

# Attachment D – Summary of Submissions for Waterloo Metro Quarter State Significant Precinct

---



# ***Waterloo Metro Quarter State Significant Precinct***

*Submissions Summary  
Report  
March 2019*

March 2019

© Crown Copyright, State of NSW through its Department of Planning and Environment 2019

### **Disclaimer**

While every reasonable effort has been made to ensure this document is correct at time of printing, the State of NSW, its agents and employees, disclaim any and all liability to any person in respect of anything or the consequences of anything done or omitted to be done in reliance or upon the whole or any part of this document.

### **Copyright notice**

In keeping with the NSW Government's commitment to encourage the availability of information, you are welcome to reproduce the material that appears in *Waterloo Metro Quarter Submissions Summary Report March 2019*. This material is licensed under the Creative Commons Attribution 4.0 International (CC BY 4.0). You are required to comply with the terms of CC BY 4.0 and the requirements of the Department of Planning and Environment. More information can be found at: <http://www.planning.nsw.gov.au/Copyright-and-Disclaimer>.

# Contents

<b>Overview</b>	<b>5</b>
Executive Summary	6
Purpose	7
Waterloo Metro Quarter	7
Waterloo State Significant Precinct and relationship to Waterloo Estate	8
Context	10
State Significant Precinct Process	11
Proposal	13
Exhibition	14
<b>Feedback Overview</b>	<b>16</b>
Submission Overview	17
<b>Key Feedback - Community</b>	<b>22</b>
Density	23
Social and affordable housing	23
Open Space	23
Traffic	23
Car Parking	24
Separation of Waterloo Estate and Waterloo Metro Quarter	24
Development of government-owned land	24
Overshadowing	24
Building Heights	24
<b>City of Sydney Submissions</b>	<b>26</b>
State Significant Precinct Submission	27
State Significant Development Submission	27
<b>Submissions from NSW Government Agencies</b>	<b>30</b>
Environment Protection Authority NSW	31
Office of Environment and Heritage, Heritage Division	31
Office of Environment and Heritage, Communities and Greater Sydney Division	31
Fire and Rescue NSW	32
Department of Education NSW	32
Sydney Local Health District	32
<b>Submissions from Community Organisations</b>	<b>34</b>
WalkSydney	35
REDWatch	35

The Salvation Army Australia	36
Aboriginal Housing Company	37
Shelter NSW	37
Groundswell	37
Counterpoint Community Services	38
Vigilanti	39
<b>Next Steps</b>	<b>40</b>



***Overview***

## Executive Summary

The Department of Planning and Environment publicly exhibited the Waterloo Metro Quarter rezoning proposal for a period of 10 weeks between 22 November 2018 and 30 January 2019. During the exhibition period, a total of 124 submissions were received in response to the proposal, with 108 submissions received from community members, 8 submissions from non-government organisations, 1 submission and an addendum from the City of Sydney Council and 7 submissions from government agencies.

This report provides an overview of the issues identified during the public exhibition, with the key issues raised by the community including the following:

- The proposed level of **density** was excessive (64% of community submissions received);
- Insufficient **social and affordable housing** was being provided with affordable housing only provided for a period of 10 years and not held in ownership by a government agency (59% of community submissions received);
- Insufficient amounts of **open space** were provided of low quality with minimal solar access (54% of community submissions received);
- **Traffic** congestion and generation from the proposed development was excessive (48% of community submissions received);
- The quantity of **car parking** spaces proposed was inappropriate (47% of community submissions received);
- **Waterloo Estate and Waterloo Metro Quarter** should be considered jointly (45% of community submissions received);
- **Development of government owned land** should be held to a greater standard, specifically in delivery of affordable housing and achieving best practice design (38% of community submissions received);
- **Overshadowing** impacts on surrounding properties, proposed open space and Alexandria Park was excessive (22% of community submissions received); and
- Proposed **building heights** were excessive and do not respond to the local character and context (19% of community submissions received).

The applicant, UrbanGrowth NSW Development Corporation, will need to consider issues raised in submissions and prepare a report responding to the issues. Based on the submissions received, the applicant may need to consider undertaking additional analysis and identify if the proposal should be amended to address concerns.

Following receipt of the applicant's response to submissions and updated proposal (if applicable) the Department of Planning and Environment will work with assistance from the City of Sydney to assess the proposal. The Department will then prepare a recommendation to the Minister for Planning to decide whether to approve the new planning framework. The Minister's decision will be made public on the Department's website.

## Purpose

This report summarises the key issues that were raised in submissions to exhibition of the proposed rezoning of land bounded by Botany Road, Cope Street, Raglan Street and Wellington Street, Waterloo, known as Waterloo Metro Quarter.

## Waterloo Metro Quarter

The new Waterloo Station is currently being constructed with entrances to be located on the corner of Raglan and Cope Streets, Waterloo. It is scheduled to open in 2024. The Waterloo Metro Quarter is the area above and around the station bounded by Botany Road, Cope Street, Raglan Street and Wellington Street, Waterloo. It has an area of approximately 1.91ha and is mostly owned by Transport for NSW, with the exception of the Waterloo Congregational Church.



Figure 1 Waterloo Metro Quarter Locality Plan

Source: Waterloo Metro Quarter State Significant Precinct Study, UrbanGrowth NSW, October 2018, edited by DPE



The land is mostly vacant, with only the Waterloo Congregational Church at 103-105 Botany Road remaining on site with all other structures demolished in accordance with the Critical State Significant Infrastructure approval (SSI 15\_7400 as modified). The Waterloo Congregational Church is a locally listed heritage item (Item Number 2069) in the *Sydney Local Environmental Plan 2012* (SLEP 2012). The Waterloo Congregational Church is located within the precinct boundaries, however there are no direct physical works proposed to this building or changes to the planning controls applicable to the church.

UGDC have met with Waterloo Congregational Church to incorporate the needs of the church into the proposed reference design.

The surrounding land uses include Waterloo Housing Estate to the east, low scale terrace housing within the Alexandria Park Heritage Conservation Area (C1) to the west beyond Botany Road and diverse land uses and built forms along Botany Road north and south consisting of commercial / light industrial / residential development.

Botany Road is identified as a route for oversize vehicles and vehicles carrying dangerous goods.

## **Waterloo State Significant Precinct and relationship to Waterloo Estate**

In November 2016, UrbanGrowth NSW Development Corporation (UGDC) acting on behalf of the NSW Family and Community Services, Land and Housing Corporation (LAHC) and Sydney Metro, wrote to the Department requesting nomination of the Waterloo Precinct as a State Significant Precinct (SSP). In March 2017, the Minister for Planning nominated Waterloo as a SSP, incorporating Waterloo Metro Quarter and Waterloo Estate, as shown in Figure 2 below.



