

21 July 2026

Jude Urbanik
Department of Planning, Housing and Infrastructure
Via email: jude.urbanik@dpie.nsw.gov.au

Dear Jude,

Waterloo Estate (South) – CPTED Response to Submissions

This letter relates to the State Significant Development Application (SSDA) and concurrent rezoning to the Sydney Local Environmental Plan 2012 for the Waterloo Estate (South) Concept (SSD93222706).

The DPHI has in its assessment of the SSDA identified matters to address with respect to responding to agency submissions. In their submission, the City of Sydney Council included matters relating to the Crime Prevention Through Environmental Design (CPTED) report that accompanied the SSDA.

This letter provides a response to the following matters for DPHI's consideration:

While the inclusion of a CPTED assessment in the application is commended, there are some gaps in the assessment that require addressing. The assessment should be amended to include:

- *An update of the crime profile to provide a distinction between rates of crimes occurring in public spaces and private dwellings, as well as a distinction between alcohol related and non-alcohol related crimes, for all recorded crime types in the crime profile.*
- *A selection of a suitable urban comparison area in the crime profile or removal of the state average. The current assessment compares Waterloo to the state average which is not appropriate given the significant differences in activity levels between inner city areas to those in suburban or regional areas.*
- *Robust primary data to inform the crime baseline, including evidence of site visits undertaken at different parts of the day and night and consultation with the South Sydney Police Area Command, to more accurately understand and respond to current safety concerns on the estate.*
- *A CPTED assessment specific to the impacts of construction. If not fully incorporated into the concept report, a detailed CPTED assessment must be provided at each stage of detailed design and construction given past safety concerns on Cope and Raglan Street during the Waterloo Metro Quarter redevelopment.*
- *Ensure a detailed lighting staging plan at the detailed planning phase and include as a management measure in the CPTED assessment.*

Crime Profile Comparison Assessment

In response to the submissions received, Urbis has provided a supplementary analysis of the crime profile provided in the CPTED report. This includes:

- The selection of a suitable urban comparison area in the crime profile.
- An update of the crime profile to provide a distinction between rates of crime occurring in public spaces and private dwellings, and between alcohol related and non-alcohol related crimes.

Crime data from the Bureau of Crime Statistics and Research (BOSCAR) was analysed to identify the crime profile at Waterloo between April 2025 and March 2026. Data for the City of Sydney (LGA), and Zetland, a local suburb bounding Waterloo, has been analysed. This has been based on the incident rate per 100,000 residents.

As seen in the table below, the Waterloo suburb exhibited higher crime rates across the analysed categories when compared to Zetland over the analysed period. This is except for 'steal from retail store', where the rate of incidents per 100,000 residents in Waterloo was 235.1, compared to 440.2 in Zetland. Other key insights include:

- The rates of non-domestic assault were significantly higher in Waterloo (847.4) than Zetland (146.7), but lower than the City of Sydney (1,230.6).
- The rates of domestic assault were significantly higher in Waterloo (672.5) than Zetland (349.3) and the City of Sydney (515.4).
- The rate of breaking and entering within Waterloo was around double that of Zetland (568.6 compared to 286.5), however this was lower than that of the City of Sydney (164.8).
- The rate of liquor offences was higher in Waterloo (76.5) than in Zetland (41.9), but significantly lower than the City of Sydney (474.1).
- The rates of malicious damage to property were significantly higher in Waterloo (1241.0) than in Zetland (251.5) and the City of Sydney (945.3).
- The rate of stealing from a person in Waterloo (71.1) was higher than Zetland (14.0), but significantly lower than the City of Sydney (129.0).

Additional data points can be found in the table below.

