



Response to Submissions and Amendments Report

Concept SSDA (SSD-93222706) and Rezoning Proposal for
Waterloo Estate (South)

Prepared for Stockland and NSW Land and Housing Corporation

26.08.26
24233

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C. Amended Concept Envelope Plans	<i>SJB</i>
D. Amended Revised Waterloo South Design Guide 2026	<i>SJB and Beam Planning</i>
E. Schedule of Design Guide Amendments	<i>Beam Planning</i>
F. Addendum Urban Design Report and Architectural Response Pack	<i>SJB</i>
G. Addendum Landscape Report and Landscape Response Pack	<i>Aspect</i>
H. Addendum Retail Demand Letter	<i>Urbis</i>
I. Social Impact Response Letter	<i>L10 Collective</i>
J. Heritage Response Letter	<i>Artefact</i>
K. Transport Response Letter	<i>PTC</i>
L. Addendum Wind Response Letter	<i>SLR</i>
M. Addendum CPTED Letter	<i>Urbis</i>
N. Amended Preliminary Public Art Plan	<i>UAP</i>
O. Addendum Noise and Vibration Impact Assessment and Acoustic Response Letter	<i>E-LAB</i>
P. Addendum Statement of Heritage Impact	<i>Artefact</i>
Q. Addendum Aboriginal Cultural Heritage Assessment Report	<i>Artefact</i>
R. Addendum Historical Archaeological Assessment	<i>Artefact</i>

Executive Summary

The Site	The site is known as Waterloo Estate (South) or 'Waterloo South' and comprises the land owned by the NSW Land and Housing Corporation and surrounding public roads located at 6 John Street, 97-109 Cooper Street, 209-219, 229-231 & 247-251 Cope Street, 238-246, 248-254, 331-337 & 339-341 George Street, 232 & 250 Pitt Street and 74-76 Wellington Street, Waterloo.
The Application(s)	The Concept SSDA seeks consent for the land uses, building envelopes, indicative development yields and distribution of development, public domain outcomes and infrastructure delivery parameters which will inform the future detailed applications undertaken for the site. The Concept SSDA does not seek consent for any physical works on the site, but it establishes the key planning, design and development principles and considerations that will inform future and separate applications that will seek consent for the construction of new development on the site. The Concept SSDA is accompanied by concurrent amendments proposed to the <i>Sydney Local Environmental Plan 2012</i> (Sydney LEP 2012) and the Waterloo Estate (South) Design Guide 2022 (the 'Rezoning Proposal'). Once the Concept SSDA and Rezoning Proposal are determined, future planning applications for the construction of the development will be assessed against their consistency with the new planning controls and Concept SSDA.
The Proposal	The vision for the site is to create a unique and vibrant mixed-tenure housing precinct that supports the needs of the community and delivers much needed housing in response to National and State Government priorities. The Concept SSDA seeks concept approval for a mixed use development which includes the following key planning metrics (described in detail in Section 1.3 of this report): • Approximately 267,198m² of residential accommodation (approximately 3,300 dwellings), comprising: - A minimum 30% of residential GFA to be used for social housing. - A maximum of 50% of residential GFA to be used for 'market housing' / 'private housing'. - Approximately 20% of residential GFA to be used for affordable housing, noting that at least 7% of residential GFA must be used for the purposes of affordable housing that is owned and managed by a community housing provider in perpetuity. Any additional affordable housing provided over and above 7% of total residential floor space will be provided as affordable housing for a minimum period of 25 years. • A minimum of 15,000m² non-residential land uses, including a minimum of 5,000m² 'community uses' which could comprise health services facilities, community facilities, centre based childcare facilities and/or educational facilities. • Approximately 1,500 car parking spaces (across all land uses), excluding on-street car parking spaces, including 60 retail car parking spaces to be delivered on Block 9 to support the supermarket tenancy. • The removal of approximately 236 trees and the retention of 304 trees across the precinct. • Delivery of a new 'Park' with a minimum area of 20,000m² at Block 1 and new local park with a minimum area of 1,000m² at Block 8. • Associated public domain, services and infrastructure upgrades and augmentation.
Overview of Submissions	A total of 130 submissions were received on the Concept SSDA and Rezoning Proposal during the public exhibition period from relevant government agencies, organisations, community and special interest groups, and members of the public. An overview of the submissions received is provided below: • 14 government agency submissions were received; • 1 submission received from City of Sydney Council; and • 115 submissions were received from the public, 12 of which were in support of the project.
Actions undertaken since exhibition	Following the public exhibition of the Concept SSDA and Rezoning Proposal, design amendments are proposed in direct response to submissions received and further design development to ensure a positive outcome on the site and the surrounding area. Additional technical responses have also been provided in response to the submissions which are included as Appendices to this Response to Submissions and Amendments Report. Specifically, the following key amendments are proposed to the Rezoning Proposal: • Reduction in the proposed maximum building heights for Buildings 4C, 5A, 6A and 8A, with corresponding amendments to the Sydney LEP 2012 Height of Buildings Map, to better align the LEP controls with the reference scheme and planning envelopes.

Updated project description

- Refinement of the proposed floor space ratio (FSR) standards for Blocks 8A, 9A, 10A, 5A and 2C, with corresponding amendments to the Sydney LEP 2012 FSR Map, to better align the controls with the planning envelopes and reference scheme.
- Amendment to the Height of Buildings and FSR Maps for Blocks 9 and 10 to exclude land subject to the potential future road widening in DP 252609, consistent with the approach adopted for Block 8.
- Introduction of an FSR of 0.1:1 for the parks within Blocks 1 and 8 in response to feedback from the City of Sydney.
- Rationalisation of the Sydney LEP 2012 Active Frontage Map for Blocks 8 and 9 to reflect the more detailed design development of these blocks.
- Removal of the proposed amendment to clause 7.29(6) of the Sydney LEP 2012 from the Rezoning Proposal.
- Amendments to the Revised Waterloo Estate (South) Design Guide 2026 including the introduction of upper-level setbacks along George Street, clarification of deep soil and planting-on-structure requirements, reinstatement of the Block 8 through-site link to McEvoy Street and updates to relevant figures, tables and street design provisions.

The key design amendments proposed to the Concept SSDA include:

- Rationalisation of Concept Envelopes for Buildings 8AB3, 8BB1 8CB1 and 9BB1.
- The Concept Envelopes for Buildings 9AB1 and 10AB1 have also been amended to account for the future potential widening of McEvoy Street.
- An amended Preliminary Public Art Plan.
- Additional information and studies are provided for assessment including technical responses in relation to heritage impacts, traffic and parking impacts, wind impacts, noise and acoustic amenity, retail demand, and social impacts. Further information on the proposed urban design and landscape framework is also provided by the project Architects and Landscape Architects.

Due to the overall scale and nature of the proposal, the project refinements outlined above are considered relatively minor and generally do not necessitate amendments to the project description of the exhibited development, as set out in **Section 1.3**. The only change to the stated maximum building heights (storeys) relates to Building 8B, which is now described as follows:

- Building 8B – part 4 and part 6 storeys.

1.0 Introduction

This Response to Submissions and Amendments Report has been prepared by Beam Planning for Stockland on behalf of NSW Land and Housing Corporation (the Applicant) in relation to a concept State Significant Development Application (the Concept SSDA) and State Assessed Rezoning Proposal (SARP) for the renewal of Waterloo Estate (South), known as 'Waterloo South' (the site).

The Concept SSDA was lodged with the Department of Planning, Housing and Infrastructure (the Department) and publicly exhibited for 28 days between 6 May 2026 and 2 June 2026. During this time, 130 submissions were received from relevant government agencies, organisations, community and special interest groups, and members of the public. This Response to Submissions and Amendments Report provides an analysis of submissions, summarises the actions taken since public exhibition of the proposal, outlines the Applicant's response to submissions, and provides an updated justification of the proposed development.

This Submissions and Amendments Report, as required under section 59(2) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), has been prepared in accordance with the Department's State Significant Development Guidelines, including Appendix C – Preparing a Submissions Report and Appendix D – Preparing an Amendment Report.

1.1 Project Background

Planning for the renewal of the Waterloo South Precinct Area has evolved over several years. A planning proposal was prepared by NSW LAHC in 2020 and amended in 2022 following feedback from the community, the City of Sydney and the NSW Department of Planning, Housing and Infrastructure (the Department). That process introduced new land use zoning, amended height and floor space ratio development standards, site-specific planning provisions and the Waterloo Estate (South): Design Guide 2022 (2022 Design Guide) to support the future delivery of the renewal project. A tripartite Voluntary Planning Agreement (VPA) securing key public benefits to be delivered within the renewal project was also executed in February 2023 between the Department, the City of Sydney and NSW LAHC.

Following a competitive tender process, in April 2025 the NSW Government selected Stockland and their partners Link Wentworth, City West Housing and Birribee Housing as the Waterloo Partnership that will deliver the renewal of Waterloo South. In reviewing the planning controls that currently apply to the site, Stockland and Homes NSW ("also referred to as NSW LAHC") have identified inconsistencies between the 2020-2022 planning documents that apply to the site and have further identified additional opportunities to improve the amenity of the precinct and to deliver upon the NSW Government's commitment to deliver 50% of the residential floor space as social and affordable housing.

As such, concurrent with the lodgement of the Concept SSDA, the Applicant proposes amendments to the *Sydney Local Environmental Plan 2012* (Sydney LEP 2012) and the 2022 Design Guide within a State-Assessment Rezoning Proposal (Rezoning Proposal). Together, these processes are intended to improve delivery certainty, reduce reliance on site-specific variations at later stages and ensure the planning framework effectively supports the NSW Government's commitment to delivering social and affordable housing while maintaining high-quality residential amenity and public domain outcomes.

The Concept SSDA builds upon previous strategic planning work and studies and consultation with the existing community and other stakeholders, to establish a contemporary planning and design framework that is informed by feedback, detailed feasibility testing, design development and delivery planning.

1.2 Project Objectives

The vision for the site is to create a unique and vibrant mixed-tenure housing precinct that supports the needs of the community and delivers much needed housing in response to National and State Government priorities. The Vision is:

To create a new and unique urban village on the Project Land (Gadigal Land) which:

- **delivers new homes, community places and green spaces with diverse housing choice and amenity;**
- **prioritises the health and wellbeing of residents;**
- **and offers an authentic sense of place and mixed and more sustainable local and mixed communities.**

The proposed redevelopment seeks to respond to this Vision by creating a unique and vibrant neighbourhood that can deliver significant social benefits to residents, visitors and workers in the Waterloo area and broader City of Sydney LGA. The co-location of community uses with housing and employment will ensure the redevelopment is an integrated, accessible and connected precinct that supports the social needs of community. To achieve the project objectives, the Concept SSDA will seek to achieve the key development metrics as summarised in **Figure 1**.



Figure 1 Key concept development metrics

Source: Design Report prepared by SJB

1.3 Exhibited Development

The Concept SSDA, as exhibited, sought approval for a comprehensive redevelopment framework for the NSW LAHC owned properties within Waterloo South. The concept proposal establishes the overarching land use, built form, public domain and infrastructure parameters that will guide future detailed development applications.

The Concept SSDA does not seek consent for any physical works to occur on the site, as these works will be sought in separate planning applications. All physical works will be the subject of future applications, to be lodged following the submission of this Concept SSDA and assessed having regard to the parameters established by the Concept SSDA development consent once granted.

Specifically, the Concept SSDA seeks consent for the following development parameters across the Waterloo South precinct:

- Maximum building envelopes, including maximum building heights, street-wall heights and setbacks.
- Distribution of gross floor area across the Waterloo South precinct development blocks.
- Indicative allocation of floor space between social, affordable and market housing, as well as non-residential and community uses across the Waterloo South Precinct Area.
- Loading, vehicular, pedestrian and active transport access arrangements.
- Public domain upgrades and new public domain and publicly accessible areas.
- Indicative subdivision plan, staging plan and delivery sequencing for development.
- Several precinct-wide management plans and strategies to inform future stages of the development, including:
 - Updated Design Excellence Strategy
 - Design with Country Strategy
 - Preliminary Public Art Strategy
 - Contamination Strategy

- Flood Management Strategy
- Stormwater Management and Drainage Strategy
- Ecologically Sustainable Development (ESD) Strategy
- Utilities and Services Strategy, including service infrastructure lead-in and enabling works
- Tree Retention Strategy

A summary of the key metrics of the exhibited development is provided at **Table 1**.

Table 1 Summary of key development metrics

Component	Proposal	
Site Area	• Waterloo South has a developable site area of 114,822sqm / 11.5ha (as depicted in Figure 2) • The broader Waterloo South Precinct Area, which includes all LAHC owned and privately owned properties and roads within the precinct, has a site area of 123,149sqm / 12.3ha.	
Proposed Land Uses	• Residential: - Social housing - Affordable rental housing - Market housing • Community uses which could include community facilities, childcare uses, health services and educational uses • Non-residential uses to be determined in future detailed applications including but not limited to retail premises, commercial premises, business premises, light and creative industries and recreational facilities	
Dwelling yield	Approximately 3,300 dwellings	
Maximum Gross Floor Area (GFA)	Total GFA (Maximum)	282,484.68m ²
	Residential	The proposed concept includes approximately 267,198m² of residential accommodation (approximately 3,300 dwellings), comprising: • A minimum 30% of residential GFA to be used for social housing. • A maximum of 50% of residential GFA to be used for 'market housing' / 'private housing'. • Approximately 20% of residential GFA to be used for affordable housing, representing the balance between the minimum social housing and the maximum market housing that is proposed, noting that at least 7% of residential GFA must be used for the purposes of affordable housing that is owned and managed by a community housing provider in perpetuity. • Any additional affordable housing provided over and above 7% of total residential floor space will be provided as affordable housing for a minimum period of 25 years.
	Non-residential	• A minimum 15,000m² non-residential land uses (inclusive of the 5,000m² referred to as 'community uses' below). • Reference scheme illustrates 15,305m² for non-residential uses.
	'Community Uses'	• Minimum 5,000m² which could comprise health services facilities, community facilities, centre based childcare facilities and/or educational facilities. • Reference scheme illustrates 5,389m² for these 'community uses' within the total 15,305m² non-residential GFA.
Maximum Building Heights (storeys)	Block 2	• Building 2D – 9 storeys • Building 2B – 4 storeys
	Block 3:	• Building 3A – part 6 and 22 storeys • Building 3B – part 6 and 15 storeys
	Block 4:	• Building 4B – 8 storeys • Building 4C – part 8 and 21 storeys
	Block 5:	• Building 5A – part 6 and 18 storeys

Component	Proposal	
	Block 6:	Building 6A - part 6, 11 and 16 storeys
	Block 7:	- Building 7A - part 6 and 28 storeys - Building 7B - part 7 and 19 storeys
	Block 8:	- Building 8A - part 8, 15 and 33 storeys - Building 8B - part 3 and 6 storeys - Building 8C - part 3 and 10 storeys - Building 8D - 2 storeys
	Block 9:	- Building 9A - part 1, 9 and 33 storeys - Building 9B - part 1, 11 and 16 storeys
	Block 10:	- Building 10A - part 10 and 31 storeys - Building 10B - 17 storeys
Car Parking	Approximately 1,500 spaces (across all land uses), excluding on-street car parking spaces, including 60 retail car parking spaces to be delivered on Block 9 to support the supermarket tenancy.	
Public Open Space	The proposal will deliver the following public open spaces across the precinct: - The proposed development includes the Village Green Park comprising a minimum 20,000m² at Block 1 (site bound by George, Wellington, Cope and Raglan streets). - The proposed development includes a local park comprising a minimum 1,000m² at the centre of Block 8 bound by Cope, John, George and McEvoy streets.	
Tree Retention	304 trees are proposed for retention.	
Tree Removal	236 trees will require removal to facilitate the proposed concept development.	
Staging/ Phasing	The project is expected to occur in 7 stages. The 7 stages will consist of 6 built form stages and 1 stage specifically for the delivery of the large park, which under the VPA, is required to be completed prior to the occupation of 50% of the total GFA. Based on the staging plan, the Park is targeted to be completed prior to OC of Stage 3. Staging is indicative and may be adjusted as the project progresses.	

1.4 Site Overview

The site is located on the traditional land of the Gadigal people of the Eora Nation, within what is now the suburb of Waterloo. The suburb of Waterloo is located with the City of Sydney Local Government Area (LGA) and is located 3km south of Sydney CBD. The site is part of the broader Waterloo Estate, which comprises the northern, central and southern precincts and accommodates a significant community residing in social housing.

Waterloo Estate (South) (from here out referred to as 'Waterloo South') extends across 10 street blocks within the inner-city suburb of Waterloo (refer to **Figure 2**). Waterloo South is generally bound by Cope, Raglan, George, Wellington, Gibson, Kellick, Pitt and McEvoy streets.

The Waterloo South Precinct Area is predominantly owned by NSW LAHC. The NSW LAHC owned sites are currently used almost exclusively for the provision of social housing and some of the adjacent roads and public realm areas, with ancillary offices and community facilities. The balance of adjacent roads and public realm lands are owned by City of Sydney Council and Transport for NSW. Waterloo South currently contains a total of 750 social housing dwellings and 120 private dwellings. Consistent with the prior planning approach, the Concept SSDA and the EIS does not apply to the privately owned properties within the Waterloo South Precinct Area and works are constrained to the remainder of the precinct owned by Homes NSW and other publicly owned lands as depicted in **Figure 3**.

The broader area has been subject to significant change over the last 10 years with projects such as South Eveleigh, Redfern North Eveleigh Precinct Renewal, Botany Road Precinct, Waterloo Metro Quarter and Over Station Development (OSD) all contributing to the changing character of the area. These broader renewal projects are supported by proximity to a range of public transport services, including Sydney bus network, Redfern station, Green Square station and Waterloo metro station, all of which are within walking distance of Waterloo South.



Figure 2 Aerial view of the Waterloo Estate and Waterloo South Precinct Area (in red)
 Source: Six Maps, modified by Beam Planning

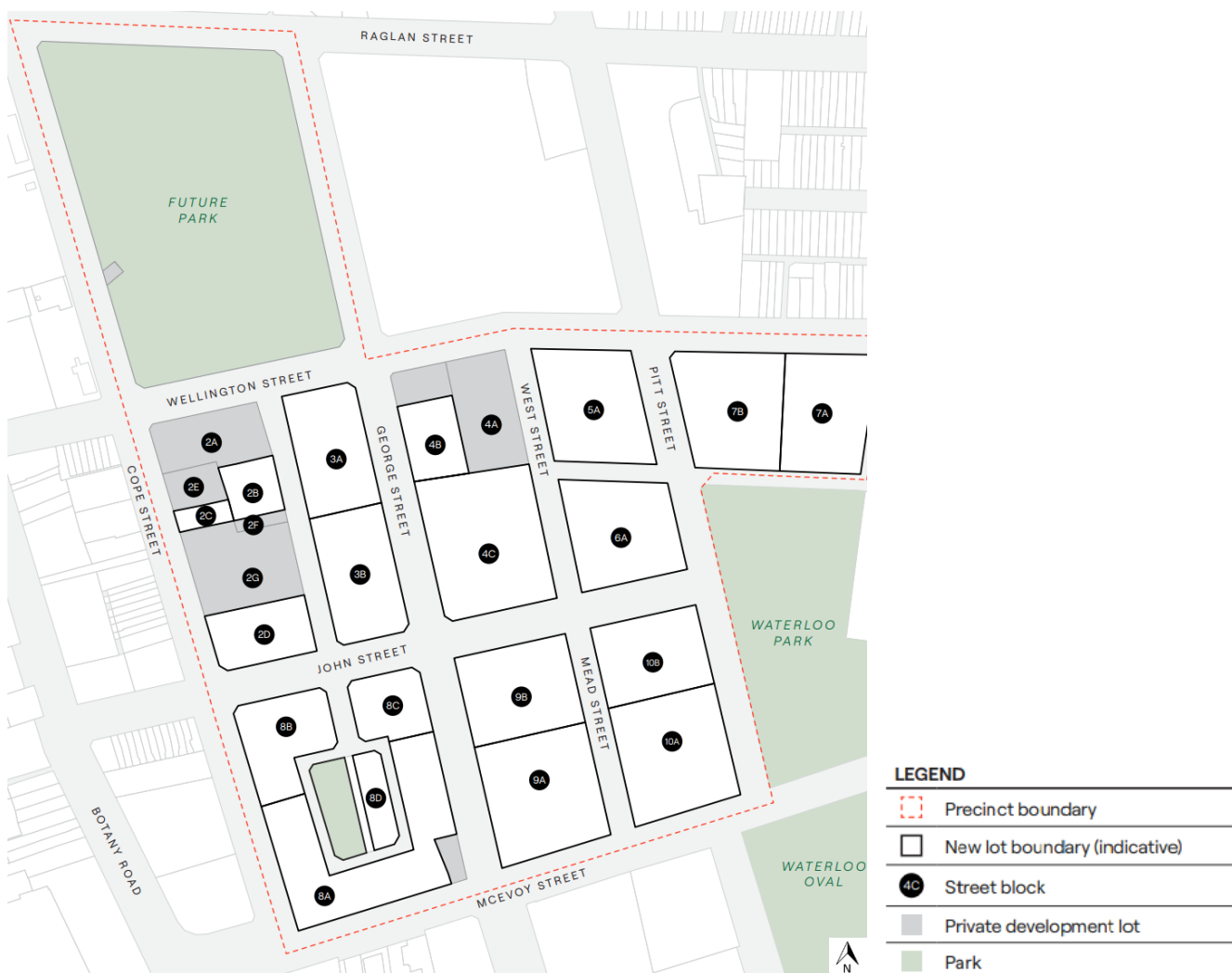


Figure 3 Waterloo South Precinct Area and proposed new lot and block boundaries
 Source: Revised Design Guide (Waterloo South)

2.0 Analysis of Submissions

2.1 Overview of Submissions Received

In addition to the Department's letter requesting additional information, a total of 130 submissions were received in response to the public exhibition of the Concept SSDA and Rezoning Proposal. Of the 130 submissions, 14 were from state and local government agencies, 1 was from City of Sydney Council and 115 were from community and special interest groups, and members of the public. A breakdown of the government agencies, public submissions received from residents and Community Groups received is provided in **Table 2**.

