Design Report referred to the transition from the two-storey “Duke” to the 13-storey proposed built form across the road from it as a “dramatic height increase” (34, p.

77). Similarly, the addendum Heritage Impact Assessment says that a proposed 11-storey form to the south of the “Duke” would “visually dominate in its context with respect to the low-scale of the heritage item” (38, p. 46). It is inconsistent that language of this nature is not typically used within the exhibited documents in relation to the Mount Carmel interface (aside from the addendum Urban Design Report’s complete lack of attention to that interface). If anything, the Mount Carmel interface would be more significantly impacted (by, e.g., overshadowing because it is situated southeast rather than east of the proposed built form).

69. When the original Heritage Impact Statement was produced, the interface with Mount Carmel Church and School under the LAHC proposal would have been eight-storeys. The drafter of that report implicitly acknowledged that a built form of that scale on the interface could produce an unsatisfactory heritage result by insisting that it would be “set at a level significantly below street level and significantly below the ground level of the heritage item” such that it would “read” as a significantly lower height (13, p. 201). If an eight-storey built form gave rise to these sorts of concerns at that stage, it is unbelievable that the subsequent heritage analyses have not determined that the proposed 27-storey tower would produce an unacceptable adverse heritage impact. Considering the sheer scale of the proposal at this interface, I submit that architectural articulation or other such *de minimis* measures are insufficient to address the issue in the circumstances.
70. Another unexplained but material difference in the heritage approach to the proposed Block 7 tower is that the specification of important heritage accommodations, e.g. “a stepped interface to heritage buildings or conservation zones”, is deferred to the design stage, which will necessarily follow this round of public feedback. For other buildings interfacing with heritage items, these accommodations have already been made, enabling the public to provide views on their adequacy.
71. Similarly, a different approach is taken to the various protected terrace houses within the site to the terrace houses in adjacent Waterloo conservation area.
  - a. The addendum Heritage Impact Assessment noted that, in relation to the Cope St terrace houses, provision has been made for a low to medium scale control on surrounding development. It determined that the presence of an 8-storey tower to the north would have had a visually dominating impact (38, p. 48), warranting the conclusion that the proposal would result in an “increased visual impact” to the heritage item (*ibid*).
  - b. The original Heritage Impact Statement noted that, in relation to the Gordon Terraces on John Street, provision had been made in the LAHC scheme for a large area of open space to physically separate them from future development, adjacent built forms of up to four storeys only, and a four-to-six-storey podium on an adjacent proposed 32-storey built form. The addendum Heritage Impact Assessment noted that the proposed 32-storey form had been reduced in the DPIE scheme to eight storeys, resulting in a “reduced visual impact” to the heritage item (38, p. 51).
72. Of course, this analysis does not even raise the important consideration of the function of the Mount Carmel Church and School heritage items. Within the exhibited documents, a need for extra school facilities, to accommodate the anticipated increase in children in Waterloo South, was identified — specifically, six primary school classrooms are expected to be needed (49, p. 54) in the locality, where Mt Carmel School is the only school specialising in primary education. More attention should be paid to ensuring the longevity of such existing facilities, so that an even greater deficit/need is not inadvertently created.

73. Under and as a result of the current proposal, there are parts of the heritage-protected Waterloo Park, which contains several listed trees, that will receive 0.00h sunlight at winter solstice (34, p. 98). This is self-evidently unacceptable. The Department should re-consider its approach to assessing the adequacy of solar access to Waterloo Park and not endorse or adopt the *de minimis* approach employed in the exhibited documents.
74. The only significant trees that remain from a 1943 aerial survey are located in Waterloo Park and other nearby parklands. Indeed, original Urban Forest Study (21, p. 19) suggest that the “extensive and significant trees of Mt Carmel” are “an important part of the urban forest due to the visual and historical significance they provide”.
75. Some of the touted benefits of the taller typographies are fairly weak. For example, the original Urban Design and Public Domain Study (and its appendices) suggested that tall buildings would beneficially act as “geographic markers and landmarks” (10, 204) and “support wayfinding” (15, p. 141). Accepting for the sake of argument that these are real benefits, it would seem that there are better and less visually imposing modes of achieving the same, including appropriate signage and the retention of high-value trees (21, p. 49).
76. In relation to the proposed built form along the edges of Block 7, I submit that meeting the technical minimum requirements for building separation is insufficient where the scale differential (rise) between the buildings on either side of the street is so significant.
77. I query whether the proposed Block 7 tower and the Mount Carmel Church and School are adequately separated, especially in light of the advice in the original Urban Design and Public Domain Study that “building separation should be increased beyond minimums” if the proposal would significantly reduce solar access of a neighbour (10, p. 217).
78. Throughout the exhibited documents, it is made clear that the proposed building types must respond to the streetscape, site, topography, “immediate environs” (10, p. 239), (critical) heritage interfaces, etc. The proposal for Block 7 arguably does not do this. If the immediate environs, which in the case of Block 7 largely consist of heritage items and the Waterloo heritage conservation area, had been adequately considered, the development on that block would have been limited.
79. (The original Urban Design and Public Domain Study takes an approach to the site’s interface with the Waterloo heritage conservation area that the Department should disclaim. It suggests that, because the surrounding heritage conservation area has “low-growth potential”, Waterloo South should be made into a “key growth site”, presumably to compensate. This is a cynical and heritage-diminishing approach to the surrounding conservation area.)
80. Special care has been taken in relation to managing air quality for the proposed buildings adjacent to McEvoy Street, but no such care has been taken for the proposed and existing buildings adjacent to Wellington Street. Even without the anticipated increased traffic flow on Wellington Street, the sensors placed along it delivered high air pollution readings — the only other part of the site to consistently do so.
81. It is important that the missing setback, identified above, be introduced along Wellington Street [preferably to 20m away from the road, where the concentrations could be expected to drop by 75% (24, p. 84)] so that the risk of adverse health impacts can be avoided. Without such a setback, Wellington Street is liable to become a “street canyon” — particularly if the proposed tower, which would cause poor dispersion conditions through the effects of downwash, is proceeded with.

82. Despite the attention given in the exhibited documents to relevant past practice, the proposal has not successfully eschewed bad/worst practice and has not successfully achieved good/best practice.
- a. Public housing developments with tower forms were noted as having previously “fostered a sense of isolation and alienation” and “allowed for the intensification of unfavourable activities and behaviour” (13, p. 116). This was seen in the examples of Cabrini-Green (13, p. 117), Pruitt-Igoe (13, p. 118), and Heygate Estate (13, p. 122).
  - b. In light of the observation that the buildings and balconies in Waterloo South would need to be designed so as to “minimise jump risks” (25, p. 47), it is discouraging that the Department is advocating the addition of further tower forms.
  - c. The original Social Baseline Study referred to the example of Stonebridge, UK (28, p. 85), where tower blocks that had given rise to a hostile environment were demolished and replaced with sustainable homes of a 2–3 storey typology, of a comparable scale to the adjacent pitched roof interwar housing developments and heritage items. With respect, if the Department is aware of and refers to this better practice example, why is it not striving to achieve an equivalent outcome?
83. There were many important and sensible reasons that, at an earlier stage in the process, density and height was deliberately focused on the new Metro Quarter (14, p. 72). These included:
- a. To align to key regional strategies (15, p. 69); and
  - b. To promote the role of transit oriented development (15, p. 69) — detailed further below.

Indeed, in the original Ecologically Sustainable Development Study, Waterloo South was referred to as having the “inherent nature of [...] a ‘transit-oriented development’” (30, p. 49). It is unfortunate then that such a high proportion of the dwellings proposed for the Precinct are concentrated on Block 7 — it is one of the few blocks that fall entirely outside both the 200m and 400m walking catchments for the Metro (15, pp 73, 77) and multiple parties have noted its insurmountable accessibility issues (discussed further below).

84. The Department should recall that a very high train mode share target of 40% has been adopted (26, p. 49) and that the levels of train usage in the area (17%) are already lower than the LGA as a whole (22%), which potentially makes meeting this target more challenging. The Department should encourage the desired adoption of the Metro by returning to a development model that allows the people of Waterloo South to live as proximately as possible to the new Metro Quarter. This is especially important since the large majority (76%) of Waterloo Metro Station customers are anticipated to walk from the local area (26, p. 40) and car ownership and use is being actively discouraged through parking restrictions and other measures.
85. Moreover, broad adoption of the Metro is essential to alleviate the ongoing over-capacity load factor on the heavy rail line at Green Square and Redfern (25, p. 53).
86. The Department should recognise that the Sydney metro will operate a “wide span of hours, from early in the morning to late at night” (26, p. 46). To ensure the safety of commuters walking home at night, especially women [consider Sustainable Development Goal 11], their dwellings should be within the walking catchments.

87. The February 2022 version of the Draft Design Guide lists as a transport-related objective “[s]upport[ing] direct, safe and comfortable pedestrian access to the Metro Station from within and through Waterloo Estate (South)” (36, p. 75). For reasons discussed further below, including accessibility, concentrating a significant number of dwellings on Block 7 does not achieve this objective.
88. It has been very recently acknowledged that the site has “limited bus connections”, particularly for east-west travel, and that improvements are unlikely until at least 2024 (49, p. 9). It also seems that, at least at an earlier stage in the process, these improvements were only “assumed” or “yet to be announced” (26, p. 8). As such, bus services should not be counted on in the Department’s plans to meet the transportation needs of a concentrated population on Block 7.
89. As mentioned above, several parties have expressed accessibility concerns about Block 7.
  - a. The Council noted that, between George and West Streets, the topographical slope is around 1:12 and between West and Pitt Streets is around 1:7 (11, p. 11). It found that these slopes are “not accessible for people of all abilities” (ibid).
    - i. The diagrams at 11, p. 86 show that neither the streets bordering Block 7 nor the Council and LAHC proposed throughways across the block are/would be accessible (see also 11, p. 91 re the Council proposed throughway).
  - b. The Council noted that the inaccessibility of some new streets and walkways “restricts access from the west of the site, isolating Pitt, West, Reeve and Kellick streets [...] to the park and future Metro station” (11, p. 83).
  - c. The LAHC acknowledged that Waterloo South’s topography “poses some challenges for accessibility, particularly in the east, with a notable increase in grade” (14, p. 115).
  - d. The “Accessible Local Movement Route” illustrated in the appendices to the original Urban Design and Public Domain Study — said to provide a “universally safe environment for all ages” — does not (and presumably cannot) extend further to the east than West Street, nowhere near Block 7 (14, p. 115).

It is evident that, any large towers, in which a large number of dwellings will be concentrated, should be placed at lower elevations on flatter topography to allow better access especially to and from the Metro Quarter.

90. This would best accord with the feedback received during the original Social Sustainability Study: that the accessibility of the Metro Station by walkable routes was of great importance (25, p. 48).
91. This is also supported by much of the demographic analysis. Waterloo South is said to be characterised by its “large elderly population” and “high proportion of [...] people with a disability” (28, p. 3).
92. Moreover, the Department should adopt an approach which accords with Australia’s undertaking to deliver Sustainable Development Goal 11, which includes “expanding public transport, with special attention to the needs of those in vulnerable situations, women [walking home late at night], children [distance], persons with disabilities and older persons [topography]” (30, p. 18).

93. By concentrating such a significant portion of the future Waterloo South population on Block 7, it is unlikely that the redevelopment will be able to achieve the targeted walk score of 90–100 (29, p. 37).
94. By concentrating such a significant portion of the future Waterloo South population on Block 7, it is unlikely that the redevelopment will be able to achieve the desired 6\* Green Star (Communities) rating — Credit 9 is for a pedestrian-friendly urban design, and Credit 27 is for a walkable urban design.
95. The proposal also does not accord with the February 2022 version of the Draft Design Guide, the general provisions of which require public space to “address in the design and execution any significant changes in level caused by the natural topography to ensure accessibility is maximised” (36, p. 28). It is disappointing to see conclusions like that at 36, p. 43: that it “may not be necessary” to employ accessible design for the proposed Wellington Street to Kellick Street throughway on Block 7.
96. It is clear from the foregoing, that the Department should deeply consider whether its proposal to introduce a fourth tower on Block 7 represents the best and/or only solution for the various issues raised.
97. In determining whether to include a fourth tower in the final development plan at all — not a foregone conclusion — the Department should be cognisant of the sustainability implications of a decision to include one. It is clear from the exhibited proposal that “tall buildings are more expensive to run” and “use more energy” (49, p. 37). They are also more difficult to achieve sustainability within, as the less ambitious statutory BASIX energy targets for high-rise suggest. Since the Department appears to be motivated to beat the statutory targets (30, p. 59), it should select the lowest-rise typology possible to most effectively allow it to do so.
98. It is impossible for the public to assess whether the proposal to introduce a fourth tower on Block 7 is the best and/or only solution for the various issues raised because it is in the dark about the plans for Waterloo North and Waterloo Central. For example:
  - a. It could well be possible to more equitably redistribute floor space across those parts of the site.
  - b. It could well be possible to locate the proposed fourth tower on one of those parts of the site without such a significant loss of amenity to adjacent heritage items and conservation areas. Indeed, Waterloo North has at least two relevant qualities that could make it a better location for another tower:
    - i. It sits at the bottom of a significant rise up to Redfern, such that the effective height of the towers is reduced from key sightlines.
    - ii. A section of Waterloo North is not subject to the PANS-OPS restriction, such that building can take place up to the RTCC limit of 152.4m there.

This is the unfortunate result of the Department’s decision to release the plans for Waterloo South in isolation. Just because the construction is intended to be staged, does not mean the release of the development proposals need also be.

99. Much of the advocacy for the proposed fourth tower generally and the proposed tower on Block 7 specifically seemed to revolve around feasibility concerns. However, it does not make sense from a feasibility perspective to build the fourth tower on such an elevated point. Since any tower built within the PANS-OPS restriction area is limited to a maximum RL of 126.4m, the best yield will be achieved by a tower built on the lowest-set possible ground.

100. On feasibility, the IAG already made its best efforts to ensure that the scheme that it proposed met feasibility requirements. While the Department could acceptably form the view that feasibility requires some adjustments to that scheme, those adjustments should not be such a grand departure from the IAG scheme — they should be restricted to the greatest possible extent to small adjustments across the whole scheme, to ensure that the integrity of the scheme as a whole is retained. The yield has already been improved by removing the cutouts from the towers along McEvoy Street, which should make the need for any further grand departures from the IAG scheme especially unnecessary.
101. Many issues with the proposed location of the fourth tower have been raised in the technical documents exhibited. If feasibility truly does rely on the existence of the fourth tower, the tower should be placed in a safe location that is not so susceptible to issues such as wind impacts. By doing so, the Department will ensure that feasibility of the whole redevelopment is not later put into question at the design stage, if it is realised that the mitigation strategies employed are inadequate to improve public safety to the required level.
102. It is important that the Department do everything in its power to ensure that the redevelopment of Waterloo South will be delivered in a blended and “tenancy-blind” way. Because of Block 7’s relative geographic separation from the remainder of the estate, placing a tower on its furthest-flung corner would prove too great a temptation to effectively carve off the block from the Precinct for exclusively private uses, to the detriment of Waterloo South’s existing and future social and affordable housing residents. Because “on what street blocks affordable and social housing is to be provided” is a “matter that is to be resolved in a development application (49, p. 44), the public would not be able to express its dissatisfaction with an eventual state of affairs like this. Such an eventual state of affairs should therefore be put beyond question at the present stage in the process, by doing away with or relocating the tower.
103. The exhibited documents left me with the impression that the Department has a much greater concern with risk and developer/buyer appetite than the opinion of the affected community. For instance, it seems that the Department is moving towards a building by building approach, despite the feedback from 46% of community respondents that they would like SAP within the same building (23, p. 75). This was disappointing.
104. It would appear that the Department has not yet considered whether its proposal to introduce a fourth tower on Block 7 represents the best and/or only solution for the various issues raised. In the Planning Proposal, the Department was required to answer the question:
- Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?* [emphasis added] (49, p. 64)
- It responded:
- A planning proposal is the only way by which planning controls on the site can be changed [...]* [emphasis added] (ibid)
- The Department appears to have missed the point of the question — it was being asked whether the *substance* of its Planning Proposal is the best and/or only solution, but gave a response about the *form* of a planning proposal generally. This is as good as no answer.
105. Providing feedback on the Planning Proposal and the documents that underlie it was extraordinarily challenging. This is largely attributable to the disagreement between Council and the LAHC, which necessitated several competing proposals and technical analyses of each of them. This is unfortunate, because it effectively deprives the public of giving

informed and useful advice on the proposal. In my view, the Department has not provided “clear and publicly available justification for each plan at an early stage”, as asked of it by the Minister (4, p. 2).

106. It is also incumbent on the Department to consider that, if the proposed redevelopment is only feasible by allowing a ridiculously high density or FSR, it may be that the proposed redevelopment is simply unfeasible, at least where the requirement that it represent no cost to the NSW Government (3, p. 41) is insisted upon. This possibility should not be excluded. There should be some upper limits to density or FSR. Feasibility is not the be all and end all.
107. (It would also appear that, since the IAG expressed concern that the proposed FSR of 3:1 across the site, that the FSR has been materially increased yet again. The Department should better heed the warning issued by the IAG on this point and better consider the adverse consequences of unlivably high density.)
108. Selling off a valuable public asset and allowing it to be made so dense that it becomes practically unlivable does not represent “innovative financing” of redevelopment, as envisaged by the Future Directions for Social Housing in NSW plan (30, p. 22).
109. I acknowledge and respect that “[t]he planning proposal is seeking to negotiate the significant challenge of meeting both a high requirement for yields [...] and achieving an amenable and comfortable neighbourhood” (34, p. 63), but unfortunately it has not yet managed to successfully negotiate this challenge.
110. There are many possible (not necessarily mutually exclusive) solutions to the issues that I have identified. In order of suitability, these are:
  - a. Block 7 should be redeployed as a valuable extension of Waterloo Park, as floated in the original Urban Design and Public Domain Study and its appendices (14, p. 65). The “pros” of this solution are that:
    - i. It is away from arterial roads;
    - ii. It would enhance the existing heritage-listed Waterloo Park, in particular by adding a “level platform area”, created by the existing buildings, for more active recreation to it;
    - iii. It is adjacent to heritage items and the Waterloo heritage conservation area, which means that potential for adjacent high-rise development is restricted;
    - iv. It is surrounded by many high-value trees, which would provide good shade for park users;
    - v. It is not adversely impacted by overshadowing as the “very contained” southwest pocket park is expected to be (34, p. 55);
    - vi. Because it would not be the only park within the redeveloped area, and the other park is accessed at a significantly lower grade, the accessibility issues to which the block gives rise would be of reduced significance.
    - vii. The southern end of the Precinct would still benefit from a new park.
  - b. Leave the zoning of Block 7, as a protuberance from the Precinct into the Waterloo heritage conservation area, as it currently is. To the extent that a fourth tower is required, move it to a more appropriate location, such as proposed location B or C, or the corner of Pitt St/John St (on the northern side of John St).
  - c. Though a less preferable solution, the proposed Block 7 tower could be moved to another (safer, less heritage-averse, less high value tree-averse) location on the block — i.e. to the west.

- i. I note that the three “exposed” edges of the block are all critical heritage interfaces, but the conservation area does not extend to the corner of Pitt St/Wellington St (on the northern side of Wellington St).
  - i. I note that the southwest corner of Block 7 has moderate or low value trees only. The only Hills Weeping Fig in the corner has been identified as having the defect of a “very asymmetric canopy”.
- b. Ideally, the fourth tower would be done away with entirely and any redistribution of floor space would be achieved through small equitable adjustments across the whole site.
- d. If there is no option but to place a tower on Block 7, especially in the heritage-rich southwest corner, I would very much appreciate an assurance that it will not be exclusively or even majority privately owned housing. It was highly disappointing to read in the exhibited documents that “the presence of social housing tenants” was thought to be an obstacle to the “[m]arketability of private apartments” (23, p. 69). I would have expected that, after the extensive consultations with the Waterloo South community, that the Department would have better realised that community’s worth.

## Appendix B

No.	Document
1	Gateway Determination Waterloo South Gateway Determination V1
2	REPORT - Waterloo South Gateway Determination Report V1
3	Att F - Waterloo South IAG Final Report May 2021 V1
4	Letter to Planning Proposal Authority Waterloo South Gateway Determination V1
5	Gateway required study - Water quality, flooding and stormwater report (GHD) - Waterloo Estate (South)
6	Additional supporting study - Aboriginal cultural heritage study (Artefact) - Waterloo Estate (South)
7	Draft Infrastructure Schedule - Waterloo Estate (South)
8	Original supporting study - Pedestrian Wind Environment Study - Waterloo Estate (South)
9	Original supporting study - Consultation and Visioning Report - Waterloo Estate (South)
10	Original supporting study - Urban Design and Public Domain Study (Appendices 2) - Waterloo Estate (South)
11	Original supporting study - Urban Design Study - Waterloo Estate (South)
12	Original supporting study - Visual Impact Assessment - Waterloo Estate (South)
13	Original supporting study - Heritage Impact Statement - Waterloo Estate (South)
14	Original supporting study - Urban Design and Public Domain Study (Appendices 1) - Waterloo Estate (South)
15	Original supporting study - Urban Design and Public Domain Study - Waterloo Estate (South)
16	Original supporting study - Aboriginal Cultural Heritage Study - Waterloo Estate (South)
17	Original supporting study - Water Quality, Flooding and Stormwater Study - Waterloo Estate (South)
18	Original supporting study - Aeronautical Study - Waterloo Estate (South)
19	Original supporting study - Community Facilities Study - Waterloo Estate (South)
20	Original supporting study - Utilities and Infrastructure Servicing Study - Waterloo Estate (South)
21	Original supporting study - Urban Forest Study - Waterloo Estate (South)
22	Original supporting study - Noise and Vibration Assessment - Waterloo Estate (South)
23	Original supporting study - Housing Diversity and Affordability Study - Waterloo Estate (South)
24	Original supporting study - Air Quality Study - Waterloo Estate (South)
25	Original supporting study - Social Sustainability Study - Waterloo Estate (South)
26	Original supporting study - Transport Study - Waterloo Estate (South)
27	Original supporting study - Flora and Fauna Study - Waterloo Estate (South)
28	Original supporting study - Social Baseline Study - Waterloo Estate (South)
29	Original supporting study - Climate Change Adaptation Report - Waterloo Estate (South)
30	Original supporting study - Ecologically Sustainable Development Study - Waterloo Estate (South)
31	Original supporting study - Environmental Wind Assessment - Waterloo Estate (South)
32	Original supporting study - Light Spill Study - Waterloo Estate (South)
33	Original supporting study - Retail Review - Waterloo Estate (South)
34	Gateway required study - Addendum to urban design report (Hassell) - Waterloo Estate (South)
35	Gateway required study - Financial feasibility assessment (Savills) - Waterloo Estate (South)
36	Draft design guide - Waterloo Estate (South) V1
37	Gateway required study - Addendum to urban forest report (Aspect) - Waterloo Estate (South)
38	Gateway required study - Addendum to heritage impact assessment (Artefact) - Waterloo Estate (South)
39	Additional supporting study - Acoustic report (Marshall Day) - Waterloo Estate (South)
40	Gateway required study - Addendum to Economic Development, Retail and Services report (SGS Economics and Planning) - Waterloo Estate (South)
41	Gateway required study - Updated transport assessment report (Bitzios) - Waterloo Estate (South)
42	Gateway required study - Addendum to wind report (Arup) - Waterloo Estate (South)
43	Gateway required study - Addendum to climate change mitigation and adaptation (GHD) - Waterloo Estate (South)
44	Implementation of Gateway conditions table - Waterloo Estate (South)
45	Explanation of provisions - Waterloo Estate (South)
46	Alteration of Gateway determination - letter to PPA
47	Attachment A - Alteration of Gateway determination
48	Draft maps - Waterloo Estate (South) V1
49	Planning proposal - Waterloo Estate (South) V4

SUB-1704

Name withheld

Dear Mr Bright

Re: Waterloo Estate (South) - PP-2021-3265

I am making this submission to convey my strong objection to the proposed connection of Pitt Street to McEvoy Street in the Waterloo Estate (South) development proposal. This submission adds to the many submissions of other concerned residents of the Redfern community and a petition sent to the Lord Mayor.

A connection between Pitt Street and McEvoy Street would significantly increase traffic on Pitt Street, as an alternative traffic channel between Cleveland Street and McEvoy Street, two of the busiest arterial roads in the area.

The Pitt St Redfern area is one of local community, family homes and a conservation area with a sense of "place". Increasing traffic along Pitt St would increase pollution, noise and the risk of traffic accidents, which would significantly undermine the work taken to preserve the street as one of a local community. This would impose risks to the many children who attend the Redfern Occasional Child Care centre on Pitt Street, and the many elderly people who cross Pitt Street when commuting to Redfern Health Centre, Aboriginal and Torres strait Islander people attending the Aboriginal Medical Service and community members attending the Redfern Station Medical Centre.

Whilst the proposed redevelopment of the Waterloo Estate is commendable in that it will contribute positively to the community and the lives of the vulnerable persons in need of affordable housing, there are risk mitigations which could be implemented to reduce this unintended consequence of the development. For example, the proposal to link between Pitt Street and McEvoy Street could be discarded altogether, or, if greater main road access to the redeveloped estate is required, the connection could proceed but with a small parklet constructed in a suitable position on Pitt Street (North of Raglan Street) to block car traffic in both directions. This strategy would add a new public space, improve pedestrian access and mitigate the traffic impact without blocking pedestrian or bike access to Redfern Street village from Waterloo Estate (and vice versa). Road-dividing parklets for traffic flow are common in Redfern, including on Great Buckingham Street, Telopea Street, Zamia Street, Kepos Street and Charles Street, among others. Either of these measures would significantly improve the planning outcome for local residents without materially impacting the Waterloo Estate (South) development as a whole. They are also entirely consistent with emphasis of pedestrian, bike and train transport as alternatives to cars in the Waterloo Estate redevelopment plans.

Therefore I request that, as a condition of the development, an undertaking is given that Pitt Street and McEvoy Street are not connected, without further steps to mitigate the likely significant negative impact on the Pitt Street community and on the general Redfern area.

6th May 2022

Mr Alan Bright  
Director, Planning Proposal Authority  
Planning & Assessment  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

c/o [waterloo.project@dpie.nsw.gov.au](mailto:waterloo.project@dpie.nsw.gov.au)

## **Stockland submission to the public exhibition of the Waterloo Estate (South) Planning Proposal (PP-2021-3265)**

Stockland welcomes the opportunity to make a submission in relation to the package of materials currently on exhibition for the Waterloo Estate (South) Planning Proposal (**PP exhibition package**). As Australia's largest diversified property group and largest residential developer, Stockland is committed to supporting the renewal of precincts across this city in a way that creates sustainable, inclusive, and liveable places for our diverse communities.

We've proudly partnered with Government over several years to deliver sustainable communities, employment precincts, affordable homes, shopping centres, education and recreational facilities across the state. Last year, Stockland also released a new strategy which will see our business expand and rapidly increase our footprint across office, mixed-use, apartment, and inner-city projects across Sydney.

We take our role as a creator of communities seriously and are extremely interested in initiatives that ensure that the places we create are more affordable, sustainable and liveable. Importantly, we also understand the community value that can be achieved when industry and government work together to achieve great planning outcomes.

Overall, Stockland believes the intent and objectives of the PP exhibition package for Waterloo Estate South are supportable. Renewal of aging housing stock in the inner city will be important to ensure quality housing and amenity is achieved into the future to support our growing city. Moreover, it is appropriate and commendable that the proposed controls seek to increase the existing amount of social housing on site by almost 100 units, as well as embed the provision of new affordable housing stock, all alongside new market-based housing. This represents a true mix of tenures that, if delivered through quality design and thoughtful processes, has the potential to facilitate positive outcomes for people.

Whilst the overall PP exhibition package is supported, Stockland seeks to highlight some specific points for the Department's consideration as it finalises the planning process. The points for consideration listed below focus on key areas where we believe it would be appropriate to make some amendments or clarifications.

## Points for consideration

### 1. Design Guide

It is noted that a Design Guide has been included in the PP exhibition package given the likely future development approvals process will be a State Significant process, which overrides the Council Development Control Plans (DCPs). It is therefore appropriate to have some level of design guidance specific to the site, however, the applicability of the Design Guide (relative to a DCP) should be clarified. The EP&A Act declares that DCPs are guidance documents only and assumes a level of flexibility when applying DCP controls. It is noted that Page 3 of the Design Guide states that the Guide is a DCP for the purposes of Section 4.1 of the Act. Acknowledging Section 1.7 of the Guide, to further clarify and articulate the role of the Guide, there should be an explicit statement to clarify that the Guide is, in fact, a guidance document only and some level of flexibility in its application is appropriate.

### 2. Relationship between FSR, Height and the potential planning bonuses

We have conducted a detailed design review of the proposed FSR and Height controls relative to the Design Guide, acknowledging that the Planning Proposal will only allow a 10% bonus to be applied to floor space (not height) and requires any bonus floor space to 'fit' within the height envelopes.

The design review was based on the envelopes determined by the various controls in the Planning Proposal including the Design Guide. Appropriate efficiencies were applied to the planning envelopes to determine the achievable GFA based on equivalent comparable typologies. This was supported by the area analysis outlined in the Addendum Design Report by Hassell as outlined in the Planning Proposal.

Our review indicates that the planning envelopes are potentially capable of achieving the base allowable GFA (circa 255,210m<sup>2</sup>) across the site. However, our analysis indicates the potential for only an additional 1,500m<sup>2</sup> GFA within the planning envelopes. This falls significantly short of the allowable Design Excellence floor space bonus of circa 25,600m<sup>2</sup>.

It should also be noted that some blocks would not be able to achieve even the base allowable GFA while other blocks could accommodate up to an additional 5% GFA.

Initial analysis of the envelopes indicates limited potential to realise additional GFA through Design Excellence given the prescriptive height controls. At best, an addition 2,000-3,000m<sup>2</sup> might be achieved if tall tower footprints could be increased, and this would only be achievable on some blocks and not generally across the site.

This design review highlights an important aspect of the PP exhibition package, which could ultimately undermine the ability to achieve the intent and objectives of the proposed controls. It is recommended the Department reconsider the extent of prescriptive design controls embedded in the Design Guide and provide more general envelopes that allow detailed design to occur at DA stage.

We would be happy to share our detailed design review with the Department should this be helpful.

**Conclusion**

We recommend that the NSW Department of Planning and Environment take into account the points raised by Stockland about the PP exhibition package to ensure the project can be delivered in line with the project vision.

Ben Christie, Executive General Manager, Apartments, ([ben.christie@stockland.com.au](mailto:ben.christie@stockland.com.au)) is the contact for your office if you wish to discuss any of the comments or recommendations above.

It is noted Stockland has not made any reportable political donations in the previous two years.

Regards,



**Ben Christie**  
**Executive General Manager, Apartments**  
**Stockland**

[REDACTED]

We are the landlord of [REDACTED], the left side is mid-level townhouses and apartments and our right side are low level ( 2-3 storeys) townhouses. With the development proposal, we can see the buildings around us, in the front, left and right have all been given the height limit to 6 to 13 storeys, only us planned to be 2-5 storeys. We also note the house behind us, which facing Cope St, is a heritage building, but this property is not directly adjacent to our building, on the other way, their backyard is facing our backyard, and there are at least 20 meters between their building to ours. Being the only building planned to be low levels, we are disadvantaged by the surrounding buildings have all been given 6-13 mid-levels, and with no doubt this will give us less sunlight and loss of privacy. We hereby urge this plan to be revisit and grant us the same mid-levels height limit.

Besides the height, we are further disadvantaged by to low FSR ratio, our left side building has been granted a 2.75:1 ratio and our right hand side building been granted to 3.35:1, The buildings in front of us has 5.9:1 and only us been given an extra low FSR ratio of 1.45:1, This is further damaged the value of our land, whether we choose to rebuild along with the South Waterloo construction or sell to a developer. We found this as unfair and injustice, with the high ratio given to all other building surrounding us and that we got an extremely low FSR, in fact the lowest in the area. We also ask this decision to be reviewed and grant us a similar FSR ratio as the others.

## FORM SUBMISSION

*Form submissions which are identical, or near identical, are counted as one submission. Form submissions altered to raise additional or different issues are counted as a unique submission.*

The Waterloo Project,

My postcode is:

I am making a personal submission.

I consent to my name being published in the list of submitters on the department's website.

I have no political donations to report.

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SUBMISSION ON WATERLOO SOUTH PLANNING PROPOSAL PP-2021-3265

I OBJECT to the proposal for Waterloo South. This development would evict hundreds of public housing tenants from their homes for little to no public benefit - fewer than 100 hundred additional social housing units in a state with more than 50,000 households on the waiting list. 98 more social units is not enough

The 847 social housing units proposed for Waterloo South is far too low for a site of this size and development of this scale. This is an addition of only 98 social homes, while there are more than 1000 households on the waiting list for public housing in the inner city allocation zone. These are the people who need public housing right now; by the time the development is complete, there will be many more. Any development of public land should prioritise public housing.

Redfern-Waterloo needs more affordable housing for Aboriginal people

In addition to a desperate need for more public housing, Redfern-Waterloo needs more housing that is affordable to Aboriginal people and families. The Redfern Waterloo Aboriginal Affordable Housing Campaign, which is supported by the Redfern Waterloo Alliance of Aboriginal Community Controlled Organisations and allied organisations, demands that 10% of any housing developed on government land is devoted to social and affordable housing for Aboriginal people. This is the least that the government should do to address the decades of state-sponsored gentrification and displacement of Aboriginal people from this neighbourhood, which was once home to tens of thousands of Aboriginal people and so crucial to the movement for self-determination.

The promise of 30% social housing has been broken

When the redevelopment of the Waterloo estate was announced in December 2015, the Minister promised that 30% of new housing would be social housing. Under this proposal, only 28.2% of homes will be social housing – 57 fewer than promised. Nor will social housing make up 30% of the residential floor space of the proposed development – it will comprise only 26.5%.

Furthermore, the proposal seeks approval for 3,012 total units plus 10% bonus floor space for design excellence, whereas the City of Sydney proposal was for 3,012 units inclusive of this 10% bonus for design excellence. This is a cunning attempt to sneak in an extra several hundred units for private sale and is a further betrayal of the promised 30% social housing.

Bad economics leads to bad planning

The fundamental problem with this proposal is that the NSW Land and Housing Corporation is trying to redevelop Waterloo at no cost to the NSW Government. Good planning outcomes are not

possible under these financial constraints: too many homes are proposed and too few of them will be affordable to people on low and moderate incomes. The NSW Government and Commonwealth Government should instead fund the construction and acquisition of new public housing and the proper repair, maintenance and refurbishment of existing public housing. Yet even under the NSW Government's self-imposed constraints, more social and affordable housing and better planning could be achieved if the site is retained in public ownership, as shown by a recent report by Dr Cameron Murray and Prof Peter Phibbs for Shelter NSW and by the submission of Prof Bill Randolph and Dr Laurence Troy to the Waterloo South Independent Expert Advisory Panel.

It's not too late to make it right

I strongly object to the proposal for Waterloo South. The budget-neutral model it follows should be abandoned. It is patently obvious that it would lead to far too many homes for the site yet far too few social and affordable ones.

Furthermore, a thorough social impact assessment of the proposed redevelopment is yet to be commissioned, despite the persistent demands of community organisations over the past six years. The Land and Housing Corporation and Department of Planning should go back to the drawing board to find the most socially beneficial approach to the Waterloo estate rather than the most financially beneficial one.