Figure 2 Waterloo Precinct

Source: Waterloo Metro Quarter State Significant Precinct Study, UrbanGrowth NSW, October 2018

In May 2017, the Department issued separate and comprehensive Study Requirements for each project to enable them to be decoupled if required. The Study Requirements were developed in consultation with the City of Sydney Council.

Waterloo Metro Quarter was subsequently decoupled from the Waterloo Estate to allow assessment of the proposed planning framework and SSP Study for the Waterloo Metro Quarter to align with the delivery of the Waterloo Metro Station which is currently under construction and scheduled to open in 2024.

The Waterloo Estate State Significant Precinct is progressing separately and is expected to be lodged with the Department of Planning and Environment in 2019.

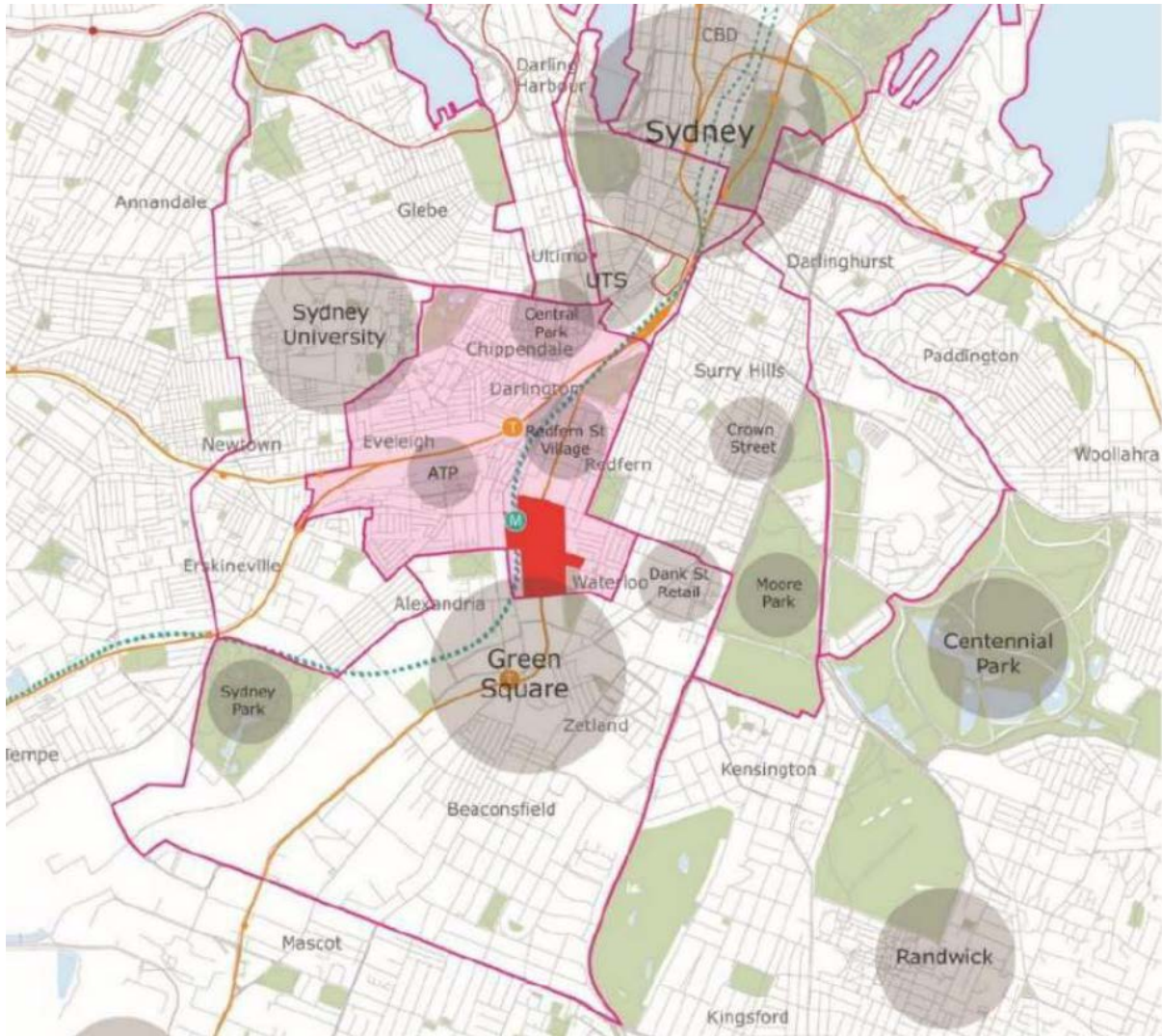
Plans for the Waterloo Estate are still being developed by LAHC and UGDC. Whilst no definitive plans for the Waterloo Estate have been lodged with the Department for consideration, LAHC has been undertaking separate informal and non-statutory community consultation to assist in the development of plans for Waterloo Estate. As part of this consultation and community engagement, LAHC released a preferred Master Plan for the Estate in January 2019 which is detailed in Figure 3 below.



Figure 3 Waterloo Preferred Masterplan  
 Source: Waterloo Preferred Masterplan, Land and Housing Corporation, January 2019

## Context

The site is part of the City of Sydney’s Redfern Street Village and is approximately 3.3km south of Sydney CBD, 1km north of Green Square and less than 1km south of Redfern Station. The location of the Waterloo SSP is shown in red in Figure 4 below.