Table 1 - Crime Incidents per 100,000 Residents

Crime type	Waterloo (Suburb)	City of Sydney (LGA)	Zetland (Suburb)
Assault (non-domestic)	847.4	1,230.6	146.7
Assault (domestic)	672.5	515.4	349.3
Break and enter dwelling	568.6	287	286.5
Break and enter non-dwelling	136.7	164.8	55.9

Liquor offences	76.5	474.1	41.9
Malicious damage to property	1,241.0	945.3	251.5
Motor vehicle theft	164.0	246.1	118.8
Steal from dwelling	885.7	606	810.5
Steal from motor vehicle	393.6	364.1	265.5
Steal from person	71.1	129.0	14.0
Steal from retail store	235.1	1,204.10	440.2
Trespass	251.5	383.5	55.9

Source: BOSCAR 2026

These rates have been broken down based on whether they are alcohol or non-alcohol related. For these main categories, the data is only available for assault (non-domestic) and assault (domestic). Key findings were:

- Overall, non-alcohol related incidents were higher than alcohol-related across all three geographies.
- The rates of alcohol-related non-domestic assault in Waterloo (114.8) are significantly higher than in Zetland (7.0), but significantly lower than the City of Sydney (386.5)
- Rates of non-alcohol related domestic assault are highest in Waterloo (595.9) compared to Zetland (293.4) and City of Sydney (386.5).

Further detail can be found in Table 2 below.

Table 2 Alcohol and Non-Alcohol Related Incidents per 100,00 Residents

Crime type	Waterloo	City of Sydney	Zetland
Alcohol-Related			
Assault (non-domestic)	114.8	386.5	7.0
Assault (domestic)	76.5	163.1	66.9
Non-Alcohol Related			
Assault (non-domestic)	732.6	844.2	139.7
Assault (domestic)	595.9	386.5	293.4

Source: BOSCAR 2026

The data has also been analysed based on whether the crime occurred in a public space or a dwelling. Based on the available data, we have assumed that a crime occurring in a residential location is equivalent to occurring in a dwelling, while all other locations are assumed to be occurring in a public space. This includes those occurring in outdoor and public spaces, retail, carparks, and on/around public transport.

Key insights include:

- Across the various categories, crimes in public spaces in Waterloo typically occurred at higher rates than in Zetland, but at lower rates than in the City of Sydney overall.
- Exceptions include 'steal from a retail store' in public spaces, where this occurred at the lowest rate in Waterloo (235.1) compared to Zetland (440.2) and City of Sydney (1,202.4), and trespassing in public spaces, which occurred at a rate of 38.3 in Waterloo, compared to Zetland (41.9) and City of Sydney (221.2).
- Crimes occurring within a dwelling were typically at the highest rates in Waterloo compared to Zetland and City of Sydney.

Table 3 Public Spaces Incidents per 100,000 Residents

Crime type	Waterloo	City of Sydney	Zetland
Assault (non-domestic)	426.4	1058.2	111.8
Assault (domestic)	93	151.7	34.9
Break and enter dwelling	n.a.	n.a.	n.a.
Break and enter non-dwelling	131.2	153	48.9
Liquor offences	76.5	473.3	41.9
Malicious damage to property	415.5	609.8	125.7
Motor vehicle theft	131.2	183.4	69.9
Steal from dwelling	n.a.	n.a.	n.a.
Steal from motor vehicle	322.5	317.7	244.5
Steal from person	38.3	119.3	14
Steal from retail store	235.1	1202.4	440.2
Trespass	38.3	221.2	41.9

Source: BOSCAR 2026

Table 4 Dwelling Incidents per 100,000 Residents

Crime type	Waterloo	City of Sydney	Zetland
Assault (non-domestic)	421	172.4	34.9
Assault (domestic)	579.5	363.7	314.4
Break and enter dwelling	568.6	287	286.5
Break and enter non-dwelling	5.5	11.8	7
Liquor offences	0	0.8	0
Malicious damage to property	825.50	335.5	125.8
Motor vehicle theft	32.8	62.7	48.9
Steal from dwelling	885.7	606	810.5
Steal from motor vehicle	71.1	46.4	21
Steal from person	32.8	9.7	0
Steal from retail store	0	1.7	0
Trespass	213.2	162.3	14

Source: BOSCAR 2026

Updates to the additional data points found in the Appendix of the original report can be found in the **Annexure 1** of this letter.