## Sydney Trains

Dear Andrew

Please see below Sydney Trains' comments in regard to the Proposed Planning for the redevelopment of Waterloo Estate (South) to facilitate the renewal of the social housing site under the NSW Government Communities Plus scheme – Ref: PP-2021-3265:

ST comments:

- The area that is subject to the proposed planning controls includes the Sydney Trains rail tunnel and associated easements, located adjacent to the Sydney Trains rail corridor and land owned by Transport Asset Holding Entity (TAHE). The proposed planning controls whilst supported in principle will require future potential Applicant/Developer to approach TfNSW (Sydney Trains) early in the design process (as part of the pre-DA discussion) to ensure that all relevant matters of consideration are taken into account and are incorporated in the future design of the development. These considerations include, but are not limited to, geotechnical and structural details and construction methodology, electrolysis report, and relevant requirements and standards within State Environment Planning Policy (Infrastructure) 2021, 'Development Near Rail Corridors and Busy Roads – Interim Guidelines', Asset Standards Authority, etc.
- Increasing density in the subject area, should take into account the rail tunnel and associated easement below ground and Sydney Trains rail corridor and land owned by Transport Asset Holding Entity (TAHE). Any future development proposed on-site near or above the rail tunnel must demonstrate that there will be no negative impact on rail infrastructure (including below ground tunnels) or rail operations. In this regard, loading impacts on below-ground tunnels for works during and post-construction must be adequately considered and addressed.
- Planning controls should include the provision of adequate setbacks to be maintained across the entire length of new development abutting common boundary with the rail corridor and rail land - this is required for future constructability and maintenance purposes.
- Any changes in the LEP to accommodate the density changes or rezoning in this area, should take into account the rail tunnels below ground as these may impact on development potential that is envisaged.
- There is an existing stratum easement for the railway, which benefits TAHE that must remain unaffected by any future development on the subject site at all times during construction and upon completion of future development.
- Future residential development on the site may be impacted by train noise and vibration, as the site is close to the Railway Line. An acoustic report in accordance with the DPIE interim guidelines must be provided along with the future development application to ensure that the residential development will account for vibration and noise from the railway to protect the lifestyle of the new owners.
- Any future proposal must be supported by a Traffic Management Plan for the construction phase, and future operation phase, to demonstrate that additional vehicular movements in and out of the site do not potentially obstruct access onto TAHE land and existing easements.
- The planning proposal should take into account the rail tunnels below ground. Any development application lodged will be required to provide documents as identified in the TfNSW standard Development Near Rail Tunnels T HR CI 12051 ST, covering, but not limited to:
  - Legal boundary alignment along the length of the proposed site was identified by an NSW registered surveyor.

- Drawings showing the development and levels of foundations in relation to the rail tunnel and associated rail infrastructure in plans, elevation view and sectional view with dimensions and reduced levels identified by NSW registered surveyor.
- Easements (including the right of ways) or stratum, covenants, caveats, first and second tunnel reserve identified by NSW registered surveyor, specifying the purpose of the easement and in favour of whom.
- Geotechnical investigation report with details in accordance with Section 8.3.1 of the above standard.
- Detailed impact assessment report with details in accordance with Section 8.3.2 of the above standard.
- Detailed risk assessment report in accordance with Section 8.3.3 of the above standard.
- Monitoring plan including trigger levels, action plans and remedial measures.
- TfNSW (Sydney Trains) is to be consulted in regard to any future proposed works in the public domain that connect to, or have an interface with rail land, rail corridor, or railway station.
- Transport for NSW Property & Commercial Services (TfNSW P&CS) has the delegation to act on behalf of Transport Asset Holding Entity (TAHE – formerly known as RailCorp) TAHE, the landowner of rail land. As TAHE is a landowner within the subject area, it is requested that Council and future nearby developers liaise with TfNSW Property & Commercial Services throughout each stage of the planning and development process of this site. We can be contacted via [DA\\_sydneytrains@transport.nsw.gov.au](mailto:DA_sydneytrains@transport.nsw.gov.au).

Kind Regards

Maddie Shahi

Senior Town Planning Officer

Property Group - Commercial, Performance & Strategy

Infrastructure and Place

Transport for NSW

As agent for TAHE (Transport Asset Holding Entity NSW)

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PO Box 459, Burwood NSW 1805

[DA\\_sydneytrains@transport.nsw.gov.au](mailto:DA_sydneytrains@transport.nsw.gov.au)

Civil Aviation Safety Authority

CASA has reviewed the Waterloo South Planning Proposal Aeronautical Impact Assessment of 24 March 2020 by Strategic Airspace.

CASA has no major issues with the Aeronautical Impact Assessment and CASA notes the intention to 'Maintain the maximum RL for the 3 proposed towers' listed in Table 2 of the Gateway Determination. CASA will assess the buildings (and cranes) in detail from an airspace obstacle perspective under the Airspace Regulations when the heights have been finalised.

The Aeronautical Impact Assessment advises that the PANS-OPS CIRCLING Surface for Category B Aircraft is 126.4m above AHD and that none of the proposed building envelopes exceed this height. As the ultimate limiting building height is a surface managed by Airservices Australia, it is recommended that Airservices Australia be invited to comment on the proposal. It is also recommended that Sydney Airport; the Department of Infrastructure, Transport, Regional Development and Communications; and NSW Health Infrastructure (from an Air Ambulance operational perspective) be invited to comment.

Please do not hesitate to make contact if you require any further information on the obstacle assessment process, obstacle environment, precedents etc.

Regards

David Alder  
Aerodrome Engineer  
Air Navigation, Airspace and Aerodromes Branch  
CASA Aviation Group  
p: 02 6217 1342 m: 0455 051 611  
16 Furzer Street, Phillip ACT 2606  
GPO Box 2005, Canberra ACT 2601

NSW Aboriginal Housing Office

No comments to make.

Department of Communities and Justice

No comments to make.

Department of Infrastructure, Transport, Regional Development and Communications (Australia)

Dear Andrew

Thank you for your email of 11 April 2022, to the Department of Infrastructure, Transport, Regional Development and Communications (the Department) requesting a review and submission for the Waterloo South Planning Proposal.

The Australian Government is investing \$120 billion over 10 years from 2022-23 through its rolling land transport infrastructure plan to deliver a stronger and more resilient Australia, meet our national freight challenge, and get Australians home sooner and safer.

Although the Australian Government provides funding for transport networks in New South Wales, the Department does not provide submissions or comments regarding state planning proposals. Thank you for writing to the Department, and we trust this information is of assistance.

Kind regards

IID Communications

Infrastructure Investment Division

w: [www.infrastructure.gov.au](http://www.infrastructure.gov.au)

GPO Box 594, Canberra ACT 2601

Department of Infrastructure, Transport, Regional Development and Communications

## Department of Planning and Environment

Our ref: DOC22/264666

Your Ref: PP-2021-3265

Andrew Golden  
Principle Planning Officer  
State Significant Acceleration  
Department of Planning and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

26 April 2022

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### Subject: Request for Advice: Waterloo Planning Proposal (PP-2021-3265)

Dear Mr Golden

Thank you for your email received 4 March 2022 seeking comments on the above planning proposal by the Land and Housing Corporation (LAHC). Environment and Heritage Group (EHG) has reviewed the supporting technical studies for this proposal and provides the following comments.

#### ***Biodiversity and urban canopy***

EHG has reviewed the Waterloo South Renewal Planning Proposal Flora and Fauna Study, dated 15 April 2020 (the flora and fauna study), the *Waterloo Estate – South Urban Forest Study*, dated 24 March 2020, and the *Waterloo South Precinct Planning Proposal Addendum – Urban Forest Study*, dated November 2021 (collectively the urban forestry report) for this planning proposal and considers that they are generally adequate.

EHG notes that that flora and fauna study did not discuss the potential for impact on microbat species because of the demolition of buildings. EHG also notes that several threatened microbat species in urban areas use buildings and other man-made structures as roosts. These species include Eastern False Pipistrelle, Eastern Coastal Free-tailed Bat, Little Bent-winged Bat, Eastern Bent-winged Bat and Yellow-bellied Sheath-tailed Bat. The mitigation measures for any development application should include a search for microbats prior to demolition. If they are present, a Microbat Management Plan should be prepared.

EHG notes that the planning proposal recommends that revegetation plans should consider planting tree species which are high nectar-producing species and/or winter-flowering species, to provide foraging habitat for Grey-headed Flying-fox (GHFF). This is identified as a way of minimising disruption to GHFF habitat. EHG generally supports this recommendation, though suggests such species should not be planted immediately adjacent to any residences, to reduce future conflicts.

EHG notes the planning proposal seeks to retain and expand the urban canopy in the Waterloo Precinct and that the urban tree strategy has been amended, as detailed in the *Waterloo South Precinct Planning Proposal Addendum – Urban Forest Study*, dated November 2021, with an additional 24 trees being able to be retained.

EHG supports the retention of urban tree canopy to improve public amenity and biodiversity outcomes and decrease urban heat island effects. EHG also supports the stated aim of increasing the diversity of species represented in the urban canopy. EHG encourages the use of local provenance canopy species.

## Department of Planning and Environment

### *Flooding impacts and modelling*

EHG has reviewed the *Waterloo South - Flooding and Stormwater Study*, dated 19 March 2020, prepared by AECOM, and provides the following comments regarding the flooding aspects of the planning proposal.

EHG considers the proponent should ensure that the roadworks in Cope Street and Raglan Street associated with the Sydney Metro are included in the flood model. The planning proposal appears to cause an increase in flood depth in Cope Street, which may be problematic in consideration of these roadworks. Similarly, any flood mitigation measures for the Sydney Metro should be included in this assessment.

EHG welcomes the introduction of flood mitigation measures and the associated reduction in 1% annual exceedance probability (AEP) flood levels, which appear to reduce flood risk generally.

However, EHG notes the planning proposal seeks to create parts of retail tenancies at floor levels lower than the flood planning level (FPL), which is generally not supported where this would introduce unacceptable flood risk to a new tenancy.

Specifically, the level of flood immunity would need careful consideration. City of Sydney prefers retail floors to be at a least at the 1% AEP flood level. The Waterloo area is affected by flooding as frequently as every 2-5 years. Exposing any part of a new retail tenancy to such frequent flooding would be unacceptable, even considering the benefits of "public private domain engagement". Precinct modelling of frequent events may be needed to determine the flood risk for individual properties where this cannot be easily obtained from Council's flood study.

EHG recommends that flood hazard mapping be revised to the up-to-date categories (H1-H6). These categories would allow more detailed consideration of hazard, including safety of pedestrians and vehicles. Flood level impact mapping of the probable maximum flood (PMF) event is strongly recommended.

EHG supports the adoption of the 1% AEP plus climate change flood level to determine the FPL. However, the proposed development will not be completed for another 20 years (2042), so the adopted planning horizon of 2090 appears insufficient. A 100-year horizon would be more suitable.

EHD considers that modelled rainfall intensity increases should be greater to account for a longer horizon. Further, the referenced literature, Australian Rainfall and Runoff (ARR), recommends consideration of both a moderate and high emissions scenario, viz RCP 4.5 and RCP 8.5. The report only mentions the moderate emissions scenario (RCP 4.5). The high emissions scenario should also be considered. To consider both scenarios for a 100-year horizon, rainfall intensity increases of 15% and 30% could be modelled. For clarity, removing low depths of flooding from the flood mapping could also be considered.

EHG recommends that the New South Wales States Emergency Service is consulted regarding flood emergency management. Medical evacuation should be considered with the proposed shelter in place strategy.

## Department of Planning and Environment

EHG notes there appears to be a general reduction in flood levels, but flood impacts warrant further consideration. EHG does not object in relation to the minor increases in 1% AEP flood levels predicted due to raising of terrain provided these are entirely within the planning proposal area and can be accommodated by the future development.

EHG recommends flood level impact mapping is revised to show impacts greater than 10mm. The mapping only shows impacts greater than 20mm. Generally, 10mm is considered insignificant and within the limits of the model. Any impacts greater than 10mm are true impacts and should be avoided.

EHG notes there appear to be no adverse offsite impacts. Careful attention will be needed in future design stages to maintain this. However, there is a location adjacent to private property at West and Reeve Streets where an adverse flood impact is mapped. Care should be taken to avoid this impact or otherwise consult with the property owner.

If you have any queries please contact David Way, Senior Conservation Officer via [David.Way@planning.nsw.gov.au](mailto:David.Way@planning.nsw.gov.au) or 02 8275 1324.

Yours sincerely,

A handwritten signature in black ink that reads "S. Harrison".

Susan Harrison

Senior Teams Leader

**Greater Sydney Branch**

**Biodiversity and Conservation**



DOC22/171044-4

Andrew Golden  
Principal Planning Officer  
Department of Planning and Environment  
4 Parramatta Square, 12 Darcy Street  
Parramatta NSW 2150

By email: [andrew.golden@dpie.nsw.gov.au](mailto:andrew.golden@dpie.nsw.gov.au)

### **No Comment on Waterloo Estate (South) Planning Proposal**

Dear Mr Golden

I am writing in response to Mr Alan Bright's letter dated 3 March 2022 inviting the NSW Environment Protection Authority (EPA) to comment on the Waterloo Estate (South) Planning Proposal which is currently on public exhibition until 29 April 2022.

The EPA understands that the Planning Proposal contains a mix of affordable housing, social housing and market housing.

The EPA provides no comment on the proposed changes to the relevant planning controls.

Please contact Lauren Musgrave on (02) 9585 6840 if you require further information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'AKnox', is written over a light blue horizontal line.

**ANTHONY KNOX**  
**A/Unit Head, Strategic Planning**  
**Environment Protection Authority**  
21/4/2022

Phone 131 555

TTY 133 677

Locked Bag 5022

4 Parramatta Square

[info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)

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12 Darcy St, Parramatta

[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)

(from outside NSW)

NSW 2124 Australia

NSW 2150 Australia



Mr Andrew Golden  
Principal Planning Officer  
Waterloo Estate (South)  
[andrew.golden@dpie.nsw.gov.au](mailto:andrew.golden@dpie.nsw.gov.au)

## **Planning Proposal – Waterloo Estate (South)**

Dear Mr Golden

Thank you for the opportunity to comment on the planning proposal for Waterloo Estate (South) under *Sydney Local Environmental Plan 2012*.

We have reviewed the planning proposal and make the following comments:

### **State heritage considerations under the *Heritage Act 1977* as delegate of the Heritage Council**

The subject area includes the State Heritage Register (SHR) listed 'Pressure Tunnel and Shafts' (SHR 01630). The Statement of Significance for item name describes the property as follows:

*The Pressure Tunnel is of high historical and technical significance as it represents a successful engineering response to the difficulties of increasing the volume of water from the Potts Hill Reservoir to the Pumping Station at Waterloo, a historically critical link in the water supply of Sydney. It is the third largest pressure tunnel in the world, representing a significant achievement in the provision of a dependable water supply by the Government and Water Board during the inter-war period.*

Excavation for future development may have an adverse impact on the heritage significance of the SHR item. It is recommended that at the detailed design stage consideration is given to measures that avoid, mitigate and manage any impacts to the SHR item. A Statement of Heritage Impact (prepared by a suitably qualified heritage consultant in accordance with the guidelines in the NSW Heritage Manual) is recommended for any future development or State Significant Development application.

In relation to historic archaeology, if the proponent has not already undertaken an investigation to assess the likelihood of 'relics', and any subsequent management required under the *Heritage Act 1977*, they should do so.

### **Aboriginal cultural heritage considerations under the *National Parks and Wildlife Act 1974***

Heritage NSW support the conservation and protection of Aboriginal cultural heritage values. It is noted that an addendum Aboriginal cultural heritage assessment in support of this proposal has been prepared by Artefact Heritage (2021). This addendum follows an Aboriginal cultural heritage assessment previously prepared for the planning proposal by Urbis (2020).

The outcomes of this assessment should be used to inform the planning proposal. We support the recommendations made by Artefact Heritage (2021), in particular:

- prepare an Aboriginal Cultural Heritage Assessment Report (ACHAR) in accordance with Heritage NSW guidelines, and
- conduct archaeological test excavation to determine the nature and significance of the identified area of archaeological potential.

The above work must be undertaken in consultation with the Aboriginal community. We note that Urbis (2020) appear to have commenced formal Aboriginal community consultation in accordance with Heritage NSW guidelines. We recommend that this consultation is maintained.

If breaks in contact of over 6 months with the Registered Aboriginal Parties on this project have occurred, then you may need to restart the consultation process to ensure the consultation is continuous, as required under the Heritage NSW guidelines.

Local Planning Direction 3.2 – Heritage Conservation requires planning proposals to address the conservation of Aboriginal objects. Heritage NSW recommends that test excavation and preparation of a comprehensive Aboriginal Cultural Heritage Assessment Report (ACHAR) should inform the planning proposal.

If the planning proposal is approved and future development proceeds, the proponent would need to consider the Aboriginal cultural heritage impacts within their environmental assessments. Where harm to Aboriginal objects cannot be avoided the proponent would be required to obtain an Aboriginal Heritage Impact Permit (AHIP) before proceeding. Further information is available in the Heritage NSW guide – [Applying for an Aboriginal Heritage Impact Permit: Guide for applicants](#).

If you have questions on this matter please contact James Sellwood, Senior Heritage Planning Officer, Heritage Assessments at Heritage NSW by email at [james.sellwood@environment.nsw.gov.au](mailto:james.sellwood@environment.nsw.gov.au) or by phone on 02 9274 6354

Yours sincerely

*Michael Ellis*

**Michael Ellis**

Acting Director, Heritage Assessments

Heritage NSW

Department of Planning and Environment

**As delegate of the Heritage Council of NSW and for Heritage NSW**

29 April 2022

5<sup>th</sup> May 2022

**CONFIDENTIAL**

Andrew Golden  
Principal Planning Officer  
NSW Department of Planning and Environment  
GPO Box 39, Sydney NSW 2001

Dear Mr. Golden,

**RE: SINSW SUBMISSION – WATERLOO ESTATE SOUTH PLANNING PROPOSAL  
(PP-2021-3265)**

School Infrastructure NSW (SINSW), as part of Department of Education (the Department), welcomes the Department of Planning and Environment's (DPE) invitation to provide comments on the Planning Proposal for Waterloo Estate South (the draft Proposal).

SINSW understands that the proposal includes the following:

- Rezoning the land from R1 General Residential and 2(b) Low Density Residential to B2 Local Centre and B4 Mixed Use.
- Amending the floor space ratio and height of building controls; and
- Requiring the provision of open space, community uses, non-residential floor space and affordable housing.

SINSW has reviewed the exhibition package and, based on the information provided, finds that the number of students projected to be generated by the proposal can be accommodated by the surrounding schools. SINSW has provided detailed commentary within the attachment below. SINSW welcomes the opportunity to engage further on the planning proposal and the content contained in this submission. Any substantial changes to the proposal (including, but not limited to, changes that may impact on population growth, i.e. more dwellings) are to be referred to SINSW again prior to lodgement.

Should you require further information about this submission, please contact Manager Strategic Planning, Alejandra Rojas at [Alejandra.Rojas1@det.nsw.edu.au](mailto:Alejandra.Rojas1@det.nsw.edu.au) or 0428 080 050.

Yours Sincerely,



**Paul Towers**  
**Executive Director – Infrastructure Planning**



## ATTACHMENT – SINSW SUBMISSION – PP-2021-3265

### **Demand for Educational Facilities**

SINSW has determined that the number of students projected to be generated by the proposal can be accommodated by the surrounding schools. A combination of asset improvement solutions can be undertaken across the area's existing schools to support any additional enrolment demand. This may include:

- Intake area boundary changes.
- Additional temporary and permanent teaching spaces on existing school sites.
- Upgrades to existing schools.

SINSW is committed to working with Council to ensure that schools are supporting community needs and continue to be appropriately resourced to respond to student population changes. As a result, SINSW requests ongoing engagement with Council regarding any future growth and change identified for the locality.

### **Active Transport and Access**

SINSW is supportive of Recommendation 1 of the Gateway Determination (IRF21/2528), which requires an updated Transport Assessment to be prepared by the proponent prior to exhibition. This Transport Impact Assessment should outline the proposal's cumulative impact on the surrounding transport network and identify active transport links to existing school travel paths.

In addition, SINSW requests that transport planning for the proposal (and surrounding development) be guided by the NSW Government's Movement and Place Framework (MAPF) and its Built Environment Performance Indicators. These indicators are based on qualities that contribute to a well-designed built environment and should be used by proponents in the formulation of transport concepts.

The MAPF's core 'Amenity and Use' and 'Primary Schools' indicators are of particular importance to SINSW, as these encourage urban designers to consider the impact on adjacent places/uses, as well as emphasising movement that supports place. The 'Primary Schools' indicator provides two specific metrics to judge the effect of infrastructure on the accessibility of public schools in an area; these being walkability and public transport access. These metrics require designers to assess whether proposed infrastructure facilitates access to primary school facilities (or public transport connections to schools) or whether it exacerbates gaps in the network.

Effective transport planning, which addresses the above indicators, would include measures that promote safety, access and pedestrian prioritisation, including:

- Provision of active and public transport infrastructure
- Physical separation between pedestrians, cyclists and heavy vehicles

- Access for all ages and abilities such as ambulant disabilities and prams
- Kerb outstands and refuges crossings (particularly around schools).
- Pedestrian legs on all approaches to intersections.
- Weather-protected bus departure zones
- For local roads: lower vehicle speeds to 15 km/h in High Pedestrian Activity Areas or 40 km/h within School Zones.

The primary school-focused MAPF amenity indicator can be accessed via the link below:

<https://www.movementandplace.nsw.gov.au/place-and-network/built-environment-indicators/primary-schools>



Reg No.: 22/0282

Wednesday, 13 April 2022

To: WATERLOO SOUTH PLANNING PROPOSAL  
AUTHORITY

**Request for comments on the Waterloo South Planning Proposal**

Dear Sir / Madam,

Proposed Activity: PROPERTY DEVELOPMENT  
Location: WATERLOO SOUTH PLANNING  
PROPOSAL  
Proponent: WATERLOO SOUTH PLANNING  
PROPOSAL AUTHORITY  
Date: 11/04/2022

This location lies within an area defined in schedules of the Civil Aviation (Buildings Control) Regulations which limit the height of structures to 45.72 metres above existing ground height (AEGH) without prior approval of the Civil Aviation Safety Authority.

The approx. ground height ranges from 16 – 30m AHD.

Sydney Airport's Obstacle Limitation Surface (OLS) over the site ranges between 51 – 81m AHD.

Any of the proposed buildings that are designed to penetrate Sydney Airport's protected airspace, would be subject to assessment & approval under the Federal AIRPORTS (PROTECTION OF AIRSPACE) REGULATIONS 1996.

The approved height is inclusive of all lift over-runs, vents, chimneys, aerials, TV antennae, construction cranes etc.

**Construction cranes may be required to operate at a height significantly higher than that of the proposed development and consequently, may not be approved under the Airports (Protection of Airspace) Regulations.**

Sydney Airport advises that approval to operate construction equipment (ie cranes) should be

**Sydney Airport**

Sydney Airport Corporation Limited ACN 082 578 809 — The Nigel Love Building, 10 Arrivals Court, Locked Bag 5000  
Sydney International Airport NSW 2020 Australia — Telephone +61 2 9667 9111 — [sydneyairport.com.au](http://sydneyairport.com.au)

**SYD Classification: Confidential**

obtained prior to any commitment to construct.

Information required by Sydney Airport prior to any approval is set out in Attachment A.

"Prescribed airspace" includes "the airspace above any part of either an Obstacle Limitation Surface (OLS) or Procedures for Air Navigation Services – Aircraft Operations (PANS-OPS) surface for the airport (Regulation 6(1)).

**Planning for Aircraft Noise and Public Safety Zones:**

Current planning provisions (s.117 Direction 3.5 NSW Environmental Planning and Assessment Act 1979) for the assessment of aircraft noise for certain land uses are based on the Australian Noise Exposure Forecast (ANEF). The current ANEF for which Council may use as the land use planning tool for Sydney Airport was endorsed by Airservices in December 2012 (Sydney Airport 2033 ANEF).

Whilst there are currently no national aviation standards relating to defining public safety areas beyond the airport boundary, it is recommended that proposed land uses which have high population densities should be avoided.

Sincerely,



**Peter Bleasdale**  
Manager, Airfield Infrastructure Technical Planning

Note:

1. a person who conducts a controlled activity otherwise than with an approval commits an offence against the Act.
  - s. 183 and s. 185 Airports Act 1996.
  - Penalty: 250 penalty units.
2. if a structure is not authorised, the Federal Court may order a person to carry out remedial works, mark or light, or reduce the height of or demolish, dismantle or remove a structure.



Alan Bright  
Director, Planning Proposal Authority  
Planning & Assessment  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

23 May 2022

Dear Mr Bright,

### **Waterloo Estate (South) Planning Proposal – PP2021-3265**

Thank you for the opportunity to comment on the Waterloo Estate (South) Planning Proposal, which seeks to amend the floor space ratio, height of building controls and zoning to facilitate the renewal of the social housing sites.

Waterloo Metro Quarter Precinct is currently under construction and will deliver a world class metro system and integrated station development, which will be a catalyst in the broader revitalisation of the Waterloo Precinct.

Sydney Metro is generally supportive of the Waterloo Estate (South) Planning Proposal as it will respond to and complement the outcomes being delivered by the Waterloo Metro Quarter Precinct, and augment urban, social and economic renewal opportunities in the area, including:

- Enabling the orderly redevelopment of the Waterloo Estate (South);
- Prioritising the delivery of social and affordable housing, balanced with the provision of market housing;
- Establishing a new centre that is supported by infrastructure, community facilities and services, open space, retail and commercial services, and employment opportunities that meet the diverse needs of the local community; and
- Providing new public open space, including a new park comprising 20,000sqm located directly to the east of the Waterloo Metro Quarter Precinct.

The proposed 20,000sqm park to be embellished and dedicated to Council is supported and will complement the public spaces proposed within the future Waterloo Metro Quarter. The Draft *Waterloo Estate (South) Design Guide* sets criteria for the future design of the park. Sydney Metro is proposing to incorporate various place-making and precinct activation initiatives as part of the Waterloo Metro Quarter which will celebrate the distinct social, heritage and cultural characteristics of the Waterloo area. The detailed design of the park should complement the place-making and precinct activation initiatives envisioned for the Waterloo Metro Quarter, to ensure delivery of a high quality and aligned precinct.

The proposed active street frontages along Wellington Street where it adjoins the proposed park are supported as this will assist with opportunities for activation and passive surveillance within the Waterloo Metro Quarter Precinct and proposed adjacent park.

Bicycle storage facilities are being constructed within the Waterloo Metro Quarter however, to ensure the delivery of the modal shift to prioritise pedestrian and cyclist movements in and around the broader Waterloo Precinct, it is recommended that consideration be given to providing additional bicycle parking within the proposed large park and also along Cope Street.

It is requested that documentation relating to the road network treatments within the Waterloo Metro Quarter boundary scope be reviewed and aligned with road network treatments contained in the Waterloo Interchange Access Plan that are being carried out by Sydney Metro.

This correspondence should be considered concurrently with comments provided by the TfNSW Land Use, Network and Place Planning Team, which have been provided under separate cover. Please find attached Sydney Metro's detailed comments in response to the exhibited Planning Proposal and supporting documentation.

Should you require further input, please contact Sumathi Navaratnam, Senior Manager Urban Planning [Sumathi.Navaratnam@transport.nsw.gov.au](mailto:Sumathi.Navaratnam@transport.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink that reads "Phil Leijten". The signature is written in a cursive, flowing style.

Phil Leijten  
Director Place Making and Precinct Activation  
Sydney Metro

**ATTACHMENT A – Detailed Comments**

<b>Subject</b>	<b>Feedback / changes suggested</b>
Place Making	<ul style="list-style-type: none"> <li>The <i>Waterloo Estate (South) Design Guide (draft)</i> sets criteria for the future design of the park. Sydney Metro is proposing to incorporate various place-making and precinct activation initiatives as part of the Waterloo Metro Quarter which will celebrate the distinct social, heritage and cultural characteristics of Waterloo. The detailed design of the park should complement the place-making and precinct activation initiatives envisioned for the Waterloo Metro Quarter, to ensure delivery of a high quality and aligned Precinct.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>The road network treatment’s objective is to prioritise pedestrian and cyclist movement. It is noted that overall vehicle movement will be reduced throughout the precinct through the proposed alterations, specifically reduced car parking. However, the delivery of this modal shift requires adequate cycling facilities. A major concern is the lack of bicycle parking proposed. It is recommended to ensure for the provision of integration of bicycle storage facilities in the Village Green at the north of Waterloo Estate (South) Precinct. This ensures for a thorough consideration of Metro’s Modal Hierarchy and will improve the Estate’s integration with the Metro Quarter. This will provide significant improvements to the place-making outcome and accessibility of the overall development.</li> <li>In addition to proposing the integration of a bike parking facility in the Village Green at the north of Waterloo Estate (South) Precinct, there is a further opportunity to convert existing car parking spaces which run along Cope St adjacent to the Village Green and the Metro Quarter into bike parking. These car spaces are currently used for residents who reside in the adjacent affordable housing which is proposed to be converted into the Village Green. This option could also be implemented in the early stages of the development, as it requires minimal construction work and as from our understanding the demolition of the adjacent housing is expected to be completed in 2027.</li> <li>The proposed no right turn at Botany Road / Wellington Intersection northbound as stated will impact on vehicle movement to the Estate. Consideration into the impact on access to the Metro Quarter and station from Cope Street is not mentioned within the report.</li> <li>Intersection treatment at Raglan Street / Cope Street to a signalised intersection has not been identified. (Bitzois Updated transport assessment report – page 3, Jacobs Original Transport Study – Page 48)</li> <li>Cope Street is identified as a ‘local shared street’. (Bitzois Updated transport assessment report – page 3, Jacobs Original Transport Study – Page 48). Are there any specific road treatments and configuration changes being proposed for Cope Street?</li> <li>In addition to the notes two primary changes of Route 355 and 309 (Jacobs Original Transport Study – Page 46), this plan should identify bus corridors (i.e. Botany Road, Raglan Street and Elizabeth Street), the bus stops which are part of the Waterloo Station interchange and where other bus stops should be located to integrate with the proposed development.</li> </ul>
Corridor Protection	<p>There are sites within these precincts which are positioned above the tunnel alignments for Sydney Metro West. We advise that any future development on this land will need to consider the State Environmental Planning Policy (Transport and Infrastructure) 2021 and the Sydney Metro Underground Corridor Protection Guidelines or Sydney Metro At Grade and Elevated Sections Guidelines (as applicable and available from <a href="http://www.sydneymetro.info">www.sydneymetro.info</a>).</p>

28 April 2022

**Mr Alan Bright**

Director, Planning Proposal Authority  
Planning & Assessment  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

**RE: PP-2021-3265 – Waterloo Estate South**

Thank you for notifying Sydney Water of the planning proposal listed above which is bounded by Raglan Street, Cope Street, McEvoy Street, Waterloo Park, Kellick Street, Gibson Street, Wellington Street and George Street.

The controls proposed in this planning proposal will facilitate:

- Approximately 3,012 dwellings including 847 social housing dwellings, 227 affordable housing dwellings and 1,938 market dwellings on LAHC owned site, and approximately 127 additional market dwellings on privately owned sites.
- A park adjoining Waterloo Metro Station more than two hectares in size
- 255,000sqm GFA
- Four towers between 27 and 33 storeys and most other buildings generally around 8 storeys. Some buildings will be 4 storeys and others up to 13 storeys where they front a park or George or Pitt Street.

We have reviewed the application based on the information supplied and provide the following comments for your information to assist in planning the servicing needs of the proposed development.

**Sydney Water understands Waterloo South is to occur over a 12-year construction program, likely starting in 2026. Sydney Water recommends the Proponent contact their Sydney Water account manager with a view to plan out servicing strategies for the development and raise a Feasibility application(s). Aged assets are located within the vicinity of the development and care must be taken to ensure no damage or negative impacts to our existing wider customer base occurs. Staging of the development should also be discussed with the Proponent's account manager to enable prudent and efficient delivery of Sydney Water works.**

**Water Servicing**

- The site is located within the Botany Gravity Water Supply Zone.

- As noted in Sydney Water's most recent Growth Servicing Plan (2020-2025), there is **limited** existing trunk water capacity. Upgrades to the network are currently only in the strategic planning phase and cannot progress without additional intel/ further assessment of this proposal.
- Please see the following link to our Growth Servicing Plan: [Growth Servicing Plan \(sydneywater.com.au\)](https://www.sydneywater.com.au)

### Wastewater Servicing

- The site is located within the South Sydney SCAMP.
- As noted in Sydney Water's most recent Growth Servicing Plan (2020-2025), there is **limited** existing trunk wastewater capacity. Upgrades to the network are currently only in the strategic planning phase and cannot progress without additional intel/ further assessment of this proposal.
- Please see the following link to our Growth Servicing Plan: [Growth Servicing Plan \(sydneywater.com.au\)](https://www.sydneywater.com.au)

### Recycled Water Servicing

- Sydney Water notes the draft Design Guide has objectives to minimise water use, maximise water re-use and ensure development is resilient against the effects of climate change. It includes requirements that if there is a commitment to providing a recycled water network, all buildings are constructed to be capable of providing a dual reticulation water system for water services which can connect to a non-potable recycled water network.
- Due to the size and nature of the development, Sydney Water recommends alternative / non potable water supply methods be considered (including but not limited to recycled water). The document *Waterloo South Utility and Infrastructure Services Study* notes a possible extension of the existing privately operated recycled water scheme in the adjacent Green Square Town Centre to Waterloo South. Sydney Water supports commitments to minimise water use, maximise water re-use and ensuring resilience against the effects of climate change.

**This advice is not a formal approval of our servicing requirements.** Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water by the proponent and as project progress. More information about the Section 73 application process is available on our [Land Development](#) web page.

The development servicing advice provided by Sydney Water is based on the best available information at the time of referral (eg. planning proposal) and will vary over time with development and changes in the local systems. This is particularly important in systems with limited capacity (such as Priority Sewerage Program scheme areas or as above where we have noted limited capacity) and it is best to approach Sydney Water for an updated capacity assessment (especially where an approval letter is more than 12 months old).

If you require any further information, please contact the Growth Planning Team at [urbangrowth@sydneywater.com.au](mailto:urbangrowth@sydneywater.com.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K. Leitch', with a long horizontal stroke extending to the right.

**Kristine Leitch**

Commercial Growth Manager

City Growth and Development, Business Development Group

Sydney Water, 1 Smith Street, Parramatta NSW 2150

19 April 2022

TfNSW Reference: SYD22/00038/01

Alan Bright  
Director  
Waterloo South Planning Proposal Authority  
Department of Planning and Environment  
4 Parramatta Square, 12 Darcey Street  
Parramatta, NSW 2150

**Attention:** Andrew Golden

---

**RE: PLANNING PROPOSAL 'WATERLOO ESTATE (SOUTH)' – CITY OF SYDNEY  
LOCAL ENVIRONMENTAL PLAN 2012**

Dear Alan Bright,

Transport for NSW (TfNSW) appreciates the opportunity to provide comment on the above planning proposal.

We understand that the planning proposal seeks to amend the Sydney Local Environmental Plan 2012 to facilitate the renewal of the social housing site under the NSW Government's Communities Plus scheme.