**Figure 4 Waterloo Precinct Context**

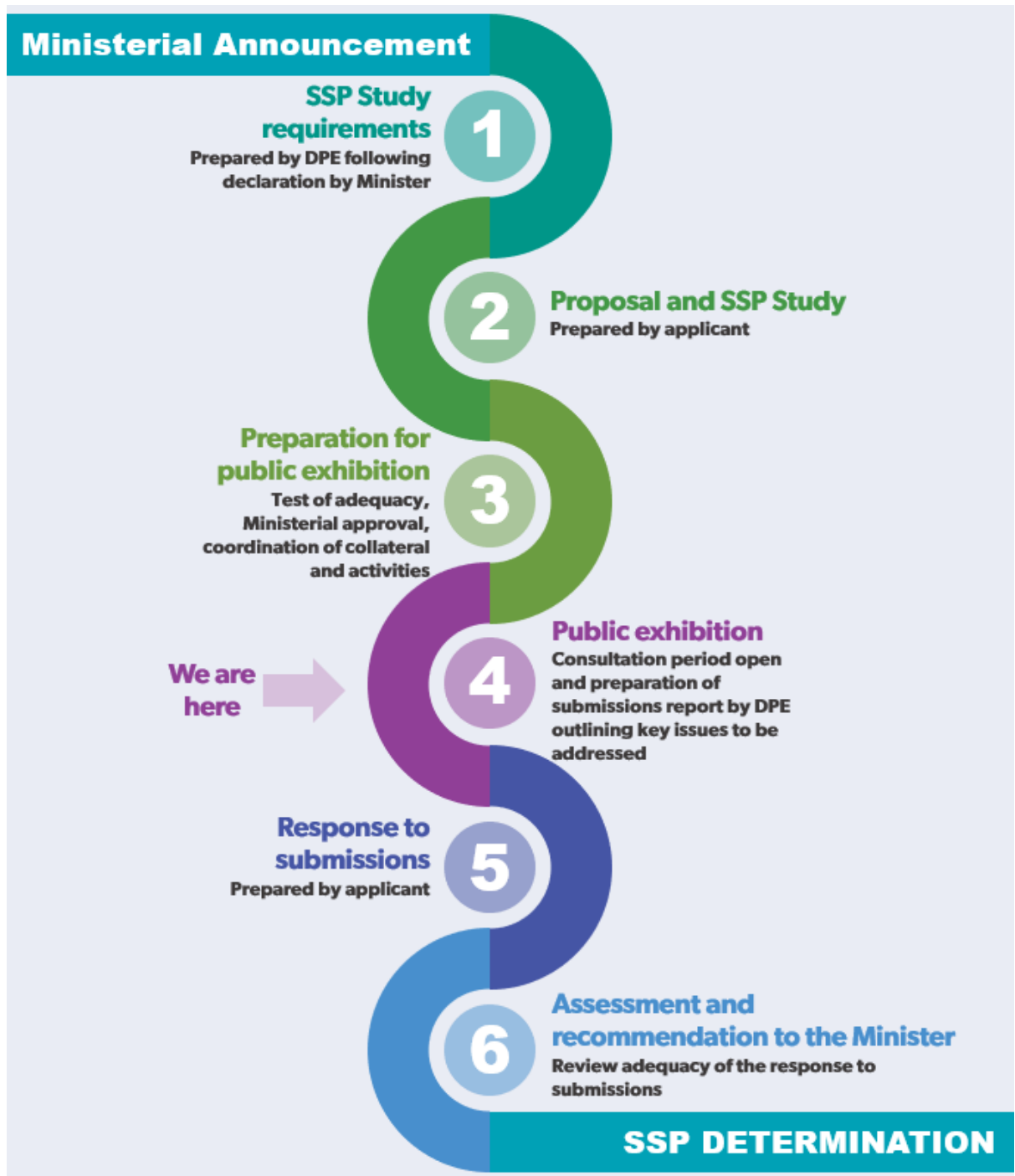
**Source: Waterloo Metro Quarter State Significant Precinct Study, UrbanGrowth NSW October 2018**

## State Significant Precinct Process

The Waterloo Metro Quarter is being investigated for rezoning under the State Significant Precinct process.

Under the State Significant Precincts rezoning process, the Department of Planning and Environment is responsible for assessment of the rezoning proposal and making a recommendation to the Minister for Planning who will decide on the proposal. At the request of the Minister for Planning, the Department of Planning and Environment is working with assistance from the City of Sydney to assess the proposed rezoning.

The key stages for the State Significant Precinct investigation process are shown below.



The public exhibition stage has been completed and this report summarises the key issues raised in submissions. The applicant, UGDC, will need to respond to the issues raised in submissions prior to the Department undertaking its final assessment, with assistance from the City of Sydney Council. Once the assessment is finalised, a recommendation will be made to the Minister for Planning. This may necessitate an amended proposal being submitted.

## Proposal

The rezoning proposes new planning controls to deliver:

- Approximately 700 dwellings, including 5% to 10% affordable housing dwellings (for a minimum period of ten years only) and 70 social housing dwellings.
- Three residential towers of 23, 25 and 29 storeys, each with a three-storey non-residential podium. The buildings will also have parking for about 65 cars and 700 residents' bicycles and 520 public bicycles.
- Approximately 4,000 square metres of retail and entertainment facilities.
- Approximately 8,500 square metres of business and commercial premises and community recreation facilities (indoor).
- A publicly accessible plaza of approximately 1,400 square metres fronting Cope Street, providing access into the Metro Station.

The proposal is also supported by a proposed site-specific Development Control Plan which will provide guidance on:

- Street, pedestrian and cycle networks;
- Car parking, access and circulation;
- Publicly accessible open space;
- Stormwater management;
- Tree planting;
- Building layout, form and design;
- Staging and implementations;
- Sustainability;
- Community facilities;
- Housing; and
- Heritage.

A State Significant Development Application for a proposed Concept Plan was also exhibited and the concept development proposal seeks consent for:

- maximum building envelopes, including maximum building heights, street-wall heights and ground and upper level setbacks
- a maximum GFA of approximately 68,750 square metres comprising:
  - approximately 56,200 square metres GFA of residential accommodation, providing for approximately 700 dwellings, including 5 to 10 percent affordable housing and 70 social housing dwellings
  - approximately 3,905 square metres of GFA for retail premises and entertainment facilities
  - approximately 8,645 square metres GFA for business and commercial premises and community and recreation facilities (indoor), including a minimum 2,000 square metres for community uses
- a three-storey podium and a free standing building located within a public plaza, accommodating non-residential land uses
- residential uses above podium level in various building forms including three taller buildings of 23, 25 and 29 storeys (Reduced Level (RL) 96.9, 104.2 and 116.9 metres Australian Height Datum (AHD) respectively)

- use of OSD space provisioning within the footprint of the CSSI Approval
- public domain works, including open space, through-site links, footpaths, provision for cycle facilities and enhanced pedestrian crossings and roads
- car parking for up to 427 vehicles
- cycle parking to support residential and non-residential land uses and visitors to the Metro Quarter. Approval is also being sought for space within the future basement for a bike hub which would also support future bike parking for Waterloo Station
- loading, vehicular and pedestrian access arrangements
- strategies for utilities and services provision
- strategies for managing stormwater and drainage
- a strategy for the achievement of ecologically sustainable development
- a public art strategy
- provision for future signage zones
- a design excellence framework
- the future subdivision of parts of the OSD footprint (if required)

The State Significant Development application process is separate to the State Significant Precinct process and this report is concerned with the later process (rezoning) only.

## Exhibition

The Department publicly exhibited the Waterloo Metro Quarter rezoning proposal for a period of 10 weeks between 22 November 2018 and 30 January 2019.

The exhibition was promoted on the Department of Planning and Environment website and advertisements were placed in Sydney Morning Herald and Daily Telegraph on 21 November 2018. Letters were sent by the Department to 12,583 addresses in the local area. A total of 158 were returned as invalid addresses or addressees no longer at the address. A Frequently Asked Questions document was also circulated and made available on the Department's Waterloo Metro Quarter website.