Table 2 Submissions Breakdown

Stakeholder Group	Submission Name	Submission Type	Total
Agencies	DPHI	Comment	14
	Transport for NSW (TfNSW)	Comment	
	Sydney Metro	Comment	
	Heritage Council	Comment	
	Heritage NSW	Comment	
	Ausgrid	Comment	
	CASA	Comment	
	Crown Lands	N/A	
	CPHR	Comment	
	DCCEEW	Comment	
	Fire and Rescue NSW	Comment	
	State Emergency Services	Comment	
	Sydney Airport	Comment	
	Sydney Trains	Comment	
Councils	City of Sydney	Comment	1
Stakeholder Group	Submission Type	Submission Sub-Total	Total
Public Submissions	Objections	75	106
	Support	12	
	Comments	19	
Community Groups	Objections	5	9
	Support	0	
	Comments	4	
Total Submissions			130

Of the submissions received, 80 public submissions objected to the proposal (including community groups), while the remainder of the submissions provided commentary. 12 public submissions were received in support of the Concept SSDA.

2.2 Summary of Submissions

To frame the response to submissions provided in **Section 4.0**, a summary of the issues raised in the submissions received is provided in **Table 3**.

Table 3 Summary of issues raised

Category	Summary of Issues Raised	Stakeholder
The project	Relationship between planning controls, planning envelopes and built form Difficulty comparing the existing approved master plan with the proposed height and floor space controls, making it challenging to assess the change in impacts comprehensively.	City of Sydney

Category	Summary of Issues Raised	Stakeholder
	- The Urban Design Report should clearly present the existing and proposed controls and clarify the application's compliance position. - Insufficient information to confirm that the changes to the Floor Space Ratio controls are correct and are rationalised against the proposed envelopes and reference scheme.	
	Disparity between the reference scheme and the proposed height controls - The reference scheme used to inform the impact assessments is significantly lower in scale than the built form enabled by the proposed controls and the assessments were therefore not undertaken against the maximum permissible built form. - The proposed height controls are too coarse and provide greater flexibility than the maximum intended built form, including differences of up to approximately 40m on some sites.	City of Sydney The Department
	Non-residential and community floor space - Concern regarding the reduction in non-residential GFA from 17,000sqm to 15,000sqm and the introduction of educational establishments into the community floor space provisions. - Further justification required for these changes, including the intent of the 2022 provisions and the basis for the proposed change, noting the increase in dwellings proposed. - Clarification sought on the intended uses of non-council community spaces.	Public Submissions The Department City of Sydney
	Road acquisition - Land along the northern side of McEvoy Street is subject to an existing road reservation for future road widening, which should be retained and reflected in the Land Reservation Acquisition Map. - The Concept Envelope Plans do not clearly identify the required road reservation or setback requirements to McEvoy Street.	TfNSW The Department
	Provision of social and affordable housing - Social and affordable housing outcomes should be maximised on the site, noting the proposal provides approximately 1,782 social housing bedrooms compared with 1,555 existing, a 14% increase. - Concern that the balance of the affordable housing, required for a minimum of 25 years, may be lost after that period. - All affordable housing in future stages should be provided in perpetuity and subject to income-based rents rather than a discount-to-market model. - Further detail sought on the long-term plan for affordable housing.	Public Submissions City of Sydney
	Planning Agreement and infrastructure delivery - The Planning Agreement requires public open space and community facilities to be delivered no later than the Occupation Certificate for 50% and 75% of GFA respectively; no timeframe is indicated for delivery of the larger open space. - The quantum of public open space identified in the EIS falls short of the approximately 23,600sqm of park embellishment identified under the Planning Agreement. - The reference scheme provides only 2,169sqm of GFA to be dedicated to the City, short of the 2,400sqm target and City-owned facilities should be consolidated rather than spread over multiple floors. - Public domain elements on opposite sides of streets and at intersections should be delivered where required for the effective function of each stage. - Errors and anomalies identified in Table 10 of the EIS relating to Mead Street, Cope Street, Cooper Street and West Street require clarification and resolution. - New street sections fronting Stages 2 and 4 should be dedicated and embellished within those stages.	City of Sydney The Department
Procedural Matters	Procedural matters were raised by the Community during the public exhibition of the proposal in relation to exhibition timeframes, addressing the	Public Submissions

Category	Summary of Issues Raised	Stakeholder
	SEARs and the consent authority. These matters have been responded to in the submissions register in Appendix A .	
Economic, environmental and social impacts	Building envelopes and massing - The concept envelopes must demonstrate an appropriate scale of development relative to the streetscape, open spaces and block and lot sizes and urban form controls must be established to ensure compatibility with the desired character. - Critical setbacks should be reflected in the envelopes, for both building separation and to guide the podium and tower relationship. - Building depths are too deep, resulting in double-loaded corridors and single-aspect apartments. - Removal of the requirement for upper-level setbacks to mandate a podium is not supported; the envelopes would result in sheer walls, poorer wind conditions and a poorer urban form outcome at street level. - It is not clear how the amended Design Guide differentiates street walls and taller building elements.	Public Submissions City of Sydney The Department
	Wind - The wind documentation does not allow comprehensive comparison of impacts between the approved and proposed envelopes; 5% exceedance data should be provided and test locations extended to surrounding streets and parks. - Predicted standing and walking comfort levels within the proposed Block 1 and Block 8 parks are unacceptable for public open space; design amendments should achieve a sitting comfort level. - Additional wind testing sought of surrounding streets and key public domain areas including Waterloo Park and Waterloo Oval.	City of Sydney The Department
	Overshadowing and solar access to surrounding development - Concern regarding increased overshadowing and the limited analysis provided, including reductions in solar access to George Street and Waterloo Park. - Overshadowing of the McEvoy Street apartments should be assessed against existing conditions rather than only the 2022 Design Guide scheme. - Only three surrounding buildings were assessed; the analysis should consider all affected surrounding dwellings, including privately owned properties at 233–246 Cope Street and 111, 123 and 127 Cooper Street. - Built form should be modified so there is no reduction of solar access to neighbouring residential buildings relative to the current Design Guide. - Concern regarding the scale of the Block 7 envelope and its relationship with the surrounding heritage conservation area and heritage items, including the absence of a graduated transition to Wellington Street.	Public Submissions City of Sydney The Department
	Residential amenity - Many proposed building separations are insufficient against Part 2F of the ADG and reliance on mitigation such as privacy screening should be minimised, particularly in the delivery of social and affordable housing. - Specific consideration for the impacts on visual privacy to privately owned lots within the precinct should be included in the assessment, noting concerns for overlooking. - The number of apartments served by a single circulation core exceeds the design criteria in Objective 4F-1 of the ADG. - The basis of the cross ventilation figures is unclear; the built form should be modified so all buildings achieve 60% cross ventilation without ventilating across common circulation, with any building gap forming part of the ventilation path being at least 6m wide. - Natural cross ventilation is unlikely to be achieved along McEvoy Street due to noise constraints. - Envelopes along McEvoy Street should provide thin-profile single-sided buildings for the first six storeys where night-time noise exposure exceeds 60dB(A); internal noise criteria for 'windows open' would not be achieved.	Public Submissions City of Sydney The Department TfNSW

Category	Summary of Issues Raised	Stakeholder
	- Section 2.120 of the Transport and Infrastructure SEPP applies to McEvoy Street; the NVIA should quantify internal and external noise levels and demonstrate compliance. - Concern that the proposed range of uses within the precinct, including parks, non-residential uses, community uses and residential uses will result in external noise emissions that impact on other nearby sensitive receivers. - Envelopes do not demonstrate that all buildings achieve a minimum 70% of apartments receiving two hours of direct sunlight in mid-winter and social housing buildings would receive inequitable solar access relative to other tenures. - Communal open space allocated to some blocks is significantly below ADG and Sydney DCP 2012 requirements, particularly in Blocks 7, 8 and 9. - The density proposed is not in accordance with the principles of transit-oriented development.	
	Social impacts - The SIA and SIMP should establish a robust overarching framework for managing social impacts at the concept masterplan stage and across future stages. - The baseline conditions against which unmitigated impacts are assessed vary throughout the SIA. - Impacts are not consistently assessed on a cohort-specific basis, including for relocated residents, residents of Waterloo Central and Waterloo North and residents of privately owned lots. - The social impact of the proposed removal of the Health One facility has not been considered. - Several impacts assess substantially the same change and overstate positive outcomes. - Mitigation and enhancement measures lack specificity, deliverability and clear allocation of responsibility. - The Preliminary SIMP does not identify desired outcomes, indicators and targets, data collection methods, monitoring frequency or adaptive measures and is not consistent with the Social Impact Management Toolbox for State Significant Projects. - Gaps identified in the CPTED assessment, including the crime profile comparison area, disaggregation of crime types, primary data and consultation with the South Sydney Police Area Command, construction-stage assessment and a lighting staging plan. - Clarification sought on a minimum percentage of retail floor space for lower-income households and on whether commercial floor space would be prioritised for Aboriginal businesses.	Public Submissions The Department City of Sydney
	Transport and traffic - Matters raised regarding the George Street and McEvoy Street intersection. - Matters raised regarding vehicle access locations within the precinct. - Further information sought demonstrating how access from McEvoy Street will be provided for emergency vehicles only. - Concern regarding the proposed turning restrictions and changes at the Wellington Street and Botany Road intersection and the traffic modelling undertaken. - Matters raised regarding traffic congestion within and surrounding the precinct - Concern raised regarding the increased demand for on-street car parking	Public Submissions City of Sydney TfNSW Sydney Metro
	Landscaping and public domain - Matters raised regarding the Block 8 southern through-site link. - No consent should be granted to any public domain plan or public domain design in the Design Guide without formal endorsement by the City and the design must accord with the City's Streets Code, Public Domain Manual and Technical Specifications.	City of Sydney

Category	Summary of Issues Raised	Stakeholder
	- Street sections were tested with a 9.25m waste truck rather than the City's 10.6m vehicle; raised intersections should include zebra crossings on each leg; further analysis of raingarden WSUD elements sought. - Street-specific matters raised regarding John Street, Cooper Street north and south, Cooper Place and the Mead Street pedestrian crossing. - Detailed comments on the Public Art Plan, including collaborative design processes, mapping of existing public art, governance over the 30-year project lifespan and expression of the budget as a percentage of construction cost.	
	Urban ecology and trees - High-value trees must be treated as a key site constraint in accordance with AS 4970–2025; 71 trees should be reconsidered for retention. - Insufficient information to demonstrate that the minimum 50% canopy cover target across the precinct at maturity can realistically be achieved and canopy expectations should accord with the Greening Sydney Strategy targets. - Concern for the loss of mature canopy and associated environmental amenity - The concept plans show inconsistent provisions of deep soil relative to the Design Guide; envelope plans should remove references to deep soil and mapping should reflect achievable outcomes noting that areas above basements are generally not deep soil.	Public Submissions City of Sydney The Department
	Heritage and archaeology - The development may result in overshadowing of the State Heritage Register-listed Yiu Ming Temple between approximately 9.00am and 10.30am mid-winter, which was not assessed in the Statement of Heritage Impact. - Matters raised regarding archaeological test excavation and staging. - Matters raised regarding the level of historical and archaeological assessment undertaken at the concept stage. - Matters raised regarding the removal of the two-storey height control within - Concern regarding overshadowing of Kensington Street heritage listed terraces.	Heritage NSW Heritage Council City of Sydney Public Submissions DPHI
	Stormwater and flooding - The FIRA shows flood impacts of up to 100mm in local roads serving the precinct, which is in excess of the generally accepted impact; mitigation measures will be required to reduce offsite impacts. - Land within Block 8 must be maintained as an overland flow path and lowered to RL 16.6m AHD, with the level secured on title by easement or similar restriction; the envelopes must be amended to maintain the George Street low point. - Opportunity identified to incorporate detention infrastructure within the Village Green to lower downstream flood levels along Cope Street; the park does not appear to have been considered in the FIRA. - Finished floor levels and basement protection levels are likely to change through detailed design and have not been demonstrated as achievable through passive rather than mechanical measures; all basement entry points should be protected to the probable maximum flood. - Climate change has been assessed as a sensitivity test only and has not been used to determine flood planning requirements; protection to at least 2050 should be achieved consistent with the draft Climate Change and Natural Hazards SEPP. - A shelter-in-place strategy is not supported for land uses involving people with reduced mobility; reliance on private Flood Emergency Response Plans is insufficient and flooding constraints should be addressed through a precinct-wide strategy considering the distribution of land uses. - The stormwater concept relies on connection to the trunk drainage system in Cope Street and is acceptable subject to approval of the connections, noting the potential for earlier surcharging at the connection point.	City of Sydney CPHR State Emergency Service
	Construction Noise, vibration, traffic and other construction related matters have not been sufficiently addressed.	Public Submissions

Category	Summary of Issues Raised	Stakeholder
	Geotechnical and structural matters, in terms of their impacts to private properties within the precinct have not been addressed. No dilapidation surveys have been undertaken.	

3.0 Actions Taken Since Exhibition

3.1 Project Refinements and Amendments

Following the public exhibition of the proposal, the Applicant and project team undertook a comprehensive design review to identify potential resolutions to the issues raised by agencies, Council, the Department, community and special interest groups, and members of the public. That review confirmed that limited, targeted amendments could be beneficial to address issues, largely to rationalise the proposed built form controls with the planning envelopes and to clarify the methodology adopted for environmental testing.

The fundamentals of the project remain unchanged. The dwelling yield, land uses, total gross floor area, tenure split, public open space provision and staging of the proposal are as exhibited. This ensures that the material and intrinsic public benefits of the proposal are retained to be delivered.

The amendments proposed are of three kinds: those made in direct response to matters raised in submissions, those reflecting the ongoing design development of the concept proposal and those arising from the detailed design of Stage 1 (Blocks 8 and 9) and Stage 2.1 (Building 2D), which has progressed outside of this application. Each is identified in the following sections.

The amendments are considered minor in nature, reflecting the extent of work undertaken on the proposal over a number of years and the well-established planning framework on which it proceeded to exhibition. They improve the quality of the proposal and do not give rise to any adverse environmental impacts. Where an amendment has necessitated further environmental assessment, that assessment has been provided as detailed at Section 3.2 and Section 4.0 of this report.

Under clause 37 of the *Environmental Planning and Assessment Regulation 2021*, an applicant may amend a development application at any time prior to determination. The amendments are described in the sections below and relate to the concurrent Rezoning Proposal, the Concept Envelope Plans and the Waterloo South Design Guide 2026.

3.1.1 Concurrent Rezoning Proposal Amendments

LEP Height Map

In response to the City of Sydney's submission and the Department's comments on the exhibited EIS and Rezoning Proposal, the proposed Sydney LEP 2012 Height of Buildings (HOB) Map is proposed to be amended to achieve closer alignment between the reference scheme, the planning envelopes and the proposed LEP height controls. The amendments apply to Buildings 4C, 5A, 6A and 8A as follows:

- **Building 4C:** reduced from 74m (as exhibited) to 34m, generally aligned with the reference scheme height of 30m, while allowing a degree of flexibility.
- **Building 5A:** reduced from 65m to 28m, to provide greater consistency with the reference scheme height of 25m applying to that portion of the site, while allowing a degree of flexibility.
- **Building 6A:** reduced from 62m to 27 m in part, to provide greater consistency with the reference scheme height of 24m in that portion of the site.
- **Building 8A:** reduced from 54m to 33m, generally aligned with the reference scheme height of 31m, while allowing a degree of flexibility.

To give effect to these amendments, the HOB Map legend has been revised to introduce a new 28m height category (T) and to amend the U3 category from 34m to 33m. No amendments are proposed to the HOB controls applying to Building 2D (37m), Block 9B (56m) or Block 10A (39m), for the reasons set out in the response to submissions at **Section 4.1.1.2**.

The amended height controls vary slightly from the corresponding reference scheme heights. This allows for a degree of flexibility for the detailed design of the buildings, allowing for potential features such as lift overruns, parapets, balustrades, plant, etc. to be provided and not require minor variations to be requested. This approach is ordinary on larger scale master planned sites.

Amendments are also proposed to parts of Blocks 9 (9A) and 10 (10A) as TfNSW has confirmed that, although no road design has been prepared, it requires the full extent of the road widening provided for in DP 252609 (registered in 1973) to be preserved, impacting Blocks 8, 9 and 10 along McEvoy Street. Consistent with the Block 8 mapping, the HOB Map has been amended for Blocks 9 and 10 so that the mapped development area excludes the land subject to the potential future road widening in DP 252609.



Figure 4 Initially proposed (top image) and now revised (bottom image) LEP Height of Building Maps

LEP Floor Space Ratio (FSR) Maps

Amendments are proposed to the Sydney LEP 2012 FSR Map to reflect the ongoing design development of the precinct and to rationalise the FSR controls against the Planning Envelopes and reference scheme.

Revisions have also been made to the FSR Map to account for the reallocation of social housing floor space between Building 10A and Building 2C. The revision retains the social housing provision within Building 2C and transfers the non-residential floor space originally proposed within Building 2C to Block 10. The FSR controls applying to the affected sites have been adjusted accordingly. In response to feedback from the City of Sydney, an FSR of 0.1:1 has been applied to the Block 1 and Block 8 parks.

An incremental increase of 0.01:1 to the FSR control applying to Building 5A is also proposed, to reconcile the overall GFA and FSR calculations against the total proposed GFA of 282,485sqm. To give effect to these amendments, the FSR Map legend has been revised to include the amended categories K (0.88:1), Z1 (5.12:1) and Z2 (5.59:1).

The potential future road widening along McEvoy Street has been further considered following the exhibition period, including through direct engagement with TfNSW. TfNSW has confirmed that it requires the full extent of the road widening provided for in DP 252609 to be retained. This impacts Blocks 8, 9 and 10 along McEvoy Street. In response, the FSR Map has been amended for Blocks 9 and 10 so that the mapped development area excludes the land subject to the road widening in DP 252609, consistent with the approach taken on Block 8 (refer to **Figure 5**).

Detailed design development for Stage 1 has also resulted in the removal of 150 m² of GFA from Block 8, with this GFA relocated to Block 9. **Table 4** outlines the proposed maximum FSR and GFA on a block-per-block basis. Changes proposed as part of this RtS are shown in **bold**.