TfNSW has reviewed the submitted 'Addendum to Traffic Study (Prepared by Bitzios), dated 04 November 2021) and provides some key comments at **Attachment A (Comments on Addendum to Transport Study Report)** for consideration.

TfNSW understands that Sydney Metro has also reviewed the proposal and associated 'Addendum to Transport Study Report' and provided comments separately via email (Dated: 23 December 2021), which shall also be considered in addition to the comments provided in **Attachment A** in the updated the transport assessment report. If required, TfNSW is willing to facilitate a meeting with the proponent and Council to discuss this matter in further detail.

Thank you for the opportunity to provide advice on the subject planning proposal. Should you have any questions or further enquiries in relation to this matter, Bayzid Khan would be pleased to take your call on 0452 015 396 or email: [development.sydney@transport.nsw.gov.au](mailto:development.sydney@transport.nsw.gov.au)

Sincerely,



Peter Mann  
**A/ Senior Manager Strategic Land Use  
Land Use, Network & Place Planning**

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OFFICIAL

**Attachment A: Comments on Addendum to Transport Study Report  
(Dated 04 November 2021)**

Section/Page ref	Comment/suggestion
General – Property Boundary	The land reservations facing McEvoy Street have been identified for acquisition to support the future project stages of the approved Alexandria to Moore Park Project. This should be considered in preparing the proposed developments/land uses within Waterloo Estate (South) boundary.
General – Parking Assessment	Given the site’s proximity to the Waterloo Metro Station and Botany Road bus services, consideration should be given to reducing the proposed car parking rates as well as explicitly identifying maximum on-site car parking provision to encourage the use of public and active transport to reduce reliance on private vehicles.
General – Active Transport Facilities	The proposal identifies potential improvements of active transport connectivity and facilities which would result in overall active transport experience within the proposed site. TfNSW supports proposed active transport measures, including enhanced pedestrian connectivity between Mead Street and McEvoy Street and reduced posted speed limit within the site. However, the proposed 30 kph speed limit of local roads within the site should comply with the new speed zoning guidelines.
Botany Road/Wellington Street	It is noted that the Addendum to Traffic Study proposes to ban northbound right turn movement from Botany Road into Wellington Street, which would result in re-distribution of traffic on the surrounding area road network. This would require the preparation of a Traffic Management Plan for review and consideration by TfNSW.
John Street/Pitt Street	It is mentioned in Table 6.1 of the Addendum to Traffic Study that John Street would be closed at Pitt Street; however, it is not clear from Figure 4.2 of the Hassel Review if John Street is closed. This should be clarified.
Pitt Street/McEvoy Street	Figure 3.2 (Planning Proposal) and Figure 4.2 (Hassel Review) illustrate prohibited right turn movements at McEvoy Street and Pitt Street (North) intersection. However, Table 6.1 of the Addendum Traffic Study indicates that the right turn movements are allowed at this intersection. This should be clarified.

Coopers Street and West Street	It is noted that the Addendum Traffic Study proposes to change the traffic flow direction of Coopers Street and West Street. Currently these roads have an arrangement of entry only from Wellington Street, which are proposed to be exit only from Coopers Street and West Street onto Wellington Street. The traffic assessment should identify impacts of such changes on the site accessibility. As Council would also appreciate, this would require the preparation of a Traffic Management Plan for review and comment of TfNSW and endorsement of the Local Traffic Committee.
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Mr Alan Bright  
Director, Planning Proposal Authority  
Planning and Assessment  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Mr Bright

I write in response to a call for submissions relating to the Waterloo Estate South State Significant Precinct, planning proposal number PP-2021-3265. The Sydney Local Health District welcomes the opportunity to respond to the public exhibit and is in general supportive of the regeneration of the Waterloo estate.

The District has concerning the following:

- the proposed mix of social, affordable and private dwellings,
- the height of the three largest towers,
- the impact on the health service of an increased number of people requiring access to health care,
- ensuring sufficient floor space for a community HealthOne service, and
- the need for a comprehensive Health Impact Assessment on the redevelopment.

**Social and affordable housing:**

- It is noted that the proposed proportion of social and affordable housing within the redevelopment exceeds the policy requirement of 70:30 private dwellings to social and affordable dwellings. The District notes that evidence on the health and social outcomes of developments of mixed tenure remains inconclusive, as there have been issues raised about the impact of gentrification and about potential tensions and resentment between socioeconomic groups.<sup>1</sup>
- The publicly owned Waterloo estate represents a unique opportunity to assist in addressing the significant lack of both affordable and social housing in the District.
- The Sydney Local Health District, as the major employer in this area, across a spectrum of jobs, considers access to affordable housing is a critical recruitment issue. We value our key workers being able to access affordable housing, which is lacking within the District. Enabling them to live closer to work would be of huge benefit to the District.

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<sup>1</sup> Jelks, N.O.; Jennings, V.; Rigolon, A. Green Gentrification and Health: A Scoping Review. *Int. J. Environ. Res. Public Health* 2021, 18, 907. <https://doi.org/10.3390/ijerph18030907>

- A greater component of affordable housing would also support the aspirations associated with the Tech Central Innovation Precinct, which has identified the lack of affordable housing, having talent and a pipeline of talent for technology related jobs and industries as an issue. Increased affordable housing close to Central Station and technology hubs would be very beneficial to the Innovation Precinct.
- In its role as the major mental health inpatient service provider and a major provider of care for highly vulnerable communities, the District frequently notes that the lack of social and affordable housing for vulnerable communities is detrimental to mental and social health.
- The District strongly recommends sustaining the Aboriginal community within this part of the city where they have traditionally lived by ensuring Aboriginal designated affordable and social housing. An increase in the social and affordable housing available within the Waterloo Estate South will enable Aboriginal people, at a minimum, to retain their current proportionate access to housing in Waterloo. This will ensure the retention of the Waterloo Aboriginal cultural hub, and that an Aboriginal sense of place is retained and built upon.
- For these reasons, the District recommends that affordable housing should be increased to 15% of all dwellings and residential GFA, and social housing increased to 35% of all dwellings and residential GFA. We note that London (UK) requires a minimum of 50% of dwellings in new developments on public land to be affordable.
- Noting that off-street car parking can add approximately \$100,000 to the cost of a dwelling, the District would support a further reduction in the maximum car parking rates. As well as reducing costs for the developer, this could significantly reduce purchase and rental prices for private dwellings. Only 50% of households in the City of Sydney reported owning a motor vehicle in the 2016 Census, indicating strong market demand for dwellings without parking.
- The District proposes there be a reduction in the net increase of the total car parking supply within the precinct. In addition to improving housing and transport affordability, this would reduce traffic generation, associated health impacts (traffic noise, road trauma, ambient air pollution, etc.), and demand on the District's facilities and services.

### **Density and height of the proposed redevelopment**

The Waterloo Estate South proposal is denser than the nearby Green Square development, which is the "densest urban environment in the Southern hemisphere". The height and density proposed for the Waterloo Estate South is buildings between 27 and 33 storeys and represents a major change in density in the area.

The District recommends a reduction in height of the three largest towers, through the reduction of private dwellings. This will support the increased mix of social and affordable housing, as well as promote the health of one of our most vulnerable populations living within the City of Sydney. Although the proposed height can be aligned to other buildings within the area, there remain concerns for potential wind tunnels, noise and shadowing that will minimise sunlight on the streetscapes below, particularly in relation to the small park.

#### **Access to health care, social care and community infrastructure**

- The proposal does not clearly identify the number of people proposed to be living within this area of the Waterloo Estate, who will all require access to healthcare within the Sydney Local Health District. By increasing the population of people living in Waterloo there will be a greater requirement for public and primary health care. As is well known, vulnerable communities have poorer health status and require increased access to health and hospital services and programs, including emergency department presentations, acute hospital care, outpatient services, oral health services, and community services.
- Community facilities will need to include a child care centre, facilities for aged people, youth facilities, community meeting spaces and health facilities. These facilities should include access to GPs and primary health care and provide the ability to provide pop up clinics within the health one.
- It is considered that the 5000 square metres proposed for Community facilities, including healthcare, is inadequate to appropriately support health services, a child care centre and community facilities for the large and vulnerable Waterloo population.
- To deliver a HealthOne service at Waterloo, the Sydney Local Health District has identified the need for 2000 square metres of space. The proposed HealthOne would include services and facilities that assist people across the life span, will target vulnerable people, young people, health and wellbeing and support community engagement facilities.
- Commercial spaces will be required to suit a variety of uses for community need e.g. access to affordable food, opportunity for a community garden to support food security for vulnerable populations, and access to veterinary services.

#### **NSW Health healthy built environment framework review**

The development proposal has been reviewed against the NSW Health Healthy built environment checklist which supports developing a healthy urban environment for all people, particularly those that are vulnerable and may be in need of support. The environment should ensure that people are safe, have access to sunlight, good ventilation, appropriate lighting to promote respiratory health.

The Proposal includes a great many studies, however remaining issues of concern include:

- potential flooding during extreme weather events
- wind tunnels
- poor access to sun light or lack of shading
- temperature control which includes sun control, tree cover and air-conditioning – noting the evidence from New York regarding a reduction of deaths when introduced to social housing
- noise as the environment needs to be conducive to activity and movement. It requires buildings where children can play.

A healthy urban environment has been directly linked to positive health including mental health, cardiovascular health, and cancer rates.

The District is supportive of the new streets and through-site links, the new cycleway and the precinct's access to current and future transport options. Given the mode share targets of 30% walk/bicycle and 50% public transport (predominantly accessed by walk/bicycle), it is disappointing that the Transport Study reports level of service modelling for motor vehicles (20% target mode share) but not for walk/bicycle. The attractiveness and safety of walk/bicycle could be improved with measures such as frequent mid-block crossings, priority at intersections/roundabouts, filtered permeability and a maximum design speed limit of 30 km/h. A lower design speed would also help to reduce traffic noise, which has well-known impacts on the health of foetuses, children and adults.

New parks and open spaces are a welcome design aspect. However, it is considered that the small park could be made larger thus providing improved access to sunlight to promote physical activity.

### **Consultation**

The District is highly engaged with the Waterloo community and understands that consultation and communication is key to supporting the community through this development. Community forums were completed in 2018 and 2019 (see Appendix 1 and 2) that identified the need for affordable housing, access to health care and employment opportunities. Significant health needs were identified included mental health, drug health, access to GPs, primary care, aged care, child youth and family services and health promotion to support wellness for physical, mental and social wellbeing.



It is recommended that a comprehensive Health Impact Assessment is undertaken of the development to ensure that positive health impacts of the redevelopment are maximised and negative ones minimised.

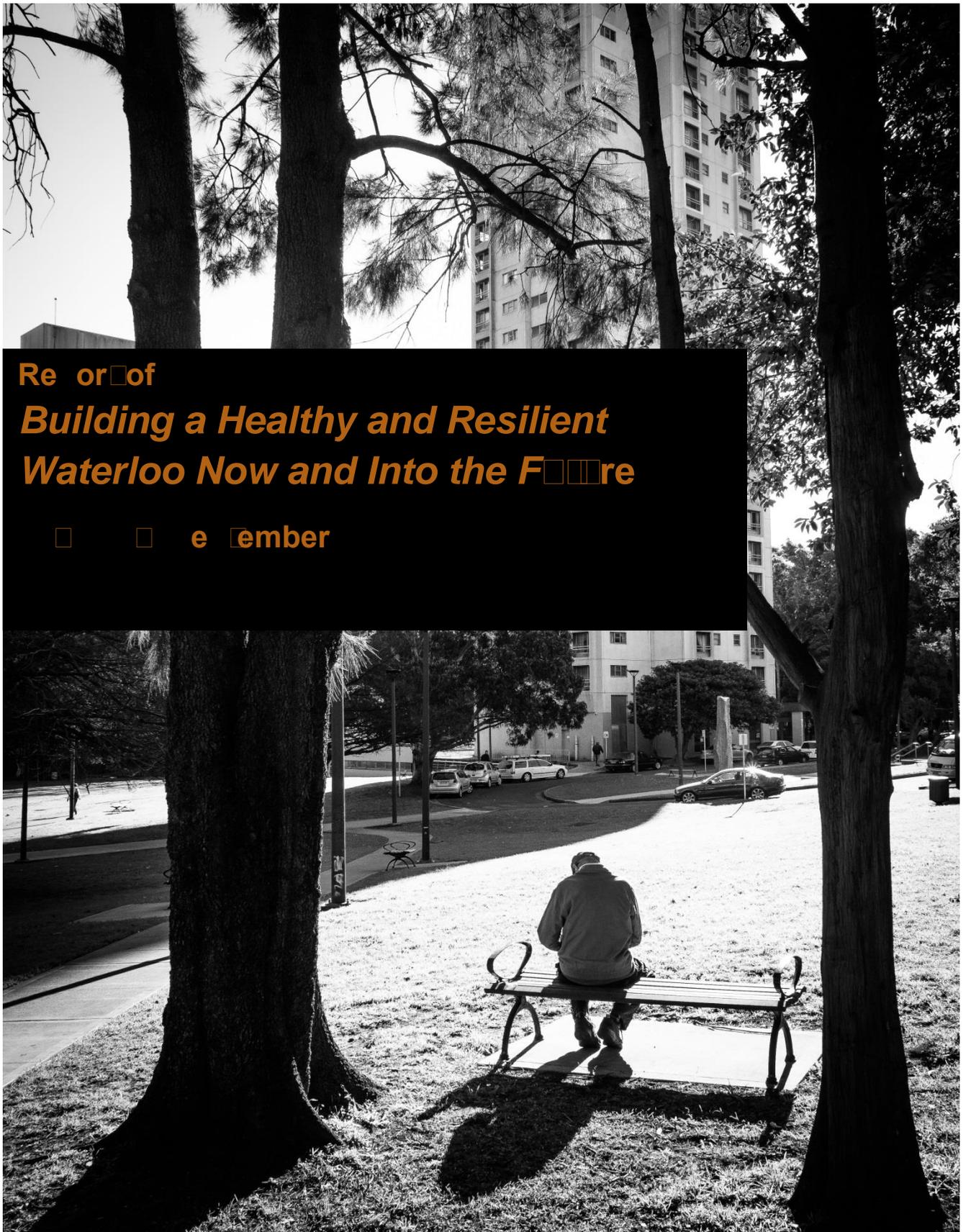
Thank you once again for the opportunity to provide feedback to the planning for our Waterloo community. The District welcomes future opportunities to contribute to the planning for the Waterloo Estate given the impact of the environment on the health and wellbeing of the local community.

Should you require any further information, please do not hesitate to contact Dr Pam Garrett, Director Planning, Sydney Local Health District at either [pam.garrett@health.nsw.gov.au](mailto:pam.garrett@health.nsw.gov.au) or 0477 333 863.

Yours sincerely

Dr Teresa Anderson AM  
**Chief Executive**

Date: 29.8.22



Re or□of  
*Building a Healthy and Resilient  
Waterloo Now and Into the F□□re*

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## Introduction

On the 27<sup>th</sup> and 28<sup>th</sup> September 2017, a two-day forum was held by SLHD in collaboration with Counterpoint Community Services, Inner Sydney Voice and REDWatch, to identify ways to improve the health and wellbeing of the residents of Waterloo now, and into the future. The forum included interactive workshops, an art workshop, presentations by residents and academics and a two part video: *“the Voices of Waterloo”*. Appendices 2 provide the objectives and the program for the two days. Appendix 2 details service utilisation data provided at the Forum.

Over 130 people including tenants, local residents and representatives from community groups, non-government organisations, Sydney Local Health District (SLHD), Counterpoint Community Services, City of Sydney (CoS), Family and Community Services (FACS), Land and Housing Commission (LAHC), UrbanGrowth NSW (UG) and other agencies came to discuss and develop solutions to promote a healthy and resilient Waterloo.

## Community

Waterloo is a culturally diverse, supportive community, but the Forum indicated that health services need to do more to engage with the community and to address health issues, particularly to help people to navigate health services. Concerns about safety, mental health, drug and alcohol usage, aged care and chronic illnesses were discussed. Ensuring the health of the community during the forthcoming redevelopment was also discussed.

“More often than not it falls to neighbours to take up the shortfall for the services that should be provided for people when they are sick or returning from hospital... there should be more help given”. Local Resident.

Affordable and locally available health care, a safe community and well-maintained housing are important to a healthy community. Vulnerable people such as the elderly, non-English speaking or disabled are not engaging in the community and are becoming socially isolated.

“...safe, happy families and individuals... one big family... I already get that sense now, but there is potential for so much more in the Waterloo community”. Local Resident.

“A healthy community that is accepting, inclusive and everyone is sharing – there is enough to go around. That is what I see as a healthy future community”. Local Resident.

## Current Community

Of the current residents of Waterloo, 50% are aged over 60 years and 5% are children, 6% aged from 10-19 years. 34% are Australian born. There is a significant multicultural community- 27% born in other countries 8% Chinese, 8% Russian. There is also a significant Aboriginal community (8% of those living in the estate).

41% have the Aged pension as their primary income source, 30% are on the Disability pension and 15% on Newstart.

73% of the people living on the estate are single people.

57% have lived in the estate more than five years, 38.6% between one and five years and 4.2% less than one year.

## Recommendations for the Waterloo Estate

The Waterloo Estate, the largest housing estate in Australia, was proposed as a State Significant Precinct in May 2017, thus initiating a series of processes associated with rezoning the area and making the Department of Planning and Environment (DPE) Minister the approval authority for the

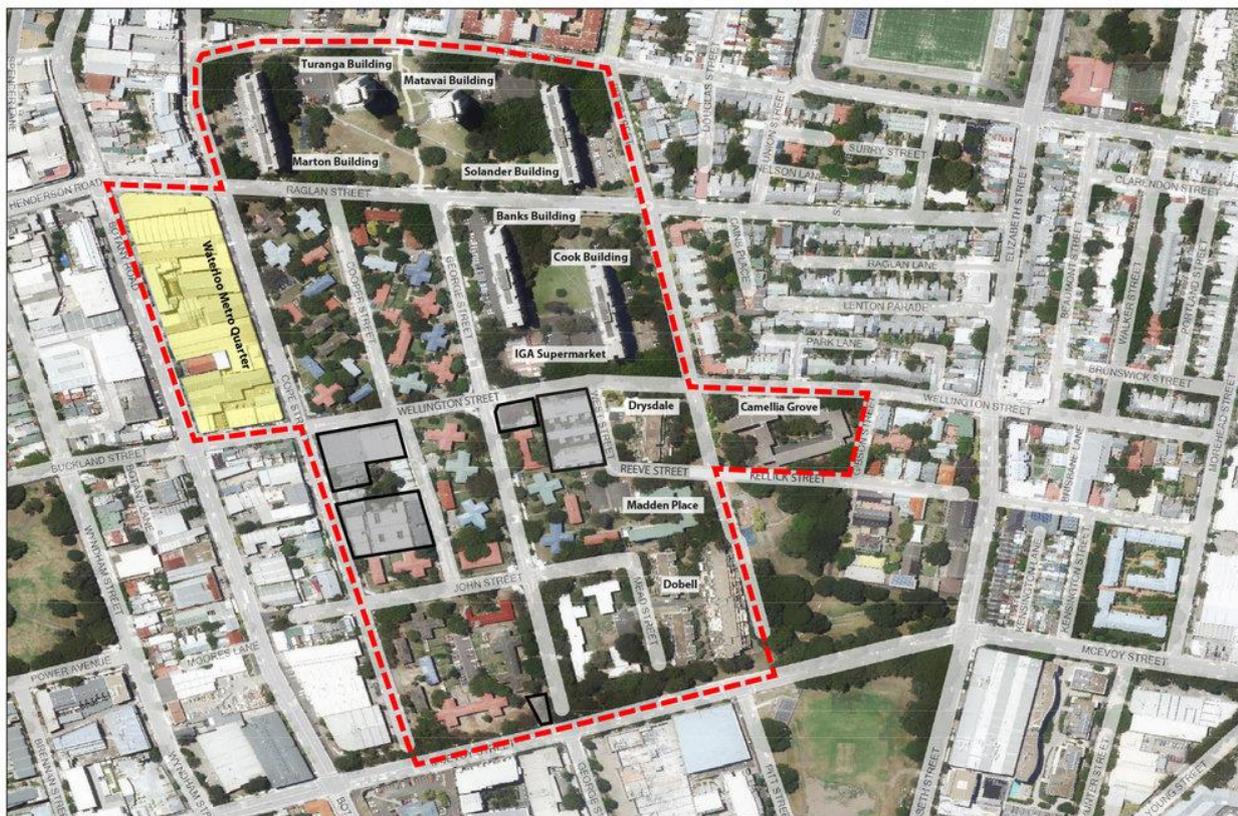
redevelopment (rather than the local council, the City of Sydney). The DPE, in consultation with the City of Sydney, issued 27 studies that LAHC and UrbanGrowth needed to address in developing the options and then the final master plan for the site. Consultation with affected communities has occurred.

State Significant Precincts in NSW are sites that are considered to be “*matters of state or regional planning significance, because of their social, economic or environmental characteristics*”. Such precincts have an important role in fulfilling government policy objectives, especially those concerning housing supply and affordability, and employment, in major sites.

In the case of Waterloo, this includes the NSW Government’s *Future Directions for Social Housing in NSW*, the *Communities Plus* program and the construction of the new Sydney Metro station at Waterloo.

The 20-hectare Waterloo precinct is located just over 3km south of Sydney CBD and includes large areas of publicly-owned and some privately-owned properties (see map). The housing estate is located between Phillip and McEvoy Streets to the north and south, and Pitt and Cope Streets to the east and west.

The Waterloo Estate social housing was built in the 70’s and comprises six high rise buildings, each up to 30 floors high. It has over 2,012 social housing units, providing accommodation to 2,630 public housing tenants including a significant Aboriginal community, people living with mental health, elderly people, and people with trauma, people living with addictions and people with significant social disadvantage. LAHC has agreed that tenants will have 6 months’ notice of any relocation, will be assisted in finding suitable alternative accommodation and, if relocated, have an absolute right of return.



Waterloo Redevelopment Precinct (SSP) Privately Owned Land

The proposed redevelopment will include additional social housing in a mixed, much denser community with new affordable and private housing, as well as the new Waterloo Metro Station. The

new estate will have over 7,000 units. There will be no loss of social housing and all housing will be accessible. The social housing will be funded through the sale of private dwellings. 30% of the dwellings will be social housing and 5-10% will be “affordable housing”. Family and Community Services (FACS), Land and Housing Corporation (LAHC), UrbanGrowth NSW and Transport for NSW (TfNSW) are working together to plan for the Waterloo renewal and the new metro train station.

Work has commenced to develop a master plan which will be shaped by the community’s views and input. The master plan will aim to guide the redevelopment to reflect the community’s needs and priorities. The community will be invited to provide feedback during the master planning process. The estate will not be developed in one lot, but will be bundled into a series of projects over the next 15-20 years.

As part of the assessment of potential health impacts, the “*Building a Healthy Resilient Community in Waterloo*” Forum was conducted. This report outlines the outcomes of this Forum.

### Video of Waterloo

A two part video was developed collaboratively with Counterpoint Community Services and Waterloo residents to capture resident experiences with health services including their current health need and future solutions. The video identified chronic illness, mental health, oral health and physical deconditioning as their current health needs.

When asked about what health services will be needed in the future, the responses were centred on integration, building a sense of community and belonging and access to specific programs. Specific solutions includes a state of the art medical centre with collocated primary health, general practice and diagnostic services, access to subsidised gyms, swimming pools and a cleaner neighbourhood that embodies a sense of community and belonging.

### Key Finding – Co-ordination – Community Services

- Co-ordination between agencies and government departments is essential for good service delivery with complex communities.
- To be effective, we need to listen and then understand the issues and concerns of the community.
- We need to recognise and involve the local residents as experts and incorporate their feedback in a meaningful way.
- We need to understand the stories behind the data.

### Key Finding – The Role of Health Services

- A key focus is helping to build strong communities
- Equity in accessing health services and having good health and wellbeing are important.
- A strong partnership among the SLHD, community based services, other government agencies, general practitioners and the local community is vital to effective, healthy solutions.
- While there is room for improvement, there are significant SLHD services providing care to the Waterloo community. The community noted that a higher profile and greater visibility of these is required.



## Key findings of the Health and Wellbeing – multi-national omnibus survey

Key issues that emerged from the work undertaken by Family and Community Services included:

- The significant number of residents living with complex health issues including complex mental health.
- The impact of dual diagnoses including substance abuse.
- Physical health issues such as bad back, kidney diseases, respiratory and diabetes.
- Dental health and access to services.
- Many are living alone independently and social isolation impacts many of the residents.

## Current Health and Wellbeing of the multi-national omnibus survey

Key findings

1. Access to a one stop medical centre with specialists and transport- a Super-clinic or a HealthOne.
2. Review transport to medical appointments – how to make it easier and more accessible to get to RPA or POW.
3. Mental health models of care see people only when they are in crisis rather than providing ongoing co-ordination, support and prevention.
4. More visible models of care are required for elderly living alone to ensure appropriate support for emergency health needs.
5. Care navigation and co-ordination support is very much needed.
6. Strengthening social connectedness and neighbourly behaviour would assist in supporting people in their homes and in their daily lives.
7. There is a need to improve the social connectivity - social isolation is a major issue. Neighbours and friends are the key to wellbeing and safety.
8. There is a lack of residential aged care services in this area.
9. Better education about personal safety is needed.
10. Sensitivity is required to support the independence of the elderly: privacy respect listening. Sometimes frail aged and elderly are coping well.

Key findings

1. Cultural issues and language differences are important to recognise especially for Chinese speakers.
2. Community development is important rather than top down service delivery. Developing and involving the community in planning and service development assists in improving self-sufficiency and ensuring relevant and appropriate service delivery.
3. Lessons should be shared between organisations – organisations should work together more.
4. User managed services would assist in their relevance and appropriateness e.g. resident ownership over spaces.

5. NGO funding is required to support service development for people who fall through the gaps of governmental agencies. This is especially so for people with mental health issues.
6. The state-wide “Get Healthy” service needs to be advertised.



### oing People

1. Young people should be included in planning and engagement processes.
2. There is a need to retain and plan open and recreational spaces that are visible and accessible. This needs special attention in the future design especially with an 8 lane road proposed for the area.
3. There are diminishing health services in the community e.g. GPs, Pharmacy, Allied Health, Psychologists. This needs to be addressed urgently.
4. There is a need to think innovatively about how to use existing services in the community to better engage young people.
5. There is a need to build on the existing services e.g. WEAVE is an NGO with a long history, and they are trusted and accessible.
6. The group aged 12-25 is seen as youth but there are really two very distinct age groups- 12-16 and then 16-25 year olds.
7. Community led, outcomes focused and place based initiatives are required with shared indicators. These should be led by young people and the community.

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1. Building trusting relationships between parents and health workers is integral to positive health.
2. Opportunities exist to outreach to children’s groups. Outreach services in schools, pre-schools are not necessarily visible.
3. There is no local school.
4. Taking advantage of opportunities to influence health and wellbeing through events that children attend e.g. Summer on the Green.
5. Up-to-date service directories and advice is required.
6. Building safe child and family friendly spaces that link good design and child safety is important.
7. Holistic health and wellbeing family initiatives are required including food security.
8. Greater community involvement is required including involvement in playgroups etc.
9. Promote the presence of health services in the community- having a “face and name” is important.
10. Link schools and dental services better.



### Aboriginal Health

1. The Aboriginal community is concerned about being “kicked out” due to the redevelopment and not knowing where they are going: it seems unlikely to many that once they are relocated that they will be able to come back. “Our home is our castle”.
2. Poet’s corner is great - and free lunches are often provided.
3. NCIE and AMS services, including the specialist clinics are excellent.
4. More culturally appropriate services are required – “Aboriginal way of life”.
5. Involving people’s pets – maintaining their way of living, although pets and pigeons which can make a mess and can be noisy.
6. “Keep working” – social enterprise is really important.
7. Implementing the new *SLHD Aboriginal Health Plan 2018-2022* is important
8. Culturally safe places to visit within the District are required – CDM, young people, oral health, cancer, population health.
9. Drugs and alcohol is a really serious issue- people drink out the front of the building and line up for the drugs.
10. Ensure key seven principles are implemented to improve health services within facilities.
11. Employing Aboriginal staff.
12. Care should be integrated across the spectrum of services.

### Multicultural Health

1. People feel more comfortable to communicate in their native tongue. It is very stressful visiting the doctor and trying to understand what he she says in English.
2. Community based programs are required, in languages, that improve social and everyday lives. English language conversation classes would be helpful.
3. “It’s the chance to communicate ... a sense of purpose” to engage in activities.
4. The Healthcare Interpreter Service needs to be valued and embedded in the culture of service provision.
5. Multicultural culturally diverse advocacy and policy change is needed.
6. Bilingual health workers able to provide health promotion, screening, falls prevention are required.
7. Commitment to supporting multicultural communities – multicultural health planning is important.

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1. Better planning and referral processes are required to support earlier intervention in mental health. Currently there is a crisis before there is any intervention.
2. Engage in local processes – e.g. Waterloo Safety Action Group.
3. “Understanding the whole story”.
4. Need public private collaboration.
5. Targeted programs for young people.
6. “We are doing a good job but can do better” and should use data and experience to improve.



## He of e er

1. “Doctors need to listen”.
2. Aging in place is very important to the community.
3. Continuity of care is very important – ensuring the same doctor treats you each time.
4. Being active and engaged in the community helps to reduce loneliness and also allows people to continue to make a contribution.
5. “Have self-confidence in own knowledge” ... of healthcare.
6. “Choosing the right intellectual and physical activities” – healthy ageing based on empirical evidence.
7. Pet companions are important.
8. Support independence among older people.
9. Remain socially engaged and feel safe.
10. Services need to be easy to access and affordable.
11. Need to intervene to diminish frailty and this will improve outcomes.
12. Need to increase primary care and its local availability- it has diminished recently.
13. Support positive or healthy ageing within the community.
14. Social and health services need to meet the demand for an increasingly ageing population.
15. Recognise and value the links among health, housing, and social services.
16. Need flexibility and multi-skilled staff.
17. Good access to support is fundamental.



## Research Evidence on the Health Impacts of Urban Redevelopment of Social Housing Estate

A Prof Jane Lloyd presented an overview of the research evidence on the health impacts of urban redevelopment of social housing estate. In particular she explored the health impacts of social mix and housing density on existing public housing tenants and also the evidence for effective strategies for building strong and cohesive communities. Broadly speaking, health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity. It was recognised that health meant different things to different cultures and communities. For some, spirituality, connection to land, family or being able to contribute to community life are important aspects to health and wellbeing. A Prof Jane Lloyd noted that the built (streets, parks and opportunities for active travel) and the natural environment impact on health directly and there are specific health impacts of social isolation such as depression, loneliness, less access to health services.

A review of the literature revealed that there is minimal evidence for the 30 70 formula of social mix. Why is 30 70 the optimal mix? Why not 60 40 or 50 50? There is an assumption that composition of the mix includes low income and public housing tenure, however other categories such as age distribution and ethnicity may be important. Social mix does not guarantee social cohesion but may have a positive role in addressing disadvantage if used with caution and alongside a range of other interventions such as deliberate strategies to encourage social interaction, the availability of green space, and community engagement in the design.

The literature did not provide one clear message. For every purported benefit of social mix there was a potential negative impact. For example social mix can be seen as providing opportunities for social inclusion by reducing the concentration of poverty and disadvantage. However, on the other hand social mix can increase community tensions, particularly in dense urban environments. Important factors in realising the potential benefits of social mix include appropriate building design, neighbourhood design and attending to need in partnership with the community. A Prof Lloyd emphasised that we can't expect social cohesion to happen automatically – a social regeneration strategy will be needed.



## Re-signifying Engineering Heritage in Ironmen in Waterloo

Mr Geoff Turnbull presented the challenges in creating a health urban environment from the perspective of the community. It is important to acknowledge the Indigenous community and the connection to Waterloo while also supporting the other cultures that make up the Waterloo community.

It was noted the public housing history of Waterloo needs to be understood especially the result of policy changes that impacted on the social mix of the community from traditional working class to individuals with complex social and health needs. The increase of those people in social housing with complex needs must be addressed so the benefits of diversity and social mix are realised. Additionally, the good will of tenants for the wellbeing of their neighbours can only continue if the system can ensure required services are available.

It was highlighted that a human services plan must go beyond the redevelopment, supporting residents before, during and after it through wrap around services. The issues associated with the built environment are separate from the human services issues.



## Renewing Waterloo Housing Commission Health Perspective

Renewing Waterloo is about upgrading properties that have reached the end of their economic life and are not meeting the needs of the tenants. The stock is not energy efficient. Improving social and health outcomes is about improving the housing experience for tenants.

The planning process aims to develop the rezoning application for the estate development, with a 15-20 year delivery timetable and the Metro development a gateway to the precinct providing opportunities for mixed uses such as residential, health and community services.

The social housing will be indistinguishable from the private housing: a seamless community of private, affordable and social housing, with positive outcomes for tenants and good value for money.

The timetable for visioning and engagement was outlined, with re-zoning timed for late 2019. The intention is that everyone has a voice. Studies will include a Social Sustainability study and a Human Services Plan.



## Healthy Communities

An interactive art workshop, provided by the RPA Arteries team, facilitated participant discussion of the healthy built environment. The workshop included seven themes.

- **Healthy Communities**

- A one stop shop to increase access to services for older, frail and disadvantaged people
- Colocation of social and health services
- Increased visibility of health services
- Streamlined approach with one point of contact
- A combined health, recreation and education space.



- **Arts and Recreation**

- Displays of public art
- Community events centred on the arts
- Celebrating the distinct Aboriginal and multicultural cultures and heritage of the area through visual artworks
- Displaying culturally appropriate language and signage.

- **Homelessness**

- Promotion of safety within a volatile environment
- Promoting passive surveillance methods
- Reinstating a neighbourhood watch model to support vulnerable people within the community
- Foster and create a sense of belonging
- A well-lit neighbourhood
- Supporting people who have been recently incarcerated.



- **Community**
  - Developing a place that is representative of the entire community
  - Considering areas for people to meet such as a community garden, dog parks, playgrounds
  - Establish annual and regular events that celebrate the community
  - Developing more opportunities to support vulnerable people.



- **Recreation**
  - Encouraging free and affordable participation in sport leisure
  - Celebrating local sporting champions
  - Fostering coaching opportunities
  - Considering leisure activities for all age groups for example movie nights with old and foreign films, quiet activities for introverted people
  - Providing inviting, safe open spaces to encourage walking
  - Implementing dog parks.
  - Establishing an aquatic and leisure centre as a core of the community.

- **Green**
  - Developing safe active transport options
  - Interactive green spaces such as community gardens
  - Considering accessibility for all age groups.
- **Infrastructure**
  - Consideration for the lifestyles of the community i.e. doors are wide enough to fit prams, wheelchairs, walking frames, ambulance accessible
  - Ensuring dwellings have access to sunlight
  - Addressing the design challenges of children living in high density – play areas, safety
  - Able to be modified for older people
  - Efficient waste and garbage management
  - Ensuring a high quality design
  - Encouraging environmental sustainability practices such as water collection and recycling
  - Ensuring future building developments lead to positive health outcomes for all the community.



## Panel Discussion

The Forum finished with a panel discussion focusing on a healthy future community. It was noted that safety and good health are key measures of a healthy community. Community engagement, local supports and integrating health and social services and being supportive of the community into the long term will lead to positive outcomes.