UGDC undertook a letter box drop informing the community of information sessions and held three community information sessions.

A video fly through was made available on the UrbanGrowth NSW Development Corporation website.

The exhibition package consisted of the following documents:

- State Significant Precinct Study;
- Explanation of Intended Effects;
- Draft Development Control Plan;
- Urban Design Study;
- Visual Impact Study;
- Transport Study;
- Housing Diversity and Affordability Study;

- Utilities and Infrastructure Servicing Study;
- Social Baseline Study;
- Climate Change Adaptation Study;
- Heritage Study;
- Urban Forest Study;
- Flora and Fauna Study;
- ESD Study;
- Water Quality, Flooding and Stormwater Study;
- Acoustic (including vibration) Study;
- Air Quality Study;
- Light Spill Study;
- Pedestrian Wind Environment Study;
- Aeronautical Study;
- Geotechnical and Contamination Study;
- Population and Demographics Study;
- Economic Development, Local Retail and Services Study;
- Market Study;
- Public Art Plan;
- Metro Quarter Targeted Engagement Report;
- Design Excellence Strategy;
- Evidence of Consultation

Exhibition documents were made available for the public to view at the following locations:

- City of Sydney Council, Town Hall House
- Green Square Library

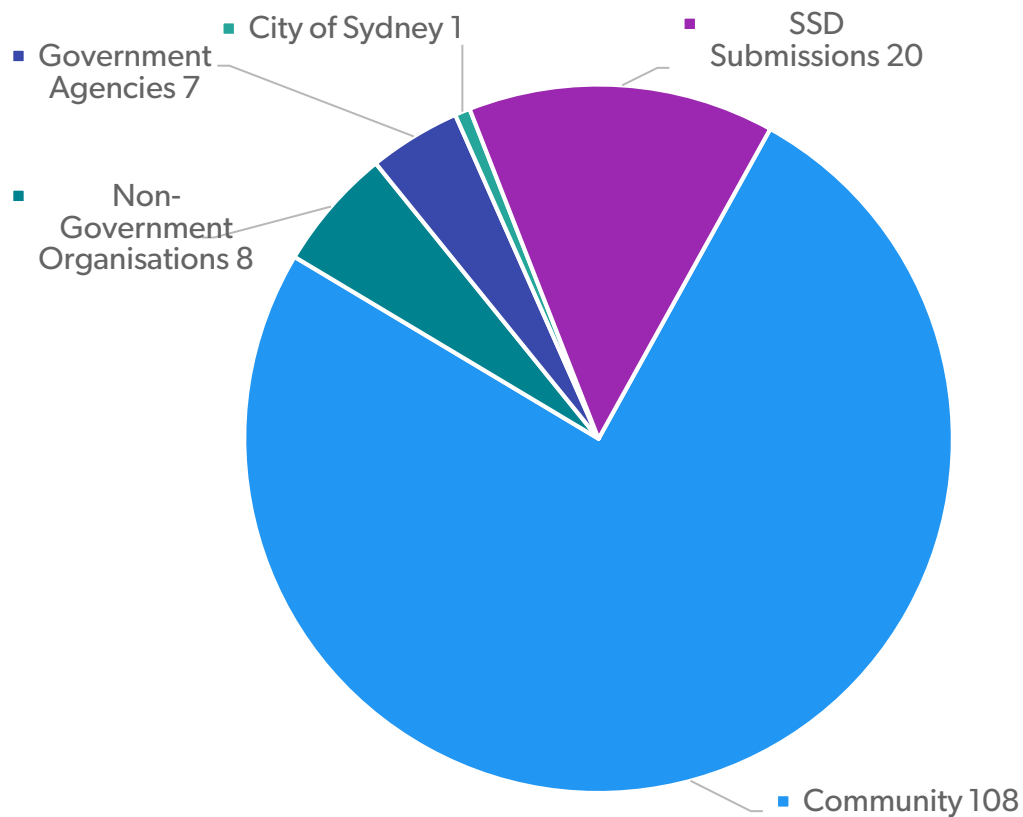
The SSD application was exhibited concurrently and was supported by a 3D model of the concept plan available at Town Hall House.



A white line starts from the top left corner of the page and extends diagonally down to a small white circle. From this circle, a white line extends horizontally to the right, ending at the start of the text.

# ***Feedback Overview***

## Submission Overview



A total of 124 submissions in response to the SSP exhibition were received. This includes the following.

- 108 submissions received from the community.
- 8 submissions received from non-government organisations including:
  - WalkSydney;
  - Vigilanti;
  - REDWatch;
  - Counterpoint;
  - Groundswell;
  - Aboriginal Housing Corporation;
  - ShelterNSW; and
  - The Salvation Army.
- 7 submissions received from government agencies including:
  - Office of Environment and Heritage (2 submissions received);
  - Environment Protection Authority;
  - Fire and Rescue NSW;
  - Department of Education;
  - Sydney Local Health District; and
  - Sydney Water Corporation.
- 1 submission + addendum received from the City of Sydney Council.

In addition to the submissions received specifically against the SSP, a review was undertaken of the submissions received in relation to the SSD application and a further 20 submissions

were identified by individuals who did not make submissions against the SSP. These additional submissions were made by members of the surrounding community.

Additionally, City of Sydney Lord Mayor Clover Moore raised concerns on her website encouraging community members to make submissions on the SSP and SSD. Lord Mayor Moore identified the following concerns with the proposals:

- *By separating assessment of the Metro Quarter over station development and the Waterloo Estate development, the Department is failing to consider the obvious cumulative impacts of the projects, including density, congestion and amenity impacts like overshadowing. These applications must be assessed together.*
- *The Metro Quarter and the Waterloo Estate will triple the density of the area, making it one of the highest density precincts in Australia with 700 dwellings in the Metro Quarter and up to 7,200 new homes in the Waterloo Estate*
- *Of the 700 apartments proposed in the Metro Quarter, only 70 homes will be set aside for social housing, and 35 for affordable rental units. And the State Government's development corporation, UrbanGrowth, is only committing to providing affordable housing for ten years.*
- *The Metro Quarter and Waterloo Estate sites are on public land and should exist for the public good. Given the housing crisis in New South Wales, any development should deliver more social and affordable housing on the site, permanently.*
- *The Metro Quarter and Waterloo Estate will introduce 4,300 additional vehicles in an already dense and congested urban setting. This congestion will be further impacted by WestConnex.*
- *Urban Growth has proposed 427 car parking spaces. Parking spaces are unnecessary and inappropriate in a development located directly above a metro station, because it encourages people to own and drive cars in an already congested part of our city. This is particularly undesirable when the dwelling are in such close proximity to public transport.*
- *It is currently the developer's responsibility to partner with a community housing provider to deliver social and affordable homes. This should be the responsibility of Urban Growth.*
- *The current proposal includes only 15 percent low amenity open space that is accessible to the public. Urban Growth's claim that there is 53 per cent open space is misleading, because the majority of this is made up of private rooftop gardens.*
- *The overshadowing impacts of the Metro Quarter and Waterloo Estate should be assessed as a whole, not in isolation of each other.*

Source: Raise your concerns to protect Waterloo  
[www.clovermoore.com.au/raise-your\\_concerns\\_about\\_the\\_waterloo\\_metro\\_quarter](http://www.clovermoore.com.au/raise-your_concerns_about_the_waterloo_metro_quarter)

The above issues formed the basis of approximately 55 submissions received. As the submissions were tailored to suit the opinions of individual community members this total number is indicative only.