Table 4 Proposed maximum GFA per block

	Sub-Block	Concept SSDA proposed block area	Concept SSDA proposed FSR control	Concept SSDA proposed permitted GFA	RtS proposed block area	RtS proposed FSR control	RtS proposed permitted GFA
Block 2	2B	899m ²	1.80:1	1,618.20m ²	899m ²	1.80:1	1,618.20m ²
	2C	366m²	1.05:1	384.30m²	366m²	0.86:1	314.76m²
	2D	1,741m ²	3.70:1	6,441.70m ²	1,741m ²	3.70:1	6,441.70m ²
Block 3	3A	2,788m ²	6.98:1	19,460.24m ²	2,788m ²	6.98:1	19,460.24m ²
	3B	2,908m ²	4.83:1	14,045.64m ²	2,908m ²	4.83:1	14,045.64m ²
Block 4	4B	1,317m ²	2.33:1	3,068.61m ²	1,317m ²	2.33:1	3,068.61m ²
	4C	4,877m ²	4.74:1	23,116.98m ²	4,877m ²	4.74:1	23,116.98m ²
Block 5	5A	3,443m²	5.11:1	17,593.73m²	3,443m²	5.12:1	17,628.16m²
Block 6	6A	3,302m ²	5.60:1	18,491.20m ²	3,302m ²	5.60:1	18,491.20m ²
Block 7	7A	3,119m ²	6.91:1	21,552.29m ²	3,119m ²	6.91:1	21,552.29m ²
	7B	3,559m ²	4.72:1	16,798.48m ²	3,559m ²	4.72:1	16,798.48m ²
Block 8	8A(1)	3,773m² (excluding future road widening area)	10.46:1	39,465.58m²	3,773m² (excluding future road widening area)	10.42:1	39,314.66m²
	8A(2)	-	-	-	-	-	-
	8A(3)	-	-	-	-	-	-
	8B	2,296m ²	2.54:1	5,831.84m ²	2,296m ²	2.54:1	5,831.84m ²

	Sub-Block	Concept SSDA proposed block area	Concept SSDA proposed FSR control	Concept SSDA proposed permitted GFA	RtS proposed block area	RtS proposed FSR control	RtS proposed permitted GFA
Block 9	8C	1,446m ²	4:1	5,784m ²	1,446m ²	4:1	5,784m ²
	8D	1,027m ²	0.82:1	842.14m ²	1,027m ²	0.82:1	842.14m ²
	9A(1)	4,109m²	7.62:1	31,310.58m²	3,456m² (excluding future road widening area)	9.11:1	31,484.16m²
	9A(2)	-	-	-	-	-	-
	9B	3,139m ²	4.49:1	14,094.11m ²	3,139m ²	4.49:1	14,094.11m ²
Block 10	10A(1)	3,905m²	7.08:1	27,647.4m²	3,274m² (excluding future road widening area)	8.44:1	27,632.56m²
	10A(2)	-	-	-	-	-	-
	10B	2,677m²	5.58:1	14,937.66m²	2,677m²	5.59:1	14,964.43m²
Sub Total	-	50,691m ²		282,484.64m ²	49,407m ² (excluding future road widening area)		282,484.16m ²



Figure 5 Initially proposed (top image) and now revised (bottom image) LEP FSR Maps

LEP Active Frontage Map

The LEP Active Frontage Map is proposed to be amended to reflect the more detailed design of Blocks 8 and 9 which is occurring concurrent with the assessment of the Concept SSDA. The active street frontage requirement along the southern edge of Blocks 8 and 9 is proposed to be rationalised (refer to **Figure 6**).

The proposed amendments to the active frontage mapping along the McEvoy Street frontage of Block 9 respond to the site's topography. In particular, the change in level means that the proposed ground floor supermarket tenancy will be substantially subterranean for at least half of the frontage, which would technically not qualify as active.

The amendments to Block 8 result from the introduction of an additional north-south through-site link between Buildings 8AB1 and 8AB2, together with the ongoing development of the servicing design which has been encouraged through engagement with the City of Sydney.

The amendments continue to ensure that George Street, as the precinct's principal main street, maintains a highly activated street frontage. They also reinforce the importance of the McEvoy Street interface by retaining active frontages where appropriate.

Coupled with the proposed mapped active street frontages, the addition of the Block 8 north-south through-site link will further promote pedestrian movement and establish an additional welcoming entry into the precinct. Activation is also expected to occur within the street blocks and along the through-site links, consistent with the relevant requirements and considerations of the Design Guide. Figure 6 of the Revised Waterloo South Design Guide 2026 (refer to **Appendix D**) has also been amended for consistency with the LEP mapping.



Figure 6 Initially proposed (left image) and now revised (right image) LEP Active Frontage Map

Removal of proposed amendment to clause 7.29(6)

The amendment to clause 7.29(6) of the Sydney LEP 2012 is proposed to be removed from the Rezoning Proposal. The amendment sought to exclude structures associated with rooftop communal open space from the height limits under the Sydney LEP 2012, in alignment with the corresponding amendment proposed under the City's housekeeping planning proposal (PP-2024-709).

Upon review of the proposed building heights and in response to matters raised by the Department, SJB have confirmed that allowances for communal rooftop structures and associated elements have been incorporated within the Planning Envelope and proposed LEP heights. Appropriate flexibility ranging from approximately 3.2m to 4.5m are allocated to the principal usable part of communal open spaces across the Waterloo South precinct, as shown at Figure 15 of the revised

Design Guide (refer to **Appendix D**). Rooftop communal open space and associated structures can therefore be accommodated within the prescribed maximum heights and the proposed amendment is no longer required.

3.1.2 Concept Envelope Plans

Minor amendments have been made to the Concept Envelopes and corresponding plans to respond to submissions and to reflect design development. These amendments comprise:

Block 8

- Block 8 through-site link — the public access shown between Buildings 8AB1 and 8AB2 at Figure 151 of the Public Domain and Landscape Report has been identified as a through-site link, in response to the City's feedback. The link has a width of between 6m and 9m and provides a direct pedestrian connection from the Block 8 park to McEvoy Street. Refer to **Section 4.3.6.1**.
- Deep soil — the reference to deep soil within the Concept Envelope Plans at Block 8, between the Block 8 park and the building to be dedicated under the Planning Agreement, has been removed. Future detailed applications will rely on the deep soil targets in the Design Guide. Refer to **Section 4.3.7.3**.
- Building 8BB1
 - Increase the podium height from 3 to 4 storeys as a result of detailed design development and increase the maximum RL by 0.38m to allow rooftop structures associated with communal open space to be accommodated within the building envelope.
 - Increase the maximum RL of the 6-storey component by 4.28m to allow rooftop plant to be accommodated within the building envelope.
- Building 8CB1
 - Extend the western edge of the podium by 3m to the future lot boundary shared with Cooper Place (the new internal road network around the Block 8 park)
 - Extend the western edge of the tower as a result of detailed design development to accommodate façade articulation elements.
 - Rationalise the chamfered southern and western edges to align with the western extension of the tower.
- Building 8AB3
 - Increase the maximum RL of the building by 0.6m to allow rooftop plant to be accommodated within the building envelope.

Block 9

- Building 9AB1
 - Reduce envelope by 1.4m to the south and reinstate building mass to northern component of the podium to account for potential future TfNSW road widening of McEvoy Street.
- Building 9BB1
 - Add 1.5m to the eastern extent of the tower envelope as a result of detailed design development

Block 10

- Building 10AB1
 - Reduce envelope by 1.4m to the south and reinstate building mass to northern component of the podium to account for potential future TfNSW road widening of McEvoy Street.

The amended Concept Envelope Plans are provided within **Appendix C**. The series of changes proposed to the Concept Envelopes are considered minor and do not materially alter the overall scale, form or capacity of the proposed scheme. In most instances, increases to the proposed maximum building height are limited to accommodating rooftop plant and associated structures within the envelope and are not expected to give rise to any material change in the environmental impacts previously assessed. Accordingly, the existing assessment framework remains representative of the amended scheme.

The more substantial increase in the maximum height of the podium component of Building 8BB1 is also considered acceptable, as the chamfered edge of the podium continues to protect the solar amenity of the Block 8 park. **Figure 7** provides a side-by-side comparison of the chamfered edge to the south of Building 8BB1 as submitted with the Concept SSDA and as proposed to be amended as part of this submission. The proposed amendments to the Concept Envelope Plans are intended to provide sufficient flexibility for the detailed design and do not seek to increase the overall yield nor materially change the key built form parameters that informed environmental testing. As such, the conclusions of the previous testing remain applicable to the amended Concept Envelopes.

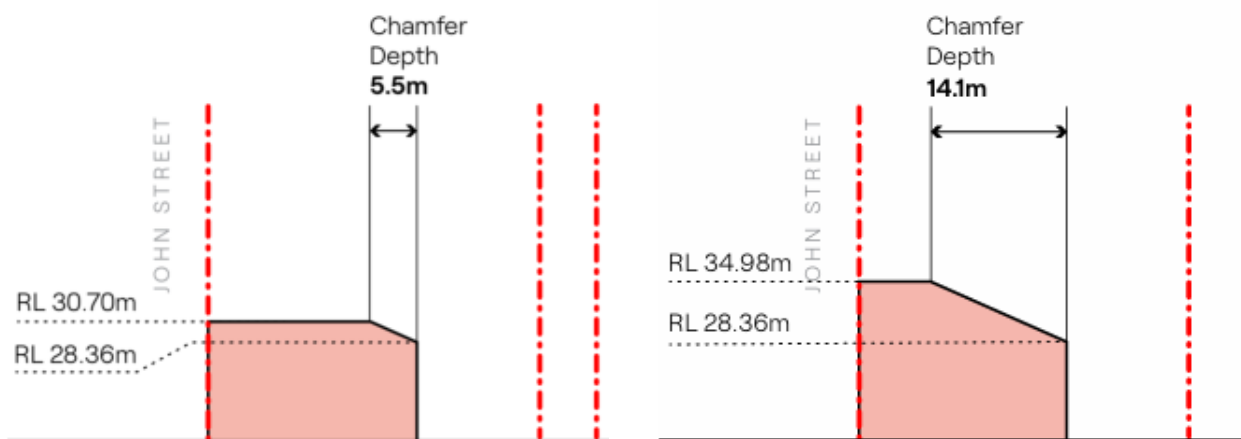


Figure 7 Concept Envelope for Building 8BB1 as submitted (left) and as revised (right)

3.1.3 Waterloo South Design Guide 2026 Updates

The Waterloo Estate (South) Design Guide 2026 (refer to **Appendix D**) has been amended in response to comments made by the Department, the City of Sydney, agencies and the Public to improve clarity and the intended planning outcome. A detailed response to each of the Design Guide related submissions made by the Department and the City of Sydney is included within the Schedule of Changes relating to the Waterloo South Design Guide 2026 (refer to **Appendix E**).

The proposed changes include introducing upper-level setbacks along George Street, removing the additional “where possible” wording, clarifying the distinction between deep soil and planting on structure, reinstating the Block 8 through-site link to McEvoy Street and updating relevant figures, tables and street-design provisions.

While a number of amendments have been made to improve the Design Guide, several recommended changes have not been adopted where the existing planning framework, the 2022 Design Guide or supporting technical documentation adequately addresses the matter. Alternative wording or design controls have also been retained where they are considered capable of achieving the intended outcome while providing greater built-form flexibility. Supporting architectural, acoustic, landscape, transport, flooding and public-domain documentation has been referenced to substantiate these responses. Additional assessment relating to each of these matters is provided within **Section 4.0** of this report.

In addition to the abovementioned changes, a number of minor amendments are also proposed that have been informed by other changes to the Concept SSDA or that have evolved as the detailed design of Stage 1 has progressed outside of this application. These changes have been addressed in more detail within **Section 4.0** of this report.

3.2 Additional Assessment

3.2.1 Additional Information Provided

In response to the submissions, additional assessment supporting documentation has been prepared and collated, as outlined in **Table 5**. A detailed assessment of impacts is provided in **Section 4.0** of this report.

Table 5 Additional assessment supporting documentation

Title	Consultant	Purpose
Appendix F Addendum Urban Design Report	SJB	To clarify the relationship between the planning controls, planning envelopes and assessed built form in response to DPPI and the City of Sydney's submission. Additional environmental analysis has been undertaken to clarify solar access and overshadowing to privately owned properties and public spaces in response to matters raised by the community, DPPI and the City of Sydney's submissions Amendments proposed to the LEP Height and FSR Maps and the Revised Waterloo South Design Guide 2026 are also detailed.

Title	Consultant	Purpose
Appendix G Addendum Landscape Report and Landscape Response Pack	Aspect	To respond to the community and City of Sydney's comments on the Public Domain and Landscape Report, including tree retention, canopy cover, deep soil provision and street design and to record the outcomes of the Public Infrastructure Working Group (PIWG) process.
Appendix H Addendum Retail Demand Letter	Urbis	To provide the further justification sought by the Department for the proposed minimum 15,000sqm of non-residential floor space, having regard to the surrounding retail context and forecast demand.
Appendix I Social Impact Response Letter	L10 Collective	To respond to the matters raised by the Department, the City of Sydney and the community regarding the Social Impact Assessment and Preliminary Social Impact Management Plan and to identify the amendments to be made to each document.
Appendix J Heritage Response Letter	Artefact	To respond to the matters raised by Heritage NSW and the City of Sydney regarding the level of historical and archaeological assessment at the concept stage and archaeological test excavation and staging.
Appendix K Transport Response Letter	PTC	To address the various matters raised by the community, City of Sydney, TfNSW and Sydney Metro regarding traffic modelling, vehicle access locations and the performance of the George Street / McEvoy Street and Wellington Street / Botany Road intersections.
Appendix L Addendum Wind Response Letter	SLR	To confirm the basis of the Environmental Wind Tunnel Assessment, including the use of 5% exceedance data and the selection of measurement locations and to respond to the Department's comments regarding wind comfort within the surrounding environment and the proposed Block 1 and Block 8 parks.
Appendix M Addendum CPTED Letter	Urbis	To address the matters identified by the City of Sydney in the CPTED assessment, including the selection of a comparison area, disaggregation of the crime profile, primary data and consultation with the South Sydney Police Area Command and assessment of construction-stage impacts.
Appendix N Amended Preliminary Public Art Plan	UAP	To respond to the City of Sydney's comments on the Preliminary Public Art Plan, including the commissioning process and milestones, the mapping of existing public art within the precinct and surrounding area and governance over the life of the project.
Appendix O Addendum Noise and Vibration Impact Assessment and Acoustic Response Letter	E-Lab	To quantify the expected internal and external noise levels for affected dwellings and demonstrate how compliance with section 2.120 of the Transport and Infrastructure SEPP is to be achieved, in response to the matters raised by the Department and TfNSW.
Appendix P Addendum Statement of Heritage Impact	Artefact	To respond to the matters raised by Heritage NSW and the City of Sydney regarding the level of historical and archaeological assessment at the concept stage and archaeological test excavation and staging.
Appendix Q Addendum Aboriginal Cultural Heritage Assessment Report	Artefact	To respond to the matters raised by Heritage NSW and the City of Sydney regarding the level of historical and archaeological assessment at the concept stage and archaeological test excavation and staging.

Title	Consultant	Purpose
Appendix R Addendum Historical Archaeological Assessment	Artefact	To respond to the matters raised by Heritage NSW and the City of Sydney regarding the level of historical and archaeological assessment at the concept stage and archaeological test excavation and staging.

3.3 Additional Engagement

The project team have undertaken the following additional engagement with key stakeholders to resolve issues raised in the submissions. The feedback received provided in this engagement is summarised in **Table 6**. The feedback received from these stakeholders has been taken on board and implemented into the revised design of the project and response to submissions provided in **Section 4.0**.

Table 6 Summary of additional engagement undertaken

Stakeholder	Summary	Date
The Department of Planning Housing and Infrastructure – Social and Diverse Housing Team Planning and Rezoning	Stockland and Homes NSW met with the Department's assessment teams following exhibition of the Concept SSDA and Rezoning Proposal. The meetings provided an opportunity for the Department to brief the project team on the key matters foreshadowed in its key issues letter and for the applicant to understand the critical matters to be addressed in the Response to Submissions. Separate meetings were held with the Concept SSDA assessment team on 25 June 2026 and the rezoning proposal assessment team on 1 July 2026. The matters raised in these meetings were subsequently formalised in the Department's Key Issues Letter dated 6 July 2026.	Concept SSDA Team: 25 June 2026 Rezoning Team: 1 July 2026
City of Sydney Council – Public Infrastructure Working Group (PIWG)	The City of Sydney has been working through the design of the public domain with the project team at regular PIWG meetings, chaired by the Department as required by the VPA. Matters discussed include road and public domain design, opportunities for water sensitive urban design, car park entries and pedestrian crossings. A record of the PIWG meetings held to date is provided at Appendix G. Following exhibition of the Concept SSDA, the project team met with the PIWG on 30 June 2026 to resolve matters raised during the exhibition period and to confirm alignment on the proposed public domain design of the streets within the precinct. The matters discussed are outlined in the Landscape Response at Appendix G.	30 June 2026
City of Sydney Council – Social Impact Team	A meeting was held on 23 July 2026 between L10 Collective and the City of Sydney staff who prepared the City of Sydney's submission relating to the Social Impact Assessment. The purpose of the meeting was to discuss which aspects of the Social Impact Assessment and Social Impact Management Plan require updating as part of the Response to Submissions.	23 July 2026
Transport for NSW – road widening along McEvoy Street	A meeting was held on 5 August 2026 between Stockland, Homes NSW and TfNSW staff who were the referral noted in the TfNSW's submission relating to the 1973 registered DP252609. Stockland and Homes NSW requested TfNSW to reduce the road widening affecting Blocks 9 and 10 by 1.4m to align with the 2022 Design Guide and retain additional trees along McEvoy Street. TfNSW did not support this proposed amendment and wish to preserve the road widening along McEvoy Street to facilitate future road improvements.	5 August 2026

4.0 Response to Submissions

Responses to the key issues raised in the submissions have been provided in this section of the report. Detailed responses to each of the individual submissions from state and local agencies and the public are provided in the Submissions Register at **Appendix A**.

In light of the responses provided in the following sections, the Applicant requests that the Department consider the responses outlined below and in the accompanying technical reports and conclude their assessment in support of the proposal and provide draft conditions for review.

4.1 The Project

4.1.1 Rezoning and Planning Controls

4.1.1.1 Matter raised - Relationship between planning controls, planning envelopes and built form

Submissions queried the representation of the proposed built form and yield across the applications noting difficulty in considering the change in impacts of the proposal. In order to clarify the relationship between the planning controls, the built form used for environmental testing and the reference scheme, SJB have prepared the diagram at **Figure 8**.

The diagram defines four elements and illustrates the difference between the 2022 Design Guide approach and the approach adopted for the 2026 scheme.

- **LEP Controls** — the maximum building envelope achievable under the Height of Buildings and Floor Space Ratio controls. These establish total development capacity.
- **Planning Envelope** — the maximum extent of built form provided for under the LEP controls as modulated by the Design Guide. This defines where floor space may be located in three dimensions.
- **Master Plan massing** — a representation of the maximum GFA achievable within the Planning Envelope. This is the built form against which environmental testing has been undertaken.
- **Reference Scheme** — a proof of concept, demonstrating one design response capable of being accommodated within the Planning Envelope and is a more articulated version of the Master Plan massing. It is used to validate solar access and cross-ventilation performance for the buildings themselves and to quantify yield and ADG outcomes.

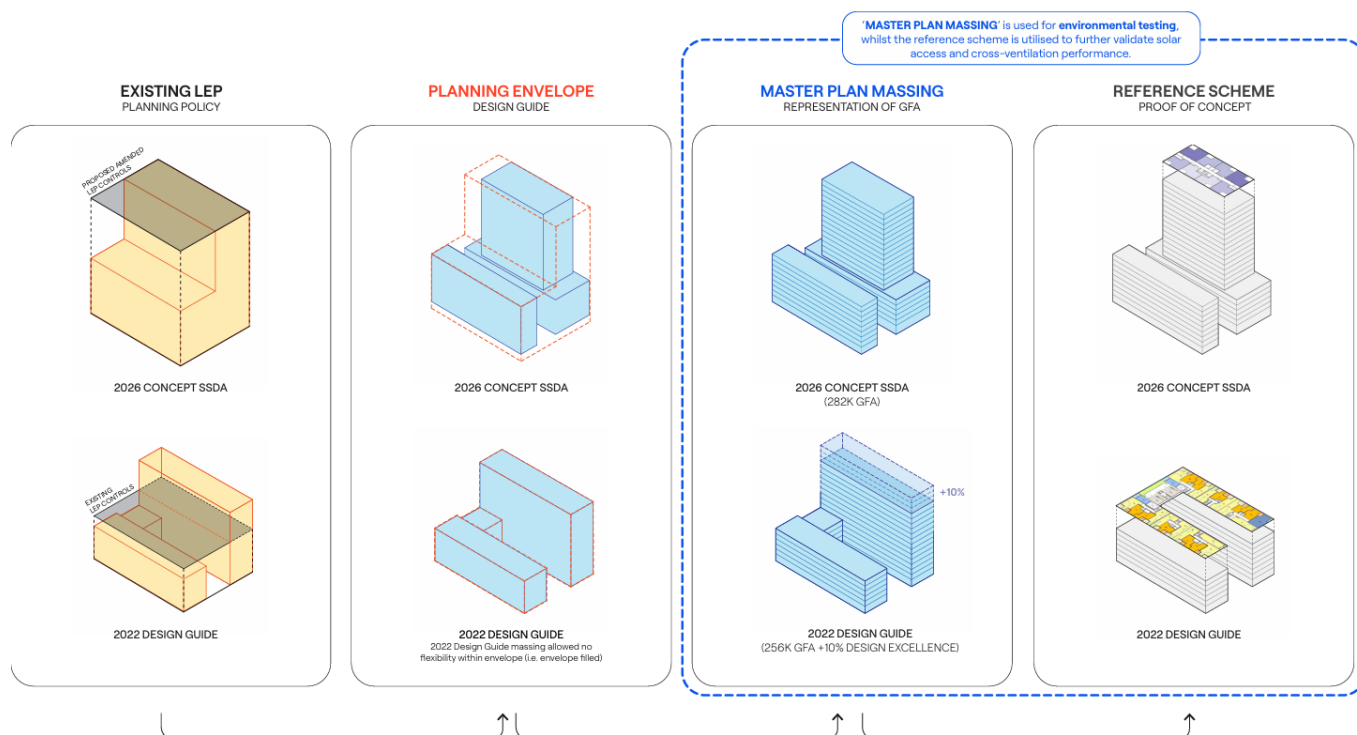


Figure 8 Diagrammatic explanation of planning envelopes

Source: Addendum Urban Design Report prepared by SJB

The diagram also illustrates the difference between the 2022 Design Guide and 2026 scheme approaches. Under the 2022 Design Guide, the planning envelopes were substantially occupied by the master plan massing without accommodating the additional 10% design excellence bonus. As such when the design excellence bonus is applied to the 2022 master plan massing, the ultimate buildings would exceed the permitted planning envelopes. The 2026 scheme incorporates the additional design excellence GFA within the master plan massing, which then also fits within the maximum permitted planning envelopes, intentionally providing limited flexibility for detailed design refinement.