### Recommendations

- Timely maintenance of properties remains a key concern the maintenance budget does not allow for call-outs especially after hours. This is unacceptable.
- Anti-social behaviour and mental health issues are serious concerns on the estate. Unless these issues are addressed then all the current problems will flow to the new redevelopment.
- There is no action when people show clear signs of mental deterioration. This needs to change.

### Recommendations

- The tenants speak a lot about health and affordable health care.
- People need to feel safe to participate in community activities.
- People are often stressed, anxious and depressed, isolated and scared of being robbed.
- Alcohol and drugs are issues that need to be addressed as this can lead to domestic violence and financial issues.
- Mt Carmel School provides free breakfasts for the children- this is great.
- Events in the community are very important- Day on Waterloo Green, with jumping castles. Companion animals support health and wellbeing so the free vet services at community events can be very important. Cooking classes are excellent.
- It's about working together, taking pride in our community, peace of mind, laughter and love.

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- Thoughtful community-led design is concerned with how people want to live their lives.
- An example is a park in Penrith where deciduous trees, water play for kids, community buildings, and resistance training facilities were developed for people with all abilities. It's about making a place where people can meet.
- Over the next year we want to understand how people live day to day and their needs.

## H

- Developing a vibrant community is about space, place and people- the way people interact to create a community and the mix of people and the quality of the environment.
- We should trust lay knowledge and people – people know what the solutions are.
- The people of Waterloo will be living on this building site for a long time. There will be problems- noise, dust, and insecure houses. We should have best practice guidelines on how to deal with these issues.
- People will be stressed about the uncertainty. We should learn from Minto, Airds and Bradbury.
- This should be a co-designed and co-produced redevelopment

## H

- We need to work with the community and listen to the community. We will continue the journey and help shape the solutions. We are with the community for the long term.



1. Develop a set of actions that maintain engagement and collaboration. A small group to undertake this task led by the SLHD Planning nit.
2. Hold a further workshop forum which will ensure greater participation by more local residents so that all have a say in health issues. This may require the health service to work with Counterpoint and residents to set up local spaces for people to have their say.
3. Hold forums every 6 months to build the ideas and ensure accountability to ensure a long-term journey. This will also improve the visibility of health services and ensure that everyone knows we are in it for the longer term.
4. Ensure all staff are aware of how to navigate other agency services so that there is no wrong door to health and wellbeing.
5. Fund a new “Healthy Living Link Worker” especially for Waterloo to assist people in finding services, healthcare, and support and in developing and empowering the community. This will help increase access to integrated wraparound services in the local community and develop the diverse and vibrant community of Waterloo.
6. Develop employment and social enterprise opportunities. The SLHD will increase the proportion of Aboriginal people employed in healthcare. Employing local people allows people to better understand services and where to seek them. Targeted employment traineeships in the community should assist.
7. Engage our communications teams to ensure that progress is communicated clearly so the broader community are also aware of the strategy.
8. Advocate that health remain a significant component in any proposed integrated human service plan and redevelopment plan.
9. Work in close partnership with the local residents, Counterpoint Community Services and other agencies to develop an action plan based on the outcomes of the forum and to further collaborate and develop actions to support a healthy, resilient Waterloo community, both now and into the future.

*“It’s many things, not just health that makes a healthy community” (Waterloo Resident).*

*“The forum was a great opportunity to communicate and create a sense of purpose, and understanding of the whole story of the Waterloo community” (Forum Participant)*

Table 1 provides a summary of actions from the Forum.

Item	Priority	Responsible	Timeline
Healthier Communities	Fund and appoint to a position with the objective of improving access to integrated wraparound services and empowering the local community.	SLHD Clinical Integration Unit	January 2018
Forum	Hold a forum within six months to demonstrate accountability to the commitment of improving access to health services	SLHD Planning Unit SLHD Chief Executive Office In collaboration with Counterpoint Community Services	May 2018
Employment Initiatives	Develop employment opportunities in the Sydney Local Health District for the Waterloo community	SLHD Workforce Unit SLHD Chief Executive Office	December 2018
Partnership	Develop a working group who is tasked with development opportunities in this area	SLHD Planning Unit	Ongoing
Initiative	Undertake a discourse analysis of the 22 studies that are being proposed for the Waterloo State Significant Precinct Redevelopment	SLHD Health Equity and Research Development Unit	End 2018



be i e

1. To highlight health issues including health service needs of the people of the Waterloo Estate
2. To discuss potential health impacts of the proposed redevelopment of the Waterloo Estate
3. To discuss recommendations for action on objectives 1 and 2
4. To promote opportunities for service integration.

rge ien e

- Community leaders and residents
- Local health providers including general and allied health practitioners
- Partner agencies including government agencies, non-government organisations and primary health networks



## Building a Healthy Resilient Community in Waterloo Program

National Centre for Indigenous Excellence (NCIE), 166 George St, Redfern

### Wednesday 27<sup>th</sup> September – Current Health Needs and Issues

**MC: Deborah Willcox**

Time	Topic	Speaker(s)
12:30pm	Arrival and Registration	
	Welcome to Country	
	Voices of Waterloo – Health and Wellbeing	Video
	Introduction – Overview of Waterloo and Purpose of the Forum	Dr Teresa Anderson, Chief Executive, Sydney Local Health District Mr Michael Shreenan, Executive Officer, Counterpoint Community Services Inc.
	Health and Wellbeing – Report on Interviews with Waterloo Housing Tenants	Ms Margaret Macrae, FACS and RedLink
	Workshop Prevention, Health Promotion and Health Care in Waterloo – what is currently working, not working, what needs to change or is missing?	
	<ul style="list-style-type: none"> <li>• Children</li> <li>• Young People</li> <li>• Adults</li> <li>• Older People</li> </ul>	
	Report and Discussion on Workshop Findings	
3:45pm	Afternoon Tea	
	Lived Health Experience in Waterloo Paired resident and service provider presentations and discussion on:	
	<ul style="list-style-type: none"> <li>• The health of Aboriginal people</li> <li>• The health of CALD communities</li> <li>• The health of the elderly</li> <li>• The health of people with a lived experience of mental health</li> </ul>	
	Discussion and Recommendations	
	Summary and Closing Remarks	Dr Teresa Anderson Mr Michael Shreenan.
	Redfern Dance Company Performance	
5.45pm	Dinner	



# Building a Healthy Resilient Community in Waterloo Program

National Centre for Indigenous Excellence (NCIE), 166 George St, Redfern

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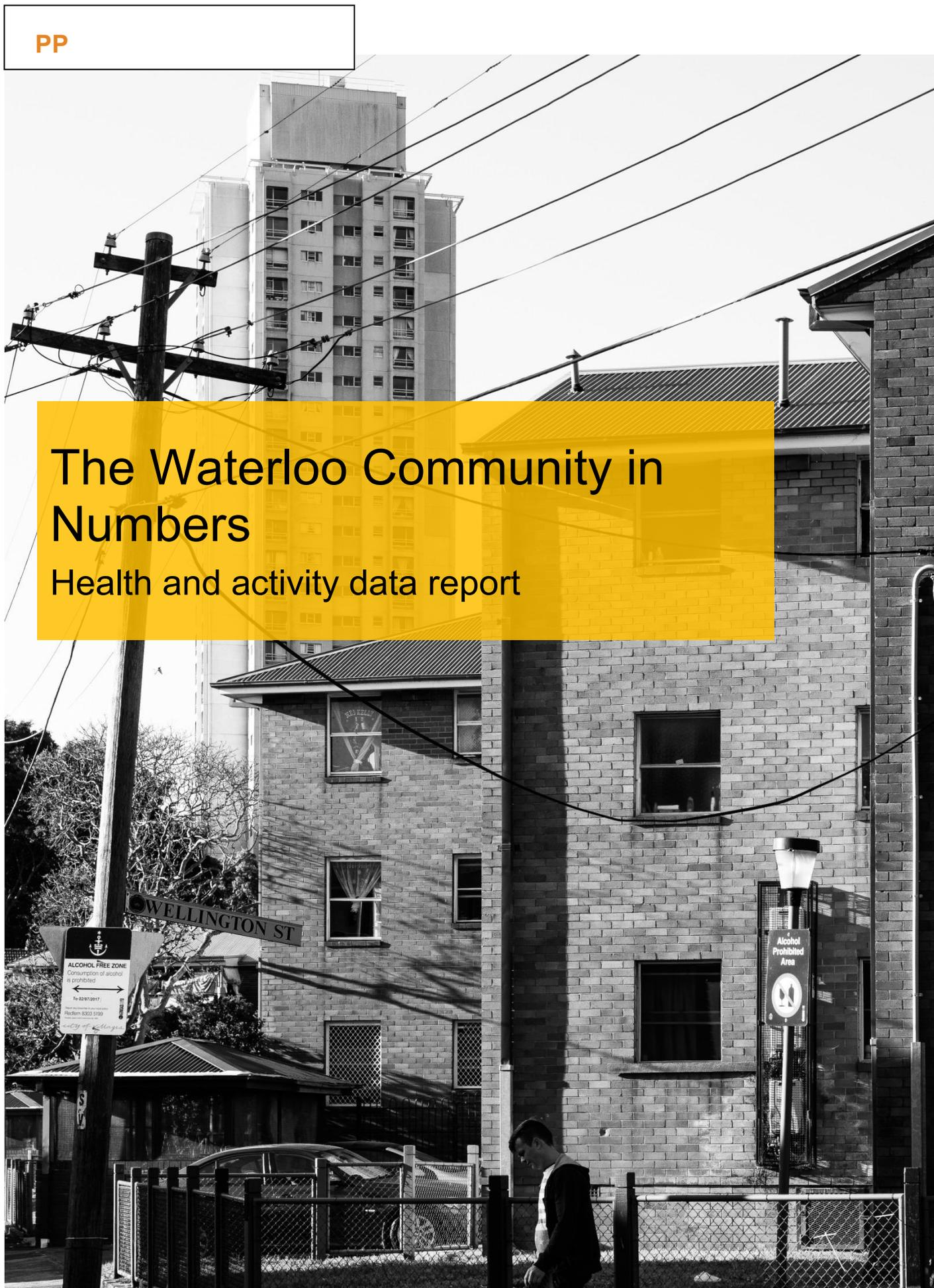
**Thursday 28<sup>th</sup> September – Future Health Needs and Issues**

**MC: Deborah Willcox**

Time	Topic	Speaker(s)
7:30am	Arrival and Registration	
8.00am	Introduction and Summary of Previous Day	Ms Deborah Willcox
	What is Proposed for a Healthy Urban Future in Waterloo	Mr Peter Anderson, Communities Plus, Land and Housing Corporation
	Voices of Waterloo – Health in the Future	Video
	What does the literature and evidence tell us about a healthy, future urban environment in Waterloo?	A/Prof. Jane Lloyd, HERDU, SLHD and UNSW Centre for Primary Care and Equity
	What are the Significant Challenges in Creating a Healthy Urban Environment in Waterloo?	Mr Geoff Turnbull, Inner Sydney Voice
	Art Workshop – What Does a Healthy Future Waterloo Look Like?	ARTERIE Health in Art
10.15am	Morning Tea	
	Panel and Discussion What Does a Healthy Future Waterloo Look Like?	
	Recommendations	
	Review and Thank You	Dr Teresa Anderson Mr Michael Shreenan
12:10pm	Lunch	

# The Waterloo Community in Numbers

Health and activity data report



This draft report has been compiled by the Sydney Local Health District

Major contributions by

The SLHD Public Health Observatory

SLHD Planning Unit

SLHD Community Health Services

SLHD Oral Health Services

SLHD Drug Health Services

SLHD Aged Care, Chronic Care and Rehabilitation Service

SLHD Community Mental Health Service

SLHD Chronic Care Service

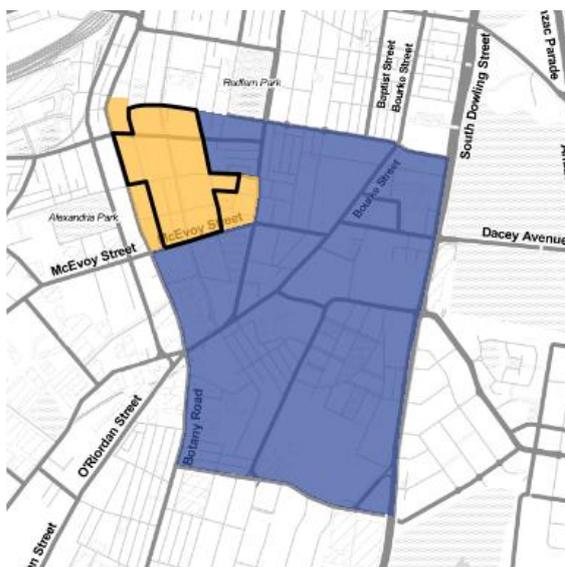
SLHD Performance Unit

## Introduction

This document provides a summary of:

1. Health-related socioeconomic characteristics of residents of an area similar to the Waterloo Estate
2. Health outcomes and selected health service use by residents of the Waterloo postcode.

Socioeconomic data are from the 2016 census. These data are available for very small areas and so it was possible to produce information for an area quite similar to the Waterloo estate. Health outcomes data were obtained from various NSW Health datasets. Postcodes are the smallest unit of geography for which administrative health data are routinely reported and thus, Waterloo postcode is the smallest area for which health information is reported here. It is important to remember that health data for small areas must be interpreted with caution because there can be large year-to-year fluctuations in rates of illness.



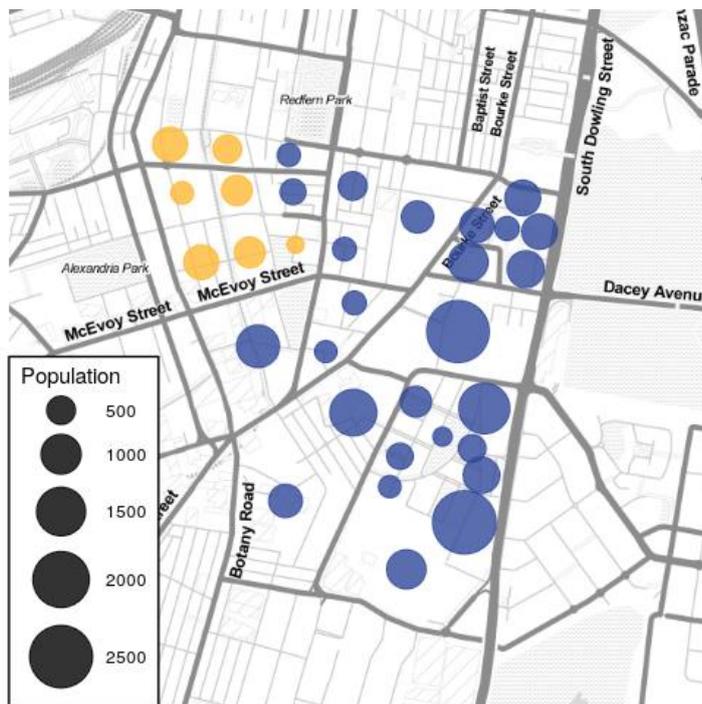
- Black box: The redevelopment area
- Orange: SA1s that contain the redevelopment area (the **statistical area**)
- Blue: The Waterloo postcode

## Population

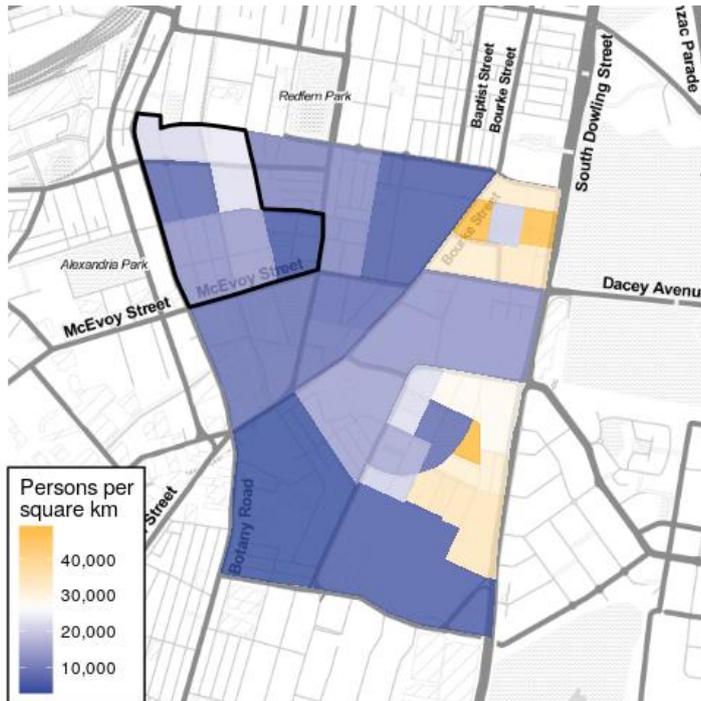
### Total population

- From the 2016 census:
  - Around 3650 people live in the SA1s that include the Waterloo redevelopment area.
  - This is around 15% of the total population of the Waterloo postcode.
- Because the population of the redevelopment area is a small percentage of the total, postcode-level measures of health may hide vulnerability within this area.

**Note: As the SA1 (census area) stretches beyond the redevelopment area, these data include areas outside the Waterloo Estate.**

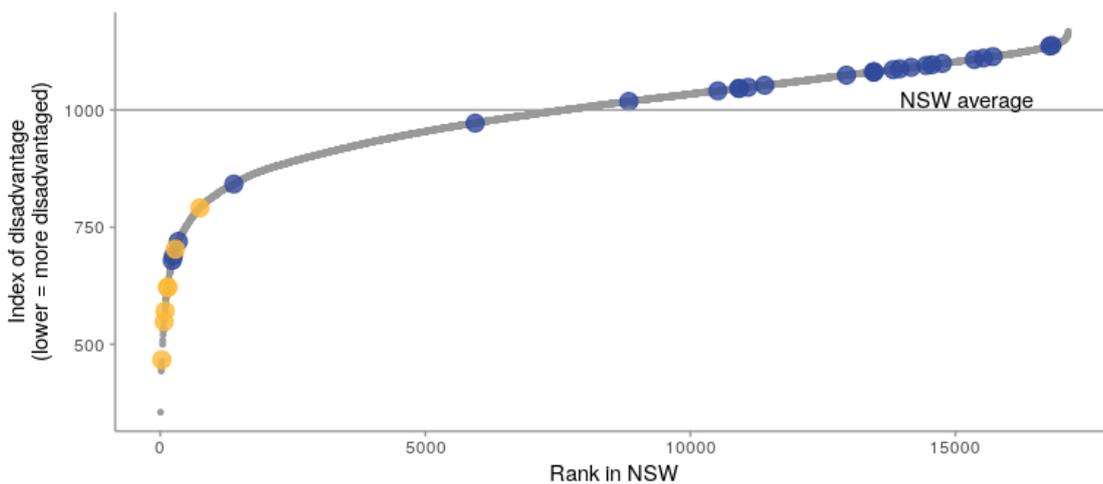


## Population density



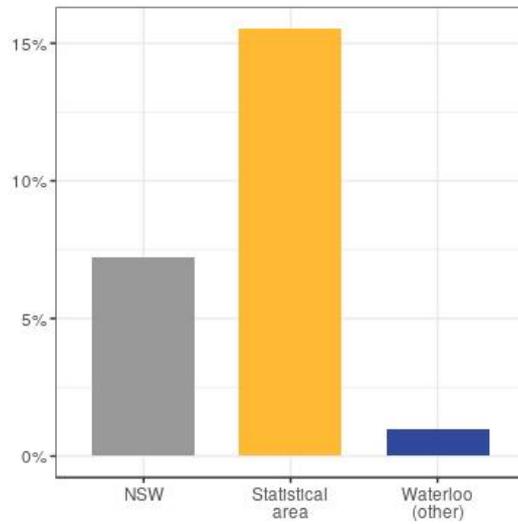
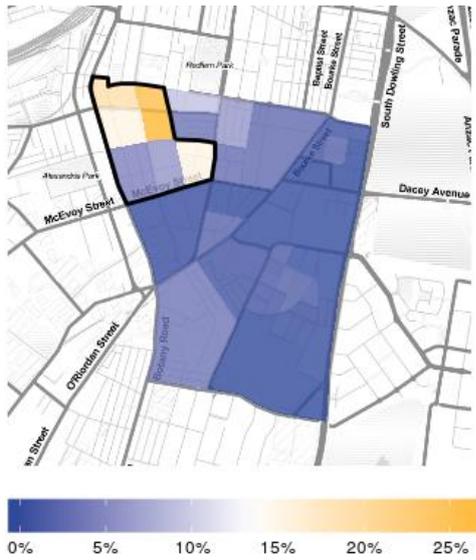
Residents of the redevelopment area are different to others in the Waterloo postcode

They are more socially disadvantaged

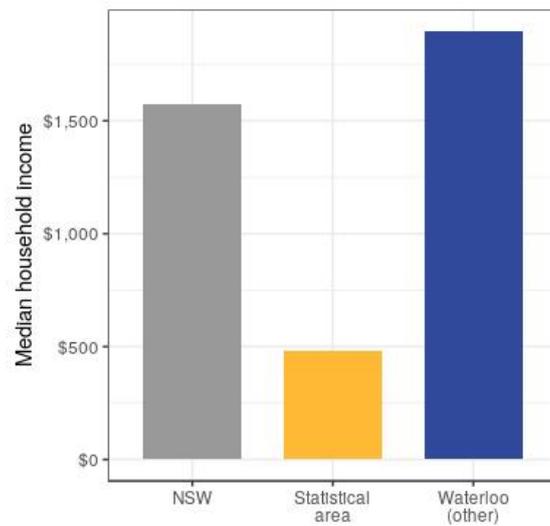
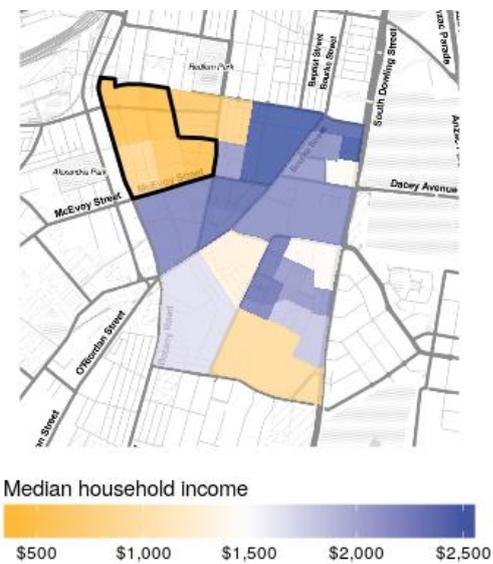


**Social disadvantage is strongly associated with poorer health.**

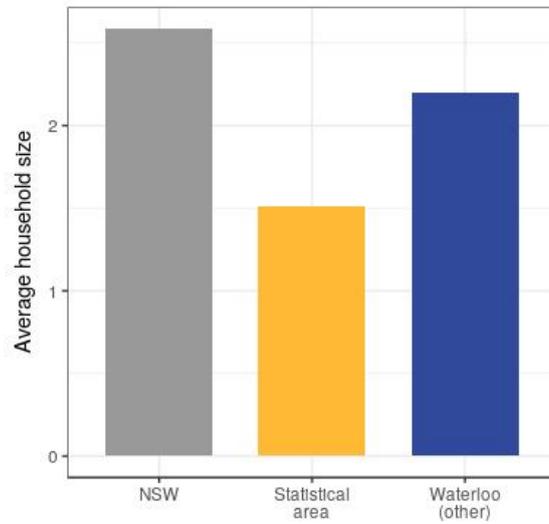
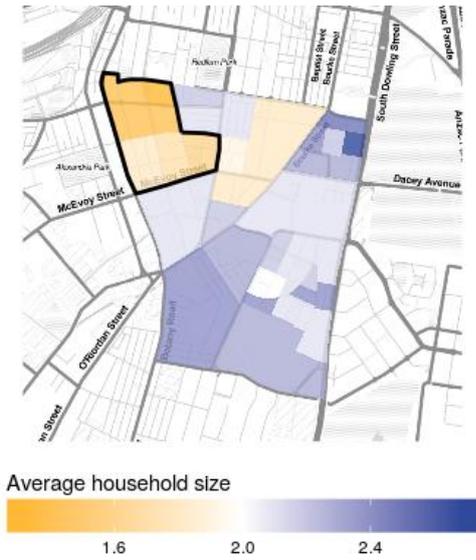
## They are older



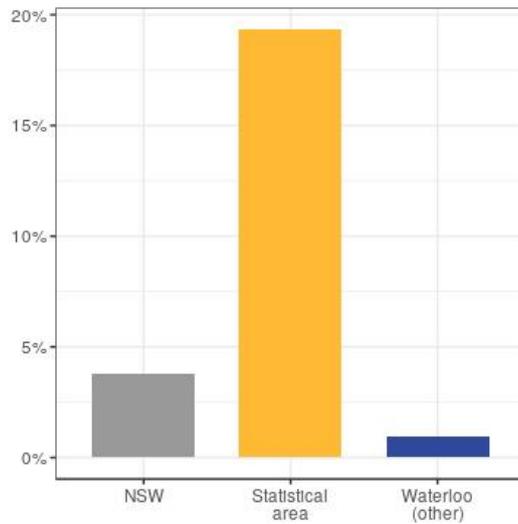
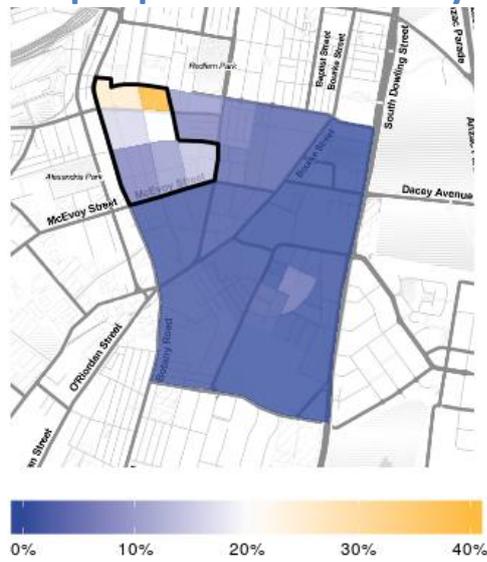
## Incomes are lower



## Households are smaller

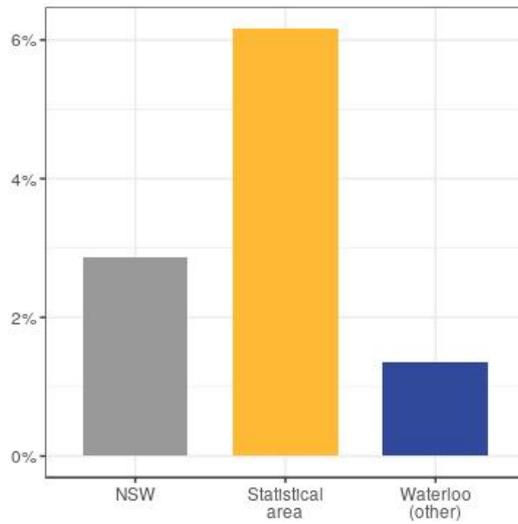


## Older people are more likely to live alone

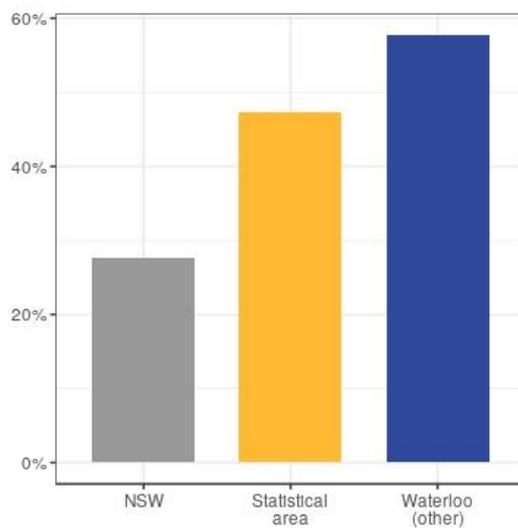


*Proportion of people aged 65+ who live alone*

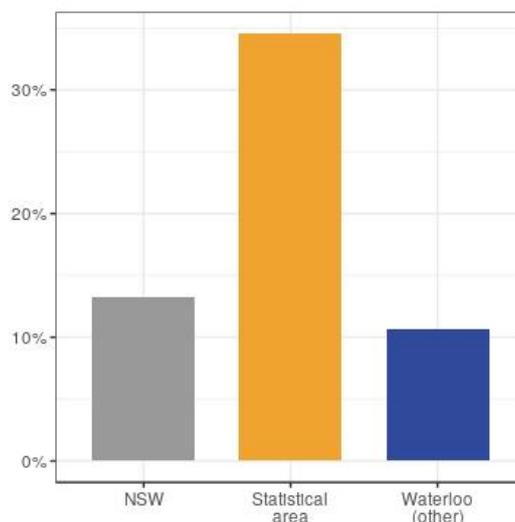
## The proportion of Aboriginal people is higher than average



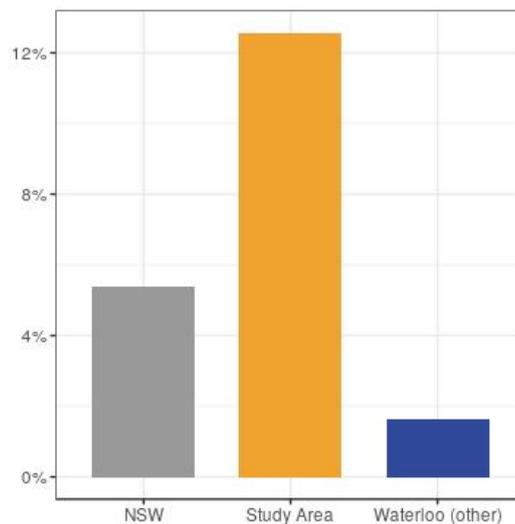
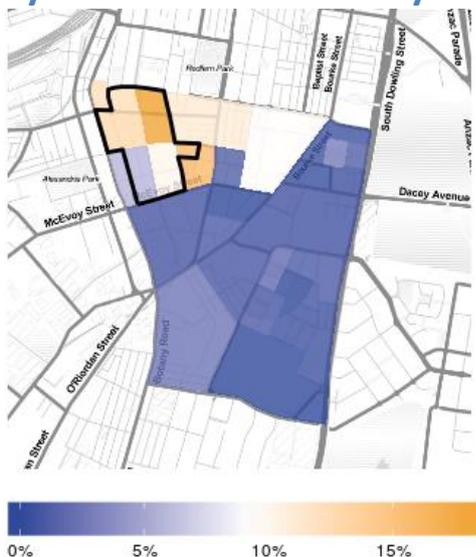
## The proportion born overseas is around 47%, but lower than the average proportion for the Waterloo postcode



## The proportion whose English is poor is higher than the average for Waterloo



## They are much more likely to need assistance with core activities



## Summary

- Social disadvantage is concentrated in the redevelopment area
- Residents:
  - Are older
  - Have lower incomes
  - Are more likely to live alone
  - Are more likely to be Aboriginal
  - Are more likely to need assistance with core activities
- Age and social disadvantage are strongly associated with worse health outcomes

## Health data for Waterloo postcode

The rates presented here are for the five years 2011 to 2015. This time period has been used to increase the precision of the estimates for Waterloo postcode.