Of the 144 submission received, 140 object to the proposal and 4 are in support or neutral. It should be noted that some submissions which objected to the proposal did raise support for certain aspects of the proposal such as:

- proposed limited number of parking spaces;

- co-ordination of the delivery of the station and over station development;
- consolidation of density over the station; and
- improved connectivity of centres as a result of the metro line.

The submission in support of the proposal indicated support on the grounds that development above the Metro Station would lead to an improved range of services provided for the local community and a more connected Sydney. One of the submissions in support stated that less social housing should be provided as this would be an unreasonable impost on future development. It was also identified in the submission that additional car parking should be provided on site.

A review of the community submissions (excluding agency and NGOs) identified the following key issues raised across the submissions:

- The proposed level of **density** was excessive (64% of submissions received);
- Insufficient **social and affordable housing** was being provided with affordable housing only provided for a period of 10 years and not held in ownership by government agency (59% of submissions received);
- The proposed quantity of **open space** provided is insufficient and of low quality with minimal solar access (54% of submissions received);
- **Traffic** congestion and generation from the proposed development would be excessive (48% of submissions received);
- The proposed number of **car parking** spaces was inadequate (47% of submissions received);
- **Waterloo Estate and Waterloo Metro Quarter** should be assessed jointly (45% of submissions received);
- **Development of government owned land** should be held to a greater standard, specifically in delivery of affordable housing and achieving best practice design (38% of submissions received);
- Excessive **overshadowing** impacts on surrounding properties, proposed open space and Alexandria Park (22% of submissions received); and
- Excessive **building heights** that do not respond to the local character and context (19% of submissions received).

Secondary issues raised by the community include:

- The proposal does not respond to the **existing local character** (8% of submissions received);
- Insufficient **public transport** exists to support the proposed development and further investigations are required to plan for the wider region (6% of submissions received);
- That the proposed range of **land uses** are too focused on residential and should include a broader range of land uses (4% of submissions received);
- Poor **pedestrian access** will be provided to the station and surrounding facilities including Alexandria Park (4% of submissions received);
- Insufficient **community consultation** was carried out with consultation occurring over the school holidays and that the Waterloo Metro Quarter should remain on exhibition until the Waterloo Estate is released (4% of submissions received);

- **Insufficient information** has been provided to the community to allow for effective consultation, the documentation provided was too complex, and the quality of reports poor including specific reference to the CPTED Report (4% of submissions received);
- Inadequate **cycling facilities and regional network** are provided (3% of submissions received);
- **Privacy** of surrounding properties will be reduced due to overlooking and proximity of future residential uses (3% of submissions received);
- The proposed built form will result in poor **wind conditions** at the ground plane due to wind tunnel effects and placement of high rise buildings (2% of submissions received);
- A higher level of **sustainable design** requirements should be applied to ensure that sustainable energy (wind turbines and solar panels) and water reuse is encouraged. The reuse of existing buildings would be more environmentally friendly than demolition of buildings (2% of submissions received);
- The proposal will have an unreasonable **visual impact** from surrounding properties including those within the Heritage Conservation Area and from Alexandria Park (2% of submissions received)
- The proposal will increase **pedestrian and traffic noise** to surrounding properties and does not respond to the existing noise from Botany Road (2% of submissions received);
- the proposal would **reduce property values** in the surrounding area due to density and associated impacts (2% of submissions received);
- The proposal does not respond to the **heritage listed Waterloo Congregation Church and the adjacent Heritage Conservation Area** (1% of submissions received);
- The proposal fails to consider the **air quality** of Botany Road which will be worsened by the additional traffic congestion generated (1% of submissions received).
- Insufficient **community facilities** are proposed or exist in the surrounding area to support the proposed population (1% of submissions received);
- The proposed towers will block **views** from surrounding buildings of the city skyline (1% of submissions received);
- The **2 stage process for the delivery of the site** is unclear and creates uncertainty for the community (1% of submissions received);
- **Additional entrances to the station** should be provided and the proposed development will not allow adequate access (1% of submissions received);
- **Insufficient buses and associated infrastructure** are provided, with the proposed bus interchange too far from the station entrance (1% of submissions received);
- **Inadequate access to surrounding schools** is provided which will creates low levels of safety for children walking to school (1% of submissions received); and
- **Poor access for service vehicles** has been provided (1% of submissions received).

Other issues raised in the submissions but not relevant to the matters placed on exhibition include:

- That the station should not be built at the proposed location as this area is well serviced by Redfern Station; (the location of the station has already been approved and not a matter for consideration under this proposal);

- Residents were not consulted on the location of the Metro Station (procedural matter associated with the approval of the Metro Station);
- That the Waterloo Estate should not be redeveloped and housing tenants relocated (this will be subject to a separate exhibition process at a later stage);
- Permissible Gross Floor Area for surrounding properties should also be increased (the application concerns increasing GFA for the Waterloo Metro Quarter site only);
- The proposal contravenes the current Council controls for height and density (the proposed SSP seeks to amend the current controls to permit the proposed level of density); and
- Tender document released for the station and Over Station Development (not relevant to the planning controls proposed under the SSP).



○ ***Key Feedback -  
Community***

## Density

- The proposal fails to adequately consider the compound impacts of the proposed number of dwellings in addition to those existing, planned and in construction in the surrounding areas. This will result in insufficient public transport, open space, schools, medical facilities and other critical infrastructure.
- When considered jointly by the Waterloo Estate, the proposal will result in one of the highest density precincts in Australia.
- The proposed densities are out of context with the surrounding area and do not recognise the low density surrounds.

## Social and affordable housing

- The amounts of affordable and social housing are too low with only 70 of the 700 being provided as social housing and 35 of the 700 as affordable housing.
- Affordable housing is only being provided for 10 years and will not be in government ownership.
- UrbanGrowthNSW should be responsible for partnering with a community housing provider instead of future developers.