The total GFA proposed under the 2026 scheme (282,485sqm) is comparable with the 256,000sqm contemplated under the 2022 Design Guide plus the 10% design excellence bonus GFA. The Rezoning Proposal included comparison tables that broke down the existing permissible and proposed FSR and Height controls on a per block basis. Refer to Table 7 and Table 8 of the Rezoning Proposal.

The City of Sydney also requested confirmation that the FSR controls are correct and are rationalised against the proposed envelopes and reference scheme. The FSR controls have been reviewed as part of the ongoing design development of the precinct and the amendments arising from that review are described at **Section 3.1.1**. The reference scheme also provides a total GFA of 282,484.64sqm which is accommodated within the maximum permissible GFA of 282,485sqm for the site.

Built Form used for Environmental Assessment

The Master Plan massing is similar to the Planning Envelopes but is reduced to reflect the proposed GFA that is permissible on each block in order to represent a realistic built form that would be permissible within the maximum Planning Envelopes (refer to **Figure 9**). The Master Plan massing is therefore a more suitable baseline to conduct environmental impact assessments such as overshadowing, wind, sky view analysis and visual impacts as it reflects a realistic maximum potential-built form.

The Reference Scheme is a more refined version of the Master Plan massing that includes more detailed building features such as placement of balconies and apartment layouts. The Reference Scheme is not used for environmental testing because it is highly likely to be adjusted and refined in the detailed SSDAs and an assessment using the Master Plan massing represents a worst-base scenario for most impacts.

The Master Plan massing is representative of the worst-case scenario for environmental assessment purposes considering the total GFA. This is further discussed in **Section 4.1.2**.

In this context, it is deemed the most appropriate method to test the worst-case scenario and is the commonly adopted approach on similar scaled projects.

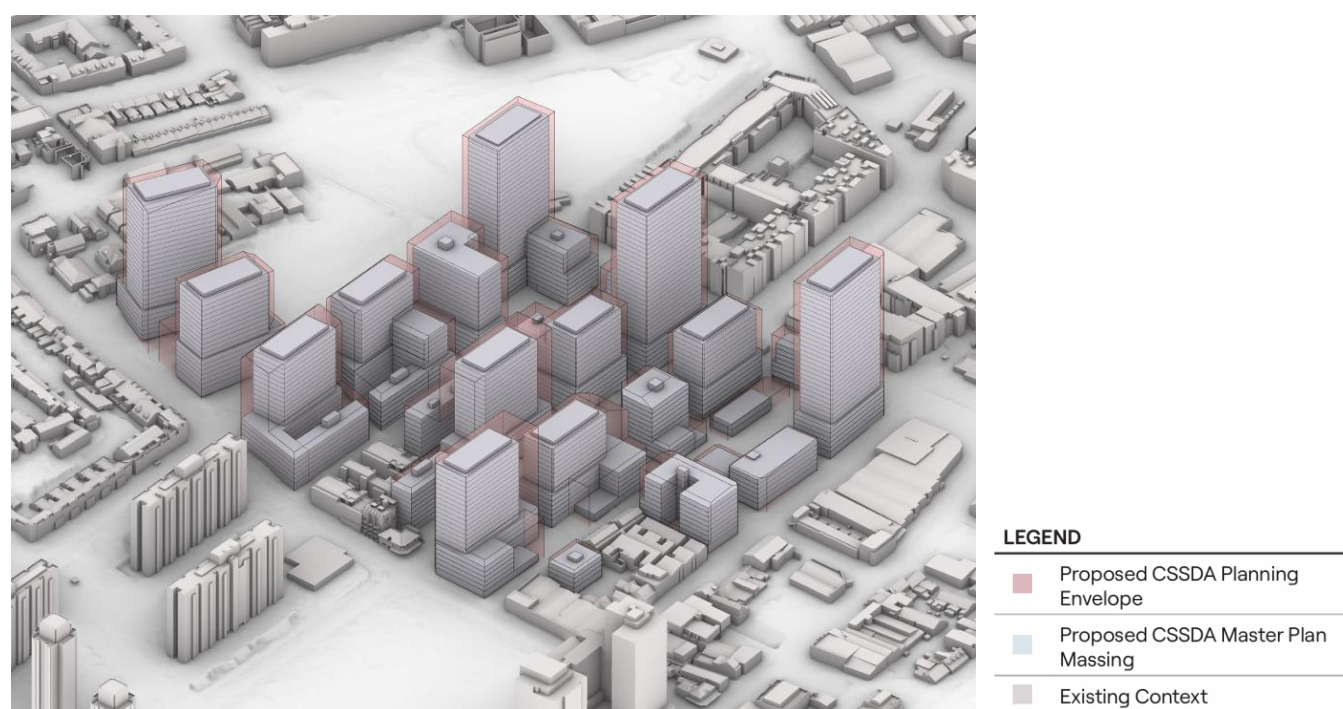


Figure 9 Proposed Planning Envelopes (shown outlined in red) and Proposed Master Plan massing (shown as grey blocks)

Source: Addendum Urban Design Report prepared by SJB

4.1.1.2 Matter raised – Disparity between reference scheme and proposed height controls

It is appropriate for the Planning Envelopes to be rationalised from the Master Plan massing and reference scheme, ensuring that future detailed design development is not unreasonably constrained to a single design solution or a tightly defined, wrapped concept envelope.

Notwithstanding a desire to permit more flexible design solutions, the initially proposed disparity between the exhibited height controls and the Master Plan massing has been reviewed and in response the proposed LEP HOB Map has been amended to reduce the height standards applying to Buildings 4C, 5A, 6A and 8A, as detailed in **Section 3.1.1** of this report.

The reductions apply to the lower mapped height areas of these sites and range from approximately 21m to 40m. These amendments directly address the locations where the greatest disparity existed between the exhibited height controls and the assessed built form (Master Plan massing).

The amendments do not alter the development capacity established by the FSR controls or the total GFA assessed as part of the Concept SSDA. Rather, they reduce flexibility in the vertical distribution of floor space and align the height controls more closely with the expected built form outcome and the environmental assessments undertaken.

No changes are proposed to the height controls applying to Buildings 2D, 9B and 10A for the following reasons:

- **Building 2D (37m):** A reduction would further constrain the ability to achieve high-quality apartment layouts, particularly having regard to the site's south-facing aspect and associated ADG outcomes. The exhibited height control is approximately 6m above the corresponding built form height of 31m.
- **Building 9B (56m):** The exhibited height provides appropriate flexibility for detailed design resolution at the Stage 1 SSDA while maintaining the strategic intent of concentrating height along George Street.
- **Building 10A (39m):** The proposed height control reflects the intended built form outcome for the site, with the podium component of the building approximately 35m in height. The basis for the 25m height referenced in the City's submission is unclear.

The preparation and assessment of a different building massing which would be permitted under the proposed LEP and Revised Waterloo South Design Guide 2026 controls is unnecessary as the Master Plan massing represents a logical and likely maximum intended built form to inform the next stages of detailed design across the precinct. The proposed amendments to the LEP HOB Map further reduce the extent of flexibility beyond the assessed outcome but are believed to reasonably accommodate the City of Sydney's feedback.

4.1.1.3 Matter raised – Reduction in non-residential GFA and inclusion of educational establishment

The reduction in minimum non-residential GFA from 17,000sqm to 15,000sqm reflects a change in the surrounding retail context since the 2022 scheme was prepared, rather than any reduction in the community serving function of the precinct. We note that the removal of the Health One facility from the project requirements is reflected in the proposed introduction of educational establishments within the community related floor space provision. An Addendum Retail Demand Letter prepared by Urbis (refer to **Appendix H**) confirms that the revised minimum non-residential area overall remains sufficient to meet the day-to-day needs of the future resident population.

The 17,000sqm minimum under the 2022 scheme was informed by retail and community floor space advice prepared by Macroplan, calibrated to an anticipated on-site population of approximately 5,542 residents and was intended to deliver a local-serving retail offer anchored by a full-line supermarket, together with specialty retail, non-retail services and community and cultural facilities. The Urbis assessment adopts an on-site population of approximately 5,500 residents, broadly consistent with that assumption. The proposed increase in dwellings therefore does not materially alter the resident population on which the non-residential provision was based and does not generate additional demand for non-residential floor space beyond that assessed.

The proposed minimum 15,000sqm of non-residential floor space provides flexibility to accommodate a range of retail, health, education, community and other services that support residents, workers and visitors to Waterloo South. The final mix and location of these uses will continue to evolve through detailed design and delivery in consultation with community organisations, service providers, Council and Homes NSW.

The revised quantum responds to approved retail development in the surrounding area, principally the Woolworths supermarket at 923–935 Bourke Street, Waterloo (D/2024/1208) located approximately 500 metres from the precinct, together with additional retail within the Metro Quarter development. These remove the need for a full-line supermarket offering within the site and the reduction is attributable to that reduced supermarket floor space requirement, in addition

to the removal of the Health One facility. Recommended specialty retail and food and beverage floor space have increased relative to the 2022 advice, reflecting the intended local village character of the precinct and community and cultural facilities floor space is substantially retained. Urbis' demand modelling, tested across a primary trade area forecast to grow to approximately 21,100 residents by 2036, confirms that 15,000sqm remains sufficient. Retaining the 2022 quantum in this changed context would risk oversupply, prolonged vacancy and reduced activation outcomes.

It is further noted that clause 7.29(3)(a) establishes a minimum requirement, not a maximum cap. Additional non-residential floor space remains permissible and can be delivered at the detailed application stage in response to demonstrated demand, progressively in alignment with population growth, tenant demand and precinct maturation.

The inclusion of 'educational establishment' as a land use that may contribute to the minimum 5,000sqm community service floor space requirement provides flexibility to accommodate a future education facility within the precinct, which would serve the resident population and fulfil a community service function consistent with the intent of the clause. Should an educational establishment not be delivered, the balance of the minimum community service floor space requirement would be met by community uses in accordance with the clause, ensuring the identified community service floor space needs are not diminished.

4.1.1.4 Matter raised – McEvoy Street road acquisition

The potential future road widening along McEvoy Street has been further considered following the exhibition period, including through direct engagement with TfNSW. TfNSW has confirmed that it requires the full extent of the road widening provided for in DP 252609 to be retained. This impacts Blocks 8, 9 and 10 along McEvoy Street.

The proposed Concept SSDA Envelopes for Block 8 already incorporate a setback consistent with DP 252609 as the road widening area is currently zoned SP2 and is identified on the LEP Land Reservation Acquisition Map. The road widening affecting Blocks 9 and 10 equates to a setback of 12.8m at the splay edges and approximately 10.34m along the majority of the McEvoy Street frontage (as measured by RPS). This exceeds the 9m setback to McEvoy Street established for Blocks 9 and 10 by the Waterloo Estate (South) Design Guide 2022, which informed the exhibited Concept SSDA Envelopes.

In response, the following amendments are proposed:

- The FSR Map has been amended for Blocks 9 and 10 so that the mapped development area excludes the land subject to the road widening in DP 252609 (refer to **Figure 5**).
- The HOB Map has been amended for Blocks 9 and 10 so that the mapped development area excludes the land subject to the road widening in DP 252609 (refer to **Figure 4**).
- The Block 9 and Block 10 Concept Envelopes have been amended to reallocate the GFA previously located within the widening area, which encroached 1.34m into that land in the exhibited scheme (refer to **Appendix C**).

It is understood that at this stage no detailed road design has been progressed by TfNSW and the land associated with Blocks 9 and 10 is not currently identified within the Sydney LEP 2012 Land Reservation Acquisition Map. Should TfNSW proceed with an upgrade of McEvoy Street in the future, the amended envelopes maintain the setback required by DP 252609 to the full extent of the McEvoy Street frontage of Blocks 9 and 10 and no built form is proposed within the land subject to the road widening. The Applicant considers that the road widening requirement is appropriately given effect through the deposited plan and the amended FSR mapping and envelopes, which together ensure no development is proposed on the affected land.

4.1.2 Provision of social and affordable housing

4.1.2.1 Matter raised - Affordable housing tenure and duration

The extent and duration of affordable housing proposed across the precinct was raised throughout many of the submissions received. Clause 7.29(3)(c) and (d) of the Sydney LEP 2012 require a minimum of 26.5% of residential floor space to be used for social housing premises and a minimum of 7% to be used for affordable housing. The proposal exceeds both minimums. The affordable housing component of the development will be provided in accordance with the definition of affordable housing established in Section 1.4 of the *Environmental Planning and Assessment Act 1979*.

The 7% of residential GFA to be owned and managed by a community housing provider in perpetuity satisfies the affordable housing requirement of clause 7.29(3)(d) in full and for the life of the development, consistent with the requirement of that clause that the floor space be used for affordable housing in perpetuity. The affordable housing required under the planning framework applying to the site is accordingly not capable of being lost at the expiry of any retention period.

The balance of the affordable housing is provided over and above the requirements of clause 7.29(3)(d). It is proposed for a minimum of 25 years, exceeding the 15-year period that is standard practice for affordable housing delivered under *State Environmental Planning Policy (Housing) 2021* and reflects the term contracted with Homes NSW. No change to that term is proposed. The overall allocation is above that typically delivered in comparable renewal precincts.

The affordable and social housing allocation for Waterloo South is contractually secured between Stockland and Homes NSW and the tenure split identified in the Concept SSDA, comprising a minimum 30% of residential floor space on Homes NSW land for social housing and approximately 20% for affordable housing, including a minimum 7% of residential GFA to be owned and managed by a community housing provider in perpetuity, will be maintained in accordance with those agreements. A minimum of 50% of the proposed residential floor space is proposed as social and affordable housing, which significantly exceeds the rate of other renewal precincts in NSW.

As always anticipated, build-to-sell floor space cross-subsidises the delivery of the social and affordable housing components across the precinct. Any reduction in build-to-sell yield, or extension of the affordable housing obligations beyond those contracted, would materially affect the funding capacity and feasibility of the project and, in turn, the delivery of the social and affordable housing it supports.

4.1.3 Planning Agreement and Infrastructure Delivery

4.1.3.1 Matter Raised - Delivery timing of public open space and community facilities

In their submission, the City of Sydney noted support for the proposed locations of the open space and community facilities across the precinct and for the staging of the delivery of the community facilities in accordance with the Planning Agreement. 50% of the precinct GFA is anticipated to be delivered on completion of Stages 1, 2 and 3, therefore the completion of the Block 1 Park is anticipated to be delivered prior to the completion of Stage 3.

The Infrastructure and Staging Plan prepared by WSce (refer to Appendix Z of the submitted EIS) identifies the delivery of Block 1, comprising the main park area, as the third stage in the proposed construction sequence, following the delivery of Blocks 8 and 9 and Blocks 2 and 4. On this basis, the large public open space would be delivered in accordance with the timeframe required under the Planning Agreement.

Some community submissions also commented on the location of community facilities to be delivered, including a reference to previous consultation whereby a preference for community facilities to be located in the main park. Whilst the detailed design and planning of the main park will be led by Council (under the VPA), it is noted that City of Sydney has requested a floor space ratio be applied to the main park. This has now been incorporated, which provides a baseline for the delivery of some floor space within the main park in the future. As the future owner of the main park land (under the VPA), this is a matter for Council to consider in the future.

4.1.3.2 Matter Raised - Public open space quantum

The quantum of public open space identified in the EIS is consistent with the Planning Agreement. The Planning Agreement provides for approximately 21,000sqm of land to be dedicated as public parks and separately provides for a total of approximately 23,600sqm to be embellished, with that quantity inclusive of any road closures.

The noted approximate 20,000sqm large park and 1,000sqm local park identified in the EIS therefore corresponds to the park land to be dedicated under the Planning Agreement, rather than the total embellishment area. The difference between the two figures reflects the inclusion of the permanent road closure within the embellishment obligation and does not represent a shortfall in the open space to be delivered. Therefore, it is confirmed the Applicant intends on complying with the relevant requirements of the Planning Agreement in delivering public parks and precinct embellishment. The obligations of the applicant and the City of Sydney in relation to the permanent road closure are as set out in the Planning Agreement and are unaffected by the Concept SSDA.

4.1.3.3 Matter Raised - City-dedicated community facilities

The Planning Agreement requires approximately 2,400sqm of community floor space to be dedicated to the City of Sydney across no more than two locations within the precinct, to accommodate multi-purpose community facilities. This dedication forms part of and is not additional to, the minimum 5,000sqm of community uses required under clause 7.29(3) of the Sydney LEP 2012.

The Concept SSDA allocates the City of Sydney dedicated community floor space to Blocks 2B and 8D, consistent with the two-location limit under the Planning Agreement. The maximum GFA capable of accommodating community floor space is 1,618sqm within Block 2B and 872sqm within Block 8D, a total of 2,490sqm. The Concept SSDA therefore retains capacity to deliver no less than 2,400sqm of community floor space to the City across no more than two locations.

The City of Sydney's preference for consolidation of City-owned facilities to minimise their spread across multiple floors is noted. Floor plate configuration and the internal arrangement of community facilities will be resolved at detailed application stage and the proponent is agreeable to a condition requiring the dedicated floor space to be consolidated within each location so far as is practicable. Stockland has reached out to the City of Sydney in June 2026 to commence consultation on the design of the Stage 1 Block 8 park and community facility. A meeting was held between Stockland and City of Sydney on 13 August 2026 to discuss next steps.

4.1.3.4 **Matter Raised - Land Dedication / VPA commitments**

The errors and anomalies identified by the City of Sydney in Table 10 of the EIS have been rectified. **Table 7** sets out the revised indicative development staging and associated land dedication and Planning Agreement commitments, with amendments shown in bold.

In relation to Mead Street, the upgrade is proposed to be staged across the delivery of Block 9 (Stage 1) and Block 10 (Stage 5). Stage 1 provides for public domain upgrades to the Mead Street western footpath for the length of Block 9 between McEvoy Street and John Street, with Block 9 designed to the new western footpath level. Temporary works will address the height differential between the new footpath and the existing road level and pedestrian and vehicle access will be maintained via the existing alignment. The raising of the road level and realignment of Mead Street will be undertaken with the delivery of Block 10 in Stage 5. Undertaking that work in Stage 1 would have adverse impacts on vehicle access for the existing residents of Block 10 and the staged approach is therefore considered appropriate to maintain access while enabling the progressive delivery of the street upgrade.

In relation to West Street, the reference to upgrades within Stage 2 relates to the development of Block 4, which is bounded by George Street, West Street and John Street. **Table 7** has been amended to identify Block 4 rather than Block 3 in this regard. New or revised text is shown in **bold**.

Table 7 Indicative Development Staging and VPA Commitments

Stage	Indicative Development Staging	Land Dedication / VPA commitments
Stage 1 – Blocks 8 & 9	Stage 1 comprises the redevelopment of Blocks 8 and 9 and establishes the foundation for the renewal of Waterloo South. Key components of Stage 1 include: • Delivery of Blocks 8 and 9 as the first phase of redevelopment. • Establishment of George Street as the central north-south spine of the precinct, supporting movement, connectivity and early activation. • Early activation of George Street through ground-level retail and community uses, creating a safe, legible and weather-protected pedestrian link to the metro station and strengthening connections to Green Square. • Accelerated delivery of public open space, landscaping and stormwater infrastructure within Block 8, including deep soil zones and water-sensitive urban design measures. • Delivery of Blocks 8 and 9, including the Block 8 tower as a gateway building and landmark signalling the commencement of precinct transformation. • Provision of an anchor non-residential tenant in the early phase to support residents, workers and visitors and foster an active, walkable neighbourhood. • Stage 1 will deliver essential public domain, infrastructure and activation outcomes to support subsequent stages of development	Stage 1 comprises the construction and delivery of key road infrastructure works surrounding Blocks 8 and 9, including upgrades to the eastern half of Cope Street, southern portion of John Street and full extent of George Street, together with associated public domain improvements such as new footpaths. The upgrade of Mead Street is proposed to be staged across the delivery of Block 9 (Stage 1) and Block 10 (Stage 5). In Stage 1, public domain upgrades associated with the Mead Street western footpath for the length of Block 9 (between McEvoy Street and John Street) are proposed, with Block 9 designed to the new Mead Street western footpath level. Temporary works will address the height differential between the new footpath and the existing Mead Street road and pedestrian levels and vehicle access will be maintained via the existing Mead Street alignment. The raising of the road level and realignment of Mead Street will be undertaken with the delivery of Block 10 in Stage 5, as upgrading the level of Mead Street in Stage 1 would have adverse impacts on vehicle access for the existing residents of Block 10. Stage 1 also proposes the delivery of Cooper Street South and Cooper Place, to be dedicated to Council and the establishment of East-West through-site links and now an additional North-South through-site link, provided as easements. In addition, Stage 1 includes the dedication of community infrastructure and the delivery of the Block 8 public open space.