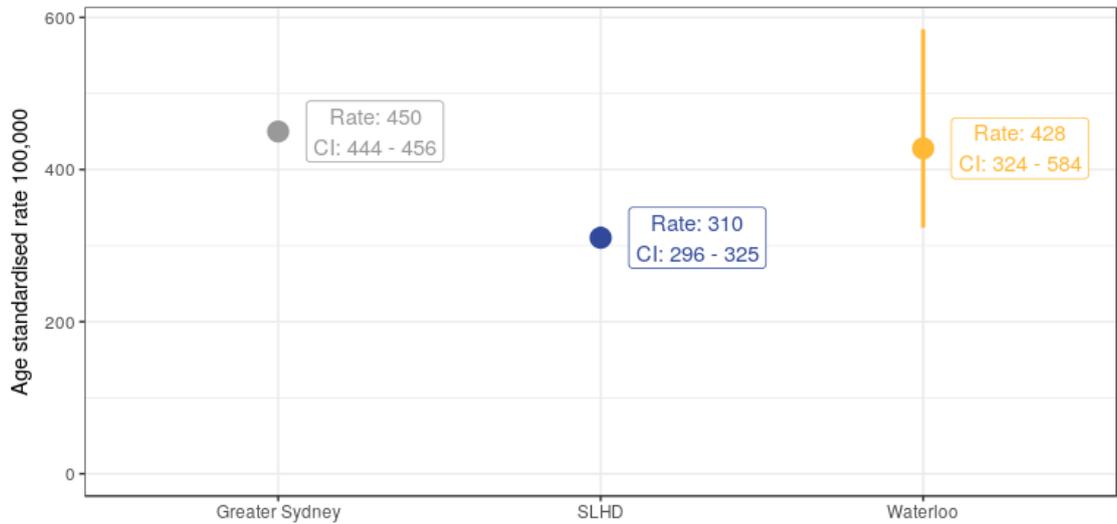
## Smoking in pregnancy



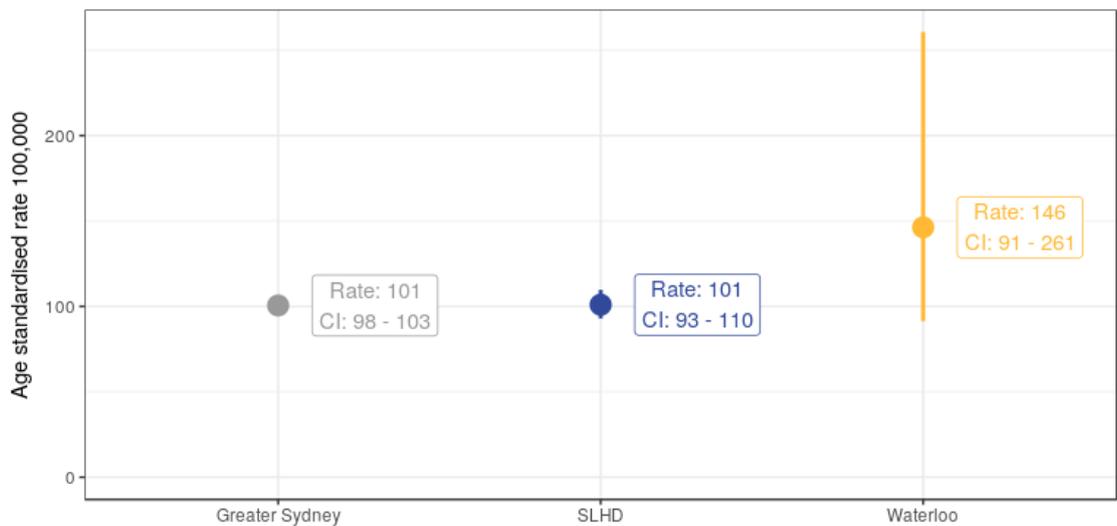
## Rate of admission with stroke



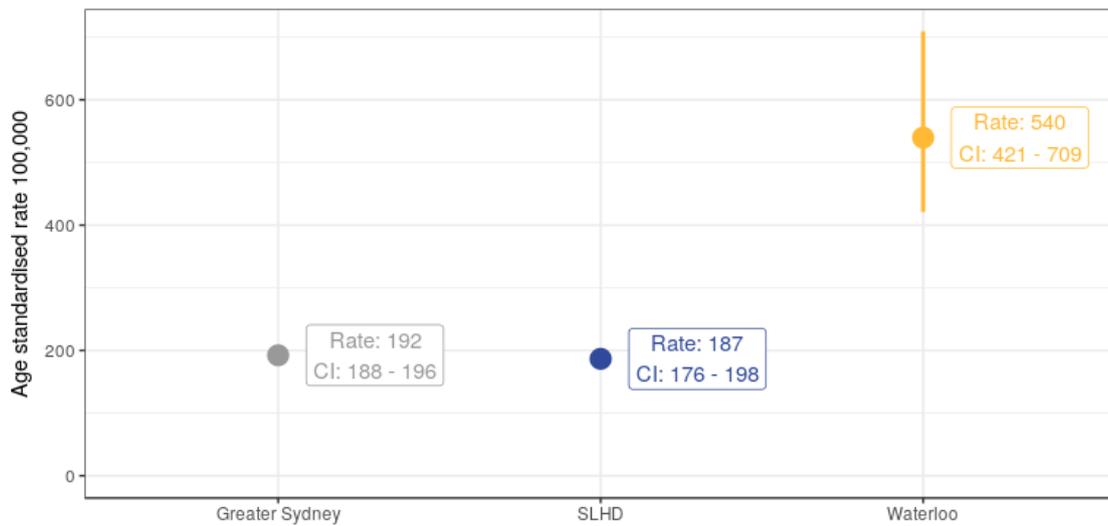
## Rate of admission with coronary heart disease



## Admissions following self-harm



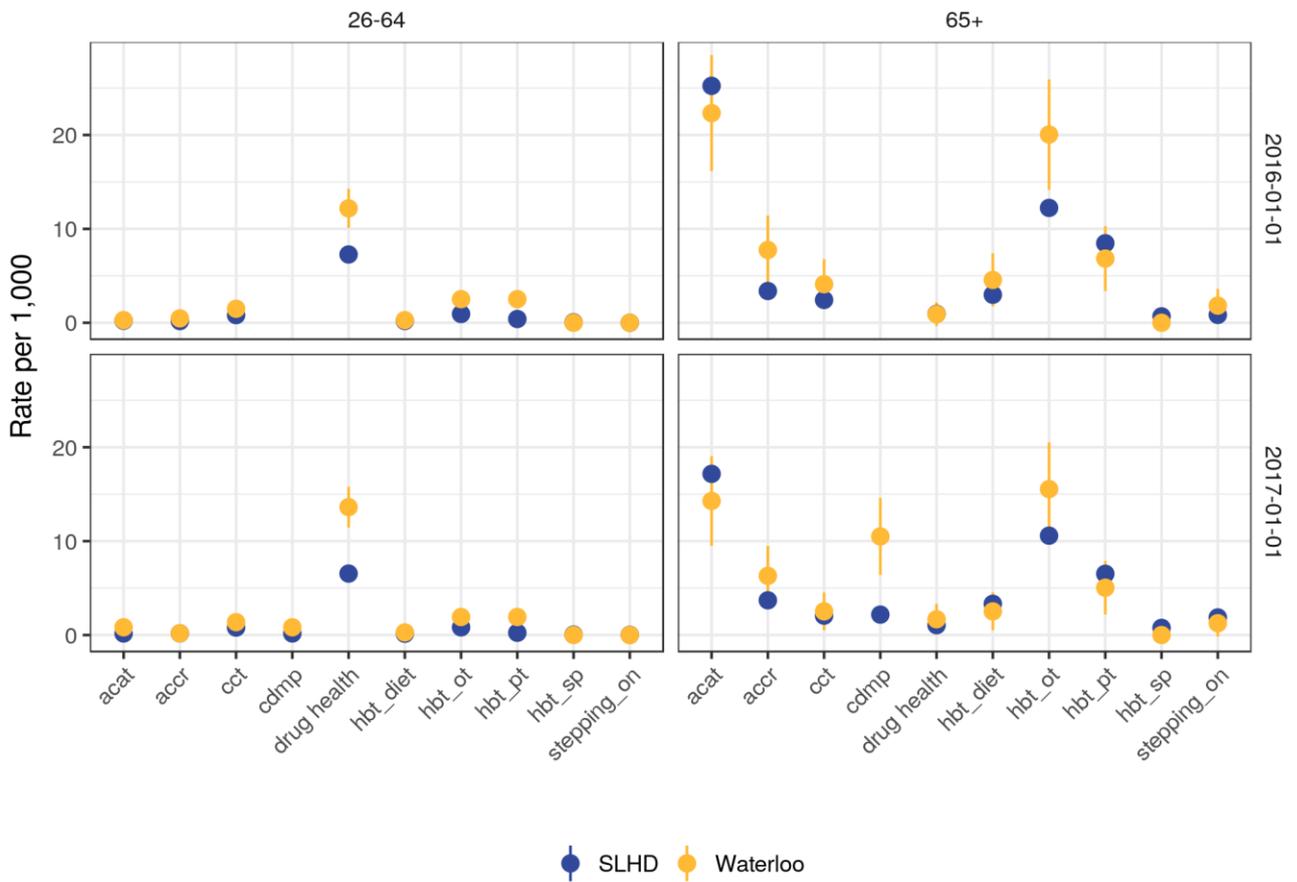
## Rate of admission with Chronic Obstructive Pulmonary Disease (COPD)



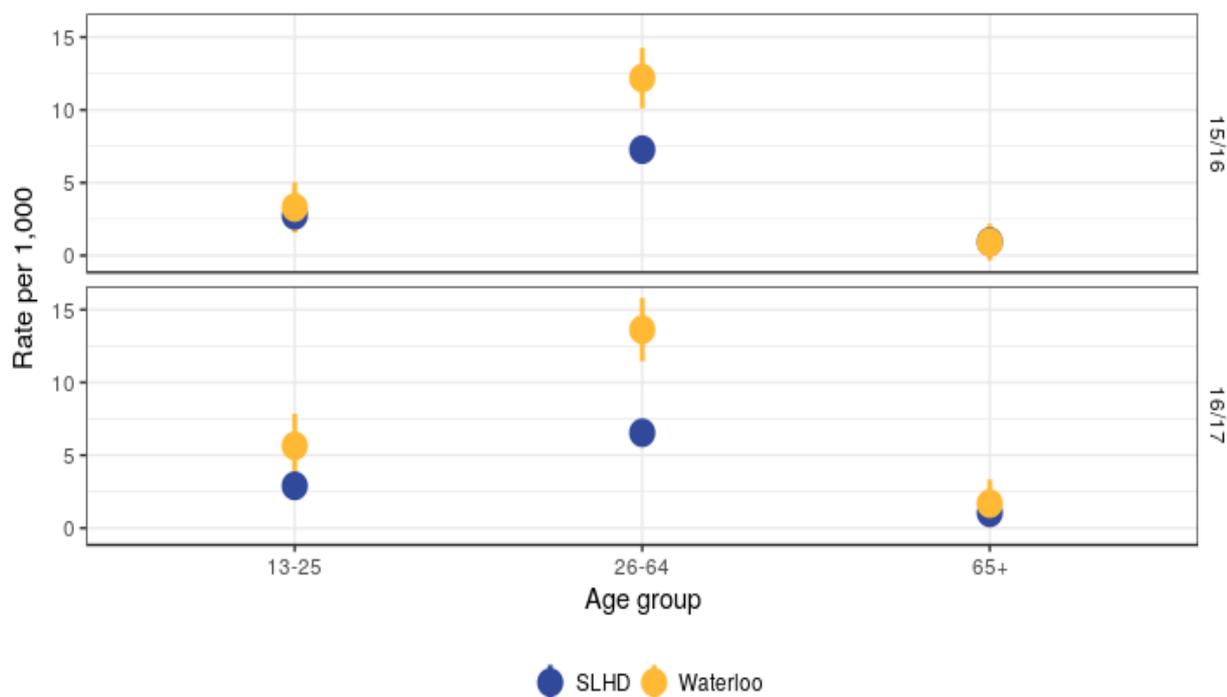
## Rate of ED presentation



**Age standardized Rate of Service Use for Community Aged Care compared to SLHD** – indicates overall a higher usage in Waterloo (except ACAT). In 2016/16 there were Waterloo ACAT clients. They together had 1,610 occasions of service.



**Community Drug Health Services age standardized rates compared to SLHD – indicates overall a higher usage in Waterloo.**



Drug Health Main Treatment/Service Provided	FY2015/16	FY2016/17
Assessment only	3	4

Drug Health	Patients	OOS / events
FY2015/16	147	1,293
FY2016/17	178	1,475
Consultation	16	45
Counselling	32	52
Information and education	0	1
Maintenance pharmacotherapy	49	45
Other	25	12
Rehabilitation	0	0
Support and Case management	36	13
Withdrawal management	19	12
<b>Grand Total</b>	<b>180</b>	<b>184</b>

## Community Health (CH) Activity for Waterloo

WATERLOO - Selected CH Services	FY15/16	FY16/17
Community Health Centre/Clinic	1592	2652
Community Services Centre	4	6
Day care centre/respice care centre	0	5
Home	2901	4008
Other - Educational Facility	0	8
Other setting	57	137
Outreach	5	16
School	3	46
Youth Health Services	112	110
<b>Grand Total of All CH Activity</b>	<b>4679</b>	<b>6994</b>

Community Health Services Registrations	FY 1516		FY 1617	
	<b>Ethnicity</b>			
Aboriginal	112	736	143	1144
Both (Aboriginal & Torres Strait Islander)	2	6	2	0
Declined to respond	2	5	617	2
Neither	376	3892	9	5833
Not Stated/Unknown	12	40	771	15
	<b>Age group</b>			
0-4	66	168	100	426
5-12	52	182	83	364
12-25 (13 to 25)	32	184	48	310
adult (26-64)	172	1795	269	2518
65+	182	2350	271	3376
Grand Total	504	4679	771	6994

## Oral Health Services

Oral Health Services	2015/16	2016/17

	<b>Patients</b>	<b>Activity</b>	<b>Patients</b>	<b>Activity</b>
<b>Oral Health + Sydney Dental Hospital</b>	<b>757</b>	<b>6828</b>	<b>801</b>	<b>8195</b>

<b>Oral Health</b>			
<b>Diagnostic Services</b>		2998	3631
<b>Endodontics</b>		117	99
<b>General Services</b>		158	206
<b>Oral Surgery</b>		426	429
<b>Orthodontics</b>		38	32
<b>Periodontics</b>		179	289
<b>Preventative and Prophylactic Services</b>		1298	1846
<b>Prosthodontics</b>		814	934
<b>Restorative Services</b>		800	729

## Selected other Health Services Activity for Waterloo

Selected Other Community Based Services for Waterloo Residents	2015/16		2016/17	
	Patients	Activity	Patients	Activity
<b>Mental Health</b>	<b>128</b>	<b>NA</b>	<b>133</b>	<b>3233</b>
<b>Chronic Care</b>	<b>NA</b>	<b>NA</b>	<b>59</b>	<b>430</b>

Waterloo Outpatient Activity	2015/16	2016/17
Balmain	<b>3003</b>	<b>2332</b>
Canterbury	<b>15</b>	<b>15</b>
RPA	<b>4101</b>	<b>4096</b>
Concord	<b>246</b>	<b>426</b>
IRO	<b>532</b>	<b>356</b>
Chris O'Brien Lifehouse	<b>1080</b>	<b>898</b>

Hospital Activity	2014/15	2015/16
Total episodes	<b>1174</b>	<b>1223</b>

Report of  
The Waterloo Health Forum 2  
*Strategies for improving the  
Health and Wellbeing of the  
residents of Waterloo  
now and into the future*

Friday 4<sup>th</sup> May 2018



With special thanks to:



NATIONAL CENTRE OF  
INDIGENOUS EXCELLENCE

## Introduction

This report provides the outcomes from the second Waterloo Health Forum held on the 4<sup>th</sup> of May 2018. This forum, held at the National Centre for Indigenous Excellence (NCIE), was collaboratively organised by the Sydney Local Health District (SLHD), Counterpoint Community Services, REDwatch and Inner Sydney Voice. The purpose of the forum was to report to the community on the progress made since the first forum and further explore health and wellbeing issues identified at the first forum. These forums focused on devising strategies for improving the health and wellbeing of the residents of Waterloo now and into the future. The second Waterloo Forum focused on reporting back to the community and diving more deeply into two significant issues for the community- mental health and drug health.

This second forum was attended by over 80 participants representing tenants, community groups, non- government organisations, health workers from the SLHD, Counterpoint Community Services, City of Sydney (CoS), Family and Community Services (FACS), Land and Housing Commission (LAHC) and other agencies.

### The first Waterloo Health Forum indicated that Health needs to:

- Engage better with community, be more visible, help people to better navigate health services.
- Support affordable, accessible on-site healthcare.
- Support employment and social enterprise.

Safety, social isolation, mental health, drug and alcohol usage, aged care, child and family health and complex and chronic illnesses were raised as issues.



## Voices of Waterloo (Part 3)

The forum commenced with a video 'The Voices of Waterloo' focused on health facilities and services – now and into the future.

### Issues voiced in the video included:

- Waterloo has a lot of traumatised people who generally don't like institutions and need home visits (mental health issues).
- A visible, accessible Waterloo Health Centre is needed.
- More outreach 24/7 services are required.
- Culturally appropriate services are important.
- NDIS access is important.
- A Needle and Syringe program is needed.
- Mental health issues should be covered by a social worker or a nurse that comes once a week.
- Employment is important for mental health.
- Currently, if you are outside the services box, the service moves you on.
- Proven lived experienced is critical. There are not enough peers working in the health system.
- There is a need for post-natal groups for both mums and dads.

## The Previous Waterloo Health Forum - What Has Been Done?

### Dr Teresa Anderson, Chief Executive, SLHD.

Dr Anderson reiterated the commitment of the SLHD to work in close partnership with the local residents, Counterpoint Community Services and other agencies to develop an action plan to support a healthy and resilient Waterloo community, both now and into the future. Dr Anderson addressed the issues raised at the first forum.

#### 1. Engage and Empower the Waterloo Community, Support Community

##### Connectedness and Diversity

**Response:** SLHD has employed a new Healthy Link Worker. Health Promotion Programs have been occurring regularly. Waterloo forums will continue.

#### 2. Respect Aboriginal Cultural Heritage and Cultural Diversity

**Response:** An additional forum will be held to discuss best practice approaches to ensuring Aboriginal cultural safety. SLHD is committed to implementing the new Aboriginal Health Strategic Plan (2018-2023). SLHD will continue to support Aboriginal employment through the SLHD Aboriginal Workforce Strategic Plan (2016-2020), and targeted social enterprise.

#### 3. Improve Navigation, Access and Service Integration

**Response:** The SLHD Healthy Link Worker is now employed. The collaborative Human Services Framework will address service issues. Mental Health and Drug Health Strategies are the focus of this, the second forum.

#### 4. Support the Development of Employment and Social Enterprise Opportunities

**Response:** SLHD will extend various programs to Waterloo. The challenge is applying these programs and developing Waterloo-relevant employment programs. SLHD will discuss this further at the next forum and devise specific strategies for implementation.

#### 5. Provide On-Site Health and Wellbeing Services at Waterloo

**Response:** Planning commencing for a HealthOne in Waterloo; aiming to provide greater visibility of SLHD health services.

#### 6. Protect the Health of the Community, Now and During the Redevelopment.

**Response:** A Health Impact Assessment will be undertaken for all of Waterloo.



**“It’s many things, not just health that makes a healthy community”**

## **What Has Happened Since The Previous Forum?**

**Mr Michael Shreenan, Executive Officer, Counterpoint Community Services Inc.**

**At the last forum, we spoke about need for:**

- ➔ Clear leadership and joint ownership and accountability.
- ➔ Clear understanding of the issues.
- ➔ Creating the culture for community to re-engage and have ownership.
- ➔ Ensuring the approaches and policies to reduce health inequalities become a reality (testing what we think already exists).

**Since the last workshop:**

- ➔ Recruitment of new link worker and establishing outreach (already identified issues).
- ➔ Report from last meeting with broad recommendations (now it’s time to unpack and implement tangible actions).
- ➔ Establishment of forums led by LAHC to develop a Human Services Plan for Waterloo. This is the start of a long journey to go but need everyone’s input.
- ➔ Completion of LAHC Vision consultations.
- ➔ Inner Sydney Voice establishment of Community Resilience Committee – identified range of systems that are assume to be in place but are not.
- ➔ REDWatch perspective on Human Services – residents feeling a lack of respect and a perception that they have to fight to get access to support.

## Our focus for the 2.0 Forum:

- ➔ Mental Health and Drug Health.
- ➔ Aim for evidenced based informed action.
- ➔ Interconnectedness of people's issues are often complex but what is more complex is the system response. The system is broken, not the people.
- ➔ Developing health strategies across the lifespan of residents.
- ➔ Meeting the needs of people with health problems.
- ➔ Moving beyond just clinical responses to building social resilience /capital.
- ➔ Focusing on outcomes - keeping our integrity in check moving beyond sounding good, looking good to doing good.

**“Are we ready to respond to what the SLHD Healthy Link Worker and other community groups are saying the priorities are rather than relying on our own assumptions? Are the mechanisms in place to un-defensively respond?”**

## When you decided on the 2.0 Forum actions we asked:

- ➔ Will the approaches implemented make a difference for the resident and the community? Are we moving beyond ticking a box?
- ➔ Are we playing it safe? Are we too risk adverse?
- ➔ Are our collective services and systems ready to deliver? (Skills, resources, accessibility, relationships building and passion).



## Community Interviews

In this session, local residents Ms Catherine Skipper, Mr Jim Anderson and Mr Gary Moylen interviewed personnel from SLHD to understand key action issues from the last forum. The session provided information on the forthcoming Health Impact Assessment, the planning for the development of more visible and on-site health facilities at Waterloo and the work of the new SLHD Waterloo Health Link Worker.

## Waterloo Health Impact Assessment

### Where's the opportunity for greatest impact?

**Ms Catherine Skipper, local Waterloo resident interviewed Mr David Lilley, Deputy Director, Health Equity Research Development Unit (HERDU) – SLHD and UNSW.**

**“At HERDU health is defined as physical, mental, and social wellbeing, all of which are likely to be affected by the change in Waterloo.”**

In Health Impact Assessments (HIAs) we look at proposed projects and plans and try to predict what some of the health impacts might be. We then try to answer 3 questions:

- a) How can we minimise or eliminate things that could harm health?
- b) How can we maximise the things that support health?
- c) How can the health benefits of the project be shared in a fair way, particularly for the most marginalised?

### For example:

- ➔ Changes to the built environment and long construction times may alter people's exercise patterns, and dust from demolition and construction may lead to respiratory concerns for some people.
- ➔ The need to move to a new house, possibly more than once, may lead to stress and anxiety. Where people have existing mental illnesses, these may be exacerbated.
- ➔ Relocation may disrupt social connections.
- ➔ We will have limited time and resources, so we will need to focus our efforts. Our primary concern is with impacts on the most marginalised people. Our current thinking

is that we will look at how to do high density development well, in the Waterloo community context that includes:

- Higher numbers of people living with mental illness.
- Higher numbers of older people.
- Within the Estate a shift from a social housing estate to a 70:30 (private: public) social mix.
- We will review the results of previous and current community consultations and make them available to local stakeholders and government agencies.
- We will collate and review the findings of relevant research.
- We will assemble a steering committee that will include representation from the local community.
- We will invite one or more tenant groups to act as a community reference group for the HIA.
- We also have interest in integrated renewal, which looks at the cumulative impact of all project elements on the health and wellbeing of residents. This includes tenant participation, tenancy management, community activity and events, human service planning, social service provision, urban planning, and construction.



## A HealthOne in the Community

**Mr Jim Anderson, Local Resident interviewed Dr Pamela Garrett, Director of Planning SLHD.**

- To develop health facilities in Waterloo, we need to understand the key issues of the people of Waterloo, especially those very vulnerable community members.
- It is clear from our consultations that people would like to see more primary care, more aged care to support people ageing in place, health promotion and community education.
- We also heard about the need for wellness, health promotion and health protection services. Some of these could be things like cooking classes, physical education, healthy eating connecting isolated people in the community etc.
- Opportunities for reducing social isolation can never be sufficient. Building more support and resilience is important.
- Green Square has substantial population growth and Waterloo sits to the north of this area. Population health, GP type services, community-based health care and specialist clinics would be available in a HealthOne model.
- The SLHD CE has asked the SLHD Planning Unit to develop a Preliminary Business Case for a HealthOne in Waterloo. Services that could be included: General Practice and primary care, mental health, drug health, child and family health, allied health, partnerships with NGOs, Telehealth, preventative health care, chronic care, Needle Syringe Exchange.
- It takes time to develop a building so we want to start by building our visibility in the community. We already provide quite a lot of services in Waterloo, mostly in people's homes. Providing services with other agencies, community engagement and improving the visibility and reach of current services and outreach is our first priority.



## SLHD Healthy Living Link Worker Report

Mr Gary Moylan, local Waterloo resident interviewed Mr Kristian Reyes, Waterloo Healthy Living Link Worker SLHD.

### Insights into community health issues:

- ➔ Provide advice regarding local service availability and information to support access to and navigation of, health services and to enhance individual and community health and wellbeing in Waterloo.
- ➔ Care coordination aspect of the role when based in community. Need for further case management support.
- ➔ Emerging noise and dust issues.
- ➔ Early Intervention Mental Health is a consistent theme.
- ➔ Strong sense that mental health issues, including serious mental health conditions, require less intervention if early detection and support occurred. This may be possible if communities, families and neighbours understood and dealt with mental health more compassionately, and if more attention was directed to community based support, social connectedness and employment support.
- ➔ The high incidence of co-existing drug and alcohol and mental health issues is a continuing theme.
- ➔ Hoarding and squalor has been identified.
- ➔ The need of people who are aged having chronic care.
- ➔ Aboriginal and CaLD communities (moving forward, involvement of Aboriginal Health Workers).

### Challenges:

- ➔ Understanding the importance of history, acknowledging systems, structures and systemic issues.
- ➔ Incorrect assumption that Redfern services will be accessed by Waterloo residents.
- ➔ Best health outcomes are achieved when the underlying structural causes of ill health are addressed.
- ➔ For service delivery we need to shift the narrative to the here and now instead of post development.

### Going forward:

- Undertake a mapping of health and wellbeing services identifying gaps, unmet need and opportunities to improve equity, integration and targeted delivery of health services for the communities of Waterloo/Redfern.
- Increase the visibility and promotion of health services.
- Respond to the needs of NGO's and recognise the barriers they face with the health system.

**“Improve access and need by looking into how the health care service is provided and the way the organisation operates, and addressing the social determinants of health in the community.”**

## Drug Health, Mental Health and Wellbeing Workshops

### What was said?

Workshops were held to create a shared narrative of drug health and mental health and wellbeing issues facing the people of Waterloo.

**Workshop groups also considered concrete actions for SLHD and partner services to build safe, healthy and resilient community of Waterloo through:**

- Tracking and monitoring community concerns around drug health and wellbeing.
- Informing the community about drug health and wellbeing issues and the evidence for change.
- Empowering the community and responding to the drug health and wellbeing issues as they arise.

## Action Items and Strategies

Drug Health and Wellbeing	Suggested Strategies/Actions
1. Discarded needles/syringes in public areas- playgrounds, streets.	→ Keep track of the data and issues and discuss with residents how to deal with these issues.
2. Street drinking. Street drinkers-safety, safe spaces for drinkers, 'wet areas'.	→ Services accessible to the community to collect any needles. Awareness of these services. Improve resident's skills around safe collection. Including calls to the Needle Collection Line.
3. Meth and cannabis very prevalent among young people. No withdrawal management for young people. Access to specialised services.	→ Develop new ways of assisting people with drug health dependencies.
4. High density drug and alcohol use resulting in anti-social behaviour, compounded effect on the community's wellbeing, aggravating others' health issues and creating chronic health issues.	→ Increase the staff in the Waterloo area. Health, housing and police need to agree on an integrated approach to drug and alcohol.
Shared (Drug, Mental Health and Wellbeing)	Suggested Strategies/Actions
1. Access to and navigation of services.	→ Provide Mental Health First Aid Training for residents.
2. Integration of mental health and drug health services.	→ Address CaLD health literacy in a collaborative way.
3. Poor health literacy of residents around health system and health prevention.	→ Provide Health Bulletin Boards across the Estate.
4. Stigma of service use.	→ Promote health services (making contact details available for all support services on a single page for residents to use). → Provide education for all support services. → Ensure that a directory of services is developed by SLHD. → Make better utilisation of social media.

Mental Health and Wellbeing	Suggested Strategies/Actions
1. Lack of early intervention services.	➔ Provide improved on-site support for residents.
2. Social isolation in aging population.	➔ Ensure Mental Health services are available
3. Anxiety regarding re-housing.	24/7 - around the clock response. Strong local
4. Community trauma-deaths in custody, continuing fear and disrespect for some government services leading to poor trust, grief, loss and compounded by loss of community.	➔ Examine opportunities to develop a pilot project of 20-30 people with known severe persistent mental health issues to assess and inform approaches to mental health care.
5. Responses to urgent Mental Health Crises are directed to the NSW Police.	

Other Health and Wellbeing Issues Raised	Suggested Strategies/Actions
1. Domestic Violence.	➔ A multi-sector approach to VAN issues is needed. Some community members would call the police but others don't feel comfortable. Occasionally will contact housing manager.
2. 'Invisible issues' such as Hoarding and Squalor.	➔ Develop stronger community development services.
3. Burden of care on neighbours, services providers. Aging in place becomes more difficult. Difficulty carrying out daily tasks. Impact of behaviour on neighbours.	➔ Develop visible services with the community. ➔ Develop stronger inter-governmental service linkages.
4. Development-noise and disruption ongoing issues due to developments. E.g. Wellington/Raglan St. for new metro station; excessive noise, demolition and tunnelling. Contributing to poor health outcomes, loss of community.	➔ Discuss oral health waiting lists with residents. ➔ Conduct forums across Waterloo with groups of residents including:
5. Fear and anxiety related to being a victim of crime, reporting crime and feeling intimidated or unsafe.	<ul style="list-style-type: none"> <li>• Young people.</li> <li>• Culturally and Linguistically Diverse residents.</li> <li>• Ageing residents.</li> <li>• Aboriginal residents.</li> </ul>
6. Changing culture and communities due to gentrification. Affects ability to cope with issues-identity crisis. Loss of link to history. Loss of connectedness.	
7. Relationship between housing conditions and health on the Estate.	
8. Access to Dental Health and Dental Health waiting lists.	

## Overall Strategic Themes From Workshops

1. Undertake health and wellbeing promotion including targeted programs for health conditions and high risk behaviours prevalent in Waterloo.
2. Strengthen the health literacy of Waterloo residents to make informed choices regarding lifestyle and health service access.
3. Address the social determinants of health through place-based strategies.



## Next Steps

### A further form to explore and report on:

1. Social Enterprise Opportunities.
2. Aboriginal Health.
3. Visible health service developments.
4. Health Impact Assessment.
5. Service Responsiveness – especially in regards to mental health.
6. To hear from the community on other health related issues.

## Appendix 1: Forum Program



INNER SYDNEY VOICE  
regional social development council



Health  
Sydney  
Local Health District

Indigenous Health and Wellbeing Review Series

Forum No: 2 - Friday 4th May 2018

National Centre for Indigenous Excellence (NCIE) 166 George St Redfern

### MCs: Charmaine Jones and Pam Garrett

Time	Topic	Speaker(s)
8:30am	Arrival and Registration	
9.00am	Welcome to Country - Aunty Beryl	
9.10am	Voices of Waterloo Video - current and future health services and facilities	
9.15am	The First Waterloo Health Forum - what has been done	Dr Teresa Anderson
9.30am	What Has Happened Since The Previous Forum?	Mr Michael Shreenan
9.40am	Voices of Waterloo Video - Mental Health	
9.45am	Mental Health and Wellbeing Workshop - Group Discussion And Feedback	
10.40am	Morning Tea	
11.00am	Waterloo Health Impact Assessment - Where's the opportunity for greatest impact?	Mr David Lilley Ms Catherine Skipper
11.10am	Report from the Waterloo Healthy Living Link Worker	Mr Kristian Reyes Mr Gary Moylan
11.20am	A HealthOne in the Community - options and opportunities	Dr Pamela Garrett Mr Jim Anderson
11.30am	Drug Health Wellbeing Workshop - Group Discussion and Feedback	
12.30pm	Review and Thank You	Dr Teresa Anderson Mr Michael Shreenan
12:40pm	Next Steps	Dr Teresa Anderson
1.00pm	Lunch	



29 April 2022

Tim Raimond  
Deputy Secretary  
Department of Planning and Environment  
4 Parramatta Square  
Parramatta NSW

Dear Tim,

**Waterloo Estate (South) - Public Exhibition of Planning Proposal  
Submission by New South Wales Land and Housing Corporation (LAHC)**

New South Wales Land and Housing Corporation, as the majority landowner in Waterloo South, welcomes the opportunity to comment on the planning proposal for Waterloo South. LAHC recognises the substantial efforts undertaken by DPE, the City of Sydney, the Waterloo community and other stakeholders in reaching this important milestone.

LAHC is committed to progressing the Waterloo Estate renewal and creating a diverse and resilient new community in the heart of Sydney. The location and scale of this renewal project positions it to achieve world-class placemaking and community outcomes.

The benefits of the planning proposal include:

- **Achievement of the proposed dwelling density will allow LAHC to facilitate the renewal of the Estate into a mixed tenure community with good access to public transport, amenities and services.** LAHC is committed to ensuring a diverse community incorporating new and better social housing.
- **Inclusion of a design excellence bonus.** The design excellence bonus will appropriately incentivise innovation in built form, architecture, public domain and environmental outcomes, consistent with the longstanding approach in the Sydney LEP. It will also assist with ensuring that dwelling yields are achievable.

We now take this opportunity to make a submission on the planning proposal, to ensure that the desired outcomes and the project objectives can be successfully achieved for Government. Outlined below are 9 recommendations, in four key areas:

1. Planning controls.
2. Proposed dwelling yields.
3. Design excellence process.
4. Development controls.

An independent assessment of the proposed planning framework by SJB is attached, to support our comments from a technical perspective.

## 1. Planning controls

### a) LEP control on tenure mix

#### **Recommendation 1(a): dispense with the proposed LEP provision mandating a proportion of social housing.**

LAHC has a strategic objective to deliver more and better social housing across NSW. This objective is consistent with LAHC's statutory functions under the *Housing Act 2001*. It also underpins the approach we have taken since the start of Waterloo Estate renewal which is seeking to maximise social housing outcomes as part of a mixed and connected community.

With respect to social housing:

- It is unnecessary to impose site-specific LEP tenure mix controls. There is no legal policy basis to do so. Social housing outcomes and targets across NSW are already controlled through Government policy and statutory settings.
- LAHC's objectives at Waterloo are to deliver the highest and best proportion of social housing, as determined through our statutory and strategic functions, together with Government policy under *Future Directions for Social Housing in NSW*. Introducing complexity and policy conflict through a mandated tenure mix in site-specific planning controls is to be avoided.
- LAHC has a proven track record over decades of renewing social housing estates to maximise the delivery of new and modern social housing within diverse communities, in order to produce positive placemaking, community and social outcomes, together with economic benefits for the State.
- The risk of precedence, which could see imposition of site-specific social housing targets by local and other planning authorities on the State's social housing provider would become untenable in the longer term. LAHC's asset recycling programs create significant additionality in social housing supply across NSW, often not confined within specific estates, but in areas where it is needed most. This would not be possible if LEP controls were to require on-site social housing provision.

With respect to affordable housing:

- LAHC supports the inclusion of affordable housing at Waterloo, to ensure diversity of housing types. Accordingly, a 7% control is appropriate.
- The District Plans provide a policy context for 5-10% affordable housing, subject to feasibility. As social housing falls within the LEP definition of 'affordable housing', the proposed levying of social and affordable housing totalling 33.5% of residential GFA in Waterloo South exceeds these policy parameters.
- The asset recycling approach does require affordable housing to be subsidised through the project land value, and therefore reduces the amount of social housing that can be delivered. A balance is necessary.

b) *LEP height map with regard to tower footprints*

**Recommendation 1(b): adopt a maximum floorplate control of 750m<sup>2</sup> GFA, which would require larger tower building footprints on the Draft Height of Building Map. This is consistent with contemporary examples in the LGA and will allow more flexibility for tower design resolution and excellence to be achieved, while still achieving the design intent for slender towers (shown in Figure 1 below).**

The Draft Height of Building ('HOB') map allows for a maximum tower footprint, using the entire area allocated to the tower, of between 549m<sup>2</sup> and 591m<sup>2</sup> (as per DPE analysis). This is smaller than typical architectural design requirements for slender towers, and smaller than contemporary examples nearby. At the Lachlan Precinct, City of Sydney has adopted a 750m<sup>2</sup> GFA maximum footprint, and at the adjacent Metro Quarter Towers DPE recently approved a maximum tower footprint of 800m<sup>2</sup>.

The Apartment Design Guideline (ADG) already effectively limits the number of apartments per floor and recommends a building envelope should be 25% to 30% greater than the achievable GFA.

The effect of the draft HOB tower mapping footprints is as follows:

- towers are 'shrink wrapped' to the edge of an architectural façade, minimising any potential for a design excellence process to identify alternative and enhanced tower forms and solutions,
- a deviation from the tower footprint could require a full planning proposal to amend the HOB map,
- the ability to achieve the stated base GFA and design excellence bonus is impacted,
- the ability to achieve design resolution at design competition and DA stage in order to improve outcomes is restricted,
- building efficiencies are impacted, which could place pressure on construction costs and ultimately future project viability.

LAHC requests DPE to consider an additional planning envelope area, on top of the building envelope area, to enable achievement of reasonable slender tower floorplates of up to 750m<sup>2</sup> GFA and allow design excellence in form.

The following image proposes a revised LEP map which maintains the desired tower locations but allows for the core intent of the planning proposal to be achieved (noting the above issues) and allows room for design excellence to be achieved for these key elements of the proposal.



Figure 04: Draft HOB\_017 City of Sydney LEP



Figure 05: Proposed Alternative, HOB\_017 City of Sydney LEP

Figure 1 – comparison of Draft Height of Building Map and Proposed Alternative.

c) Calculation of site areas and FSR

**Recommendation 1(c): validate the development potential on LAHC land is capable of achieving 255,000m<sup>2</sup> GFA (plus provision for design excellence), through auditing the site areas and FSR maps.**

LAHC understands from the IAG Report, the Gateway Determination recommendations and the DPE updated planning proposal, the intended base FSR is intended to be 255,000m<sup>2</sup> of GFA plus provision for design excellence. This figure is not always consistent across the exhibited planning proposal documentation, and it is not possible to replicate the calculations to achieve the total GFA across LAHC land holdings.

It is recommended to audit the FSR calculation to ensure the site area of LAHC land multiplied by the relevant FSR achieves the total figure.