## Open Space

- Not enough open space has been provided, with only 15% of the site provided as public open space. The proposed open space is low amenity which will function as through access to the station. The proposed open space will also receive limited solar access.
- The claim by UrbanGrowthNSW that there is 53% open space is misleading as this includes privately owned rooftop gardens.
- The lack of open space provided on site will place greater demand on surrounding open spaces which are already at capacity and are difficult to access with poor pedestrian environments. This includes Alexandria Park.
- There needs to be greater amounts of open space for dog walking and children play areas.

## Traffic

- The surrounding streets are already congested and will be worsened by the proposal and WestConnex.
- Alternate approaches to street network would improve traffic. This would include extending the one-way sections of Regent/Botany Rd and Gibbons/ Wyndham Streets to have a better flow of traffic. This could also be supported by the opening of Buckland St to allow two-way traffic to have the ability to change directions along the two existing one-way streets.



## Car Parking

- Some submissions objected to the number of car parking spaces on the grounds that there were too many for a development which will be directly located above a new metro station. More ambitious parking rates such as no parking at all should be provided (94% of submissions relating to parking).
- Other submissions also object to car parking on the grounds that there were not enough are proposed and that every unit should have access to parking spaces. If not enough parking spaces are provided, it will simply increase competition for existing on street spaces (6% submissions relating to parking).

## Separation of Waterloo Estate and Waterloo Metro Quarter

- Both the Waterloo Estate and the Waterloo Metro Quarter should be considered concurrently to ensure that the cumulative impacts of the projects including density, congestion, amenity, and overshadowing are considered.
- It is not possible to consider the Waterloo Metro Quarter in isolation from the Waterloo Estate as it cannot be determined whether the proposed building heights are acceptable, or located appropriately.

## Development of government-owned land

- The Metro Quarter and Waterloo Estate sites are on public land and should exist for the public good. Given the housing crisis in New South Wales, any development should deliver more social and affordable housing on the site, permanently.
- The development of government owned land creates an opportunity to set a high benchmark for amenity, sustainability, community, urban design and innovation.

## Overshadowing

- The proposals will result in the overshadowing of surrounding dwellings, reducing access to sunlight for private open spaces and living areas. This includes the dwellings located in the Heritage Conservation Areas.
- The overshadowing impacts of the Metro Quarter and Waterloo Estate should be assessed as a whole, not in isolation of each other.
- The overshadowing of Alexandria park is not supported as it will worsen the amenity of the park which will receive an increased amount of use.

## Building Heights

- Proposed building heights are excessive and do not respond to the local character and context. As such, the buildings should be reduced in height.
- Heights should be limited on the Waterloo Metro Quarter and increased in the Waterloo Estate.
- The proposed heights will set a precedent for the surrounding areas, resulting in future overdevelopment of the surrounding suburbs.

- The Waterloo Metro Quarter is not a gateway site that needs to be identified with tall buildings.



***City of Sydney  
Submissions***

## State Significant Precinct Submission

Key Issues: Design excellence, inadequate commitment to public infrastructure provision, quantity and quality of public open space, residential amenity, affordable housing, insufficient consideration of commercial opportunities, sustainability, car parking, separation of the planning process for Waterloo Metro Quarter from the Waterloo Estate.

### Summary:

The submitted design excellence strategy fails to set out an approach that entails a competitive design process and, therefore, does not provide for excellent design outcomes.

Consideration of the proposed planning framework for the Metro Quarter in isolation from the Waterloo Estate SSP is not appropriate. The Metro Quarter proposal also fails to consider the city-shaping opportunity for enterprise and cultural uses to be provided in this key location.

The proposal fails to appropriately plan for infrastructure and contributions.

Locating residential development adjacent to Botany Road is in conflict with the health and wellbeing of future residents due to noise and air quality impacts.

Car parking should be limited to 65 spaces.

More than 10 percent of dwellings should be provided for social housing and a minimum of 10 percent of dwelling should be provided in perpetuity for affordable housing.

The proposal does not outline adequate commitments to reducing carbon emissions and managing energy, water and waste efficiently.

The proposal does not include public open space, proposes a publicly accessible plaza with significant overshadowing and wind impacts, and has overshadowing and use impacts on nearby open space at Alexandria Park. Overshadowing of Alexandria Park after 9am in midwinter should be eliminated.

Unreasonable that this Metro Quarter proposal can progress independently of an integrated proposal for the Waterloo Estate.

## State Significant Development Submission

Whilst this submission has not been raised specifically against the State Significant Precinct, it raises concerns against the Concept Proposal upon which the controls for the site have been based.

Key Issues: Design excellence, affordable and social housing provision, heritage, noise, ventilation, solar access, building separation and privacy, context, built form and scale, impacts on surrounding open spaces, provision of public open space, through site links,

common open space, wind, oversupply of parking, traffic, pedestrian safety, sustainability, public art, community spaces.

### **Summary:**

The submitted design excellence strategy fails to set out an approach that entails a competitive design process and, therefore, does not provide for excellent design outcomes. The Environmental Impact Assessment and Visual Impact Assessment rely heavily on achievement of design excellence to lessen impacts of towers.

More than 10 percent of dwellings should be provided for social housing and affordable housing should be provided in perpetuity.

Unacceptable impacts on the heritage listed Church due to minimal setbacks, the Concept Plan relies on an awning to manage wind impacts adjacent to the church, and proximity of basements to church boundaries. The development should respond to context by providing sufficient setbacks and designing towers to minimise wind impacts rather than seeking to apply design solutions to minimise impacts.

Inaccuracies of the provided noise report raise potential issues with the proposed Concept Plan. In particular the reliance of design solutions for residential dwellings may not be appropriate and raise issues with the use of the site for residential.

Ventilation of apartments has not been adequately demonstrated, including apartments relying on design solutions to mitigate noise impacts.

The proposal does not adequately demonstrate compliance with solar access requirements of the Apartment Design Guide (ADG). This poses potential issues with the proposed amounts of GFA on the site and appropriateness of residential.

The proposal does not achieve minimum building separation under the ADG.

The concept plan does not respond to the context of the proposal, with bulk and scale which fails to respond to surrounding buildings. The built form and massing should be amended to allow for greater setbacks to streets, greater transitions in height, or reduce the extent on continuous podium along street elevations.

The proposal will result in a greater demand on surrounding public open spaces and fails to provide adequate open space on the site. The plaza provided is primarily occupied by Building H and should be designed to function as a plaza, not a setting for a building. The public domain should consider and respond to the Metro Interchange Access Plan and Station Design and Precinct Plan required to under the approval for the Station. The design of the shared street and through site link between Botany Road and Cope Street needs to respond to pedestrians and desired paths of travel.