Stage	Indicative Development Staging	Land Dedication / VPA commitments
	and establish a high-quality urban environment from the outset.	
Stage 2 – Blocks 2 and 4	Stage 2 focuses on enabling development within the western and central portions of the precinct while utilising the existing street network and deferring areas requiring more complex coordination. Stage 2 includes: • Redevelopment of the Stage 2 blocks (Blocks 2 and 4). Block 2 is bounded by Cope Street, Wellington Street, John Street and Cooper Street, whilst Block 4 is located further east and is bound by George Street, Wellington Street, West Street and John Street as shown on the staging plan. • Use of the existing road network to facilitate construction works, minimising the need for early delivery of new streets or road realignments. • The community building within block 2 is to be delivered through consultation with City of Sydney. • Progressive extension of George Street activation through additional residential, retail and community uses. • Delivery of associated public domain works, landscaping and infrastructure necessary to support subsequent stages.	Stage 2 proposes the delivery of key public domain upgrades for the extent of development proposed within Blocks 2 and 4. This includes road improvements and footpath upgrades to the eastern extent of Cope Street between John Street and Wellington Street adjacent the allotments subject to this proposal (i.e. excluding the privately owned lots). Road widening, dedication and improvements are proposed to Cooper Street as follows: • Building 2D - Cooper Street to the extent of the building frontage on the western side. • Building 2B - the balance of the Cooper Street frontage on the western side in front of Building 2B and the adjacent private residences. • The eastern side of Cooper Street is proposed to be developed as part of Stage 3. Stage 2 includes road improvements and public domain upgrades to John Street and George Street along the extents of Blocks 2 and 4. Public domain improvements are also proposed along West Street adjoining the Block 4 development site (bounded by George Street, West Street and John Street). Stage 2 also includes the dedication and embellishment of the section of John Street and the West Street extension fronting the Stage 2 development sites, to provide pedestrian and vehicle access and circulation. This stage will also facilitate the delivery of the remaining community infrastructure to be dedicated to Council for community facilities. The continuation of the east-west through site link through Block 4 and provision of the link as an easement is also proposed as part of Stage 2.
Stage 3 – Block 3	Stage 3 focuses on redevelopment of the Block 3 and will complete the central portion of the precinct and of the key east-west connection. The redevelopment of Stage 3 comprises the construction of Block 3 bound by Wellington Street, Cooper Street, Street, John Street and George Street.	Stage 3 comprises the delivery of necessary road and public infrastructure to support Block 3, including on the Wellington Street, George Street and John Street frontages of the block. Footpath upgrades only are proposed for the extent of the site along Cooper Street east. Road widening and improvements on Cooper Street are proposed as part of Stage 3. The east-west through-site link proposed between Buildings 3A and 3B is also proposed to be constructed and provided as an easement in favour of Council as part of Stage 3.
Stage 4 – Blocks 5 & 6	Stage 4 proposes the concurrent delivery of Blocks 5 and 6. Blocks 5 and 6 are bound by Wellington Street, Pitt Street, John Street and West Street.	Stage 4 includes the new road extension for West Street, allowing for its connection to the new section of John Street. Road widening is also proposed to the northern extent of West Street, improving the connection to Wellington Street. The new road extension of Pitt Street is also proposed for the extent of Block 6. The extent of Pitt Street adjoining Block 6 is also proposed to be upgraded and improved. As only the first section of the Pitt Street extension is proposed within this stage, a temporary turning head for vehicles may be required.

Stage	Indicative Development Staging	Land Dedication / VPA commitments
		The public domain improvements, including but not limited to new and upgraded footpaths surrounding Blocks 5 and 6. Stage 4 also includes the dedication and embellishment of the section of John Street fronting the Stage 4 development sites. The east-west pedestrian through-site link connecting West Street to Pitt Street between Blocks 5 and 6 is also proposed as part of Stage 4.
Stage 5 – Block 10	Stage 5 focuses on redevelopment of the southern portion of the precinct and the strengthening of connections to adjacent open space. The redevelopment of Stage 5 comprises the construction of Block 10 and completion of the physical and visual interface with Waterloo Park, improving accessibility, landscape continuity and integration between the precinct and surrounding public open space.	New sections of Pitt Street and Mead Street for the extent of Block 10 are proposed to be constructed and dedicated to Council in Stage 5. This includes the raising of the Mead Street road level and the realignment of Mead Street, completing the staged upgrade of Mead Street commenced in Stage 1. Stage 5 also comprises the extension and dedication of John Street to Council, between Mead Street to Waterloo Park. Public domain improvements are proposed as part of this stage, surrounding Block 10. The east-west pedestrian through-site link connecting Mead Street to Pitt Street between Buildings 10A and 10B is also proposed as part of Stage 5.
Stage 6 – Block 7	Stage 6 represents the final built-form component of Waterloo South and enables coordinated integration with the future Waterloo Central renewal area. The redevelopment of Stage 6 comprises the construction of Block 7, in the easternmost portion of the precinct.	Road upgrades and improvements to Pitt Street for the extent of Block 7 are proposed, as well as to Wellington Street. Public domain improvements, including new and upgraded footpaths are also proposed surrounding Block 7 as part of this development Stage.
The Park - Block 1	This stage delivers the principal public open space within the precinct. This stage comprises the delivery of the Village Green (future park) and landscape works and associated public domain infrastructure. The design of the public park will be undertaken in collaboration with the City of Sydney. <i>* The park is required to be delivered prior to the occupation of 50% of the total GFA across the precinct. As such, the park is not to be delivered as the last stage, but in advance of the occupation of 50% of the residential GFA across the precinct.</i>	This stage includes embellishment and dedication of the remaining public open space required by the VPA (approximately 20,000m ²). This stage also includes road upgrades to Raglan Street, George Street, Wellington Street and Cope Street and public domain works, including new and upgraded footpaths surrounding Block 1.

4.2 Procedural Matters

Procedural matters raised related to exhibition timeframes, addressing the SEARs and the consent authority. These matters have been responded to in the submissions register in **Appendix A**.

4.3 Economic, Environmental and Social Impacts

4.3.1 Building Envelopes and Massing

4.3.1.1 Matter raised - Envelope flexibility and urban form controls

The proposal retains the established street and block structure of Waterloo South rather than consolidating the site into larger development parcels, maintaining the permeability and grain of the existing precinct and its continuity with the surrounding streets.

The proposed Concept Envelopes have been shaped by those constraints, together with the retained and proposed open space network, the topography of the precinct and its heritage and residential interfaces to the east and south. The

Design Guide informs the built form within those envelopes through maximum street wall heights calibrated to each street, height in storeys, setbacks to street, side and rear boundaries and the through-site links, active frontage, deep soil and communal open space provisions applying to each block.

The Design Guide is structured to provide greater certainty on the outcomes that determine precinct character, while retaining defined flexibility in the means by which those outcomes are achieved. Future applications will be required to demonstrate consistency with the relevant objectives, design criteria and design guidance of the Design Guide, together with the ADG.

SJB has reviewed the relationship between the Concept Envelopes and the proposed LEP development standards and have made targeted refinements to provide greater certainty while preserving the flexibility required to achieve high-quality design outcomes through future applications. The LEP HOB Map has accordingly been amended to bring the height controls into closer correspondence with the built form provided for by the Concept Envelopes, as described at **Section 3.1.1**. Amendments to the Design Guide, including the introduction of a minimum upper-level setback along George Street, are addressed at **Section 4.3.1.2**.

The proposed targeted refinements relating to Blocks 5 and 6 are illustrated in **Figure 10** and **Figure 11**. For these Blocks, the proposed LEP HOB Map has been amended to more closely align to the proposed Concept SSDA Envelopes and Revised Waterloo South Design Guide 2026 'Height in Storeys' controls.



Figure 10 Blocks 5 & 6 - Initially proposed LEP HOB map (left image) and now revised LEP HOB map (right image)

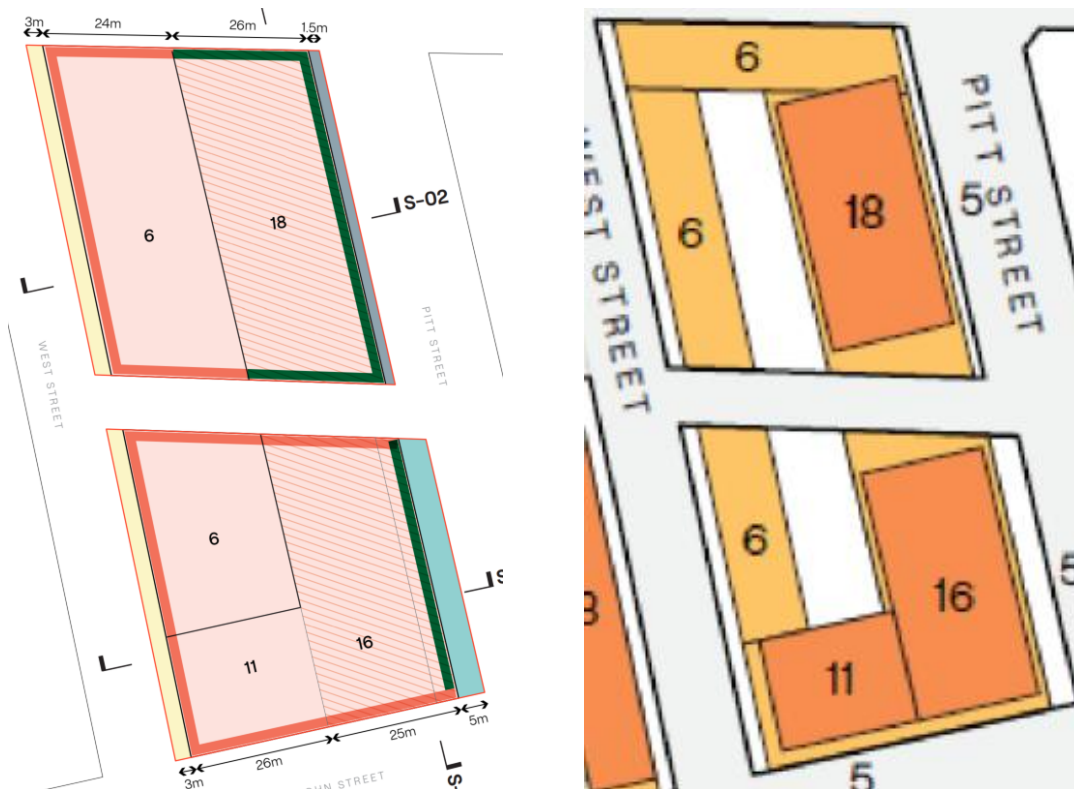


Figure 11 Blocks 5 & 6 - Proposed Concept SSDA Envelope (left image) and Revised Design Guide Height in Storeys Map (right image)

4.3.1.2 Matter raised - Upper-level setbacks and street wall

In response to the submissions, a new Design Guide control is proposed requiring a minimum 1.5m upper-level setback along George Street (refer to Figure 14a and Section 8.3 of the revised Design Guide and **Figure 12** below). In combination with the maximum street wall height controls, this will deliver a clear podium and tower expression, establish visual consistency along the street corridor and maintain an appropriate human scale at street level.

Maximum street wall height controls apply across the precinct and, together with the height-in-storeys and building separation provisions, establish the built form hierarchy along all street frontages. The additional mandated upper-level setback proposed for George Street is in recognition of its civic role and the continuity of address sought along that

corridor. Elsewhere, street wall expression is calibrated to the character and scale of the individual street, including the street wall and podium outcomes at Block 7 described at **Sections 4.3.2.2** and **4.3.2.3**.

Flexibility above the minimum setback enables future design teams to optimise floorplate efficiency, apartment amenity, solar access, wind performance, building separation and responses to individual site conditions, all of which are more appropriately resolved at the detailed design stage, guided by the ADG. Consistency with the ADG's objectives will be assessed in each future development application. The Addendum Urban Design Report (refer to **Appendix F**) has included an assessment of the additional setback in relation to wind, sky view and solar impacts. The assessment concludes the proposed setback has no material impact upon each of these matters when compared to the submitted Concept SSDA.



Figure 12 Revised Design Guide - Figure 14a: Upper Level Setbacks
Source: Addendum Urban Design Report prepared by SJB

4.3.2 Environmental Amenity

4.3.2.1 Matter raised – Wind environment

SLR has provided an Addendum Wind Response Letter (refer to **Appendix L** of this report) to accompany the Environmental Wind Tunnel Assessment Report (refer to Appendix O of the EIS) and to respond to each of the key matters raised within submissions relating to wind conditions. The Addendum Wind Response Letter confirms that original testing undertaken and submitted with the application was undertaken using the 5% exceedance speed data for comfort and safety. It therefore confirms that the point-by-point comparison provided in Table 7 of the Environmental Wind Tunnel Assessment Report (refer to Appendix O of the EIS) provides a consistent and accurate comparative analysis between the 2022 Design Guide and proposed master plan scenarios.

The location of wind measurement points was strategically selected within the immediate proximity of the proposed development, where the influence of the building mass is the greatest. If the application was to include measurement points further from the site, these would predominantly be influenced by the surrounding urban environment, rather than the proposed development itself. Therefore, it is not likely any changes in wind conditions attributable to the proposed development would be apparent.

It is noted the test points included in the Environmental Wind Tunnel Assessment Report along the western extent of Waterloo Park and northern extent of Waterloo Oval represent the points closest to the proposed development. The Addendum Wind Response Letter (refer to **Appendix L**) confirms these are the most appropriate testing locations as they are the first areas within the park to experience any development-induced changes in airflow. The selection of these points provides a conservative and representative indication of potential wind impacts within the park. Furthermore, due to the combined effects of additional physical separation from the proposed development and the existing shelter within the parks provided by trees and mature vegetation, additional testing would likely conclude that the sitting comfort criterion is likely to be achieved within each of the existing parks.

The point-by-point comparison establishes minor unfavourable wind conditions in some locations when compared with the 2022 Design Guide conditions (George Street) and minor favourable conditions in other locations when compared with the 2022 Design Guide conditions (Cooper Street).

George Street is proposed as a pedestrian-friendly, main street within the Waterloo South precinct and the proposed wind conditions reflect this, by establishing a variety of locations comfortable for walking, standing and sitting. In a baseline scenario, the proposed development results in six sitting locations on George Street, proximate proposed non-residential tenancies, allowing for potential future outdoor dining. When mitigation measures are introduced, a total of eight locations are able to achieve the wind comfort criterion for sitting.

While a minor reduction in sitting comfort is identified along George Street compared with the 2022 Design Guide scenario, the overall function and amenity of the street as a pedestrian-focused environment is maintained. The proposed layout also distributes pedestrian activity and wind amenity outcomes across the broader precinct rather than relying solely on George Street as the primary pedestrian destination.

The proposed change to conditions on George Street, as explained in the Addendum Wind Response Letter (refer to **Appendix L**) is therefore considered minor and does not diminish the amenity of the public domain so as to discourage pedestrian activity. In this light, the proposed development ensures a comfortable pedestrian wind environment across a wider area than the existing Design Guide facilitates.

The wind environment for the Block 1 park was determined by SLR to satisfy the standing criterion for the proposed development which is consistent with the conditions under the existing Design Guide controls (refer to Appendix O of the EIS). Given the proposed conditions are consistent with that under the 2022 Design Guide, it is noted that further testing will be provided at the future detailed application stage, once the seating locations within the park are confirmed. The Addendum Wind Response Letter (refer to **Appendix L**) also confirms that the implementation of targeted and specific wind mitigation measures, such as trees, or shade structures, will readily reduce local wind speeds to allow for the sitting comfort criterion to be achieved within the park at appropriate locations.

Similarly, the Block 8 park was found to have a favourable baseline wind environment in the Environmental Wind Tunnel Assessment Report (refer to Appendix O of the EIS). Accordingly, the Addendum Wind Response Letter (refer to **Appendix L**) confirms that with detailed design development and the inclusion of similar wind mitigation measures to that suggested for the Block 1 Park, there is high likelihood the sitting criterion will be achieved within some locations in the park.

4.3.2.2 Matter raised - Overshadowing and solar access to surrounding development

Privately owned properties within Waterloo South

It is acknowledged that several privately owned properties are located within the Waterloo South precinct. In response to matters raised in community submissions and the Department's key matters letter, additional shadow analysis has been undertaken and is provided in the Addendum Urban Design Report accompanying this response (refer to **Appendix F**).

The additional analysis compares the proposed Master Plan massing with the applicable base scenario, comprising the 2022 Design Guide with a 10% increase to FSR to account for the uptake of the design excellence bonus. This provides an appropriate and equitable comparison in respect of total GFA which equates to building massing. Particular attention has been given to Block 2, which contains a number of privately owned properties, including 233-246 Cope Street and 111, 123 and 127 Cooper Street.

The analysis demonstrates that while these properties within Block 2 would experience some overshadowing under the proposed Master Plan massing, they would generally remain free from shadow between 11:00am and 2:00pm in mid-winter before becoming affected by shadows from the Waterloo Metro Quarter development (refer to **Figure 13**). The exception is 111-113 Cooper Street which experiences overshadowing during this window from the proposed Block 2B community building. Notably, this overshadowing exists under both the 2022 Design Guide (+10%) and Master Plan massing scenarios and is therefore not the result of the Rezoning Proposal or Concept SSDA, but is an expected condition under the current planning framework.

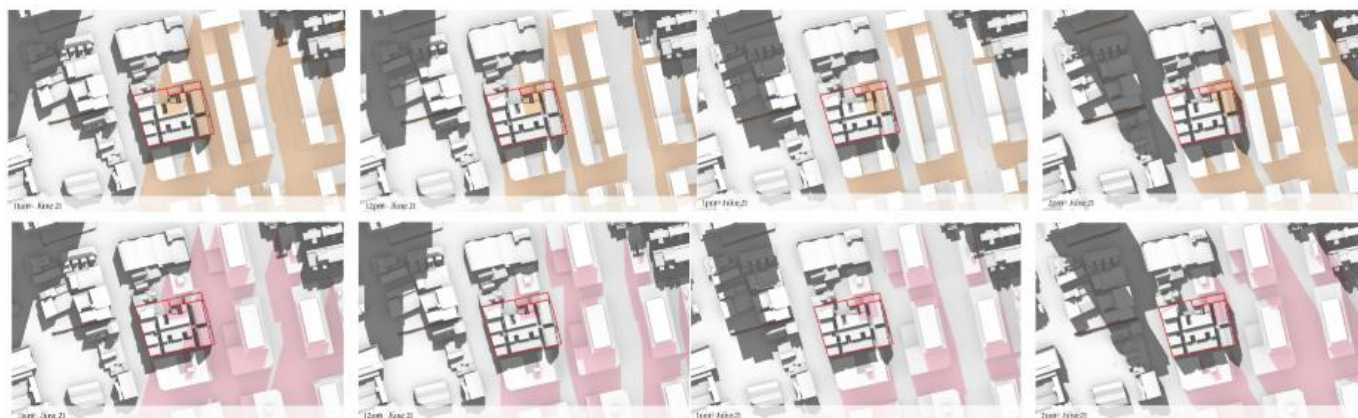


Figure 13 Block 2 - Overshadowing analysis

Source: Addendum Urban Design Report prepared by SJB

The broader overshadowing effect to the privately owned properties within Block 2 is generally consistent with those produced by the Design Guide (+10%). Accordingly, the impacts of overshadowing are not specifically attributable to the Concept SSDA or Rezoning Proposal, but rather they arise from the built form outcomes that are already contemplated by the existing planning framework.

Furthermore, it is also noted that within Block 4, 110 Wellington Street will continue to be overshadowed by the proposed development and existing development to the north until 11:30am in mid-winter, before being shadowed again by the proposed development from 1:30pm to its eastern western extent. Overshadowing impacts were considered as part of the previous Waterloo South Planning Proposal and this application does not seek to amend the applicable planning controls in a manner that would materially worsen the previously assessed impact. Further assessment of the solar impact to 110 Wellington Street will be provided as part of the relevant future detailed SSDAs.

McEvoy Street Apartments

The impacts of overshadowing to the McEvoy Street apartments directly to the south of the site have been assessed as part of the Concept SSDA. It is noted that there are three modelled McEvoy Street buildings, being 52-54 McEvoy Street, 40-46 McEvoy Street and 34-28 McEvoy Street. Solar testing undertaken using the 2022 Design Guide master plan massing confirms that none of the three buildings would achieve the ADG design criteria of a minimum of 70% of apartments to receive at least two hours of direct sunlight to primary living rooms and/or private open space between 9.00am and 3.00pm at mid-winter.