Primary Data

At the time of report preparation, only day visits were carried out. If required, night visits can be carried out and documented as part of the CPTED reports to accompany future detailed SSDAs.

As outlined in section 5.3 of the CPTED report submitted with the Concept SSDA and Rezoning Report, various stakeholder engagement was carried out in relation to CPTED

With respect to the engagement with NSW Police, as reported, a request to meet was made on several occasions however a response was not received. Email requests by Stockland were made on the following dates:

- 6 November 2025
- 18 November 2025
- 25 November 2025
- 23 January 2026
- 28 January 2026

At the time of preparing this response letter, confirmation from the Police Area Command representatives to schedule a formal interview has still not been received. Accordingly, any outstanding matters and outcomes will be addressed and incorporated as appropriate during the detailed design phases.

Whilst direct Police engagement is proposed as part of the future detailed SSDAs the Waterloo Wellbeing & Safety Action Group (WWSAG) is a consortium that meets regularly, which includes South Sydney Police Area Command. Should NSW Police wish to discuss matters with the project team, the Applicant would be happy to participate.

Impacts of Construction

A construction-specific CPTED assessment is currently not available at this concept stage but will be provided at future detailed design and construction stages.

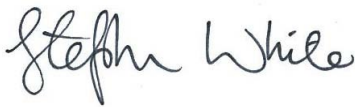
Detailed Lighting Staging Plan

A detailed lighting staging plan is currently not available at this concept stage. This will be developed through the detailed planning phase and included as a management measure in the relevant CPTED assessments.

Conclusion

This letter in our opinion has responded to the matters raised by the City of Sydney in their submission and enables DPHI to finalise their assessment of the proposal with respect to the CPTED considerations.

Kind regards,

A handwritten signature in black ink that reads "Stephen White". The signature is written in a cursive, flowing style.

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Annexure 1 – Additional Crime Data

Table 5 Additional Crimes Incidents per 100,000

Crime type	Waterloo	City of Sydney	Zetland
Drug offences	1,426.90	1,870.40	181.7
Robbery without a weapon	32.8	49.3	21
Robbery with a weapon not firearm	27.3	25.3	14
Breach ADVO	634.2	286.6	118.8

Source: BOSCAR 2026

Table 6 Additional Crimes (Alcohol Related) Incidents per 100,000

Crime type	Waterloo	City of Sydney	Zetland
Drug offences	n.a.	n.a.	n.a.
Robbery without a weapon	5.5	7.2	0
Robbery with a weapon not firearm	0	3	7
Breach ADVO	71.1	34.1	7

Source: BOSCAR 2026

Table 7 Additional Crimes (Non-Alcohol Related) Incidents per 100,000

Crime type	Waterloo	City of Sydney	Zetland
Drug offences	n.a.	n.a.	n.a.
Robbery without a weapon	27.3	42.1	21
Robbery with a weapon not firearm	27.3	22.3	7
Breach ADVO	563.1	252.4	111.8

Source: BOSCAR 2026

Table 8 Additional Crimes (Public Space) Incidents per 100,000

Crime type	Waterloo	City of Sydney	Zetland
Drug offences	1,005.9	1,677.0	111.8
Robbery without a weapon	10.9	41.7	14.0
Robbery with a weapon not firearm	16.4	21.5	14.0
Breach ADVO	79.0	78.8	14.0

Source: BOSCAR 2026

Table 9 Additional Crimes (Dwelling) Incidents per 100,000

Crime type	Waterloo	City of Sydney	Zetland
Drug offences	421.0	193.4	69.9
Robbery without a weapon	21.9	7.6	7.0
Robbery with a weapon not firearm	10.9	3.8	0
Breach ADVO	555.2	207.8	104.8

Source: BOSCAR 2026