The common open areas are likely to be heavily affected by wind and unlikely to provide sufficient amenity for future residents. Street trees should be well setback from the kerb to

allow full canopies and reduce likelihood of vehicle strike. Basements should be designed to allow sufficient landscape planting.

The Pedestrian Wind report does not adequately consider the likely impacts of the proposal, necessitating further testing and an amended response to this testing.

Excessive parking has been proposed. The amount of parking proposed should be reduced.

The traffic modelling provided is deficient, with inadequate consideration of trip generation from retail / commercial, additional consideration of vehicle queuing and pedestrian / bicycle safety required, and further consideration of surrounding future density. The proposal has not adequately considered pedestrian safety at key intersections.

The proposal has not incorporated ESD with limited dedicated commitments to on sustainability, energy consumption, water usage, waste management and resource recovery, and thermal design. The proposal should also look to be integrated into a broader precinct-scale environmental infrastructure for the Waterloo Estate.

Public Art should be considered across the five stations within the City of Sydney LGA.

Detail on the community facilities should be provided which includes proposed operating model, long term sustainability and flexibility in the use and function of the space.

A white line starts from the top left corner of the page and extends diagonally down to a small white circle. This circle is positioned to the left of the main text.

***Submissions from NSW  
Government Agencies***

## Environment Protection Authority NSW

Key Issues: Land contamination, DCP controls, water quality, air quality, noise.

### Summary:

EPA recommends that the DCP specifically addresses requirements for contaminated land assessment for proposed development.

The DCP should reference water quality targets. EPA recommends the NSW Water Quality Objectives.

The DCP should reference air quality targets. EPA recommends the *Interim Guideline for Development near Rail Corridors and Busy Road (2008)* be adopted or referenced.

Implementing noise control at a strategic planning level is recommended to manage noise-based land use conflict.

## Office of Environment and Heritage, Heritage Division

### (Delegate of the Heritage Council of NSW)

Key Issues: Separation of Estate and Metro Quarter

### Summary:

The proposal will not impact on any State Heritage Register listed places. Local heritage has been adequately considered and proposed planning controls meet the objectives of the Study Requirements in relation to heritage.

Holistic consideration of heritage and context could have been undertaken in a comprehensive way if the Metro Quarter and Estate had proceeded together.

## Office of Environment and Heritage, Communities and Greater Sydney Division

Key Issues: Quality of open space, planting and trees, street trees, planning controls for ESD, DCP details

### Summary:

OEH recommends the concept proposal is amended to provide additional open space on site which enhances the natural environment. Open space should include areas of natural soil and be planted with local native species to increase urban tree canopy, promote connection to nature and provide resilient, healthy and diverse urban forest. The non-native species proposed are not recommended.



OEH recommends mechanisms be considered for achieving ESD principles such as the 50 percent renewable precinct goal.

A series of DCP amendments are recommended.

## Fire and Rescue NSW

Key Issues: Demand for FRNSW resources

### Summary:

The submission raised no objection as the proposed renewal of older building stock is likely to result in safer, new buildings.

## Department of Education NSW

Key Issues: Sharing of community and school facilities, movement of students to Alexandria Park Community School

### Summary:

Alexandria Park Community School has sufficient capacity to accommodate predicted growth in the Metro Quarter.

The social impact assessment should consider possibilities for shared use of school facilities to accommodate the recreational needs of residents.

Movement of students and community between the Metro Quarter and Alexandria Park Community School is lacking in detail and should be addressed more clearly.

## Sydney Local Health District

Key Issues: provision of health facility and funding, support for community concerns, need for supporting infrastructure, quality of Social Impact Assessment

### Summary:

The submission recommends that a significant health facility in the Metro Quarter be provided as 'one-stop shop' for health and wellbeing – mental health, drug health, aged care, child and family services.

The submission acknowledges community concerns related to density, building heights and shadowing, construction dust, noise, safety and stress.

SLHD notes that high density living can have negative health impacts if amenity and infrastructure are not sufficient for the population and that the provision of additional height and FSR should include consideration of this.

Social Impact Assessment does not:

- recognise strengths of community;
- Consider employability of estate residents and support required;
- How social cohesion will be improved;
- Types and timing of social infrastructure;
- Social cohesion between social housing and other residents may not be realistic – may need to consider tolerance, acceptance and co-existence; and,
- Key lessons from Minto, Bonnyrigg, Airs Bradbury and Riverwood need to be applied.

## Sydney Water Corporation

Key Issues: Water servicing, wastewater servicing, stormwater and easements

### Summary:

The submission raised no objection, and noted the advice is not a formal approval of servicing requirements, with detailed requirements being provided once the development is referred for a Section 73 application.

Sydney Water noted it will work with the individual proponents once the precinct has been approved to determine the specific servicing requirements for each development.

Existing services are available for water servicing and wastewater servicing, however extensions to the drinking water network may be required, and there is limited capacity in the wastewater network system.

The submission notes that the proponent may be required to carry out additional works to ensure development does not encroach within easements owned by Sydney Water.



○ ***Submissions from  
Community  
Organisations***

## WalkSydney

*WalkSydney is a community group working to make it easier, safer and more pleasant to walk in Sydney.*

Issues: Movement, traffic, pedestrian environment

### **Summary:**

The pedestrian/bicycle connection within the site should not provide car access and should not include vehicle access points.

Supports the design of Raglan, Cope and Wellington Streets as high quality slow-speed Shared Zones designed for 30km/hour speed limits.

Recommends an on-street pedestrian crossing from the western side of Botany Road, widened footpaths and protected bicycle/scooter lanes on both sides of Botany Road along with limited vehicle access which prioritises use by mass transport.

Recommends that carparking be excluded from the development.

## REDWatch

*REDWatch is a group of community residents and friends from Redfern, Eveleigh and Darlington who support the existing diversity in these areas and wish to promote sustainable, responsible economic and social development.*

Issues: Separation of Waterloo Estate and Metro Quarter master planning processes, traffic and parking, social and affordable housing, provision of community facilities and infrastructure, provision of quality public open space, sale of government land

### **Summary:**

REDWatch is concerned that the demographic study does not detail the basis for its projections including the occupancy rates applied which may lead to significant inaccuracies in other aspects of the master plan.

Errors and misrepresentations of the local human services and facilities were identified in the social baseline report which may also distort decisions about human services and facilities planning.

Separation of the Waterloo Estate and Metro Quarter SSP processes makes assessment of the Metro Quarter master plan difficult for example with respect to overshadowing of proposed open space on the Estate.

The submission raises concerns and objections regarding the cumulative impacts of traffic from the proposed redevelopment of the Metro Quarter and Waterloo Estate as well as

detailed concerns relating to traffic and pedestrian levels of service resulting specifically from the Metro Quarter proposal. Minimal parking is recommended to reduce congestion, however, it is acknowledged that many social housing tenants recommend that parking be provided for each social housing unit.