Table 8 outlines the percentage of apartments achieving two hours of direct sunlight at mid-winter under the various scenarios.

Table 8 Analysis of 2 Hours of Solar Access to McEvoy Street Apartments at mid-winter

Property	Existing	2022 Design Guide	Master Plan Massing	% Change (2022 DG)
52-54 McEvoy Street	78.78%	68.18%	60.61%	-18.7% (-7.57%)
40-46 McEvoy Street	48.70%	42.67%	40.95%	- 7.75% (1.72%)
34-38 McEvoy Street	70.58%	69.41%	57.65%	-12.93% (-11.76%)

Objective 3B-2 of the ADG seeks to ensure that “overshadowing of neighbouring properties is minimised during midwinter” and provides design guidance that states, “where an adjoining property does not currently receive the required hours of solar access, the proposed building ensures solar access to neighbouring properties is not reduced by more than 20%”. While this guidance relates specifically to developments that do not currently achieve compliant solar access, it provides a useful benchmark for assessing overshadowing impacts to the south in light of no other specific guidance.

Table 8 outlines that the proposed development reduces the number of apartments receiving two hours of solar access by a range from 7.75% to 18.17% when compared with the existing site conditions. When the proposal is compared with the 2022 Design Guide, the reduction ranges from 1.72% to 11.76%. Under each of the scenarios, the proposal does not reduce the solar access achieved to these apartments to the south by more than 20%, consistent with the design guidance established by Objective 3B-2 of the ADG and consistent with the assessment methodology seemingly adopted in the preparation of the 2022 Design Guide.

The proposed scale of development has been sited to balance amenity across neighbouring sites and within the precinct, while delivering 10% more GFA than currently designed within the 2022 Design Guide envelopes. Despite increasing the GFA accounted for within the 2022 Design Guide by 10%, the proposed reduction to solar access compared to the 2022 Design Guide is maintained at significantly less than 10% to 52-54 McEvoy Street (7.57%) and 40-46 McEvoy Street (1.72%) and less than 12% to 34-38 McEvoy Street (11.76%). This balanced outcome demonstrates an appropriate level of amenity is maintained to apartments to the south, whilst maximising the provision of social and affordable housing within Waterloo South to the quantity envisaged under the Sydney LEP 2012.

The analysis also demonstrates the proportion of dwellings receiving two hours of direct sunlight to at least one of either the private open space or primary living room will increase, indicating that many of the additional apartments which will receive less than two hours of solar access to both living and rooms and private open space are still likely to receive between 0 and 2 hours of sunlight at mid-winter to one of these spaces. **Table 9** provides a comparison of apartments achieving 2 hours of direct sunlight at mid-winter to one of either the primary living room or private open space.

Table 9 Apartments receiving 2 hours of direct sunlight to either the primary living rooms or private open space at mid-winter

Property	Existing	2022 DG	Master Plan Massing	% Change (2022 DG)
52-54 McEvoy Street	92.41%	89.39%	78.79%	-13.62% (-10.6%)
40-46 McEvoy Street	55.16%	54.31%	51.73%	-3.43% (-2.58%)
34-38 McEvoy Street	95.28%	92.94%	90.95%	-4.33% (-1.99%)

This distinction assists in the assessment of amenity achieved to these apartments as dwellings that continue to receive two hours of direct sunlight to their primary living room, continue to benefit from the warmth and access to daylight to their primary internal living area during mid-winter. Similarly, apartments that retain the two hours of sunlight to their private open space would continue to have access to a sunlight outdoor area. While this outcome does not strictly accord with the wording of the ADG Design Criteria, it does represent a higher-level amenity for apartments than an apartment receiving less than two hours of direct sunlight to both spaces.

Other Nearby Development

It is noted there are a number of other properties within close proximity to the site. The Precinct Site Analysis – Shadow Study (refer to **Appendix F – Urban Design Appendices** of the EIS) demonstrates that any overshadowing that results from the proposal generally ensures that all properties located to the west of the site are free from shadow after 11:00am and properties to the east of the site are free from shadow until 12:00pm in mid-winter, whereby private properties to the east are not shadowed by the proposed development until approximately 1:30pm.

A more detailed assessment of the shadows cast by development proposed for Block 7 has been provided as part of the Addendum Urban Design Report (refer to **Appendix F**) in response to the comments received from the City of Sydney and the Public regarding the scale of development in this location. The analysis confirms that nearby properties, located on Gibson Street are not impacted by shadows from the proposed development until 1:00pm in mid-winter. The Our Lady of Mt Carmel Church and School is overshadowed by the proposal after 12:00pm, however, it is noted this is relatively consistent with the shadows cast by the 2022 Design Guide (+ 10%) scenario. An assessment of the proposed impacts to the heritage item, including overshadowing is included in the Statement of Heritage Impact submitted with the EIS. Other private properties to the east are also overshadowed by the proposed development at various times from 1:00pm in mid-winter, ensuring that solar access continues to be achieved for these properties by maintaining their existing access to morning and midday sun.

Overall, the overshadowing cast by the proposed development to nearby properties to the east and west of the site are demonstrated to be generally consistent with that contemplated under the 2022 Design Guide and therefore remain appropriate.

Waterloo Park and Waterloo Oval

Solar access to public open space has been assessed at 15-minute intervals between 9.00am and 3.00pm at mid-winter, against the 2022 Design Guide requirement that a minimum of 50% of each park receive at least four hours of direct sunlight (refer to **Appendix F**). Consistent with the adopted approach, the proposed scheme is compared with the 2022 Design Guide inclusive of a 10% increase in floor space to account for the uptake of the design excellence bonus.

Each of the public open spaces achieves the minimum requirement under the proposed scheme. Waterloo Oval is effectively unchanged, at 96.69% compared with 96.48% under the base scenario. Solar access to Waterloo Park reduces from 59.13% to 55.10%, a reduction of 4.03%. The park continues to achieve the minimum requirement, with more than half of its area receiving four hours of direct sunlight at the winter solstice and the affected area is at the northern extent of the park, with the principal open playing area remaining unaffected.

Table 10 Solar access to parks

Park	2022 DG	2022 DG + 10%	Master Plan Massing	% Change (2022 DG+10%)
Waterloo Park	63.3%	59.13%	55.10%	-4.03%
Waterloo Oval	96.77%	96.48%	96.69%	+0.21%

Public Domain

As detailed within **Section 4.3.1.2** the proposed massing continues to ensure amenity is shared by public domain across the precinct. Where there are reductions in solar access to some locations, for example to George Street, increases are proposed to other locations, for example to Cooper Place (refer to **Figure 14** and **Figure 15**).



Figure 14 Precinct Solar Analysis - 2022 Design Guide Scenario

Source: SJB Urban Design Report – Refer to Appendix F of the submitted EIS

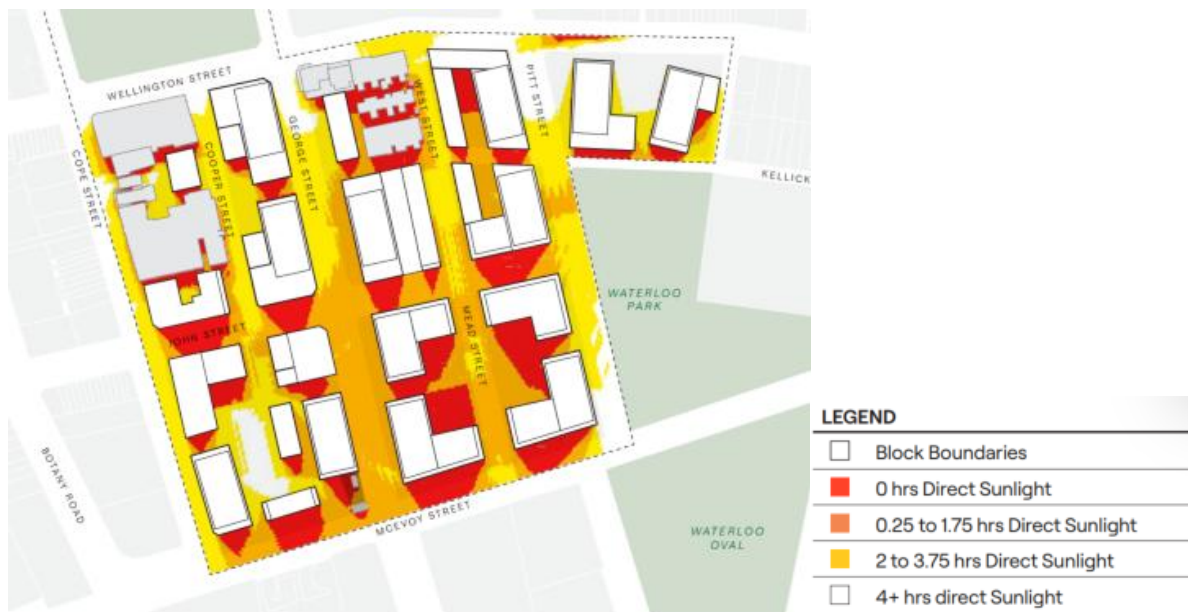


Figure 15 Precinct Solar Analysis - Master plan massing scenario (including proposed 1.5m upper level setbacks on George Street)

Source: **Appendix F - SJB Addendum Urban Design Report**

Consistent with the adopted approach, **Table 11** compares the proposed scheme with the 2022 Design Guide inclusive of a 10% increase in floor space to account for the uptake of the design excellence bonus. Solar access to George Street is marginally reduced at 38.7% compared with 40.21% under the base scenario, a reduction of 1.51%. John Street receives a minor increase to the solar access achieved increasing from 1.6% in the base scenario to 7% with the proposed scheme, an increase of 5.4%. Cooper Street increases more significantly, from 42.4% under the base scenario compared with 80.2% under the proposed scheme, an increase of 38.7%.

Table 11 Solar access to streets

Street	2022 DG	2022 DG + 10%	Master Plan Massing	% Change (2022 DG + 10%)
George Street	63.1%	40.21%	38.7%	-1.51%
Cooper Street	42.4%	42.4%	80.2%	+38.7%
John Street	12.6%	1.6%	7.0%	+5.4%

The increase in solar access to Cooper Street and John Street demonstrated by this solar analysis is consistent with the environmental wind analysis outlined in **Section 4.2.3.1**, demonstrating the proposed scheme represents an increase in shared amenity across the precinct.

4.3.2.3 Matter raised - Building 7A interface with surrounding development

The proposed maximum 28 storey building height within Block 7 (Building 7A) does not seek to amend the ultimate maximum building height contemplated for this block by the 2022 Design Guide or the existing planning controls established by the former Planning Proposal (PP-2021-3265). It does, however, seek to extend Building 7A further to the north, resulting in an increased number of storeys being accommodated within the northern section of Block 7.

Despite this, the stepped built form is maintained and a generous 9m tower-level setback is embedded into the Concept SSDA Envelopes to ensure the stepped transition between lower density development to the east on Gibson Street and the tower-built form of Building 7A is maintained. It is also reinforced that the proposal does not seek to amend the existing development standard that establishes a maximum building height of RL 126.40m.

The stepped interface is further reinforced by the maximum street wall height control established by the revised Design Guide. The maximum 5-storey street wall height along the eastern interface of Block 7 represents an improvement to the ground plane by presenting a more human-scaled development compared to the 2022 Design Guide. Similarly, to ensure the development remains at the pedestrian scale to the north, a maximum street wall height of 6 and 7 storeys is along the Wellington Street frontage of Block 7. **Figure 16** provides a side-by-side comparison of development contemplated by the 2022 Design Guide and the proposed Master Plan.

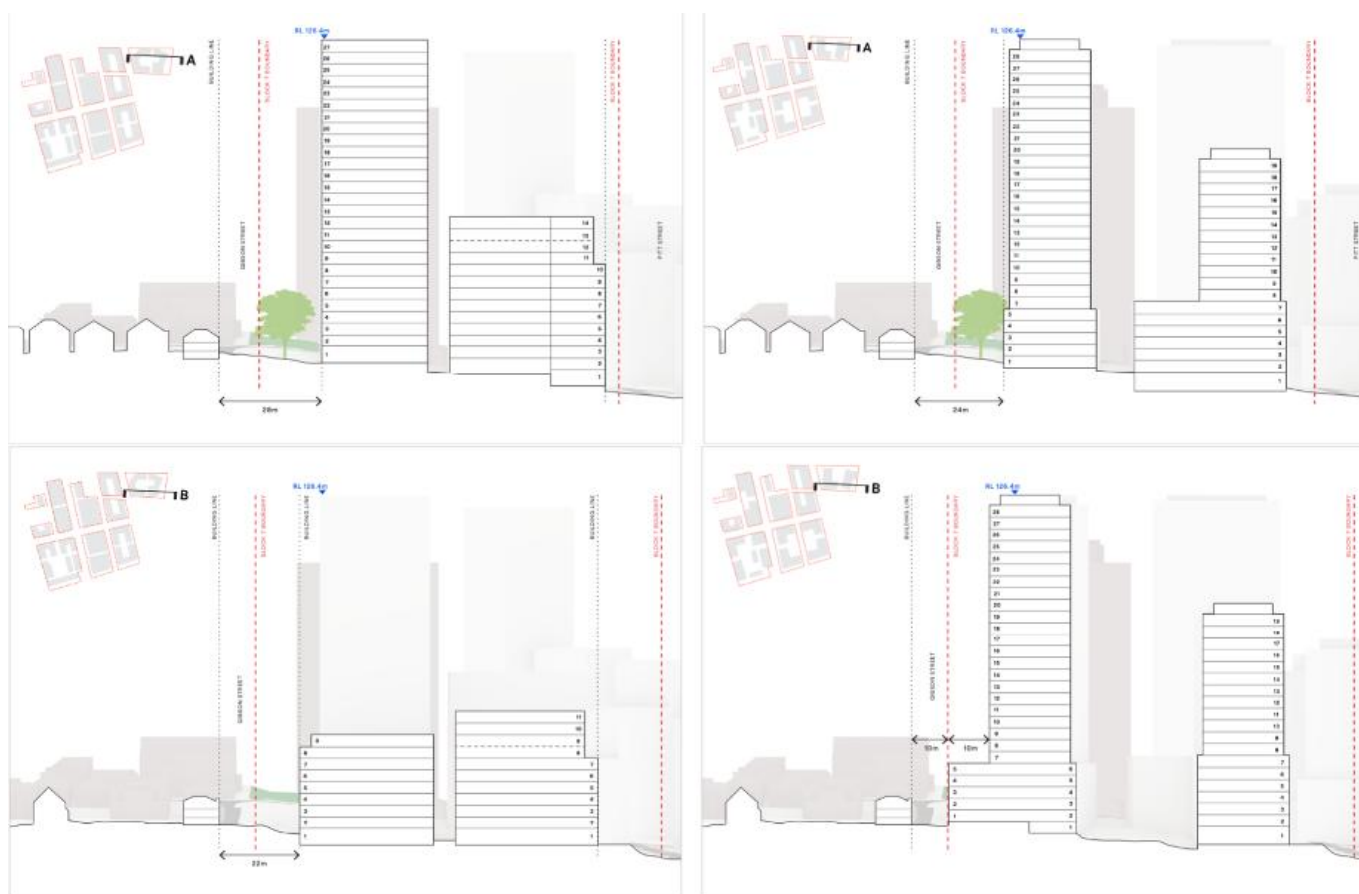


Figure 16 Block 7 - Comparison of 2022 Design Guide (+10%) (left images) and proposed master plan massing (right images)

Source: Addendum Urban Design Report

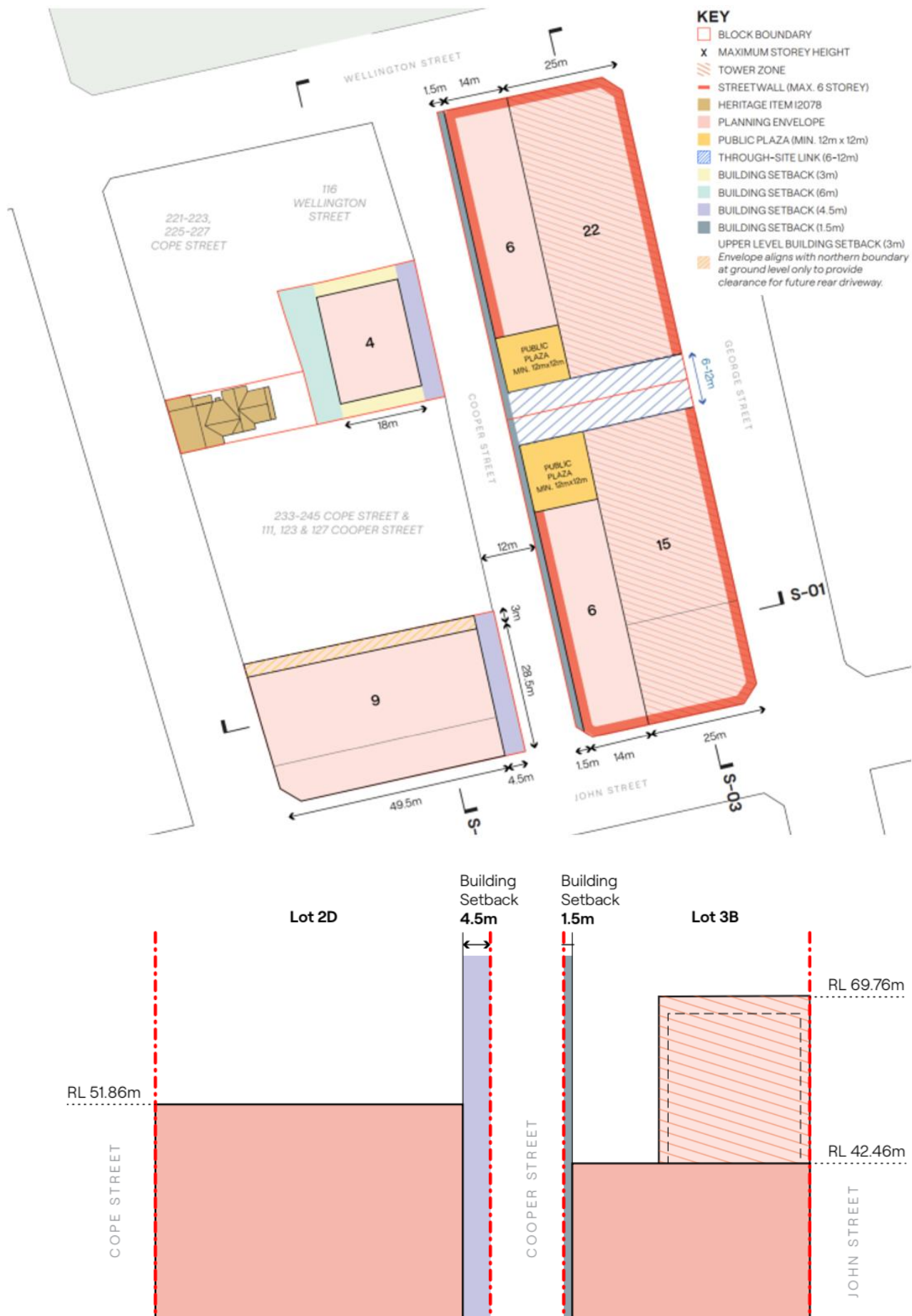
The Block 7 Preliminary View Study undertaken by SJB as part of the Addendum Urban Design Report (refer to **Appendix F**) also confirms that the retention of existing, high value retention trees within Block 7 along Gibson Street and significant landscaping contributes to screening the majority of podium level development, supporting the relationship and transition between the eastern extent of the precinct and lower scale development within its heritage setting.

4.3.2.4 Matter raised - Building 2D interface with surrounding development

Photomontage 11 within the Visual Impact Assessment (refer to **Appendix P** of the submitted EIS) is provided from the north-western corner of Block 2. It provides an indicative representation of the visual relationship between the proposed development and surrounding properties (and public domain) within this location. It confirms that while the proposed building envelopes may result in some additional loss of open sky views due to the increased scale of development, the Concept SSDA does not introduce a significant increase in height and scale beyond that contemplated under the existing planning framework and the 2022 Design Guide.

It is acknowledged that the proposed built form will alter existing views from surrounding properties, including privately owned land within Block 2. The proposed Concept SSDA Envelopes (refer to **Appendix JJ** of the submitted EIS) have been designed to minimise potential visual impacts through the application setbacks and a stepped transition in building heights between existing lower-density development and the larger-scale built form contemplated by the proposed controls.

For example, a 6-storey podium is proposed for Blocks 3A and 3B below a maximum 15 and 22 storey tower that is setback 14m from Cooper Street to manage the transition from the privately owned lots within Block 2 and taller built form within the precinct (refer to **Figure 17** below).