## 2. Proposed dwelling yields

**Recommendation 2(a): validate the full 255,000m<sup>2</sup> of GFA plus the additional 10% design excellence bonus can be accommodated within the proposed planning controls, with appropriate flexibility for design excellence, as per the Gateway Determination recommendation.**

**This would be ideal prior to finalising the proposed LEP amendments. It is noted the requested tower floorplate amendments and relaxation of tower height envelope set out in 1(b) may also contribute.**

The Gateway Determination requires testing to confirm building efficiencies to ensure that the GFA and Net Sellable Area (NSA) is achievable, and for this analysis to be exhibited. Whilst

case studies have been provided of building efficiencies on other projects, they are of a different scale and complexity.

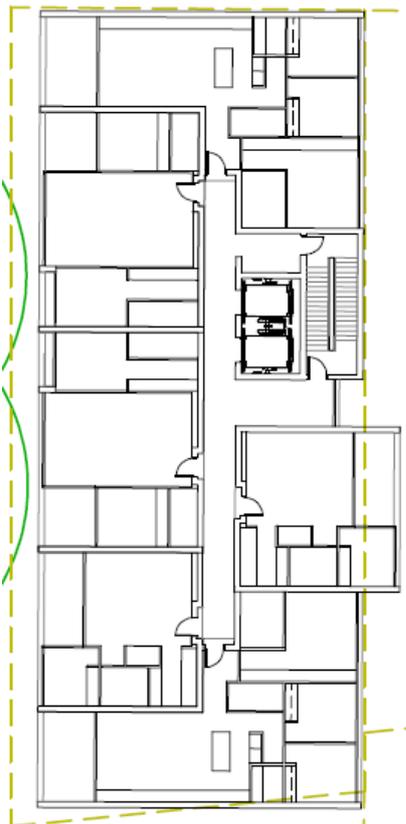
A specific validation is needed, to address building efficiency issues identified through the SJB analysis, and to demonstrate that the full GFA and targeted yield can be achieved. This end, LAHC suggests this could be achieved by:

- addressing issues in point 1(b) above including increasing the tower footprint sizes to a maximum of 750m<sup>2</sup> GFA and include the larger suggested tower envelope zone, and
- continuing to address 10% design excellence bonus.

LAHC notes that the independent assessment by SJB (including test-fits for two superlots – see SJB report chapter 4), indicates that it will be difficult to achieve both the proposed base GFA and building efficiencies adopted in the updated planning proposal.

Through the exhibited controls, DPE and Hassell have provided a single floor plate test for a single tower that confirms SJB’s analysis that the achievable tower footprints are about 5% smaller than what DPE have relied upon in calculating the 255,000m<sup>2</sup> base GFA, as per Figure 2 below.

**SJB tower floor plate for block 9**



Gross building area – 688m<sup>2</sup>  
 Gross floor area – 545m<sup>2</sup> (-4.7%)  
 Net sellable area – 452m<sup>2</sup>

**DPE/Hassell tower floor plate for block 10**



Gross building area – 638m<sup>2</sup>  
 Gross floor area – 522m<sup>2</sup> (5.1%)  
 Net sellable area – 450m<sup>2</sup>

Figure 2 – comparison of tower building efficiencies.

### 3. Design excellence processes

**Recommendation 3(a): adopt a more streamlined process to drive design excellence. Design excellence integrity could be achieved more simply with competitive processes for tower blocks, and an alternative design excellence process for the remainder of the site including specific criteria for design diversity.**

**Recommendation 3(b): LAHC will prepare a design excellence strategy, in consultation with DPE, and for endorsement by Government Architect NSW.**

LAHC supports design excellence and diversity in the renewal of Waterloo South.

Under the Draft Design Guide, sixteen competitive design processes are required across Waterloo South (as shown in Figure 20 of the draft guide). The effect of this is a time consuming, expensive and onerous process. All additional costs will impact on the proposed social and affordable housing outcomes as well as the projects' ability to deliver on wider public benefits such as the proposed regional open space and community facilities.

Given the change in character of the Waterloo area catalysed by the Waterloo Metro Station and Waterloo Metro Quarter development, LAHC is of the view that a design excellence process that references and improves upon the Central Sydney approach would be appropriate. This would require:

- design competitions for the 4 tower blocks as per the updated planning proposal, and
- an alternative design excellence process for the other blocks where the use of different architects is encouraged for each building coordinated, by an overarching executive architect.

This would see an orderly approach to the precinct maintained, and a diversity of styles and fine-grained approach implemented.

Examples of similar processes with acknowledged success are provided by SJB in the attached document, specifically the Quay Quarter (Sydney LGA) and Newcastle East End. Note:

- in the Quay Quarter a combination of a design competition and a design alternatives approach was used, with a competition for the tower and an executive architect working with emerging and specialist architects for the laneways component, and
- similarly in Newcastle a panel of experts was established comprising City of Newcastle, GA NSW and Newcastle Urban Design Consultative Group. The project was designed by an executive architect working with two other firms, with each of them responsible for design of a separate block.

A variant of this approach was also used in the Central Park development (in Sydney LGA), requiring the use of a different architect for each block. It is also noted that the Waterloo Metro Quarter Development established a design review panel to manage design excellence, rather than holding design competitions.

#### 4. Establishing development controls

a) *The proposal to elevate DCP provisions into a complex local LEP provision*

**Recommendation 4(a): review the design guideline, and instead implement a site-specific DCP (consistent with standard planning practice and clause 7.20 of the Sydney LEP).**

**This will ensure compliance with the regulatory framework, allow for appropriate best-practice merit-based assessment of future development, and minimise delays to project delivery, by not mandating the requirement for a further Concept DA process for the entire site.**

The proposed elevation of the DCP-style provisions into a complex local LEP provision raises several areas of concern with respect to compliance with current Ministerial Directions, clause 7.20 of the Sydney LEP, and the *Environmental Planning and Assessment Act* (EP&A Act) provisions relating to DCPs (including recent planning reforms to provide greater flexibility in DCPs).

LAHC is concerned to ensure that the Minister's discretion in the assessment of future State Significant Development Applications is not fettered. Note:

- Ministerial Direction 1.4 under section 9.1 of the EP&A Act has the objective “to discourage unnecessarily restrictive site-specific planning controls” and includes guidance that a planning proposal should not include development standards in addition to those already in existence in a land use zone. It also states that a planning proposal “must not contain or refer to drawings that show details of the proposed development.”
- The proposed incorporation of the design guideline into the LEP effectively creates over 85 pages of development standards and contains dozens of drawings of the proposed development. This is not consistent with the Ministerial Direction and presents a risk that there will need to be multiple future planning proposals to amend the restrictive controls. This could of course impact on delivery on time, and within a viable budget, and thereby impact the ability to achieve the project objectives. It is understood any change to the proposed design guideline would require a further planning proposal.
- Section 7.20(b) of the Sydney LEP describes the requirement for a site-specific DCP for sites over 5,000m<sup>2</sup> or 25m in height. The detailed requirements in this clause are addressed by the proposed design guideline, but as proposed would not meet the requirements of clause 7.20 and could require a further DCP (or Concept DA) to be prepared in addition to already complex and restrictive controls.
- Division 3.6 of the EP&A Act codifies the requirements for providing detailed design guidance for the implementation of LEP provision, as does clause 7.20 of the Sydney LEP. In light of this, it is not clear why detailed DCP-style controls are proposed to be elevated to LEP provisions in the case of Waterloo South.
- Clause 2.10 of the SEPP (Planning Systems) (formerly the SEPP (State and Regional Development)), which states that DCPs do not apply to State Significant Development projects, deliberately promotes greater flexibility in the assessment of state significant development applications. Usual practice would be to require an assessment against a site-specific DCP through the Secretary's Environmental Assessment Requirements (SEARs). This approach would allow for the development to be influenced by the site-specific DCP but retain the flexibility prescribed by the SEPP and the EP&A Act.
- Adopting an approach that elevates development controls to the LEP provisions could have the effect of fettering the Minister's discretion under the EP&A Act, and will likely

result in multiple future LEP amendments, as well as a lengthy Concept DA process before any new housing is able to be delivered.

Adopting a site-specific DCP, instead of elevating these provisions to the LEP, will allow room for appropriate design evolution and drive exemplar outcomes.

b) *Proposed design guidelines/DCP*

**Recommendation 4(b): consider the recommendations in the SJB advice, that the proposed design guidance be incorporated into a site-specific DCP, to maintain appropriate statutory flexibility.**

Aside from the issues raised above in point 4(a), the design guide document represents 85 pages of detailed site specific design controls in addition to the existing Sydney DCP 2012. This design guide seeks to impose controls that exceed controls that would ordinarily apply to development on adjoining or similar sites.

LHC requests DPE to consider further refinement of this guidance, and to take into account independent recommendations made by SJB in the attached report. The recommendations make suggestions for how height of building mapping in particular could be amended, in order to allow for design excellence, design development and evolution. Flexibility in the interpretation of these controls is critical. In summary, SJB makes the following key points:

- **Built form.** Instead of prescriptive built form requirements, performance-based controls that are measurable and convey intent will allow architects to design a number of solutions.
- **Height.** Rather than prescriptive height control standards, performance-based controls such as amount of solar access to open space and key streets could be used.
- **Height.** SJB suggests a revised height map in the design guideline which is illustrated below in Figure 3.
- **Setbacks.** Any setback requirements should clearly illustrate intent and be demonstrated through street wall controls or upper level setbacks.



Figure 3 – comparison of draft height in storeys plan and proposed Alternative.

The effect of the prescriptive nature of the design guide can be managed if implemented as a DCP (as per clause 7.20 of the LEP), as requested by LAHC.

Clause 1.7 of the 85 page document attempts to introduce this flexibility through the following statement.

*Any application for development is to demonstrate how it meets the objectives and guidance. The guidance sets clear and measurable benchmarks for how the objectives can be practically achieved. If it is not possible to satisfy the guidance, applications must demonstrate what other responses are used to achieve the objectives.*

This intent of this statement would be more capable of achievement through a DCP, rather than if it is a design standard in an LEP.

c) *Minister's discretion in future SSD projects*

**Recommendation 4(c): adopt a site-specific DCP, to satisfy clause 7.20 of the Sydney LEP, which would remove the requirement for a Concept DA, and consider referencing the DCP in any future SEARs for SSD projects.**

As noted above the NSW statutory planning framework has been designed to allow for flexibility in detailed planning controls. This is reinforced by the section 9.1 direction against complex local provisions. The SEPP (Planning Systems) also deliberately allows for flexibility in the application of DCP controls to State Significant development and allows the Minister to prescribe environmental assessment requirements for these projects, even extending as far as to allow partially prohibited development.

Whilst the City of Sydney report to Council suggests that for future State Significant Development the design guide should be an LEP provision, this is contrary to the intent of the NSW planning system. It also has potential to create significant delays, impacts on design excellence outcomes, and could fetter the Minister's statutory role with regard to merit-based assessment of SSD projects.

## **Conclusion**

In order to ensure that social housing outcomes can be maximised at Waterloo, and the project objectives for the renewal of the Estate can be achieved, LAHC requests DPE to consider adopting the requests outlined in this submission.

We look forward to continuing to work with DPE as this significant project continues through the planning process, and ultimately to deliver outstanding housing, place and social outcomes in this remarkable location.

Yours sincerely



Deborah Brill  
Chief Executive  
NSW Land and Housing Corporation

SJB Urban

# Waterloo Estate South

## Draft Design Guide Review

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We create spaces people love.  
SJB is passionate about the  
possibilities of architecture,  
interiors, urban design  
and planning.  
Let's collaborate.

---

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**Prepared for**  
Land and Housing Corporation

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**Issued**  
27 April 2022

# We create spaces people love

At SJB we believe that the future of the city is in generating a rich urban experience through the delivery of density and activity, facilitated by land uses, at various scales, designed for everyone.

Version: 01  
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# Purpose of Review

# 1

SJB has been engaged to provide a review of the Draft Design Guide for Waterloo Estate (South) for the Land and Housing Corporation. The focus of this review is to address four key themes:

- Proof of concept
- Flexibility of controls
- Tower footprints
- Design excellence

The purpose of the review is to ensure that the planning proposal achieves the following objectives:

- To ensure that the allowable GFA (including both the base level and 10% additional Design Excellence Bonus) are achievable within the permissible building envelope.
- That there is opportunity for flexibility and innovation within the design and planning process to enable the delivery of high-quality outcomes.
- To deliver a design excellence process in a manner that achieves variation and innovation without being onerous.

The aim of our review was to highlight areas of the Draft Design Guide which we believe should be interrogated and provide recommendations as to how they might be 'tweaked' to ensure that they enable the delivery of a high-quality built form outcome, able to accommodate the development yield sought.



## Waterloo Estate (South): Design Guide 2021 (Draft)



February 2022

Figure 01: Waterloo Estate (South) Design Guide 2021 (Draft)

# Tower Footprints

# 2

The Draft Design Guide indicates four key tower sites in the Waterloo Estate (South). Three tower sites are located towards McEvoy Street, in the southern part of the estate and the fourth tower is on the corner of Kellick and Gibson Streets, north of Waterloo Park. The Draft Design Guide indicates tower footprints and controls which may limit future flexibility, feasibility and the design excellence process.

Tower footprint locations indicated in the draft Guide are limiting. Creating larger tower zones allows for flexibility and movement of the tower in the design process. Final locations of towers should be considered as part of the design excellence process.

Tower locations in the Draft Design Guide do not match locations indicated in the Draft LEP Height of Buildings Map. The controls should provide enough scope and flexibility to achieve good tower design as indicated in Figure 02 below. Figure 03 indicates tower footprint zones of 1500m<sup>2</sup> which can accommodate a final tower footprint of up to 750m<sup>2</sup> GFA based on typical efficiencies.

The key limitation of small tower footprints is the inability to achieve base GFA and building efficiencies adopted by the Department. This then lends itself to higher construction costs due to an inability to achieve a level of construction or development efficiency expected in the market.

The Planning Proposal indicates actual tower sizes of 549-591m<sup>2</sup> GFA with no justification for the reduced floor plate size compared to equivalent precincts in the City. SJB and Hassell were unable to achieve these sizes in their test fits. Larger tower footprints of up to 750m<sup>2</sup> GFA should be allowed within the Waterloo Estate (South). This footprint size allows for compliance with SEPP65 requirements including natural ventilation and number of dwellings per core.

Further to tower footprint size and location, planning controls for the towers should be minimal to allow for effectiveness of the design excellence process. Controls that clearly articulate intent provide a clear framework for a successful competitive design process. Scope for innovation and design exploration can be limited by overly prescriptive controls.

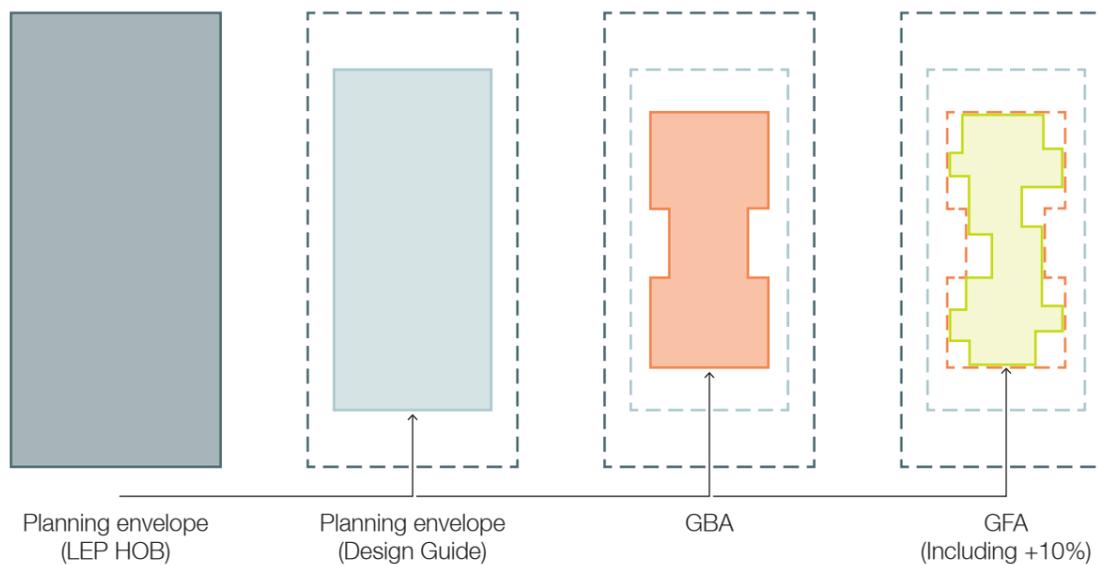


Figure 02: Indicative process of tower footprint controls



Figure 03: Indicative tower footprint zones

## Tower Footprints

The image to the right (Figure 04) shows the proposed Height of Buildings LEP map including the tower locations in black. Below that (Figure 05) are our proposed amendments to the Height of Buildings LEP map to accommodate the larger tower footprint zone.

The larger tower footprint zones enable enough flexibility in the controls to achieve the GFA with reasonable efficiencies as demonstrated in Figure 02.



Figure 04: Draft HOB\_017 City of Sydney LEP



Figure 05: Proposed Alternative, HOB\_017 City of Sydney LEP



Figure 06: Dunkerley Place, Lachlan Precinct

## Tower Footprints

Other major urban renewal precincts in the city have demonstrated successful outcomes for new towers. The proposed controls in the Draft Design Guide are inconsistent with these similar precincts including Lachlan Precinct.

### Lachlan Precinct

The Lachlan Precinct is bounded by Bourke, Lachlan and South Dowling Streets and O'Dea Avenue, Waterloo. It forms part of the wider Green Square Urban Strategy and is a key urban renewal site in inner Sydney. The City of Sydney Development Control Plan 2012 outlines the urban strategy for the Lachlan Precinct. Figure 5.90 of the DCP highlights the five tower sites across the precinct. One of the controls for the largest tower are highlighted below:

*5.4.3.3 Building form and design (3) Further to 5.4.3.3(2) above, the location of the building envelope for the tower may be flexible provided the tower floorplate does not exceed 800sqm. This is to enable design of the building to appropriately define this highly visible site at the intersection of the two principal streets. The optimal tower envelope is to be explored through the competitive design process required for the street block, cognisant of impact on solar access within Wulaba Park, and agreed by the Consent Authority.*

Greater flexibility of tower footprints allows for creativity and innovation in the competition process and avoids inadvertently limiting outcomes by creating controls that result in one feasible layout.

Another tower within the Lachlan Precinct which has worked within the controls of the DCP to create a successful design outcome is Waterfall for Crown. The tower was awarded to SJB through a competitive design process. The following control created a design intent which did not restrict the design process:

*5.4.3.3 Building form and design (5) Tall buildings of 9 storeys or over are to be designed as 'slender form' with a maximum floorplate of 750sqm including balconies, with the exception of the tower referred to in 5.4.3.3 (3).*

The result is a tower which is connected to a larger podium but reads independently as an architectural object. It has a slender form which can be read as part of the larger Green Square Precinct. The success of Lachlan Precinct with towers that are highly awarded is the result of design controls that clearly state design intent whilst allowing for an element of flexibility and innovation in the design process.

#### Recommendation:

- Allow 750m<sup>2</sup> GFA tower footprints in line with the City's controls in Lachlan Precinct
- Provide an opportunity through design competitions to explore optimal tower approach



Figure 07: Typical Tower Footprint, Waterfall

Tower Footprints

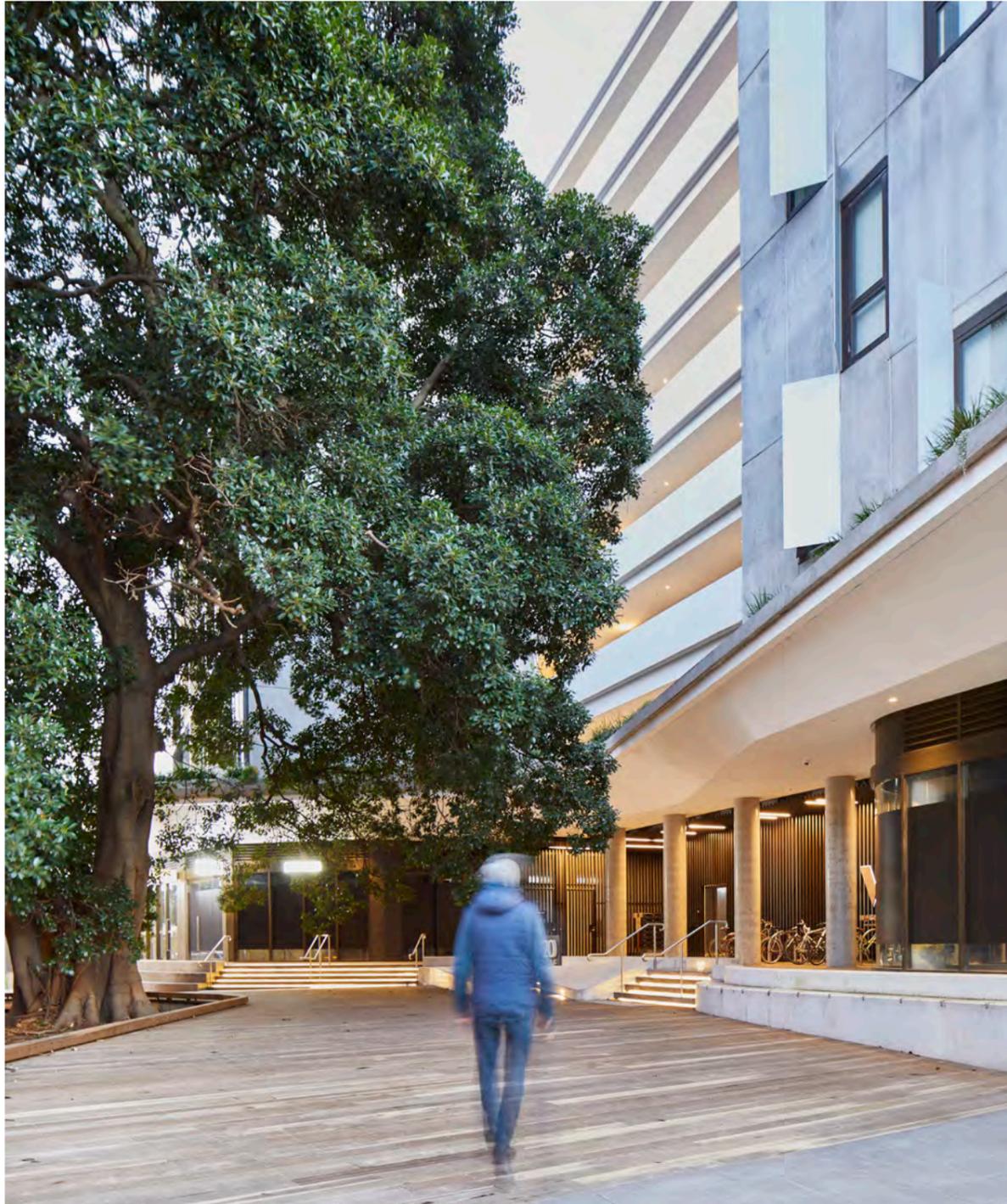


Figure 08: Existing significant tree retained, Waterfall

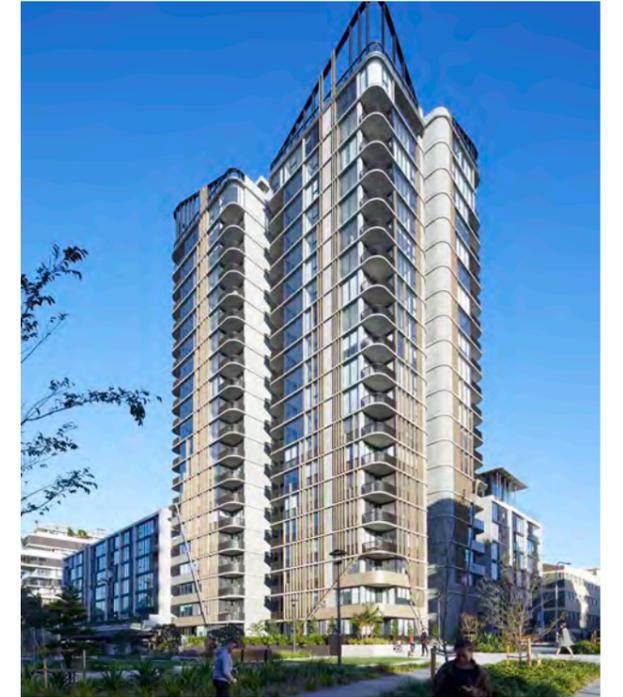


Figure 09: Selected images, Waterfall

# Flexibility of Controls

# 3

The Draft Design Guide falls between the rigour of a Stage 1 Development Application and the flexibility of a Development Control Plan. The controls are too prescriptive for this stage in the design and planning process which can limit innovation and flexibility.

The building heights result in an overly prescriptive building envelope and do not clearly articulate intent. There are many reasons for prescribing building heights and a clear intent allows architects to design to a particular outcome. Other measures can be implemented to ensure solar access and amenity to open space and key streets without creating an overly prescriptive built form outcome. For example, solar access to the community building and open space in Block 8 should be a measurable requirement which would drive a built form outcome similar to what is shown in the controls but allowing for some flexibility in how it is reflected in built form.

Setbacks within the Guide should also clearly articulate intent. It could be demonstrated through street wall controls or requirements that upper levels are recessive. For example:

- Respecting the context outside the study boundary, there is a 2 storey street wall control along Cope Street.
- Buildings on George Street and Pitt Streets have two upper levels recessed.
- Buildings on Cooper, Mead and West Streets have their uppermost level recessed.
- Buildings along McEvoy Street provide a minimum setback to maintain the existing setbacks and/or provide solar access to Waterloo Oval.
- Setbacks along Gibson Street should allow for the retention of existing significant trees.

Ashmore Precinct is an example of an urban renewal precinct within the City of Sydney that has used a site specific DCP to achieve high quality outcomes. The controls are measurable and articulate intent without limiting the opportunity for innovative design.

## Ashmore Precinct

The Ashmore Urban Strategy within the City of Sydney DCP 2012 outlines the key controls for the redevelopment of the inner-city precinct. The site is bound by Ashmore Street, Mitchell Road, Coulson Street and the railway embankment. One of the objectives of the Urban Strategy was for the future development to be of the highest quality, and sympathetic to the existing surrounding local character and history of Erskineville and Alexandria and their former industrial uses.

An example of flexible planning controls for the Ashmore Precinct include ensuring solar access to McPherson Park as a measurable requirement without a prescriptive built form outcome: *5.5.4.1 Solar access Provisions (2) A minimum of 60% of the total area of McPherson Park is to have direct solar access between 10am and 2pm at the winter solstice.*

Within Ashmore Precinct are the Erko Apartments, the first development to be completed as part of the precinct. Erko contains 320 dwellings in both residential flat buildings and terraces. The controls outlined in the DCP have resulted in a varied architectural outcome which relates to its surrounding context. For example: *5.5.8.4 Building form and design (4) Dwellings on the ground floor facing the street are to have individual entries from the street.* This control has resulted in residential flat buildings with the first two storeys reading as rows of terrace housing, relating to the surrounding context of the precinct and creating a smoother transition from medium to high density.

### Recommendation:

- Simplify building envelope controls and provide clear measures to ensure amenity
- Articulate intent behind controls to ensure design objectives are achieved



Figure 10: Tower Podium, Erko Apartments



Figure 11: Metters Street, Erko Apartments



Figure 12: Terrace Housing, Erko Apartments

Flexibility of Controls



Figure 13: Height in Storeys Plan, Page 50 Draft Design Guide



Figure 14: Rationalised Height in Storeys Plan

# Planning proposal should adequately demonstrate that the proposed dwellings can be delivered within the proposed planning framework

# 4

The planning proposal aims to deliver 255,000m<sup>2</sup> of GFA as a base case which does not include the additional 10% design excellence bonus. The challenge is that the proposal may not deliver either the base GFA or additional design excellence bonus within the proposed planning controls.

As part of this review, SJB has developed 'test fit' schemes for Blocks 8 and 9 to gain a better understanding of whether it is possible for future development to realise the yield potential. While it appears possible to fit the proposed base level GFA on the sites within the allowable building zones and heights, it is tight. This 'tightness' in the planning controls gives a level of certainty to the built form outcome, however it makes the delivery of innovative alternative architectural solutions difficult to achieve if the scheme is also expected to meet all planning controls and achieve the maximum GFA.

Achieving the 10% Design Excellence Bonus GFA within the allowable heights will be very challenging. The Bonus can only be granted as 10% of FSR, no increase in building heights is allowed. Furthermore, the GFA cannot be transferred from one superlot to another. Therefore, it is important that it is possible to achieve this bonus within the allowed maximum building envelope.

Through the development of 'test fit' schemes inclusive of the additional 10% it was found that lower levels of the building would contravene building separation distances contained within SEPP 65, controls that are far less likely to be varied than the Guide. To achieve the maximum GFA for the sites (inclusive of the 10% Design Excellence Bonus) there needs to be some relaxation of the proposed controls.

The narrower building forms proposed in the Draft Design Guide would likely result in a higher façade to FSR ratio. Whilst the architectural outcomes of the narrower built form are not negative, it will likely result in a higher construction cost per dwelling. This contributes to the overall development feasibility of the project.

It is recommended that the allowable tower footprint zones are expanded to allow for flexibility in physical location and greater footprint sizes to improve building efficiency and yield outcomes. It is essential that the planning controls can deliver maximum yield outcomes under both the base case and design bonus provisions.

### Recommendation:

- Ensure that development envelopes allow for both the realisation of maximum development yields, including both the base case and 10% Design Excellence Bonus
- Expand allowable tower footprint zones to enable better building efficiency, higher yield outcomes and greater flexibility.



Figure 15: Block 8 and 9 Test Fits

# Design Excellence Processes

# 5

The Draft Design Guide specifies the competitive design process and design excellence strategy for Waterloo Estate (South). The Guide contains a plan (Figure 14) indicating the location of the sixteen competitive design process sites across the estate. This will create a time consuming, expensive and onerous process to achieving the design excellence objectives.

There are alternate pathways to achieving design excellence that do not require a design competition. They can still result in variation and innovation whilst reducing the risks associated with multiple design competitions running on one renewal precinct. The competitive design process should be limited to tower sites and key sites determined to have a high visibility or unique characteristics. Alternative processes can create an opportunity to curate a design excellence process which responds to the unique opportunities and constraints of the site.

The two case studies below explore large city blocks in Sydney and Newcastle which have undergone alternative design excellence process supported by their respective City Councils and GANSW. They have both achieved high quality urban design and architectural outcomes.

## Quay Quarter

Quay Quarter spans two city blocks in Circular Quay including both Quay Quarter Tower and Quay Quarter Lanes. The tower site achieved design excellence through an international design competition, as a significant future contribution to Sydney's skyline.

Quay Quarter Lanes established an alternative design excellence process which was run by the City of Sydney and the client. This relied on an established architect acting as executive architect with emerging and specialist architects working on selected buildings. This resulted in a highly collaborative process with a unified and successful rejuvenation of the block.

## Newcastle East End

Newcastle East End is three-stage development of four city blocks in east Newcastle. The first stage, which comprised of one city block, has been completed and utilised an innovative design excellence process.

A highly collaborative and transparent design excellence process was established for the first stage and was facilitated by a panel of experts from the Newcastle Urban Design Consultative Group, GANSW and the City of Newcastle. An architectural team was selected through a series of interviews with a particular focus on experience in mixed-use and heritage. One executive architect worked with two other firms throughout the process, with each firm designing a mixed-use building.

### Recommendation:

- Design competition process limited to tower and key sites only.
- Design an alternate design excellence process for the remainder of the sites, curating a team of architects per block including an executive architect, emerging and specialist designers.



Figure 16: Competitive design process sites, Page 71 Draft Design Guide



Figure 17: 15 Young Street, Quay Quarter



Figure 18: Aerial view, Quay Quarter



Figure 19: Loftus Lane Quay Quarter



Figure 20: Aerial view, Newcastle East End



Figure 21: Central courtyard, Newcastle East End



Figure 22: Perkins Street, Newcastle East End

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# Waterloo Estate (South) Planning Proposal – Submission



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## Introduction

In February 2020 the Council and the Central Sydney Planning Committee (CSPS) approved a planning proposal and draft design guide for the Waterloo Estate (South). The proposal was informed by the City's Alternative Approach to Waterloo, that was in turn reviewed and guided by an Expert Advisory Panel that included:

- Ken Maher AO (chair)
- Nathan Moran – CEO, Metropolitan Local Aboriginal Land Council
- Professor Nicole Gurran – Chair of Urbanism, University of Sydney
- David Riches – David Riches Associates (former Head of Projects, INSW)
- Wendy Hayhurst – CEO, Community Housing Industry Association
- Professor Bill Randolph – City Futures Research Centre, UNSW
- Andrew McAnulty – CEO, Link Housing

The final draft of the proposal was peer reviewed and thoroughly examined by some of Australia's most prominent urban designers and allied professionals who participated in a Design Challenge Review. The review was observed by staff of the City of Sydney, Department of Planning, Industry and Environment and the NSW Government Architect as well as the Greater Sydney Commission's District Commissioner for Eastern City and North District.

Participants in the Design Challenge Review included:

- Ken Maher AO, AIA Gold Medallist 2009 President of the Australian Sustainable Built Environment Council and Honorary Professor of Practice in the Built Environment Faculty at UNSW, (chair);
- Kerry Clare, AIA Gold Medallist 2010;
- Richard Johnson MBE, AIA Gold Medallist 2008 Professor of Architectural Studies in the Built Environment Faculty at the UNSW;
- Professor Nicole Gurran, Chair of Urbanism USYD;
- Peter Mould, NSW Government Architect Emeritus;
- Matthew Pullinger, architect and Acting Commissioner NSW Land and Environment Court;
- Rod Simpson, former Environment Commissioner Greater Sydney Commission; and
- David Riches, former Head of Projects INSW.

The City's proposal, following review by the Independent Advisory Panel, has been amended by the Department of Planning and Environment (Department) and is now being publicly exhibited.

The City welcomes the opportunity to respond to the public exhibition.

The City has closely reviewed the planning proposal and design guide and commends the Department for maintaining the core principles of the planning proposal and design guide as approved by the Council and CSPC.

However, the City is deeply concerned by several issues identified in its review of the publicly exhibited materials. Of particular concern is:

- the additional floor space that is facilitated by a drafting instruction that allows design excellence floor space above the mapped floor space, resulting in up to an additional 25,000sqm of floor space on Land and Housing Corporation (LAHC) owned land and 4,200sqm on privately owned sites in Waterloo Estate (South); and

- the significant reduction in the allocation of floor space for social and affordable housing that was required under the City’s planning proposal adopted by Council and the Central Sydney Planning Committee in February 2021, noting the proportion of floor space to be provided for social and affordable housing is now below even the 30% social housing and 5% affordable housing of floor space the City understood to form part of LAHCs original planning proposal request in May 2020. The proposal also fails to meet the 30% target for social housing on redevelopment sites that form part of the NSW Government’s Communities Plus program.

The City makes the following recommendations for change to the planning proposal and the draft design guide prior to making the new planning controls for Waterloo Estate (South).