The submission queries the appropriateness of the proposed parking controls as a response to the Traffic and Transport Study and indicates that other options for the use of the site should be considered as a potential solution to this issue.

The submission supports a mid-block crossing on Botany Road.

Improved provision of open space is recommended based on the density proposed. Amenity and facilities to support the local community should be assured if such density is allowed.

Affordable housing should be required to meet the upper target of 10 percent and 5 percent of housing should be dedicated affordable housing for Aboriginal people. Affordable housing should be provided in perpetuity. The City of Sydney Affordable Housing Contributions Plan would be an appropriate mechanism to provide this.

REDWatch recommends that the proposal follow a “build-to-rent” or other model which allows the government to retain ownership of the land.

## The Salvation Army Australia

*The Salvation Army, an international movement, is an evangelical part of the universal Christian Church. Its mission is to preach the gospel of Jesus Christ and meet human needs without discrimination.*

Key Issues: Provision of community spaces and accommodation

### **Summary:**

The Salvation Army is investigating the potential to redevelop their site at 117-123 Cope Street, adjacent to the Waterloo Estate SSP, to enlarge their existing facility and would appreciate the opportunity to collaborate and consult on the provision of community spaces and accommodation.

The Salvation Army supports the Waterloo Metro Quarter proposal’s investment in infrastructure, housing (especially social and affordable housing), employment sources, community services and creating a better community and the opportunity to meet the significant demand for current social services including accommodation, support and counselling services, community programs and welfare assistance.

## Aboriginal Housing Company

*The Aboriginal Housing Company Limited is an independent non-profit charity and the first community housing provider in Australia.*

Key Issues: Aboriginal and Torres Strait Islander housing

### **Summary:**

The proposal lacks affordable housing for Aboriginal and Torres Strait Islander people.

## Shelter NSW

Key Issues: Provision of social housing, baseline assessment of rental stress/housing need, time limitation on proposed affordable housing, amenity of social and affordable housing, separation of Waterloo Estate and Waterloo Metro Quarter

### **Summary:**

Shelter NSW recommends the planning controls place significant emphasis on the development and delivery of affordable rental housing, requiring it to remain available in perpetuity. Amenity principles recommended in the Housing Diversity and Affordability Study should be incorporated in the planning framework.

Assumptions forming the basis of the assessment of need, and revenue stream for affordable rental housing are questioned, and also the proposed time limitation on affordable housing provision.

The proposal should be considered in context with the Waterloo Estate SSP.

## Groundswell

*GROUNDSWELL is a community empowerment process facilitated by a coalition of Redfern and Waterloo non-government agencies who explore ways of supporting residents facing the significant issues and changes proposed for the Redfern and Waterloo area.*

Key Issues: Parking and traffic, affordable housing, community facilities, climate change, density, employment, social sustainability, ownership of public domain, separation of Waterloo Estate and Metro Quarter planning processes

### **Summary:**

The submission includes notes from a meeting of the Groundswell agencies with local residents. These notes discuss and provide residents' views on a series of issues including parking and traffic, affordable housing, community facilities, climate change, density,

employment, and social sustainability. A broad range of opinions have been raised by local residents including the following:

- Separation of the Waterloo Estate and Metro Quarter master planning processes is deceptive.
- The fact that social cohesion is a result of long-term residents remaining in Waterloo is not accounted for in the Social Sustainability Study.
- The proposal should incorporate more opportunities for start-ups and social enterprises and could involve social housing tenants.
- The proposed density is not supported.
- The plan should allow residents to explore different energy supply models.
- The master plan lacks detail regarding the proposed use of commercial and community spaces.
- A public benefit such as affordable and social housing must be provided in return for the sale of public land.
- Some residents oppose studio apartments.
- Parking should be minimised to reduce car usage and traffic congestion. Residents are concerned about traffic congestion on Botany Road.
- Public domain should return to public ownership.

## Counterpoint Community Services

*Counterpoint's Mission is to: assist in the relief of poverty, sickness, suffering, distress, misfortune, destitution or helplessness, by fostering the growth of community life and community services within Inner Sydney and surrounds.*

Key Issues: Separation of Waterloo Estate and Metro Quarter master planning processes, community consultation, traffic and parking, social and affordable housing

### **Summary:**

Separation of the master planning processes for Waterloo Estate and Metro Quarter have resulted in difficulties in understanding and assessing the proposal. In contrast to the Estate, masterplan options were not presented for consideration by the community which made consultation inadequate.

Baselines should have included more local input and should have included a health impact study, community safety strategy, poverty strategy and local employment strategy.

Proposed health and community facilities on site are supported and should be committed to in the proposed planning framework.

Traffic study should include consideration of the broader context. The submission supports the maximum parking allowance of 427 spaces although numbers for cycle parking are considered excessive. The proposal should consider inclusion of a "park and ride" scheme to support the Waterloo Metro.

Five percent Aboriginal affordable housing should be provided in addition to the proposed 5 to 10 percent affordable housing which should be provided on a permanent basis not limited to 10 years. The proposed provision of 70 social housing units should be increased to 30 percent. Further consultation on the mix of social housing within the built form is also recommended.

The submission attaches a detailed gap analysis of the Social Baseline Study.

## Vigilanti

*Vigilanti have been assisting WPHAG in researching and documenting various aspects of the Estate in preparation for their formal submissions to LAHC.*

Key Issues: Cumulative impact of growth on the traffic network, density, quality and quantity of affordable housing, provision of quality open space

### **Summary:**

Separation of the assessment of Waterloo Estate and Metro Quarter fails to account for cumulative impacts with regard to building heights, overshadowing and flightpath maintenance, cumulative population growth and infrastructure needs, and broader traffic impacts.

The proposed density, in conjunction with growth in other nearby areas, is not supported and will result in further congestion in the traffic network.

The proposal should include higher affordable housing targets.

The claim of 53 percent open space is misleading. The proposed low quality public open space is inadequate.





***Next Steps***

The applicant, Urban Growth Development Corporation will need to consider issues raised in submissions and prepare a report responding to the issues. Based on the submissions received, the applicant may need to consider undertaking additional analysis and whether the proposal should be amended to address concerns.

Following receipt of the applicant's response to submissions report and updated proposal (if applicable) the Department of Planning and Environment will work with assistance from the City of Sydney to formally assess the proposal. The Department will then prepare a recommendation regarding the proposed planning framework for consideration by the Minister for Planning.

Community members who have registered for updates on the Department of Planning and Environment's Waterloo Metro Quarter webpage will be kept up-to-date by email communications.