4.3.3 Residential Amenity

4.3.3.1 Matter raised - Building separation/ Visual privacy

It is noted that for some buildings proposed under the Concept SSDA, strict compliance with the building separation design criteria of 12m (up to 4 storeys), 18m (5–8 storeys) and 24m (above 8 storeys) is not achieved if it is assumed that habitable rooms or balconies are facing each building façade. The reduced building separation distances in certain locations across the site are proposed based on educated assumptions regarding the location of non-habitable rooms and blank walls which are shown in the reference scheme. This enables a reduction in building separation distances (in certain locations) while still achieving the objectives of the ADG. An identical approach was adopted in the formation of the current planning framework on the site, with multiple instances of inconsistent building separation distances under the 2022 Design Guide.

It is emphasised that Part 2F of the ADG establishes a range of building separation requirements, based on the site conditions and treatment of the built form. The minimum building separation distances established by Part 2F of the ADG between habitable and non-habitable rooms are 9m (up to 4 storeys), 12m (5–8 storeys) and 18m (above 8 storeys) and the minimum building separation established by Part 2F of the ADG between non-habitable rooms are 6m (up to 4 storeys), 9m (5–8 storeys) and 12m (above 8 storeys). The ADG also provides design guidance which outlines no separation is required between blank walls.

As outlined within Section 9.5.1 of the submitted EIS, where building separation between buildings within the precinct may be shown less than the design criteria for habitable rooms facing habitable rooms, the reference scheme demonstrates that blank wall conditions or the orientation of apartments and windows can achieve the ADG objectives and design criteria.

Where applying separation to buildings on adjoining sites, half the minimum separation distance should be applied, measured to the boundary. This distributes the building separation equally between sites, consistent with Objective 3F-1 of the ADG which aims to ensure *'adequate building separation distances are shared equitably between neighbouring sites, to achieve reasonable levels of external and internal visual privacy'*. The Concept SSDA Envelopes require a minimum 3m setback above Level 1 to the northern boundary of Building 2D. It is noted this boundary is shared with the existing residential development at 233-245 Cope Street and 111, 123 & 127 Cooper Street.

No ground level setback is proposed to account for a future vehicular access to the privately owned properties within Block 2 should they redevelop in the future (refer to **Figure 17** and **Figure 18**). The upper-level setbacks proposed by the Concept SSDA Envelopes are consistent with the 2022 Design Guide as depicted within the revised Design Guide (refer to **Appendix D**).

At the upper levels, additional visual privacy measures may also be included as part of a future detailed SSDA to demonstrate consistency with the ADG design criteria and guidance established by Objectives 2F and 3F-1. It is noted that visual privacy in accordance with Objective 3F-1 of the ADG will be required to be demonstrated as part of the detailed SSDA for this stage. It is also reinforced that appropriate building separation is provided between the buildings proposed on Block 3 and the existing residential development (233-245 Cope Street and 111, 123 & 127 Cooper Street) within Block 2.

While the proposed reference scheme is conceptual only, it is noted that each of the future detailed applications will be required to provide an assessment against the relevant criteria of the ADG. It is noted that at this time, where separation distances are not provided in accordance with Part 2F of the ADG, detailed building design will clearly demonstrate mitigation measures to maximise visual privacy within the precinct and to neighbouring developments in accordance with Part 3F Visual Privacy of the ADG.

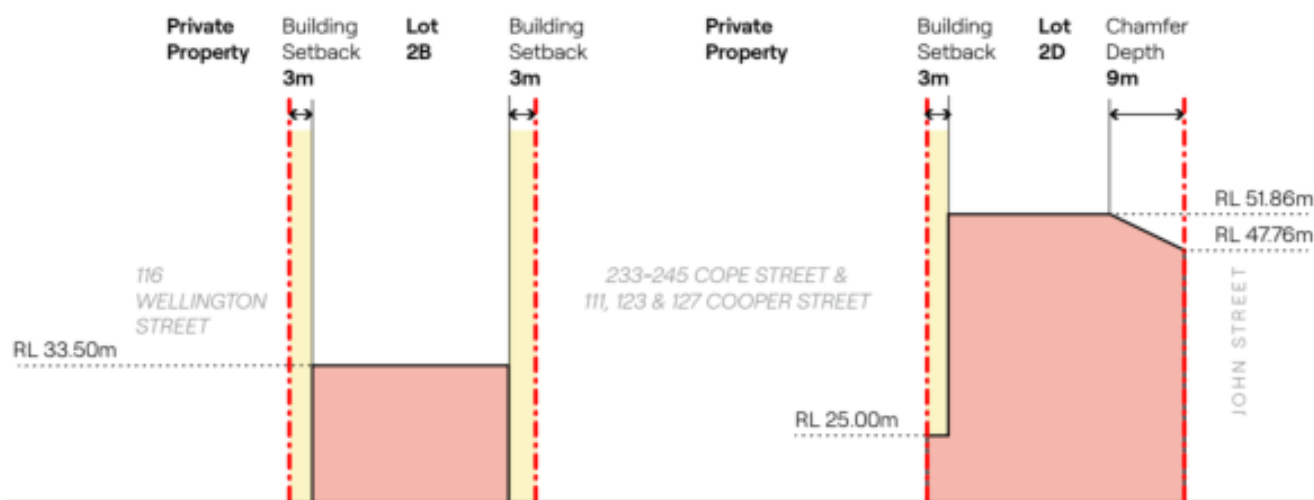


Figure 18 Block 2 - Proposed Concept Envelope Section 02

Source: EIS Appendix J - Urban Design Report Appendices prepared by SJB

4.3.3.2 Matter raised – Number of apartments per floor

The reference scheme submitted with the Concept SSDA and Rezoning Proposal is an indicative design prepared to demonstrate how the site could reasonably be developed in accordance with the proposed building envelopes. It demonstrates the anticipated development outcome to ensure appropriate environmental testing is able to be undertaken at this early stage. Key considerations, such as the number of apartments serviced by a single circulation core are matters which are required to be addressed by future applications.

It is noted Objective 4F-1 requires “*common circulation spaces achieve good amenity and properly service the number of apartments*”. Objective 4F-1 provides two design criteria, which include:

- the maximum number of apartments off a circulation core on a single level is eight

The ADG Practice Note published by the Department on 1 July 2026 emphasises that development must demonstrate how it satisfies the objectives of the ADG. It also clarifies that the design criteria provide practical examples of how the objectives may be achieved, rather than prescribing the only means of satisfying them. Under Objective 4F-1 of the ADG, the design guidance establishes that achieving the design criteria for the number of apartments off a circulation core may not be possible. It further establishes that where a development is unable to achieve the design criteria, a high level of amenity for common lobbies, corridors and apartments should be demonstrated, including:

- sunlight and natural cross ventilation in apartments
- access to ample daylight and natural ventilation in common circulation spaces
- common areas for seating and gathering
- generous corridors with greater than minimum ceiling heights
- other innovative design solutions that provide high levels of amenity

While it is recognised that some buildings in the reference scheme comprise more than eight apartments off a single core, as established by the design criteria of Objective 4F-1 of the ADG, it is emphasised that it is a reference scheme where the abovementioned amenity is not demonstrated due to the limited detail within the design. The detailed design of buildings will occur as part of future detailed SSDAs, whereby each of the relevant ADG design criteria and guidance will be considered for each building. As such, the opportunity to address this matter in detail and to provide an assessment of the detailed building design against the relevant components of the ADG lies within the future detailed SSDAs. If at that time, the ADG design criteria are not strictly met, consistency with the objective will be demonstrated in accordance with the relevant requirements of the Housing SEPP and the ADG Practice Note dated 1 July 2026.

4.3.3.3 Matters raised - Cross ventilation

Objective 4B-3 of the ADG aims to ensure the number of apartments with natural cross ventilation is maximised to create a comfortable indoor environment for residents. Design Criteria 1 of this objective requires at least 60% of apartments to be naturally cross ventilated for the first nine storeys of the building.

The reference scheme compliance diagrams provided in the Urban Design Report Appendices (refer to Appendix J of the EIS) demonstrate that consistency with the ADG criterion is achieved. This is further reinforced by Table 30 of the EIS which outlines a minimum of 60.6% and a maximum of 73.66% of apartments are naturally cross ventilated on a block-by-block basis. At the precinct wide scale 63.66% of apartments in the reference scheme are naturally cross ventilated.

As outlined above, the ADG Practice Note published by the Department on 1 July 2026 emphasises that development must demonstrate how it satisfies the objectives and design criteria of the ADG. It also clarifies that the design criteria provide practical examples of how the objectives may be achieved, rather than prescribing the only means of satisfying them. It is noted the reference scheme submitted with the Concept SSDA and Rezoning Proposal is an indicative design that demonstrates how the site could reasonably be developed in accordance with the proposed Planning Envelopes. Key considerations, such as the number of naturally cross ventilated apartments are matters which are required to be addressed by future development applications.

E-lab has prepared an Addendum Noise and Vibration Impact Assessment and Acoustic Response Letter (refer to **Appendix O**) to outline how acoustic amenity and natural cross ventilation are proposed to be balanced across the precinct specifically in relation buildings within Blocks 8, 9 and 10 with frontage to McEvoy Street. Noise has been addressed in **Section 4.3.3.4** below.

4.3.3.4 Matters raised – Acoustic amenity

An Addendum Noise and Vibration Impact Assessment (NVIA) has been prepared by E-LAB as part of the Response to Submissions (refer to **Appendix O**). The Addendum NVIA confirms the appropriateness of the controls contained within the Revised Design Guide, which establish a maximum internal noise level for habitable rooms under a windows-closed scenario. This approach is consistent with the controls contained within the Sydney DCP 2012 and Draft Sydney DCP and aligns with the acoustic assessment metrics established under the *State Environmental Planning Policy (Transport and Infrastructure) 2021*.

The submitted NVIA included an assessment of external traffic noise impacts and identified appropriate mitigation measures. It concluded that the majority of façades across the precinct are capable of achieving the relevant internal noise requirements using standard single glazing. For the more noise-exposed habitable rooms facing McEvoy Street, higher-performing single glazing may be required however double glazing is not expected to be necessary as part of the detailed design of buildings within the precinct.

The Addendum NVIA (refer to **Appendix O**) also includes a preliminary façade glazing matrix to guide glazing specifications based on external noise levels and the proportion of glazed area, having regard to typical room dimensions and finishes. The matrix identifies three glazing performance categories, with minimum acoustic ratings of Rw32, Rw35 and Rw37. It is intended that this matrix will be used as a guide and be reviewed as necessary as part of the detailed SSDA stages.

The Addendum NVIA also includes a precinct-wide concept natural ventilation strategy, incorporating a 'windows open' assessment to identify locations where untreated façade openings may result in exceedances of the relevant noise criteria. The assessment indicates that only a limited number of dwellings across the precinct are likely to require more substantial acoustic mitigation.

A range of potential mitigation measures has been identified for the various exceedance scenarios, including acoustically lined soffits, building design responses, wintergardens and acoustic ventilators. The concept natural ventilation strategy demonstrates that appropriate design solutions are available to enable future detailed SSDAs to achieve compliance with the relevant natural ventilation and noise criteria.

The NVIA includes an assessment of the external noise emissions likely to arise from the future development to ensure the acoustic amenity of sensitive receivers is maintained. As part of future detailed SSDAs, noise emissions associated with the proposed development, including residential dwellings, non-residential uses, indoor and outdoor community spaces, and associated mechanical plant, will be assessed against the relevant noise criteria to demonstrate that the acoustic amenity of sensitive receivers will continue to be achieved.

4.3.3.5 Matters raised – Internal solar access

The reference scheme has been tested on a building-by-building and block-by-block basis to validate solar access outcomes across the precinct in response to solar access concerns. Precinct-wide, the reference scheme demonstrates that 79.5% of apartments (2,647 of 3,329) receive a minimum of two hours of direct sunlight in mid-winter, exceeding the ADG's 70% design criterion. 9.5% of apartments receive no direct sunlight in mid-winter, within the ADG's recommended maximum of 15%.

At the block scale, nine of the ten blocks achieve or exceed the 70% criterion, with block-wide performance ranging from 70% (Block 10) to 94% (Block 7). Block 2 is the only block below the criterion, achieving 59%, which is a product of the block's orientation, with building frontages addressing south-facing aspects.

Within otherwise compliant blocks, a small number of individual buildings (2DB1, 4CB1, 6AB1, 8CB1, 8BB1, 9BB1 and 10BB1) do not individually reach 70%, as to be expected of a precinct of such a scale. This is attributable to building orientation, building separation resulting from the retained street layout and site constraints, rather than to the scale of the envelopes. In each case, the underperformance arises from overshadowing by adjoining development within the precinct at specific morning or afternoon periods — for example, the eastern podium of Building 9BB1 is overshadowed by Block 6 until 11:00am and its western podium by Block 3 from 2:00pm. These buildings nonetheless sit within blocks that achieve compliance at the block scale. Section 9.5.2 of the EIS provides a detailed justification for each building that does not achieve the 70% ADG criterion.

Amending the envelopes to mandate that every individual building achieves 70% is not necessary or appropriate. The concept proposal establishes the envelopes and planning framework within which detailed design will occur and it is noted solar access performance is materially influenced by apartment layout, unit mix and façade design, which will be resolved at the detailed design stage. Requiring universal building-level compliance within the concept envelopes would over-constrain future design flexibility and limit the residential yield established at the Planning Proposal and Concept SSDA stages.

The detailed design process will continue to maximise solar access within these built-form constraints and ensure that apartments with reduced direct sunlight achieve a high level of amenity through daylight, outlook, natural ventilation, functional layouts and access to high-quality communal and public open space. Where an individual building cannot achieve 70% at the detailed design stage, it will be addressed through the relevant development application and justified on a merit basis in accordance with the ADG, having regard to the block-wide and precinct-wide performance demonstrated by the reference scheme.

4.3.3.6 *Matters raised – Extent and location of communal open space*

While the quantity of communal open space will be confirmed as part of future detailed applications, it is understood that Blocks 2, 3, 8 and 9 do not achieve a minimum 25% of the site area as communal open space.

As noted within the Addendum Public Domain and Landscape Report (refer to **Appendix G**) the calculation of communal open space at 14% within Block 2 includes the site area of Block 2B which is entirely non-residential. When the area of Block 2B is excluded, the total quantity of communal open space increases to 25% of the Block 2 site area achieving consistency with the ADG design criteria.

Where an individual block does not provide the full 25% allocation, such as Blocks 3, 8, and 9, the proposed communal open space has been carefully located to maximise amenity and usability, including access to sunlight, reduced overshadowing and favourable wind conditions. In addition, each block that does not independently achieve the 25% requirement is located in close proximity to either the proposed Block 8 park or Block 1 park, as well as a number of publicly accessible private courtyards distributed throughout the precinct.

Objective 3D-1 of the ADG specifically suggests where developments are unable to achieve the design criteria, such as in a dense urban area, they should demonstrate good proximity to public open space and facilities and/or provide contributions to public open space. The well located and diverse public open spaces within the precinct supplement communal open space as they enhance residential amenity and offer landscaping opportunities. In addition to the new parks proposed under this Concept SSDA, Waterloo South is surrounded by a network of public open spaces within walking distance including, including Waterloo Park and Oval, Alexandria Park, James Cook Community Garden, Waterloo Green, TJ Hickey Park, Redfern Oval and Park and Eveleigh Green. The proposal also improves the accessibility of these existing public open spaces by providing new active transport linkages via the proposed through site links.

The location and quantity of communal open space will be further refined and confirmed through the future detailed SSDAs and it is noted that any alternative approach to achieving the objectives of the ADG would be required to demonstrate consistency with the design guidance of the ADG, including by demonstrating its proximity and accessibility to public open space in addition to the high amenity outcomes achieved within the site through residential amenities that will be introduced during the detailed design stage.

At this stage, we note that as part of the design work that has progressed for Block 8 within Stage 1 the proportionate rooftop communal open space is not able to be achieved for Building 8AB2 or 8CB1. Communal open space has however been added to the northern extent of the podium within Building 8AB1. Accordingly, provision of rooftop communal open space has been amended for Block 8 within Figure 15 of the revised Waterloo South Design Guide 2026 (refer to **Figure 19**).



Figure 19 Block 8 - Revised communal open space

Source: Addendum Urban Design Report prepared by SJB

As described in **Section 3.1.1** of this report, the amendment to clause 7.29(6) of the Sydney LEP 2012 is proposed to be removed from the Rezoning Proposal.

4.3.4 Social Impacts

4.3.4.1 Matter raised — Content of Social Impact Assessment and Social Impact Management Plan

A detailed response to each of the comments and recommendations for revision to the SIA and Preliminary SIMP is provided in the Social Impact Response Letter prepared by L10 Collective at **Appendix I**, which identifies the amendment to be made to the SIA or SIMP in each case by 30 September 2026.

The approved concept proposal will be used as the baseline for impacts relating to physical form and urban design and the community profile prior to any development or relocation will be used as the baseline for social and community impacts.

Meetings have also been held with the Homes NSW Relocation Team, Stockland and the City of Sydney. In addition, meetings have been held with community organisations, but further meetings are being arranged with other community organisations that made a relevant submission on the Concept SSDA and Rezoning Proposal during the public exhibition period to further understand the comments raised and update the SIA and SIMP.

The SIA and SIMP will be revised to:

- apply the agreed baseline consistently across all impacts and reassess the unmitigated and mitigated ratings on that basis, with any reduction in the significance of an impact clearly attributable to an identified mitigation measure;
- assess impacts on a cohort-specific basis, including relocated residents, residents of Waterloo Central and Waterloo North, residents of privately owned lots, Aboriginal tenants, seniors and other groups at increased risk of social and psychological impact;
- reflect the duration of impacts across the full lifecycle of the development, including pre-construction and relocation impacts;
- consolidate impacts assessed more than once and restructure the report in the form discussed with the City;

- specify mitigation and enhancement measures across all impact categories, identifying the responsible party in each case; and
- restructure the SIMP in accordance with the Department's Social Impact Management Toolbox for State Significant Projects, identifying for each measure the desired community outcome, responsibility, indicators and targets, data source and method, monitoring and reporting frequency, adaptive measures where targets are not met and the treatment of cumulative impact.

It is acknowledged that many of the SIA comments received in submissions relate not only to the identification of impacts, but also matters relating to operational matters, the role of trusted community providers, and the long-term implementation of mitigation measures over the life of the redevelopment. In addition to the mitigation measures identified within the SIMP, engagement and coordination with Homes NSW, government agencies, community organisations, service providers and other stakeholders will continue as future stages of the project progress. Governance, monitoring and stakeholder engagement arrangements will be reviewed and refined over time to respond to emerging needs, cumulative impacts and lessons learned through project delivery.

The revised SIA and SIMP are intended to establish the framework within which the social impact assessment accompanying each future detailed application will be prepared. The scope of revision and the consultation required to support it, is accordingly greater than would ordinarily attend a response to submissions. The updated SIA and SIMP is targeted to be submitted to the Department by 30 September 2026.

4.3.5 Transport and Traffic

4.3.5.1 Matter raised – Intersection of George Street and McEvoy Streets

Primary vehicle access to the precinct is proposed via Wellington Street under the Concept SSDA. The access framework reflects the structure established in the 2022 Design Guide, with targeted refinements informed by traffic assessment and consultation with relevant authorities. It is noted the current design of George Street does not intend or allow for vehicles larger than a B99 (car) to travel along George Street South, as there are no block access driveways located on George Street South and therefore the turning circle at the southern end is designed to accommodate a B99, as per the existing arrangement.

In a meeting with City of Sydney on 30 June 2026, the City advised that the City and TfNSW recommend a left in from McEvoy Street north into George Street. The City of Sydney also confirmed that they were continuing to have discussions with TfNSW to support a left in and left out at this intersection. Once alignment between both the City of Sydney and TfNSW has been agreed, further traffic analysis can then be undertaken in the preparation of the Block 9 and Block 8 detailed SSDAs. The analysis would include detailed traffic assessment and include consideration of the issues raised by the community about this matter.

It is acknowledged that the treatment of this intersection is a matter that has been raised by many community members, with feedback provided during the pre-lodgement and exhibition periods. Community members raised concerns around safety, traffic movements, and the impact on the precinct, stating a preference to keep the intersection closed to vehicles, whilst others acknowledged the limited number of existing access points and advocated for new access points to be considered.

The revised Waterloo South Design Guide 2026 (refer to **Appendix D**) has been updated to include the City of Sydney's recommended wording to enable that a left in and left out from George Street to be pursued in the future. The Transport Response Letter (refer to **Appendix K**) states that opening this intersection would be possible based on the conceptual proposals prepared by the City of Sydney, but that this would be subject to future assessment of its detailed design and consultation during the preparation of detailed applications.

4.3.5.2 Matter raised – Intersection of Wellington Street and Botany Road

The Transport Response Letter (refer to **Appendix K**) confirms that both the Planning Proposal (PP-2021-3265) and the Concept SSDA assessment allowed for the existing right-turn movement from Botany Road northbound into Wellington Street.

The Concept SSDA forecasts only minor variations in traffic generation compared with the Planning Proposal (PP-2021-3265) and these changes are not expected to materially alter the previous modelling outcomes. As per the modelling assessment undertaken as part of PP-2021-3265, the forecasted traffic generated by the development is not expected to

have significant impact on the road network, including at the Botany Road and Wellington Street (Buckland Street) intersection.