## **Summary of recommendations**

### ***Built form***

1. Reduce the mapped floor space so that any design excellence bonus does not exceed the maximum floor space contained in the City’s planning proposal and confirmed by the Minister’s Independent Advisory Group. This is the amount of floor space anticipated by the original Gateway Determination and illustrated in the Urban Design Review (Hassell 2022) and assumed in the Financial Feasibility Assessment (Savills, 2022).
2. Rearrange the height zones on the height map so they are consistent on each side of the various streets rather than on a block by block basis and more closely aligned with the height in storeys figure in the Design Guide.
3. Maintain existing floor space ratio and height standards on heritage listed sites.
4. Test the sun access to the small park and, if required, adjust the height of building maps and number of stories diagrams. Add a requirement in the Design Guide to ensure 50% of the park area receives 4 hours of sunlight at the winter solstice between 9am and 3pm.
5. Reposition and adjust the building envelope of the tower on Kellick and Gibson streets in consultation with a wind expert and with the aid of sun studies that model the heights of buildings shown on the height of buildings map and the height in storeys figure to ensure that pedestrian wind comfort and safety in the public space and at least 50% of the park area receives 4 hours of sunlight at the winter solstice between 9am and 3pm.
6. Retain the projecting building wings at George and McEvoy and Pitt and McEvoy; and make a narrower opening, say 6 metres wide, of Mead to McEvoy Streets subject to further noise testing and analysis.
7. Reinstate the guidance for breaks in towers more clearly noting that this is one of a range of measures to ensure pedestrian wind safety and amenity and do not add additional floorspace to the tower envelopes.
8. Remove the inconsistencies across all the documents to improve clarity and transparency for the community.
9. Publish a further addendum to the Addendum Urban Design Review (Hassell, 2022), to reconcile errors and inconsistencies in the various publicly exhibited materials.
10. Obtain certified land surveys from LAHC and use these to calculate site areas. Confirm all site boundaries and areas with a survey that complies with the Surveying and Spatial Information Regulation 2017. Remake and reconcile the maps, diagrams and calculations to provide clarity for future planning and assessment.

## Waterloo Estate (South) Planning Proposal – Submission

11. Reconsider and adopt where relevant the reduced building heights along streets shown in the preferred direction of the Addendum Urban Design Review.
12. Rework the maximum building height map in the planning proposal to have height zones relating to street widths and park locations.
13. Reconcile the height in storeys map in the draft design guide, with the maximum height of buildings map in the planning proposal to ensure they are consistent. This is to provide clarity for the community and future landowners and ensure certainty in the development application process.
14. Amend the mapped FSRs and heights on private sites so that the resulting floor space aligns with those in the City's planning proposal.
15. Ensure the landowners and the community can have a true understanding of the development that may result on the privately owned sites.
16. Consult further with the wind expert and conduct further wind testing to reduce the floor space allocated to the towers along McEvoy Street and to ensure enough flexibility to provide a comfortable and safe pedestrian wind environment.
17. Review the recommendations from the acoustic report and where appropriate reference the City's Alternative natural ventilation of apartments in noisy environments performance pathway guideline. Reference to this guide should be incorporated into the design guide. If the noise consultant advises that interior noise levels cannot be provided on this pathway, the design changes must be reversed including the following:
  - a. reduce the building depth of buildings on McEvoy Street to at least 12 metres to ensure that windows to habitable rooms can face away from the noise source; and
  - b. retain the projecting building wings in the setback zones at George and McEvoy and Pitt and McEvoy streets; and make a narrower opening, say 6 metres wide, of Mead Street to McEvoy Streets subject to further noise testing and analysis.

### **Housing**

1. At a minimum, restore the requirement in the publicly exhibited planning proposal that at least 30% of gross residential floor space on LAHC owned land be for social housing and 20% be for affordable housing.
2. Ensure that the drafting instruction is explicit that the minimum % requirement for social and affordable housing applies to all residential floor space in Waterloo Estate (South) including any design excellence floor space.
3. Develop innovative funding and procurement models to allow for direct dealings with Community Housing Providers to support the increase of social and affordable housing in Waterloo Estate (South) and in later stages of the redevelopment in Waterloo Estate (North) and Waterloo Estate (Central).
4. Ensure the Department of Communities and Justice develops and implements the Human Services Plan including the delivery of services to existing residents, during the relocation of residents and all future residents.
5. Prioritise development of an independent Social Impact Assessment and Social Impact Management Plan to identify and mitigate impacts on communities from the redevelopment of the Waterloo Estate (South).

## Waterloo Estate (South) Planning Proposal – Submission

6. Allocate 10 per cent or more of the total number of dwellings to be provided for Aboriginal and Torres Strait Islander households, noting there is much work to be done to achieve the outcomes aspired to in the draft design guide.
7. Amend the drafting of the affordable housing LEP clause for private sites to ensure the contribution requirement is commensurate with the increase in development capacity on those sites.
8. Work with the City of Sydney in finalising the drafting the affordable housing LEP clause for private sites to ensure consistency with other planning proposals currently under consideration.
9. Amend the requirement that the Housing SEPP does not apply to Waterloo Estate (South) so that only select parts of the SEPP, those that allow floor space bonuses and development concessions, are not applied.

### **Public infrastructure**

1. Ensure that any deed or planning agreement between the City and LAHC is publicly exhibited, executed and registered on the title of LAHC owned land in Waterloo Estate (South) before any change is made to the Sydney LEP 2012 to facilitate redevelopment.
2. Repeal of the Redfern-Waterloo Authority Contributions Plan 2006, as it applies to Waterloo Estate (South), so that the City of Sydney Development Contributions Plan 2015 applies to the land if the subsequent development is categorised as State Significant Development.
3. Remove land for new roads from the land acquisition map and remove reference to the City of Sydney as an acquiring authority for the new roads, noting the City does not give concurrence for this provision to be included in the Sydney LEP 2012.

### **Sustainability**

1. Support the long-term resilience of the community and lead by example by including in the LEP and design guide a requirement that all development in Waterloo Estate (South) demonstrate environmental performance beyond the minimum prescribed by BASIX.
2. Include an appropriate requirement in the planning controls to facilitate a water recycling facility to be in Waterloo Estate (South), noting this may include an allocation of space and a stronger requirement that all buildings be dual reticulated.

### **Traffic and transport**

1. Revise the access and circulation plan in the draft design guide to address future traffic arrangements.

### **Minor issues**

1. Correct and clarify the minor errors and inconsistencies in the draft design guide.

# 1. Built form

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## 1.1. Addendum Urban Design Review

In general, the City supports the finding in the Addendum Urban Design Review, prepared by Hassell.

Unfortunately, the urban design review was conducted without the collaboration of wind and noise experts. The reports from these experts were made following the urban design review and indicate serious shortcomings in some of the recommended changes. Changes are required in relation to the expert findings to the design guide and the planning maps.

The study recommends a number of changes as follows:

- simplifying the height map
- changing the development standards on heritage sites
- building massing changes
- shifting the small Park to the north
- an additional walkway from Cope Street to the small park
- extending Mead Street to McEvoy Street
- further setback of buildings facing McEvoy Street between George and Pitt streets
- differential setbacks to the block bounded by Wellington, Gibson, Kellick and Pitt streets
- widening of the building faces McEvoy Street
- adding a tower on the corner of Gibson and Kellick streets
- removing some of the wind guidance and additional tower floor space

### Simplifying the height map

The clear intention of building heights in the City's planning proposal is to arrange the taller buildings 11-13 storeys along the wider main street, George Street and facing the parks on Wellington, Pitt and Kellick streets. Here there is greater outlook and building separation giving more opportunity for sunlight to fill the streets. Medium height buildings, 7 – 9 stories face the majority of the narrower streets. Lower building heights are arranged between these on the east west running streets and on the narrower part of Cooper Street where there is less outlook and building separation and where the street orientation, east-west, allows less sunlight to penetrate.

The proposed simplifying of the heights on a whole block basis, rather than based on street widths undermines the relationship between amenity and height.

### Extending Mead Street to McEvoy Street

No traffic movement between McEvoy and Mead streets is proposed nor allowed.

The urban design review incorrectly observed that there was no pedestrian connection provided between McEvoy Street in the City's planning proposal; a colonnade connection was provided. There is little if any demand for a pedestrian connection in this location, it is not possible to cross McEvoy Street at this location and there is little pedestrian flow on McEvoy Street. To ensure a choice of pedestrian route a connection was provided.

McEvoy Street is a busy street and the noise study notes that with the change - *Noise levels external to the buildings (east/west facades) fronting Mead Street may therefore be at a level where windows to bedrooms would need to be closed to achieve relevant internal noise levels.*

The Study's comparison of George Street to Mead Street neglects that Mead Street is narrower and therefore reflected noise is greater and on the eastern corner of McEvoy Street building projections, also removed by the study, gave some protection to the façade openings to the west.

Only a net gain of two additional trees are conserved by the opening.

Changing the development standards on heritage sites

Changes to height in metres and floor space ratios in the exhibited planning proposal, create unrealistic expectations on heritage sites, are not aligned with the built form articulated in the design guide, and place undue pressure on heritage items in the development application process.

Building massing changes

The recommended building massing changes to lower the heights of buildings in various places have not been incorporated into the building height maps or the design guide.

Shifting the small park to the north

This is a minor change. It is essential for the amenity of the park that at least 50% of the park receive 4 hours of sunlight on the winter solstice between 9am and 3pm. No study is provided to demonstrate this.

An additional walkway from Cope Street to the small park

The addition of this walkway is supported.

Further setback of buildings facing McEvoy Street between George and Pitt streets

There is no objection to this change.

Differential setbacks to the block bounded by Wellington, Gibson, Kellick and Pitt streets

There is no objection to this change.

Widening of the buildings facing McEvoy Street

The urban design review observation on the building depth of these buildings is:

*“Building massing along McEvoy Street is very narrow, may result in bedrooms to be located on the McEvoy Street frontage which is noisy and polluted. Building mass does not provide enough depth to achieve good apartment amenity.”*

The observation is incorrect and misleading. The narrower width is to specifically deal with the noise source as has been done in other locations. The narrow depth allows all habitable rooms including bedrooms to face away from the noise source towards the sunlight for good apartment amenity. Widening these buildings has the opposite effect of encouraging some habitable rooms, particularly bedrooms as the living rooms will be placed to face north, to face the busy road amplifying the noise effect on amenity.

Adding a tower on the corner of Gibson and Kellick streets

The addendum to the wind report states:

*“The preferred location of the additional tower on Kellick Street to the north-east of the site ... is not ideally located from a wind perspective. A tall building in this elevated location is exposed to all prevailing strong wind directions. The wind conditions ... on the corner of*

*Kellick and Gibson Streets, ... approached the safety criterion. With the significant increase in building massing, this and nearby locations along Gibson and Kellick Streets, and Waterloo Park would be expected to exceed the safety criterion."*

The City notes that the tower increases the overshadowing of Waterloo Park and that the sun studies in the urban design review contain buildings lower than those in the height of buildings map and the height in storeys figure and are therefore misleading.

*Removing wind guidance and additional tower floorspace*

The wind guidance on providing a break in towers ensures that if other guidance for shaping the towers are not successful wind safety can be maintained. It is not a mandated guidance.

The addendum to the wind report states:

*"The removal of the mid-height slots and 3-4 storey increase in height to the three southern towers, and the enclosing of the Laneway from Cope Street, would all be expected to increase the wind conditions around the corner of McEvoy and Cope Streets. Without the mature trees in the vicinity of the corner, the wind conditions would be expected to exceed the safety criterion."*

It further states:

*"The safety wind conditions could be ameliorated with altering the building massing for example by rounding the south-west corner, increasing the tower setback from the podium edge to the west, reducing the height of the tower, introducing appropriate place articulation, and incorporating an awning structure around the corner."*

These measures would decrease the yield for these sites to a greater extent than proposed risking the undermining of the pedestrian wind safety.

## **Recommendations**

- Rearrange the height zones on the height map so they are consistent on each side of the various streets rather than on a block by block basis and more closely aligned with the height in storeys figure in the Design Guide.
- Maintain existing floor space ratio and height standards on heritage listed sites.
- Test the sun access to the small park and, if required, adjust the height of building maps and number of stories diagrams. Add a requirement in the Design Guide to ensure 50% of the park area receives 4 hours of sunlight at the winter solstice between 9am and 3pm.
- Reposition the tower location to ensure pedestrian wind comfort and safety in surrounding public space and 50% of the park area receives 4 hours of sunlight at the winter solstice between 9am and 3pm. This is to be carried out in consultation with the wind consultant to and with the aid of sun studies that model the heights of buildings shown on the height of buildings map and the height in storeys figure.
- Retain the projecting building wings at George and McEvoy and Pitt and McEvoy and make a narrower opening, say 6 metres wide, of Mead to McEvoy Streets subject to further noise testing and analysis.
- Reinstate the guidance for breaks in towers more clearly noting that this is one of a range of measures to ensure pedestrian wind safety and amenity and do not add additional floorspace to the tower envelopes.

## 1.2. Building envelopes (Floor Space Ratio and Height) – LAHC owned sites

The City's planning proposal and draft design guide facilitated a total Floor Space Ratio (FSR) of 3.04:1 on LAHC-owned land (including a bonus for high BASIX performance and design excellence). The total available floor area on LAHC sites in the City's planning proposal, including design excellence, is about 249,000 sqm (see Table 3 of the City's planning proposal), incorporating about 18,000 square metres for non-residential uses and about 231,000 square metres for residential uses. This generally matched the development outcomes described in the ~~what was proposed in the~~ planning proposal request made by LAHC to the City in May 2020. These yields will facilitate about 3,067 dwellings (at about 75sqm/dwelling).

### Significantly increased floor area in the precinct

The publicly exhibited planning proposal results in significantly more floor space in Waterloo Estate (South). The main reason for the increase is that the publicly exhibited planning proposal maps in the LEP about the same amount of the maximum floor space that was available under the City's planning proposal (which included design excellence), but allows for a further 10% additional floor space above the mapped amount for design excellence.

The following table identifies the resulting floor space from the mapped FSRs. It shows the planning proposal will facilitate over 276,000sqm of floor area in Waterloo Estate (South) on LAHC owned sites. This is about 25,000sqm of additional floor area (approximately 330 additional dwellings at 75sqm/dwelling) above what was facilitated by the City's planning proposal adopted by Council and the Central Sydney Planning Committee and confirmed by the Minister's Independent Advisory Group.

This is addition to the up to 4,200sqm of additional floor space on privately owned sites (an estimated 55 potential dwellings), discussed later in this submission.

**Table 1:** Floor space facilitated by the publicly exhibited planning proposal

Site <sup>+</sup>	Site area (sqm)*	Mapped FSR	Mapped floor area (sqm)	Total available floor area (sqm)**	Comment
2A	NA	NA	NA	NA	Excluded – site not owned by LAHC Includes future street widening
2B	1,297	1.45	1,881	2,069	Includes future street widening
2C	NA	NA	NA	NA	Excluded – site not owned by LAHC Includes future street widening
2D	1,884	3.59	6,764	7,440	Includes future street widening
2E	NA	NA	NA	NA	Excluded – site not owned by LAHC
2F	NA	NA	NA	NA	Excluded – site not owned by LAHC Includes future street widening

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3A	3,250	5.91	19,208	21,128	Includes future street widening
3B	2,978	5.31	15,813	17,394	Includes future street widening
4A	NA	NA	NA	NA	Excluded – site not owned by LAHC Includes future street widening
4B	1,315	3.12	4,103	4513	
4C	NA	NA	NA	NA	Excluded – site not owned by LAHC Partially includes and partially excludes future street
5A	3,326	4.68	15,566	17,122	Partially includes and partially excludes future street widening
6A	3,322	4.57	15,182	16,700	Partially includes and partially excludes future street Includes area currently in a separate lot
7A	3,266	6.3	20,576	22,633	
7B	3,400	3.35	11,390	12,529	
8A	3,695	7.45	27,528	20,381	Streets have been excluded
8B	1,930	3.73	7,199	7,919	Streets have been excluded
8C	1,793	4.74	8,499	9,349	Streets have been excluded
8D	996	0.95	946	946	Streets have been excluded
9A	3,480	6.86	23,873	26,260	Partially includes and partially excludes future street
9B	3,796	4.19	15,905	17,496	Partially includes and partially excludes future street
10A	3,390	6.44	21,832	24,015	Partially includes and partially excludes future street
10B	3,116	4.36	13,586	14,944	Partially includes and partially excludes future street
	71,389		<b>251,239 sqm</b>	<b>276,268 sqm</b>	

\* See Figure 1 for site reference

\* The site areas shown above are the areas contained within the site boundaries indicated in the exhibited FSR map. The map does not accurately represent the actual site areas.

The mapped floor areas are calculated by multiplying these site areas by the mapped FSR exhibited.

\*\* This includes mapped floor area, plus 10% for design excellence

This is an unacceptable increase in the amount of floor area in Waterloo Estate (South) that will have significant urban design impacts. Moreover, it is the City's view the publicly exhibited planning

proposal and draft design guide misleads the community in what will be built at Waterloo Estate (South). The City's key concerns are discussed further below.

### Density

There is a new mismatch between the floor space and the envelopes. The increase in floor space resulting from the publicly exhibited planning proposal will result in unacceptable densities in Waterloo Estate (South), creating pressures on the built form, amenity and access to services.

The Independent Advisory Group (IAG) report states that:

*“There is a general view by commentators on this proposed development that the density is too high.”*

This statement is based on an outcome that facilitates about 3,060 dwellings. To add up to an additional 330 dwellings will result in an even more dense precinct, adding to the pressures that are noted by the IAG:

*“The consequence of this density is that the design either includes many towers (LAHC) or higher street and courtyard walls than would be indicated for good solar access and amenity in order to accommodate the high number of units”.*

*“High density apartment development creates additional pressures on the public realm and the levels of amenity available to residents. This is a consequence not only of the large number of people using the public realm in dense settings but also the need to access parkland as a contrast to the heavily built up environment and to provide recreational opportunities”.*

The IAG concluded that

*“having tested multiple options, the density should remain as proposed in the [City's] Planning Proposal. The IAG considers, however, that at this density, design quality, building quality, and urban amenity are of significant importance at development assessment stage and at the construction stage.”*

### Community understanding of the development outcomes

The significant increase in floor space resulting from the publicly exhibited planning proposal is not immediately apparent to the community. The planning proposal does not attempt to make clear what will actually result from the addition of design excellence floor space above what the maximum floor space that was established in the City's planning proposal.

The community, who are not planners, cannot be reasonably expected to further examine the intricacies of drafting instructions that add up to 10% of additional floor space above the development outcomes in the introduction on page 18, or to interpret what that means for the built form.

Most people in the community will use the draft design guide to understand what will be built in their neighbourhood in the future.

The City's draft design guide shows building heights consistent with what could be achieved under its planning proposal. It is shown this way to ensure that the community have clear understanding of the built form resulting from the planning proposal.

However, the building envelopes described in the Department's draft design guide do not reflect the additional floor space that will be facilitated by planning proposal. Neither does the Area Schedule on page 205 of the urban design review reflect this additional floor space.

The community at large will not understand that in future development applications. It is the FSRs and heights shown in the LEP that will prevail over those secondary controls and building envelopes shown in the design guide, ultimately resulting in larger buildings, and undermining the efficacy of the design guide.

*Insufficient evidence for the increase in floor space*

The urban design review does not show any evidence of testing building envelopes that would result from this additional floor space, with respect to either solar access to apartments or wind. Further, there is no indication in the publicly exhibited planning proposal documentation of any testing to confirm that the Height of Building controls in the LEP map can fit this additional floor space.

This concern applies to the sites owned by LAHC and to the sites in private ownership.

This not only creates challenges in the assessment of development applications with possible delays (where the LEP envelope will generally override what is facilitated in the design guide envelope), but it also establishes false expectations for the community, who will reasonably expect the built form to reflect that shown in the images in the design guide. It is also noted some of the private sites are heritage items and no analysis has been made in increasing the floor space and retention of their heritage values.

*Insufficient consultation with the City*

While the Department have engaged with the City about the planning proposal in preparing it and some information has been shared with the City as required by condition 2 of the Gateway Determination, there has been no consultation with the City regarding the sudden increase in the amount of floor space resulting from the Department's planning proposal.

In the City's view, this is a critical issue that will have substantial impact on the built form and the demand for public infrastructure. If this is an intended departure from all the previous work to date, the City should have been consulted on this matter.

*Inconsistency within the publicly exhibited materials*

There are inconsistencies in the publicly exhibited documents which make it difficult to deduce the actual outcomes of the planning proposal. Some examples include:

- section 5.1.5 of the planning proposal (p. 41) says the maps facilitate 236,404sqm of GFA on all LAHC-owned land;
- table 4 of the planning proposal (p.44) indicates a total of 254,850 sqm. of GFA on all LAHC-owned land can be provided;
- table 1 of the Design Guide (p. 18) indicates a total of 255,207 sqm. of GFA on all LAHC-owned land can be provided;
- all of the above figures are exclusive of up to an additional 10% floor space that could be achieved through a design excellence process;
- the Area Schedule on p. 205 of the urban design review, which was required by the Gateway, indicates 254,807 sqm. of GFA can be accommodated in the built form envelopes described in the Height in Storeys map of the Design Guide (p.51);
- discrepancies in the mapping of land to be included in calculations of GFA (see Table 1 above for comment);

- questions of whether the building heights described in the Height in Storeys map of the Design Guide can be facilitated by the proposed height standards described in the LEP Height of Buildings map.

Site areas

The maps in the urban design review, the draft design guide and the proposed LEP are inconsistent, and the exhibition material does not reconcile the differences or indicate how the floor space ratios have been calculated. Is the site area shown on the FSR map, on the design guide diagrams, or in the urban design review the basis of calculations?

In addition, none of these maps accord with the survey material submitted by LAHC that state that they cannot be used to verify the site areas. This is confusing to the community, the City and future applicants and assessors.

For example, when the floor space ratio map is overlaid with the land reservation acquisitions map, as shown at Figure 1, some sites on the floor space ratio map include land to be acquired, others do not, some sites partially, not fully include the land to be acquired. The land reservation acquisitions map is inconsistent with the land dedications and easements diagram in the design guide. The floor space ratio map is poorly, or inaccurately drafted. Street alignments that are shown straight and aligned step and change orientation without reason. Sites extend across deposited plan lots without need or explanation.

The impact of incorrect site areas has a significant flow on impact on the calculation of Gross Floor Area (GFA), for example, the floor areas shown in Table 1 of the draft design guide do not match the area schedule in the urban design review and cannot be reconciled to the floor space ratio map. Consequently, the GFAs exhibited in the publicly exhibited planning proposal are not an accurate indication of how much floor area will be facilitated by the FSR controls, an issue that is not made adequately clear to the community.

**Figure 1: Site area discrepancies map**



Note: This map overlays the land reservation acquisitions (yellow) and street widenings (red) that overlap with the site boundaries on the floor space ratio map (broken black lines).

## Recommendations

- Reduce the mapped floor space so that any design excellence bonus does not exceed the maximum floor space contained in the City’s planning proposal and confirmed by the Minister’s Independent Advisory Group. This is the amount of floor space anticipated by the original Gateway Determination and illustrated in the Urban Design Review (Hassell 2022) and assumed in the Financial Feasibility Assessment (Savills, 2022).
- Remove the inconsistencies across all the documents to improve clarity and transparency for the community.
- Publish a further addendum to the Addendum Urban Design Review (Hassell, 2022), to reconcile errors and inconsistencies in the various publicly exhibited materials.
- Obtain certified land surveys from LAHC and use these to calculate site areas. Confirm all site boundaries and areas with a survey that complies with the Surveying and Spatial Information Regulation 2017. Remake and reconcile the maps, diagrams and calculations to provide clarity for future planning and assessment.

### Maximum building heights - LEP maps

The maximum building heights in the planning proposal (LEP maps) (Figure 2) have significantly changed from what was proposed by the City (Figure 3). The change is prompted by the Gateway determination instruction to modify the height map to “*remove the 3m and/or 6m height control that depicts the location of private internal courtyards and apply the adjacent maximum heights*” and to “*set simplified maximum heights above ground on the Height of Building Map, including an allowance for roof top communal facilities and flood levels*”.

The proposal has removed the courtyard heights as instructed.

The setting of simplified maximum heights has been interpreted in the extreme with each block having a single height zone without regard to the widely varying circumstances of each street frontage.

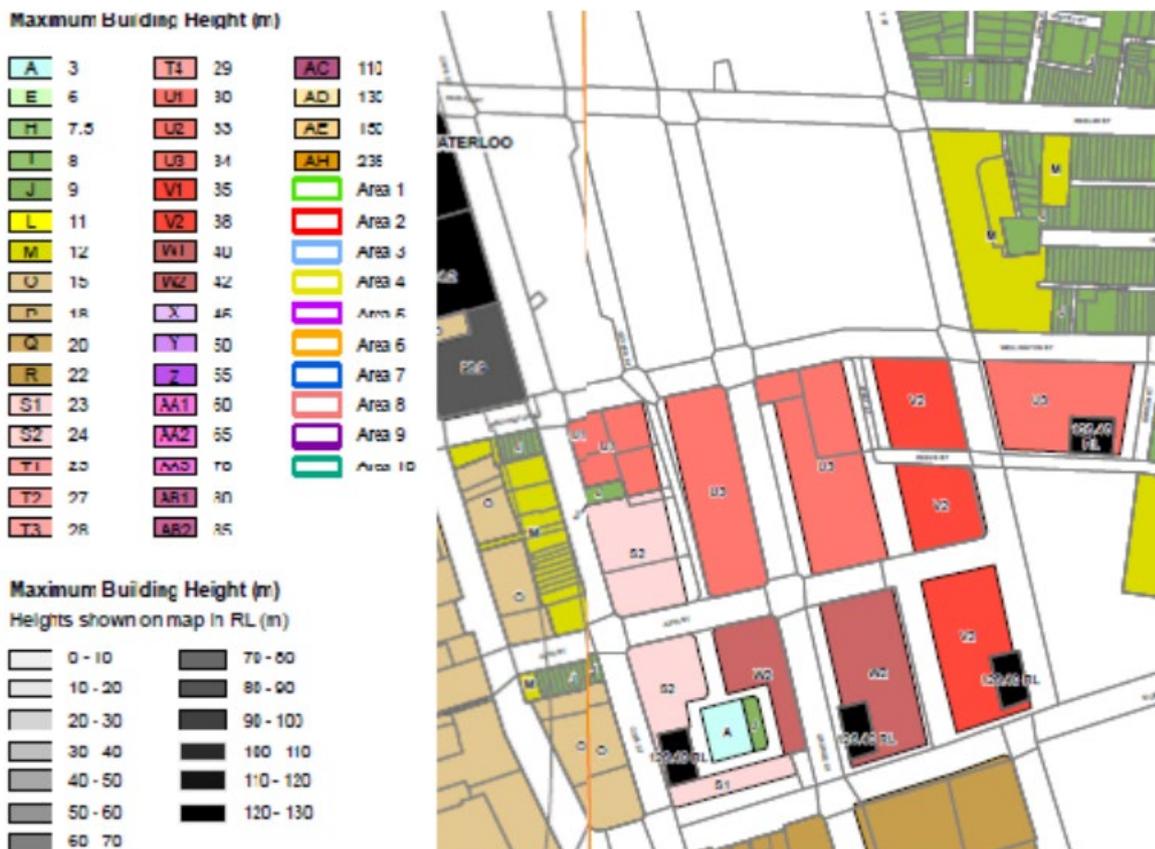
The simplification of the LEP maps allows for a significantly altered building envelope than that shown in the draft design guide and places several of the aims and principles of the planning proposal in jeopardy. Key risks include:

- placing heights on lots containing heritage items well beyond the existing height of the item;
- increased height immediately adjacent to heritage items;
- exposing narrower streets to heights that are in proportion to wider streets or park frontages on the opposite side of the blocks;
- loss of articulation of height in relation to street width and orientation, park frontage, and corner emphasis;
- substantial decreases of sun access to streets and parks;
- loss of relationship to areas subject to flooding; and
- loss of relationship to the topography.

Figure 2: City's proposed height in metres map (LEP)



Figure 3: Department's proposed height in metres map (LEP)



Height in storeys maps - draft design guide

The height in storeys diagram in the Departments exhibited draft design guide (shown at Figure 4) replicates the City's height in storeys diagram (shown at Figure 5) except where some of the changes recommended by urban design review have been incorporated.

The adjustments that have been made to the building envelopes along McEvoy have resulted in some minor changes to height at the north of the small park. For part of the east side of Cooper Street between Wellington Street and the walkway, the building height is reduced by one storey. The block bounded by Wellington, Gibson, Kellick and Pitt streets contains the additional tower and the other towers have an extra 3 storeys added.

Despite the observations of Addendum Urban Design Review that building heights be reduced in some locations (to compensate for floor space that has been used into the new tower), there has been no decrease in the general heights of buildings shown in the draft design guide. The result of this is that the capacity of building envelopes to accommodate floor space may have increased.

Figure 4: Department's exhibited draft design guide - height in storeys diagram



Figure 5: City's draft design guide - height in storeys diagram



## Recommendations

- Reconsider and adopt where relevant the reduced building heights along streets shown in the preferred direction of the Addendum Urban Design Review.
- Rework the maximum building height map in the planning proposal to have height zones relating to street widths and park locations.
- Reconcile the height in storeys map in the draft design guide, with the maximum height of buildings map in the planning proposal to ensure they are consistent. This is to provide clarity for the community and future landowners and ensure certainty in the development application process.

## 1.3. Building envelopes (Floor Space Ratio and Height) – privately owned sites

The City’s planning proposal includes FSRs and heights for privately owned sites in Waterloo Estate (South).

The publicly exhibited planning proposal makes several unexplained and unjustified changes to the FSRs proposed on privately owned sites. Moreover, significant errors have been made, with information provided conflicting across several sections of the planning proposal. The following table identifies the proposed changes, highlights errors and provides additional comment.

**Table 2:** Building envelope comparison

Site	City’s planning controls + *	Publicly exhibited planning controls**	Comment
233 Cope Street, Waterloo	FSR - 2.15:1 Height - up to 33m HiS (DG) – 8 storeys	FSR - 2.75:1 (drafting instruction / mapped) Height – 24m HiS (DG) – 8 storeys	The mapped FSR conflicts with Table 3 of the planning proposal (page 42), which identifies a mapped FSR of 2.4:1.  The increase FSRs (in the drafting instruction and on the FSR map) is unexplained, with no justification provided in the planning proposal or urban design review.
221-223 Cope Street, Waterloo	FSR - 2.61:1 Height – 35m HiS (DG) – 8 storeys	FSR - 3.35:1 (drafting instruction / mapped) Height – 30m HiS (DG) – 8 storeys	The mapped FSR conflicts with Table 3 of the planning proposal (page 42), which identifies a mapped FSR of 2.61:1.  The increase FSRs (in the drafting instruction and on the FSR map) is unexplained, with no justification provided in the planning proposal or urban design review.
116 Wellington Street, Waterloo	FSR - 2.65:1 Height – 35m	FSR - 3.35:1 (drafting	The mapped FSR conflicts with Table 3 of the planning proposal (page 42),

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	HiS (DG) – 8 storeys	instruction / mapped) Height – 30m HiS (DG) – 8 storeys	which identifies a mapped FSR of 2.65:1.  The increase FSRs (in the drafting instruction and on the FSR map) is unexplained, with no justification provided in the planning proposal or urban design review.
110 Wellington Street, Waterloo	FSR - 2.32:1 Height – 30m HiS (DG) – 8 storeys	FSR - 3.15:1 (drafting instruction / mapped) Height – 34m HiS (DG) – 8 storeys	The mapped FSR conflicts with Table 3 of the planning proposal (page 42), which identifies a mapped FSR of 2.57:1.  The increase FSRs (in the drafting instruction and on the FSR map) is unexplained, with no justification provided in the planning proposal or urban design review.
111 Cooper Street, Waterloo	FSR - 1.75:1 Height – 15m HiS (DG) – 4 storeys	FSR - 1.75:1 (drafting instruction / mapped) Height – 24m HiS (DG) – 4 storeys	The mapped FSR conflicts with Table 3 of the planning proposal (page 42), which identifies a mapped FSR of 2:1.  The increase FSRs (in the drafting instruction and on the FSR map) is unexplained, with no justification provided in the planning proposal or urban design review.
225-227 Cope Street, Waterloo (heritage item)	FSR - 1.75:1 Height – 9m HiS (DG) – None shown	FSR - 1.75:1 (drafting instruction / mapped) Height – 30m HiS (DG) – None shown	The mapped FSR conflicts with Table 3 of the planning proposal (page 42), which identifies a mapped FSR of 2:1.  The increase FSRs (in the drafting instruction and on the FSR map) is unexplained, with no justification provided in the planning proposal or urban design review.
291 George Street, Waterloo (heritage item)	FSR - 1.75:1 Height – 18m HiS (DG) – None shown	FSR - 3.35:1 (drafting instruction) Height – 34m HiS (DG) – None shown	The publicly exhibited planning proposal has mapped this site at 1.75:1 (note the 3.35:1 in the drafting instruction).  It is noted the FSR in the drafting instruction conflicts with Table 3 of the planning proposal (page 42), which identifies an FSR of 2:1.  The increase FSRs (in the drafting instruction and on the FSR map) is unexplained, with no justification provided in the planning proposal or urban design review.

+ Noting minor inconsistencies were identified with the City's planning proposal, confirmation of City's proposed FSR's was provided by email to Department 3 September 2021 and are shown above

\* In addition to the mapped FSR, a bonus of 0.25:1 was facilitated in the City's planning proposal where BASIX was exceeded (the BASIX bonus), as well as a 10% of floor space bonus for design excellence (based in both mapped and BASIX bonus floor space)

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\*\* It is presumed the BASIX bonus was intended to be incorporated into new mapped FSR's (given the bonus was removed in the publicly exhibited planning proposal). In addition to the mapped FSR, a 10% floor space bonus is available for design excellence.

The impacts on floor space availability under the Sydney LEP 2012 are shown in Table 3

**Table 3:** Floor space resulting from proposed changes to FSRs on private sites

Site	Site area (sqm)	Floor space available under the City's planning proposal*	Floor space available under the publicly exhibited planning proposal (mapped FSR)**
233 Cope Street, Waterloo	2,732	7,212	8,264
221-223 Cope Street, Waterloo	843	2,652	3,106
116 Wellington Street, Waterloo	948	3,024	3,493
110 Wellington Street, Waterloo	2,410	6,813	8,351
111 Cooper Street, Waterloo	205	451	395
225-227 Cope Street, Waterloo (heritage item)	662	1,456	1,274
291 George Street, Waterloo (heritage item)	583	1,283	2,148
		<b>22,892sqm</b>	<b>27,032sqm</b>

\* In addition to the mapped FSR, a bonus of 0.25:1 was facilitated in the City's planning proposal where BASIX was exceeded (the BASIX bonus), as well as a 10% of floor space bonus for design excellence (based in both mapped and BASIX bonus floor space)

\*\* In addition to the mapped FSR, a 10% of floor space bonus for design excellence is facilitated through the drafting instruction

As above, there are several errors and inconsistencies in the planning proposal that make it impossible to determine the intent of FSRs on private sites. If the mapped FSRs are indeed what is intended to be facilitated through the planning proposal, and not the FSRs shown in Table 3 of the planning proposal (page 42), the City is extremely concerned with what is proposed and notes the following key issues:

- the increase would result in over an additional 4,200sqm of floor space above what is facilitated in the masterplan. While not all sites will redevelop, theoretically at least this would allow for an additional 55 dwellings (at 75sqm/dwelling);
- the height in storeys map in the design guide remains unchanged as it pertains to the private sites and does not allow for the additional floor space. This not only creates challenges in the assessment of development applications (where the LEP envelope will generally override what is facilitated in the design guide envelope), but it also establishes false expectations for the

community, who will reasonably expect the built form to reflect that shown in the images in the design guide;

- there has been no testing of the impacts of the additional FSRs and height in the urban design review and no justification provided as to why FSRs and heights should be increased on private sites; and
- there has been no consultation with the City about such a significant increase in FSRs, as was required by condition 2 the Gateway Determination.

Notwithstanding the above, the City supports the retention of the 1.75:1 FSR for heritage items, noting it is not the intention that this planning proposal would encourage the redevelopment of these sites.

### **Recommendations**

- Amend the mapped FSRs and heights on private sites so that the resulting floor space aligns with those in the City's planning proposal.
- Ensure the landowners and the community can have a true understanding of the development that may result on the privately owned sites.

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## **1.4. Wind**

The wind report concludes that the changes proposed will create a poorer pedestrian wind environment, and the pedestrian wind environment safety criterion is expected to be exceeded, particularly around the new tower on the corner of Kellick and Gibson Street and wind comfort is likely to be worse.

The suggestion that wind safety and comfort can be achieved through the design excellence competitions is unworkable due to the complexity of all competitors undertaking wind tunnel testing during a competition and the likelihood of solutions requiring change to a Stage 1 building envelope and does not accord with the City's experience.

### **Recommendation**

- Consult further with the wind expert and conduct further wind testing to reduce the floor space allocated to the towers along McEvoy Street and to ensure enough flexibility to provide a comfortable and safe pedestrian wind environment.

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## **1.5. Noise**

The noise report clearly describes that the proposed changes to the building envelopes create a noise environment in apartments that will exceed the accepted standards at night and, in particular, bedrooms cannot be provided with natural ventilation as windows must be closed to provide a comfortable internal noise environment.

McEvoy Street is a busy road and the noise study notes that with the change - *Noise levels external the buildings (east/west facades) fronting Mead Street may therefore be at a level where windows to bedrooms would need to be closed to achieve relevant internal noise levels.*

The apartment design guide requires all habitable rooms, including bedrooms, to have openable windows for natural ventilation. The noise consultant's recommendation to close windows cannot be reconciled with the apartment design guide and therefore the built form must be adjusted at this stage.

## Recommendations

- Review the recommendations from the acoustic report and where appropriate reference the City's *Alternative natural ventilation of apartments in noisy environments performance pathway guideline*. Reference to this guide should be incorporated into the design guide. If the noise consultant advises that interior noise levels cannot be provided on this pathway, the design changes must be reversed including the following:
  - reduce the building depth of buildings on McEvoy Street to at least 12 metres to ensure that windows to habitable rooms can face away from the noise source; and
  - retain the projecting building wings in the setback zones at George and McEvoy and Pitt and McEvoy streets; and make a narrower opening, say 6 metres wide, of Mead Street to McEvoy Streets subject to further noise testing and analysis.

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## 1.6. Trees

The City supports the retention of more existing trees, particularly significant trees where this does not compromise the expected amenity of people in apartment buildings.

On McEvoy Street the intention of conserving additional trees is supported but the maintenance of protection of residents from the adverse effects of noise must also be retained.

## 2. Social and affordable housing

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### 2.1. Social housing and affordable housing

#### *Background*

Throughout the planning process for the Waterloo Estate the City's has advocated for an alternative approach to increase the provision of social and affordable housing and maximise the retention of government owned land for future generations.

The City engaged an Expert Advisory Panel that included: Ken Maher AO, Professor Nicole Gurrin – Chair of Urbanism, University of Sydney, David Riches – David Riches Associates, Wendy Hayhurst – CEO, Community Housing Industry Association, Nathan Moran – CEO, Metropolitan Local Aboriginal Land Council, Professor Bill Randolph – City Futures Research Centre, UNSW, and Andrew McAnulty – CEO, Link Housing. The panels expertise on social, affordable and Indigenous peoples housing models and provision, development and design expertise, and academic research informed the City's approach, advocacy, planning and design.

The City consulted with community housing providers, institutions including the National Housing Finance and Investment Corporation, undertook feasibility studies, policy development and lobbied State and Federal Governments ministers. The City joined with other capital cities in this effort. The City's alternative approach paralleled, adopted and supported approaches made by others including Shelter, Community Housing Industry Association, academic research groups and other non-government organisations.

This work and the work of others show that alternative approaches to development, financing, design and planning can provide more and better quality social and affordable housing than proposed by the Land and Housing Corporation or facilitated in the Department's publicly exhibited planning proposal.

The Minister's Independent Advisory Group supported most but not all of the City's alternative approach and the former Minister for Planning accepted their findings in June 2021. In January 2022 the density was increased without explanation, but otherwise the City's alternative approach has been successful in improving the public space and built form of LAHC's proposal but has not succeeded in convincing Government to change the approach to development to increase the provision of social and affordable housing.

#### *Reduced social and affordable housing*

The City's planning proposal included requirement that 30% of residential floor space on LAHC owned land be for social housing, and 20% be for affordable housing. The requirement was to result in about 920 social housing dwellings and 613 affordable dwellings being provided as part of the redevelopment of the Waterloo Estate (South).

The publicly exhibited planning proposal significantly reduces the requirement for the provision of social and affordable housing in Waterloo Estate (South) to about 847 social housing dwellings (28.2% of dwellings and 26.5% of residential floor space) and about 227 affordable dwellings (7.5% of dwellings and 7% of residential floor space). It is not clear in the drafting instruction if the minimum 26.5% and 7% of residential floor space requirement in the LEP is to be calculated on the mapped floor space, or also any floor space achieved through design excellence.

The City is concerned with the reduction in affordable and social housing proposed in Waterloo Estate (South), noting the proportion of floor space to be provided for social and affordable housing is now below even the 35% of floor space the City understood to form part of LAHCs original planning proposal request made to the City in May 2020. The proposal also fails to meet the 30% target for social housing on redevelopment sites that form part of the NSW Government's Communities Plus program.

Access to affordable and social housing is essential for a diverse, cohesive, and economically successful global city. At a time when the wait list for social housing in NSW is almost 50,000 people, the demand for social housing has never been greater. In NSW the total housing stock increased by 15.4% from 2.8 million in 2011 to 3.3 million in 2020. Comparatively, NSW's social housing stock has increased by only 8.7% over the same period from 142,320 to 154,717, according to a recent UNSW analysis of housing in NSW.

With a five to 10 year waiting period for social housing in the local area, and the extra demand that will be created by the health, social and economic impacts of Covid-19, there is a critical need to deliver more social and housing in the City.

LAHC states the barrier to providing more social and affordable housing on Waterloo Estate (South) is the feasibility of redevelopment. The City acknowledges LAHC is an NSW government organisation that is not budget funded. It generally relies on the profits generated from the redevelopment of public land for market housing to renew and increase the amount social housing on the same site or elsewhere and contribute to other ongoing organisational costs.

The financial feasibility assessment (Savills, 2022) appended to the public exhibition materials describes at a broad level its study objectives and methodology but contains scant and insufficient detail on assumptions adopted for the scenario modelling to allow meaningful review.

Notwithstanding the above, it is the City's strong view that a greater percentage of social and affordable housing on Waterloo Estate (South) should and can be achieved. While the City's feasibility work show that increased affordable housing, greater than 10% up to 20%, can be provided at no cost to Government and the IAG confirmed that at least 10% could be provided; LAHC and the department have not released feasibility studies that demonstrate the quantity of affordable housing that can be sustained. Rather the studies simply state that the bare minimum, 5%, is sustainable. Different and more innovative approaches to development at no cost to government will achieve a higher proportion of affordable housing at Waterloo. Targeted additional funding by Government and/or, the application of innovative funding models and a procurement model that allows for direct dealings with Community Housing Providers (CHPs) are able to lift the combined proportion of social and affordable housing beyond the provision in the revised planning proposal and must be further investigated and supported by changes to the planning framework.

While it is acknowledged these remedies sit outside the planning system, government commitment to achieving a high proportion of social and affordable housing should be reflected in the minimum requirements set out in the planning controls.

#### *Human services plan*

The City continues to support the community is its advocacy for a robust human services plan.

Staff from the City are participating in the development of the human services plan, which focuses on six priority areas: safety, health and wellbeing, communication and consultation and community participation, customer service, service integration and service accessibility for all service users, and responses to systemic issues (and accountability) on an ongoing basis. The Department of Communities and Justice is responsible for the endorsement, publication and delivery of the plan. The City may have a lead or supporting role in carrying out actions under the plan.

It is the City's strong view the Department of Communities and Justice must have the Human Services Plan in place prior to the planning proposal being finalised.

## Recommendations

- At a minimum, restore the requirement in the publicly exhibited planning proposal that at least 30% of gross residential floor space on LAHC owned land be for social housing and 20% be for affordable housing.
- Ensure that the drafting instruction is explicit that the minimum % requirement for social and affordable housing applies to *all* residential floor space in Waterloo Estate (South), including any design excellence floor space.
- Develop innovative funding and procurement models to allow for direct dealings with Community Housing Providers to support the increase of social and affordable housing in Waterloo Estate (South) and in later stages of the redevelopment in Waterloo Estate (North) and Waterloo Estate (Central).
- Ensure the Department of Communities and Justice develops and implements the Human Services Plan including the delivery of services to existing residents, during the relocation of residents and all future residents.
- Prioritise development of an independent Social Impact Assessment and Social Impact Management Plan to identify and mitigate impacts on communities from the redevelopment of the Waterloo Estate (South).

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## 2.2. Aboriginal and Torres Strait Islander housing

The City's draft design guide included provisions to encourage LAHC, and any future community housing providers to:

- deliver in excess of 10 per cent or more of the affordable housing for Aboriginal and Torres Strait Islander people;
- maintain or increase the current proportion of social housing provided to Aboriginal and Torres Strait Islander people; and
- ensure Aboriginal and Torres Strait Islander housing is culturally appropriate housing and developed in consultation with Aboriginal and Torres Strait Islander people.

Notwithstanding the above, the City recommends allocating 10 per cent or more of the total number of dwellings to be provided for Aboriginal and Torres Strait Islander housing, noting there is much work to be done to achieve the outcomes aspired to in the draft design guide.

The City acknowledges the Department for maintaining the requirements in the publicly exhibited draft design guide, noting there is much work to be done to achieve the outcomes aspired to in the draft design guide.

### Recommendation

- Allocate 10 per cent or more of the total number of dwellings to be provided for Aboriginal and Torres Strait Islander households, noting there is much work to be done to achieve the outcomes aspired to in the draft design guide.

## 2.3. Affordable housing on private sites

The City’s planning proposal introduced a new clause and schedule into Sydney LEP 2012 to identify privately owned sites within Waterloo Estate (South) as ‘planning proposal land’ and require an affordable housing contribution commensurate with the increase in development capacity. This approach aligns with the affordable housing target in the Eastern City District Plan that says 5% - 10% of new floor space should be affordable housing, subject to viability.

The publicly exhibited planning proposal has generally maintained this approach, however some adjustment is required to the drafting instruction included in the planning proposal in response to changes to the proposed floor space ratios on private sites.

The affordable housing requirement on private sites, that captures a contribution on new floor space facilitated by the planning proposal, needs to state the proportion of floor space in the planning proposal that is new. The following changes are therefore required, noting additional adjustment will be necessary should FSRs again change following consideration of public submissions:

**Table 4:** Affordable housing contribution on private sites

Site	Current FSR	Proposed FSR	Required contribution adjustment*
233 Cope Street, Waterloo, being Lot 12 DP 1099410	1.75:1	2.75:1	A required affordable housing contribution of: <ul style="list-style-type: none"> <li>• 36% of total floor area: 9% contribution, plus</li> <li>• 64% of total floor area: Contribution required under clause 7.13 of Sydney LEP 2012.</li> </ul>
221-223 Cope Street, Waterloo, being Lot 6 DP 10721, Lot 7 DP 10721, Lot 9 DP 10721 and Lot 8 DP 1147179	1.75:1	3.35:1	A required affordable housing contribution of: <ul style="list-style-type: none"> <li>• 48% of total floor area: 9% contribution, plus</li> <li>• 52% of total floor area: Contribution required under clause 7.13 of Sydney LEP 2012.</li> </ul>
116 Wellington Street, Waterloo, being Lot 10 DP 10721 and Lot 11 DP 10721	1.75:1	3.35:1	A required affordable housing contribution of: <ul style="list-style-type: none"> <li>• 48% of total floor area: 9% contribution, plus</li> <li>• 52% of total floor area: Contribution required under clause 7.13 of Sydney LEP 2012.</li> </ul>
110 Wellington Street, Waterloo, being Lot 101 DP 1044801;	1.75:1	3.15:1	A required affordable housing contribution of: <ul style="list-style-type: none"> <li>• 44% of total floor area: 9% contribution, plus</li> </ul>

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			<ul style="list-style-type: none"> <li>56% of total floor area: Contribution required under clause 7.13 of Sydney LEP 2012.</li> </ul>
111 Cooper Street, Waterloo, being Lot 15 DP 10721	1.75:1	1.75:1	Only clause 7.13 applies to all total floor area
225-227 Cope Street, Waterloo, being Lot 4 DP 10721 and Lot 5 DP 10721	1.75:1	1.75:1	Only clause 7.13 applies to all total floor area
291 George Street, Waterloo, being Lot 10 DP 1238631	1.75:1	3.35:1	<p>A required affordable housing contribution of:</p> <ul style="list-style-type: none"> <li>48% of total floor area: 9% contribution, plus</li> <li>52% of total floor area: Contribution required under clause 7.13 of Sydney LEP 2012.</li> </ul>

\* The proportion of floor area that is subject to the high contribution requirement is based on how much floor area is as a result of the planning proposal. For example, where a site that has a current FSR for 1.75:1, and the planning proposal increases the FSR by 1.6:1 (to 3.35), then 48% of the FSR on that site is 'new' and subject to a higher contribution rate

It is noted this approach is reflected in a number of other planning proposals in the City that are yet to be finalised. The City would appreciate the opportunity to work with the Department in finalising the clause to ensure consistency across all proposals.

### Recommendations

- Amend the drafting of the affordable housing LEP clause for private sites to ensure the contribution requirement is commensurate with the increase in development capacity on those sites.
- Work with the City of Sydney in finalising the drafting the affordable housing LEP clause for private sites to ensure consistency with other planning proposals currently under consideration.

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## 2.4. Application of the Housing SEPP

The City's planning proposal included a requirement that State Environmental Planning Policy (Affordable Rental Housing) 2009 (AHSEPP) does not apply to Waterloo Estate (South). The intent of this was generally to ensure that those floor space bonuses and development concessions available under the AHSEPP could not be applied.

In the interim, the Department have made State Environmental Planning Policy (Housing) 2021 (Housing SEPP), which has replaced the AHSEPP as well as other housing related SEPPs.

The publicly exhibited planning proposal includes a requirement that the Housing SEPP not apply to Waterloo Estate (South), however it was not the intention of the City's planning proposal to remove the applicability of all housing related SEPPs.

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To maintain the original intent of excluding the AHSEPP, the planning proposal should be amended to exclude the following Chapters, Parts and Divisions of the Housing SEPP from applying to land at Waterloo Estate (South):

- Chapter 2, Part 2, Divisions 1, 2, 3 and 5 and Chapter 3, Part 3
- Chapter 3, Part 4

It is noted the above generally do not apply in other parts of the local government area under Clause 1.9 of the Sydney LEP 2012, including, Cowper Street Green Square, Waterloo Metro Quarter, 17–31 Cowper Street or 2A–2D Wentworth Park Road, Glebe, 600–660 Elizabeth Street, Redfern (only Chapter 3, Part 4).

### **Recommendation**

- Amend the requirement that the Housing SEPP does not apply to Waterloo Estate (South) so that only select parts of the SEPP, those that allow floor space bonuses and development concessions, are not applied.

## 3. Public infrastructure

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### 3.1. Public infrastructure schedule

The draft public infrastructure schedule being publicly exhibited concurrently with the planning proposal sets out the key public infrastructure items to be provided by LAHC in conjunction with the redevelopment of Waterloo Estate (South).

It is noted a draft planning agreement is to be jointly prepared by the City and LAHC for public exhibition as soon as is practicably possible in accordance with the Environmental Planning and Assessment Regulation 2000.

The City notes changes to the planning controls should not be made until such time as a planning agreement is executed and registered on title of the land, as is normal practice. To make changes to the planning controls ahead of registration of the planning agreement on title would introduce significant risk in the delivery of the necessary public infrastructure needed to make Waterloo Estate (South) a successful place.

#### **Recommendation**

- Ensure that any deed or planning agreement between the City and LAHC is publicly exhibited, executed and registered on the title of LAHC owned land in Waterloo Estate (South) before any change is made to the Sydney LEP 2012 to facilitate redevelopment.

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### 3.2. Contributions planning

The City of Sydney Development Contributions Plan 2015 currently applies to Waterloo Estate (South). However, should the redevelopment of the Waterloo Estate (South) be identified as State Significant Development, contributions will be paid to Infrastructure NSW under the Redfern-Waterloo Authority Contributions Plan 2006 (currently one per cent of development costs).

Where the Redfern contributions plan continues to apply, the City cannot offset under its plan any public infrastructure provided by LAHC. This may have significant impact on the delivery of public infrastructure.

The City has requested this matter be addressed and resolved by the Department as soon as possible to ensure the City's contribution plan applies.

#### **Recommendation**

- Repeal of the Redfern-Waterloo Authority Contributions Plan 2006, as it applies to Waterloo Estate (South), so that the City of Sydney Development Contributions Plan 2015 applies to the land if the subsequent development is categorised as State Significant Development.

### 3.3. Land acquisition map

The City's planning proposal did not identify new roads to be provided as part of the Waterloo Estate (South) redevelopment on the land acquisition map and did not identify any additional requirement for an authority to acquire land.

As new land is required for roads in Waterloo Estate (South), a planning agreement between the City and LAHC is intended to be prepared for the dedication of new finished streets by LAHC to the City free of cost (see draft public infrastructure schedule also on public exhibition), and as such the requirement in the LEP is unnecessary.

The publicly exhibited planning proposal identifies, on both private and LAHC owned land, some (but not all) road reserves on the Land Acquisition map and proposes City of Sydney as the acquiring authority. The City has requested advice from the Department, but remains unclear, as to why some but not all future road reserves are identified.

The Land Acquisition Map exposes the City to the risk, that should a planning agreement not be agreed to, a future landowner / developer of the site might require the City to acquire its land under the Land Acquisition (Just Terms Compensation Act). This is a significant financial risk to the City, who is already making substantial contribution to the development by agreeing to offset the landowner's payable development contributions for the provision of public infrastructure as well as other ongoing costs the City will bear, such as the upkeep and maintenance of parks and community facilities.

Regulation 10 of the Environmental Planning and Assessment Regulation 2000 provides that Council's concurrence would be required prior to being identified as an acquiring authority. Council has not and will not provide concurrence.

#### **Recommendation**

- Remove land for new roads from the land acquisition map and remove reference to the City of Sydney as an acquiring authority for the new roads, noting the City does not give concurrence for this provision to be included in the Sydney LEP 2012.

## 4. Sustainability

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### 4.1. Stretch BASIX provisions

The City's planning proposal included a BASIX stretch bonus of 0.25:1 FSR where BASIX-affected development (residential development) exceeds the BASIX commitments for water and energy by not less than 10 points for energy and 5 points for water. The purpose of this provision is to couple with significant planning uplift on land, a requirement that the resulting development demonstrate more than the minimum requirement for environmental performance.

Despite the retention of the objective in the LEP that seeks to ensure that development is of high environmental performance, the publicly exhibited planning proposal does not include any provision that requires it and has removed the City's incentive for higher environmental performance.

The City is disappointed with the removal of the BASIX stretch provisions from both the planning proposal and the design guide. The state government should be leaders in this space, demonstrating that high levels of environmental performance can and must be achieved in the face of the climate crisis.

More energy and water efficient buildings are critical to ensure the resilience of social housing tenants, who are some of our most at need community members, in the face of climate change and escalating costs of living.

Where significant development uplift is being achieved in the planning process, the inclusion of BASIX stretch provisions is a common practice for the City. Example clauses in the Sydney LEP 2012, including objectives and provisions, can be found at:

- **Cl. 6.23 / 6.24** 87 Bay Street, Glebe—floor space
- **Cl. 6.37** 296–298 Botany Road and 284 Wyndham Street, Alexandria
- **Cl. 6.39** Surry Hills Shopping Village
- **Cl. 6.54** 17–31 Cowper Street and 2A–2D Wentworth Park Road, Glebe

#### **Recommendation**

- Support the long-term resilience of the community and lead by example by including in the LEP and design guide a requirement that all development in Waterloo Estate (South) demonstrate environmental performance beyond the minimum prescribed by BASIX.

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### 4.2. Water recycling

The City commends the Department for maintaining in the draft design guide the City's requirement that where there is a commitment to provide a recycled water network, all buildings are to be constructed to be capable of providing a dual reticulation water system for water services and be capable of fully connecting to a non-potable recycled water network.

Sustainability studies supporting LAHC's planning proposal request make multiple references to the opportunities and benefits of using recycled water. The studies include recommendations to explore options to use decentralised technologies such as recycled water networks, and the installation of a third pipe system.

While there has been no commitment from LAHC to provide an on-site water recycling facility, the City is working with Sydney Water to investigate options for how this may be realised. This may require some space within Waterloo Estate (South), although the nature and scale of that space has not been determined at this time.

**Recommendation**

- Include an appropriate requirement in the planning controls to facilitate a water recycling facility to be in Waterloo Estate (South), noting this may include an allocation of space and a stronger requirement that all buildings be dual reticulated.

## 5. Heritage

The City's planning proposal and draft design guide includes planning controls to facilitate the appropriate protection of heritage in Waterloo Estate (South).

As noted elsewhere in this submission, the City has significant concerns with changes to height in metres and FSRs in the publicly exhibited planning proposal, noting the changes create unrealistic expectations on heritage sites, are not aligned with the built form articulated in the design guide, and place undue pressure on heritage items in the development application process.

Notwithstanding the above, it is noted the height in storeys map in the draft design guide for heritage items and development around heritage items remains mostly unchanged.

To test the potential impacts of the publicly exhibited planning controls in Waterloo Estate (South), the Department commissioned the Addendum Heritage Impact Statement (Artefact, November 2021) and the Addendum Aboriginal Cultural Heritage Study (Artefact, November 2021).

The Addendum Heritage Impact Statement notes there are some differences in the distribution of new impacts to ground surfaces and building heights (between the first and the current PP). The report notes that there is some increased visual impact on some heritage items, reduced visual impact on others, and no change to visual impact on others. Importantly, it notes:

- there would be no direct impact to any City of Sydney LEP 2012 heritage items
- there may be direct impact to SHR item Potts Hill to Waterloo Pressure Tunnel and Shafts (SHR no. 01630). Further detailed design is required to adequately assess impact; and
- there is potential to impact archaeological resources.

The City notes the potential impact upon the Potts Hill to Waterloo Pressure Tunnel and Shafts need to be carefully managed in any future development, including protection measures for heritage items during construction, appropriate design in the vicinity of heritage items, and a heritage induction process.

The Addendum Aboriginal Cultural Heritage Study (Artefact, November 2021) notes that there are some differences in the distribution of new impacts to ground surfaces (between the first and the current PP), but that there would be no additional impacts to Aboriginal archaeological values as a result of the publicly exhibited planning proposal.

Several recommendations have been made in this study, in addition to those included in the earlier Urbis 2020 report. In particular, the recommendations regarding the need for an unexpected heritage finds procedure and detailed Aboriginal community engagement to identify cultural values and guide design are essential.

## 6. Design excellence

The City's planning proposal include provisions that allow for up to 10% additional floor space (not height) where the development is subject to design excellence processes. The City's draft design guide includes more detailed provisions to guide competitive design processes, as well as a design excellence strategy for undertaking competitive processes.

The publicly exhibited planning proposal and draft design guide generally maintain the City's approach to design competitions, however, also includes an additional requirement that wind and noise issues be considered in the design excellence process. This responds to the limited testing and advice that the changes to the built form made will most likely result in unsafe and uncomfortable pedestrian wind environments and expose residents to poor health outcomes from exposure to noise.

The suggestion that wind safety and comfort, and achieving safe noise levels for people in apartments, can be achieved through the design excellence competitions is highly unlikely and does not accord with the City's experience. An architectural firm participating in the competition/s will not and cannot make wind and noise their primary consideration, above matters such as achieving the floor space. Resolving these issues when the planning for the sites is so far progressed is rarely, if ever, possible.

As noted elsewhere in this submission, it is the City's strong view that additional wind and noise testing is required and adjustments to the proposed planning controls for built form and street layout made in response to expert advice and not left to be resolved in the design excellence process.

## 7. Traffic and transport

The City's draft design guide includes detailed provisions guiding the street, pedestrian and cycle network in Waterloo Estate (South), including a plan that showed details of access and circulation within the precinct.

The publicly exhibited draft design guide has made a number of changes to the access and circulation plan, that are underpinned by the Addendum Urban Design Review (Hassell, 2021) and the Addendum Transport Assessment Report (Bitzios, 2021).

The City makes the following comment to the changes in the publicly exhibited draft design guide:

- road network around the small park - the draft design guide shows a green strip between the small park and the development block to the east of the small park. The City does not support any vehicular movement through this strip, preferring the different uses (open space on the west and potentially a community facility on the east) to operate together without interruption. It is recommended this be made clear in the legend;
- Mead Street to McEvoy Street pedestrian connection - this was not shown in the City's Planning Proposal due to noise impacts from McEvoy Street on residential buildings on Mead Street. Notwithstanding this, we support the principle of a pedestrian connection through to McEvoy Street noting it should be either a narrow walkway open to the sky or a colonnade underneath a building as included in the City's planning proposal. Either option would be subject to acoustic assessment;
- John Street ramps - the grade change going east along John Street means ramps are needed to enable accessibility for all users. These ramps are shown in the urban design review, but have been omitted in the draft design guide. The City urges they be reintroduced in the final design guide to ensure movement through the precinct is accessible for all;
- Mead Street treatment - the City prefers that Mead Street be identified as a yield street in the final design guide, as per the City's draft design guide. A yield street is a narrowed two-way street where drivers pass each other by negotiating space between on-street parking, as is common in older, dense Sydney areas such as the Marrickville or Petersham. NACTO guidelines (page 17) provide best practice advice on their use and design;
- Botany Road onto Wellington Street right turn ban - the City supports the removal of this ban as per the recommendation in the Addendum Transport Assessment Report. The original intention was to discourage through traffic using Botany - Wellington - Elizabeth that would result from the right turn ban from Botany Road to McEvoy Street. However, the City understands the need for legible access into the precinct and acknowledge that the northbound through traffic can be encouraged to use Botany Road / Bourke Street / Elizabeth Street instead of Wellington Street through design treatments; and
- Pitt Street / McEvoy Street intersection - the right turn bans shown in the City's draft design guide were indicative only, acknowledging that a solution would need to be found for the intersection. The turn bans have the advantage of being simple to implement, reducing conflicting movements and minimising delay on McEvoy. Another option is to convert the offset (dog leg) intersection to a four-way intersection. This would be the best outcome for connectivity, access and safety although would require realignment of the road and cause delays on McEvoy. This latter option also increases the effective length of Pitt Street and would mean a break would be needed somewhere north of the precinct to avoid attracting through traffic.

**Recommendation**

- Revise the access and circulation plan in the draft design guide to address future traffic arrangements.

## 8. Design guide review

In its review of the draft design guide the City has identified key issues and inconsistencies that should be addressed prior to finalising the new planning controls for Waterloo Estate (South), shown in Table 5.

**Table 5:** Issues in the draft design guide

Page	Reference	Content	Comment
3.	cl. 1.1	“adopted by Council”	The Design Guide will be adopted by DPE.
6	First paragraph	Locality Statement	Please amend to read: “Waterloo’s Traditional Custodians are the Gadigal <del>people</del> of the Eora Nation.”  ‘Gal’ means ‘people’, so a reference to Gadigal people means Gadi people people.
8	Principle 2 (13)	noise & pollution impacts	Setting buildings back from street in the context of McEvoy St will have little if any consequence and is misleading. DELETE the phrase <i>including setting buildings back from the street frontage</i> .
8	Principle 2 (18)	trees	Mentioning some but not all the streets where trees are to be retained places an inappropriate hierarchy on tree retention, a better hierarchy would give emphasis to significant trees. DELETE <i>along McEvoy Street, George Street, and at the corners of the north eastern street block bound by Wellington, Kellick, Gibson and Pitt Streets</i> ; replace with <i>particularly significant trees</i>
9.	Provision 3.1.1 (5) & (6)	Re. social housing provision	Language used can be interpreted relatively and is not measurable. A commitment to social housing should be expressed as a numerical % for planning certainty.
12.	Para. 4	ref. to cl. 4.4 of SLEP2012	No minimum floor space requirements are mentioned for social / affordable housing, non-residential floor space, community facilities, child care or health services. Measurable minimums should be articulated to give certainty to the community.  The requirement to exceed minimum BASIX requirements must be reinstated to deliver an outcome that is addresses increasing pressures of climate change.  Solar access, and management of wind and noise issues must be achievable in the proposed envelopes that inform the FSR and height LEP standards. Design Excellence processes are an insufficiently robust tool to manage these issues and would occur too late in the development process to ensure acceptable outcomes.

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			<p>A stage 1 DA must explicitly demonstrate resolution of wind impacts and noise issues in addition to solar access and tree retention.</p> <p>The dot point on noise should be rewritten to place emphasis on the design of the apartment layout ADD <i>The impacts of external noise and pollution are minimised through careful siting and layout of buildings including apartment layout, acoustic treatment to ...</i></p>
12.	Para. 5 dot point 4	Urban comfort	DELETE <i>Urban comfort</i> , it is a jargon term and its meaning is not defined
13	Provisions 4.1 (3) (a) and (b)	Street wall heights and setbacks	Building lots do not facilitate heights or setbacks, these provisions belong elsewhere, DELETE
14.	provision 4.1 (9)	Community facility options	This clause needs to clarify that any temporary facility cannot remain as a permanent facility. 'Temporary' can have implications for standard of facilities that would be inappropriate for a permanent arrangement.
22.	Provision 5.2.1 (1)		Minimum rates of dwelling tenure mix need to be articulated to ensure certainty for the community and to enable the City to achieve social and affordable housing targets set out in its LSPS.
34.	Fig. 8(b)	Wellington Street	Commercial floor at ground floor level should be shown raised above street level to indicate addressing flooding issues in this location
35.	Fig. 8(c)	Pitt Street	Residential floor at ground floor level should be shown raised above immediate ground level to improve privacy
36.	Fig. 8(d)	Cooper Street (north)	Residential floor at ground floor level should be shown raised above street level to indicate flooding issues in this location
37.	Fig. 8(e)	West Street	Residential floor at ground floor level should be shown raised above street level to improve privacy
38.	Fig. 8(f)	Mead Street	Residential floor at ground floor level should be shown raised above street level to improve privacy
39.	Fig. 8(g)	Cooper Street (south)	<p>Residential floor at ground floor level should be shown raised above street level to improve privacy.</p> <p>Height in storeys map shows 6 storeys in total at this location, not 8.</p>
40.	Fig. 9		<p>Some minor changes to the map style to avoid any confusion in interpretation in the future are recommended, including:</p> <ul style="list-style-type: none"> <li>the hatched red for road closures is missing on the legend;</li> </ul>

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			<ul style="list-style-type: none"> <li>the "yield traffic flow" symbol is on the legend but is not on the map. It is assumed this should have been shown on Mead Street;</li> <li>the colouring of existing and future cycleways is hard to distinguish; and</li> <li>the elevator symbol does not match the legend.</li> </ul>
44.	Table 4	From Mead to Pitt Street	Publicly accessible lift should be provided in addition to ramps to ensure universal access even in event of lift breakdown or if, in the future access is denied. <i>DELETE or ADD in addition...may be included</i>
46.	cl. 8 (g)		<p>This additional objective will lead to confusion in the assessment process:</p> <p>"... provides for urban amenity in the form of solar access ... and that there is variation in street wall height ..."</p>
46.	cl.8 (h)		tower location for Kellick and Gibson not tested for wind impacts <i>REPLACE at with near</i>
50.	Provision 8.3 (6)		Street cross sections need to support this provision, see above
50.	Provision 8.3 (6) (b)		Fig. 8(b) needs to support this provision see above
51.	Fig. 12	Height in Storeys	<p>Generally, changes in height in storeys do not appear to accommodate the changes in FSR. The GFA capacity of these envelopes should be checked.</p> <p>The three towers along McEvoy St show the horizontal breaks to the tower forms have been removed. This will create problems for managing wind impacts at street level. Relying on existing or future street trees to manage these impacts is not acceptable practice and cannot be relied on. Further, wind can degrade the quality of tree canopy cover over time.</p> <p>Additional wind studies are needed to support the proposed 27-storey tower at Kellick and Gibson Sts.</p> <p>Building envelope depths along McEvoy St are shown at 15m. These depths will create problems for managing noise issues. Noise attenuation plenums are problematic over the long term for provision of natural ventilation and internal air quality and can impact on GFA yield. They should not be relied upon to solve these problems.</p>
59.	8.5.3 (1)		Opening Mead St to McEvoy Street will contribute to noise experienced further north inside the site along Mead St.

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			ADD <i>carefully layout apartments so that windows to habitable rooms face away from the noise source and... prior to acoustic treatments.</i>
59.	8.5.3 (2),(3),(4),(5),(10)		Depths of building envelopes along McEvoy St should be reduced to enable issues of noise and natural ventilation to be managed through floor plan layout without having to rely on building materials, window and other building treatments.
59.	8.5.3 (2)		The 15 metre depth makes it difficult, if not impossible to design the apartments with habitable room windows facing away from the noise source REPLACE with 12 metres or a lesser figure.
59.	8.5.3 (3)		DELETE <i>wherever possible.</i>
60.	Fig. 17		Habitable rooms and balconies located on McEvoy St frontage will lead to unacceptable residential amenity outcomes.  Dimension for maximum floor plate depth must be shown on cross section, this should be 12 metres or less.
61.	Provision 8.6.1 (2) & Fig. 18		Fig 18 shows areas for principle useable open space in locations overlooking the internal courtyards. They should be located away from this edge to avoid noise issues to courtyards. Additionally, the diagram does not account for structures on roof.
64.	Fig.19		Dark green strip along street setbacks to Mead and West Streets not indicated in the legend.
65.	Provision 8.6.2 (6)		This provision in contradiction to Fig. 18 adjust the figure
65.	Provision 8.6.2 (7)		This provision in contradiction to Fig. 18 adjust the figure
65 & 66.	Provision 8.6.3 (4) & Provision 8.6.4 (3)		This provision could lead to no trees if found that wind conditions will not support any trees.
66.	Table 6.		Block 7 as shown accommodates more than 20% deep soil. The figure should be increased appropriately.
71.	Objective 8.12 (g)		Testing of proposed envelopes for wind and solar prior to plan making will obviate the need for this provision and give greater planning certainty to the project.
71.	Provision 8.12.1 (4)		This is problematic – transferring bonus floor space to other sites yet to be developed will complicate the process for future sites. The cycle of transferring could cascade through the precinct causing unnecessary testing, delays, planning uncertainty, and poor amenity outcomes.

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79.	Provision 11.1		The stretch BASIX goals have been removed and should be reinstated to ensure housing typologies that are better placed to cope with climate change.
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### **Recommendation**

- Correct and clarify errors and inconsistencies in the draft design guide.