As the staged redevelopment of the precinct progresses, individual block yields are to be maintained in line with the yields proposed at the former Planning Proposal stage and therefore are not expected to vary the approved traffic generation or distribution. Accordingly, the approved traffic generation and distribution are not expected to materially change and further traffic modelling is not anticipated to be required.

4.3.5.3 Matter raised – Vehicle access locations

In response to the matters raised within the submissions, the vehicle access locations and driveway widths have been reviewed. The Vehicle Access Location Assessment within the Transport Response Letter prepared by ptc (refer to **Appendix K**) demonstrates that reduced driveway widths can be accommodated within the precinct as part of future detailed SSDAs. To ensure this outcome is possible, minor amendments have been made to Figure 18 of the revised Waterloo South Design Guide 2026 (refer to **Appendix D**).

The Vehicle Access Location Assessment also demonstrates that the following amendments could be made to access locations as part of future detailed SSDAs.

- Block 2B – indicative 6m wide driveway provided.
- Block 2D – 9m wide driveway retained due to the constrained width of Cooper Street.
- Block 3 – driveway width reduced to 6.5m, located 8.5m from the George Street through-site link alignment and separated from the Block 8 service vehicle driveway by 3.5m, consistent with site constraints.
- Block 4 – vehicle access consolidated into a single 6.5m wide driveway.
- Block 5 – access location maintained based on building form constraints, with a 9m wide driveway required due to the narrow width of West Street.
- Block 7 – 7m wide driveway provided from Pitt Street, located 6m from the Kellick Street through-site link alignment in accordance with AS2890.1 Figure 3.1.
- Block 8 – access arrangements revised to provide two 6m wide basement driveways and one 6m wide service vehicle driveway. No vehicle access or egress to and from buildings is proposed via Cooper Place. It is however noted that service vehicles will utilise Cooper Place for waste collection, as well as loading and unloading of goods for Building 8AB2 and Building 8D.
- Block 9 – driveway widths reduced, with the basement driveway reduced to 6m and service vehicle driveway reduced to 6.5m.
- Block 10 – driveway width reduced to 6.5m based on service vehicle swept path requirements.

The revised access arrangements seek to minimise both the width and number of vehicle crossings where practicable, reduce potential conflict points between pedestrians and vehicles, and support a safe, legible and walkable public domain. Driveway locations have been reviewed to maximise separation from key pedestrian desire lines, through-site links, building entries and areas of anticipated high pedestrian activity, while ensuring compliance with the relevant provisions of the Sydney DCP 2012 and Australian Standards.

Future detailed development applications will be required to further demonstrate how vehicle access arrangements, loading areas and service vehicle operations integrate with the public domain and pedestrian network. This will include consideration of sightlines, pedestrian entrances, driveway design, accessibility outcomes and measures to minimise conflicts between vehicles, cyclists and pedestrians.

4.3.5.4 Matter raised – Emergency vehicle access

Ptc has confirmed that no changes are proposed to the existing arrangement at the southern end of George Street for emergency vehicle access (refer to **Appendix K**). The existing 'No Right Turn' and 'No Entry (Authorised Vehicles Excepted)' signage is proposed to be retained.

4.3.5.5 Car parking provision

Car parking has been addressed in Section 9.14 of the submitted EIS and within the submitted Transport Impact Assessment (refer to Appendix CC of the submitted EIS). Car parking on the site will be provided in accordance with the City of Sydney maximum car parking rates to support sustainable travel behaviour and to reflect the site's public transport accessibility. The draft Sydney LEP Housekeeping Amendments included a savings provision which will preserve

the current car parking rates for Waterloo South. Therefore, car parking will be provided in accordance with the maximum car parking rates established by the current provisions within the Sydney LEP 2012.

Car parking is proposed to be provided for each residential tenure type, as well as for the proposed non-residential uses. As detailed in the Transport Impact Assessment (refer to Appendix CC of the submitted EIS), retail car parking within the precinct is proposed to be consolidated within Block 9. It is also proposed that the car share parking spaces allocated to each block be consolidated within the Block 9 basement, as this will be the publicly accessible basement within the precinct. In addition to car parking, the Concept SSDA also outlines bicycle parking will be provided for each of the nominated uses, with the quantity to be confirmed in accordance with the Sydney DCP 2012 requirements at the detailed SSDA stage.

The concept public domain plans maintain opportunities for on-street parking and on-street loading areas on City of Sydney owned roads.

4.3.6 Landscaping and Public Domain

4.3.6.1 Matter raised – Block 8 Southern Through Site Link

The public access that was shown between Buildings 8AB1 and 8AB2 in Figure 151 of the Public Domain and Landscape Report submitted with the EIS has now been included as a through-site link in response to the Department and the City of Sydney's feedback. This has been updated throughout the revised Waterloo South Design Guide 2026 in Figures 4 and 9 and Table 4 (refer to **Appendix D**) as well as the relevant supporting documentation (refer to **Appendix F**).

The proposed additional through-site link, comprising a width of between 6m and 9m, reduces the potential risk of entrapment by providing a legible and direct pedestrian connection through from the proposed Block 8 park to McEvoy Street (refer to **Figure 20**). The link also responds to established pedestrian desire lines, as it would form the most direct route through the site towards the Green Square heavy rail station for residents coming from the North-East, encouraging regular pedestrian activity.



Figure 20 Block 8 - Amended Concept SSDA Envelope Plan

Source: Addendum Urban Design Report

4.3.6.2 Matter raised – Public domain design process and endorsement

The comments relating to the public domain and endorsement process raised in the City of Sydney's submission have been discussed through the PIWG process. Responses to the City of Sydney's detailed public domain comments have been addressed in both the Public Domain and Landscape Report (refer to **Appendix G**) and the revised Waterloo South Design Guide 2026 (refer to **Appendix D**).

4.3.6.3 Matter raised – Street designs

The revised Waterloo South Design Guide 2026 is underpinned by a key move to give priority to pedestrians, improve active transport and reduce vehicular movements through the precinct. This is proposed by reducing vehicular lanes to enable wider footpaths, more landscaping and slow traffic to create a safer pedestrian environment. Primary vehicle access to the precinct is proposed via Wellington Street, with internal streets designed as low-speed environments that balance local access requirements with pedestrian and cyclist priority.

The Vehicle Access Location Assessment prepared by ptc (refer to **Appendix K**) has retested the street layouts to demonstrate that a 10.6m waste truck could be accommodated within the precinct as part of future detailed SSDAs. To facilitate this, minor amendments have been incorporated into the northern entry of Cooper Street North (refer to Appendix 4 of the Addendum Landscape Report and Response Pack at **Appendix G**).

The crossing strategy across the precinct is outlined in the PIWG package and detailed analysis of the raingardens has been undertaken by WSce, with a summary included in the PIWG package appended to the Landscape Response Pack (refer to **Appendix G**).

In relation to the street-specific matters:

- The carriageway of John Street is not proposed to be narrowed from 8.3m, noting this is consistent with the existing carriageway and the 2022 Design Guide. The introduction of raingardens between parking bays and raised crossings at the intersections of Cope, Cooper and George Streets enable a reduction in crossing distance and provide environmental cues to slow traffic.
- Cooper Street north has been updated as a street, with concrete unit paving (small format) to footpaths and kerb geometries adjusted in line with the City's comments, including the chamfered kerb return (Refer to Appendix 4 of the Landscape Response Pack at **Appendix G**).
- The design of Cooper Street south and Cooper Place is developing with the Stage 1 detailed SSDAs and will be updated with that submission.
- The crossing in Mead Street has been adjusted to align with the through-site link (Refer to Appendix 3 and Appendix 4 of the Landscape Response Pack at **Appendix G**).

4.3.6.4 Matter raised - Public art

The Preliminary Public Art Plan has been updated in response to the City of Sydney's comments, including revisions to the commissioning process and milestones, the mapping of existing public art in Waterloo South and surrounding suburbs and clarification of the precinct-led approach to public art planning and the allocation of the \$9.2 million public art budget across the development.

It is noted that the proposed allocation of \$9.2 million to the public art budget represents 1% of the market and non-residential construction value, although it is noted that public art will be distributed across all tenure types, in accordance with the precinct led approach to public art. Detailed responses to each of the City of Sydney's comments are provided at **Appendix N**.

4.3.7 Urban Ecology and Trees

4.3.7.1 Matter raised – Tree retention

During the development of the Concept SSDA every endeavour was taken to maximise tree retention within the scope and requirements of the project, with particular regard to trees of High Retention Value. The revised Waterloo South Design Guide 2026 maintains the same standard of tree retention as the 2022 Design Guide - i.e. the retention of a minimum of 50% of high value trees and a minimum of 50% of moderate value trees. Of the 155 High Retention Value trees on the site, 50.97% are proposed to be retained and 51.4% of moderate value trees are proposed to be retained. Noting the site constraints and same precinct structure, no change to the 2022 Design Guide control is proposed.

A further nine High Retention Value trees have been identified as possible candidates for retention subject to detailed root mapping during the detailed design phase (trees 53, 63, 64, 73, 247, 267, 280, 286 and 391), as shown in Section 5.6

of the Public Domain and Landscape Report and Appendix 8 of the AIA. As detailed within the Addendum Landscape Report and Landscape Response Pack (refer to **Appendix G**) a further four trees have been identified as possible candidates for retention as part of the response to submissions process, subject to the detailed resolution of Mead Street during Stage 1 (tree 127) and to detailed root mapping and awning design to the north of Block 5 (trees 213, 214 and 215).

Of the 71 trees the City of Sydney has recommended be reconsidered, 12 are therefore already identified as candidates for retention (trees 53, 63, 64, 127, 213, 214, 215, 247, 267, 280, 286 and 391).

Of the remainder, 56 appear in the tree retention diagram in the 2022 Design Guide and their proposed removal reflects the amended block, envelope and road layout rather than a reassessment of their condition or value. Two (trees 154 and 202) have been assessed as having Low Retention Value. Five trees shown as retained in the 2022 Design Guide are proposed for removal under the Concept SSDA (trees 50, 135, 245, 246 and 267), of which tree 267 is a candidate for retention as noted above. Conversely, 16 High Retention Value trees shown as removed in the 2022 Design Guide are proposed to be retained under the Concept SSDA (trees 125, 126, 165, 174, 210, 211, 242, 248, 249, 250, 251, 254, 255, 256, 257 and 258).



Figure 21 Revised proposed tree retention diagram

Source: Addendum Landscape Report and Response Pack prepared by Aspect Studios (refer to **Appendix G**)

4.3.7.2 Matter raised – Canopy cover targets

The minimum 50% tree canopy cover target refers to canopy within the streetscape across the precinct, rather than across the entire precinct area, as set out in Section 4.7.3 of the Public Domain and Landscape Report. Canopy cover within the streetscape is calculated at 48.8% at approximately 10 years post-installation, (and excludes canopy provided within the new parks and the through-site links). The target is therefore not reliant on canopy within those areas and 50% cover within the streetscape is reasonably expected at maturity as the planting establishes beyond the ten-year horizon.

The benchmark targets raised by the City of Sydney in their submission apply to the development through the instruments and strategies already applicable to it, being the 15% private property target in Section 3.5.2 of the Sydney DCP 2012 and the street, neighbourhood park and pocket park targets in the Urban Forest Strategy. Future applications will be assessed against those targets and no amendment to them is proposed.

In relation to the 70% street canopy target, that target is not a current requirement of the 2022 Design Guide and is unable to be achieved within the precinct. The extent and species of planting achievable within the road reserve are constrained by the technical requirements of Ausgrid, Jemena and Sydney Water regarding the type and location of tree planting in proximity to their services (particularly along George Street and Wellington Street where the alignment of trunk services limits both the available planting zones and the mature canopy spread achievable within them).

The 48.8% figure represents the canopy achievable within those constraints while delivering the road network, servicing and accessibility requirements of the precinct. Provision has been made for planted kerb extensions within the road reserve in George Street and Wellington Street which will allow for additional tree planting should service providers' technical requirements change over the life of the precinct. Aspect Studios have provided a detailed response to this matter within the Addendum Landscape Report and Landscape Response Pack (refer to **Appendix G**).

4.3.7.3 Matter raised – Deep soil provision

To avoid confusion and ensure consistency between the Concept SSDA documentation and the revised Waterloo South Design Guide 2026, references to deep soil have been removed from the Concept SSDA Envelope Plans prepared by SJB (refer to **Appendix C**). Future detailed development applications will be responsible for demonstrating compliance with the relevant deep soil provisions established within the revised Waterloo South Design Guide 2026.

The deep soil mapping within the revised Design Guide has been reviewed and updated to provide greater clarity regarding the location and extent of deep soil areas across the precinct. Figure 16 of the revised Design Guide (refer to **Appendix D**) includes a revised legend to clearly differentiate between areas of deep soil and areas of planting on structure.

Aspect Studios has reviewed the landscape design approach and confirmed that no deep soil zones are proposed above basement structures. Areas identified as planting on structure have therefore been clearly distinguished from deep soil areas to ensure the mapping accurately reflects the intended landscape outcomes and future design requirements.

A minor discrepancy was identified between the deep soil percentages presented in Table 5 of the revised Waterloo South Design Guide 2026 and the Public Domain and Landscape Report. This discrepancy arose as the figures included in the revised Design Guide were based on an earlier iteration of the landscape design, prior to the final calculation of deep soil areas which excluded hardstand areas, including paving.

Table 5 of the revised Waterloo South Design Guide 2026 has been updated as part of this submission to align with the final deep soil calculations provided within the Public Domain and Landscape Report. Refer to the Schedule of Design Guide Amendments (refer to **Appendix E**) and the revised Waterloo South Design Guide 2026 (refer to **Appendix D**) for further detail.



Figure 22 Revised Deep Soil Map
Source: Revised Waterloo South Design Guide 2026

4.3.8 Heritage and archaeology

4.3.8.1 Matters raised – Overshadowing to Yiu Ming Temple

Additional shadow analysis has been undertaken in response to Heritage NSW's comments to assess potential overshadowing impacts of the proposed Master Plan on the Yiu Ming Temple site. The analysis compares the existing Waterloo South context, the 2022 Design Guide envelope and the proposed Master Plan massing at the winter solstice (21 June) between 9:00am and 10:30am.

The assessment confirms that the proposed Master Plan massing would result in overshadowing of portions of the Yiu Ming Temple site for approximately one hour, between 9:00am and 10:00am. It is noted that portions of the temple site are already subject to overshadowing from adjoining properties to the north.

The extent of overshadowing resulting from the proposed Master Plan is broadly comparable to that generated by the 2022 Design Guide envelope. From approximately 10:30am onwards, the Yiu Ming Temple site is not affected by shadows cast by the proposed Master Plan massing (refer to **Figure 23**). The Addendum Statement of Heritage Impact (refer to **Appendix P**) confirms that the minor increase to overshadowing as a result of the proposal would not impact upon the heritage significance of the item.

The additional shadow analysis is provided in the Urban Design Report (refer to **Appendix F**).

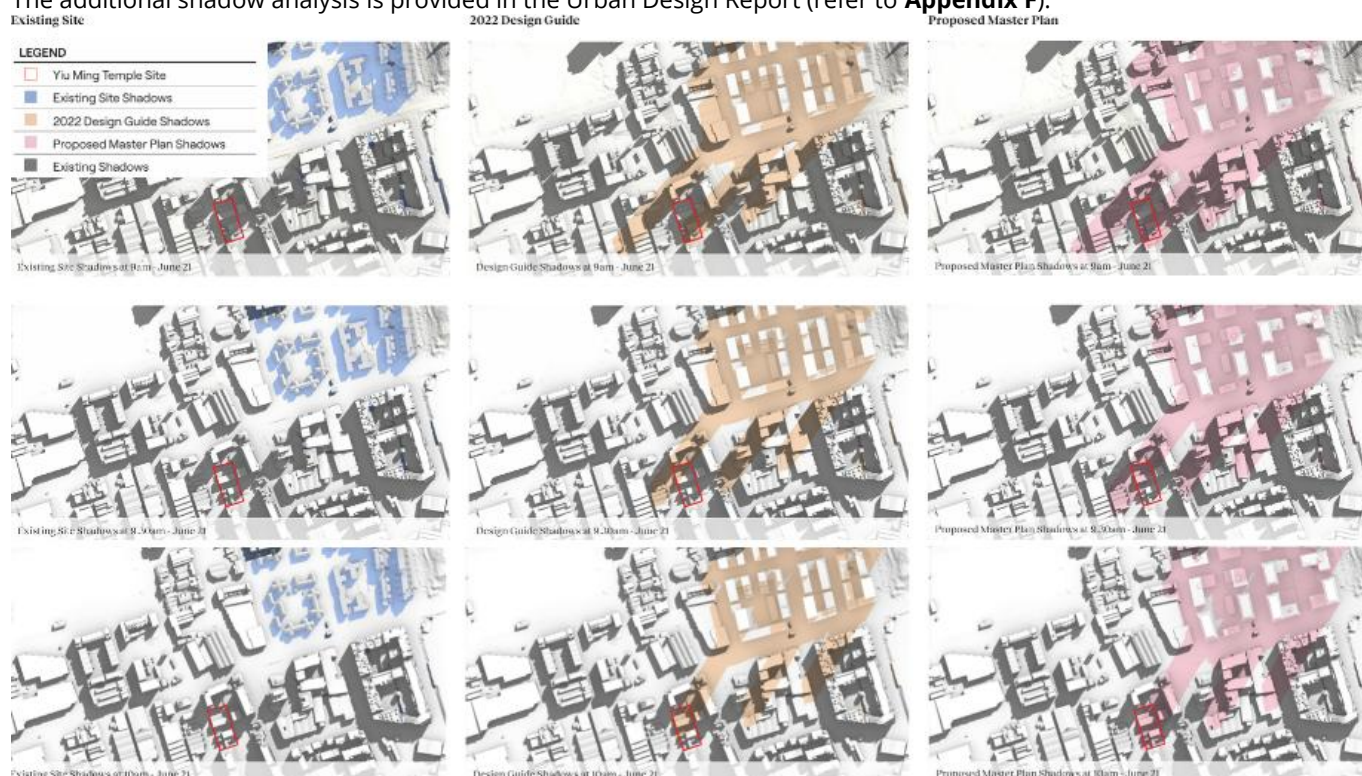


Figure 23 Overshadowing Study of Yu Ming Temple

Source: Addendum Urban Design Report prepared by SJB

4.3.8.2 Matter Raised – Overshadowing to Kensington Street Terraces

Additional shadow analysis has been undertaken in response to the community's comments to assess potential overshadowing impacts of the proposed Master Plan on the Kensington Street heritage listed terraces (Heritage Item 2081). The analysis undertakes a particular analysis of Block 7, comparing the 2022 Design Guide envelope and the proposed Master Plan massing at the winter solstice (21 June) between 9:00am and 3:00pm (refer to **Figure 24**).



Figure 24 Block 7 - Overshadowing diagrams

Source: Addendum Urban Design Report prepared by SJB

The assessment confirms that the proposed Master Plan massing would result in overshadowing of portions of the terrace group after 2:00pm in mid-winter. While the shadow cast by the proposed development at 3:00pm impacts more of the terraces than under the Design Guide (+10%) scenario, this is considered minor.

The extent of overshadowing resulting from the proposed Master Plan is broadly comparable to that generated by the 2022 Design Guide envelope. Until approximately 2:00pm, the terraces are not affected by shadows cast by the proposed Master Plan massing (refer to **Figure 24**) in mid-winter.

4.3.8.3 Matter Raised – Scale and heritage Fabric of Cope Street

Section 3.1.2(4) of the Revised Design Guide submitted with the EIS amended the two-storey limitation on development between Cope and Cooper Streets which was included in the 2022 Design Guide. The amendment changes the ‘principles’ in the Design Guide from a two-storey height limit to a prohibition on towers. The change provides greater flexibility for lower-scale or podium-style development while retaining the objective of protecting the lower scale and visual setting of heritage items on Cope Street. It continues to allow for a stepped transition between taller buildings and heritage items, while retaining flexibility in how an appropriate transition is achieved. The matter was also addressed within Table 9 of the Rezoning Report (refer to **Appendix KK** of the submitted EIS).

The Revised Design Guide incorporates an amendment to the height in storeys map at the boundary between Block 2D and Cope Street, removing the guidance for a two-storey component in this location. The effect of this amendment is limited, having regard to the small portion of the site it effects, and the ability for future detailed development to provide physical separation from nearby heritage items. As outlined in **Sections 4.3.2.4** and **4.3.3.1** of this report, the Revised Design Guide continues to include setback and building height (in storeys) controls that provide for an appropriate transition in scale to adjoining privately owned lots, addressing aspects such as privacy and outlook, as well as separation to heritage items. This guidance is further supported by the amended principle at Section 3.1.2(4) of the Design Guide.

This is also supported by the Statement of Heritage Impact (SoHI) (refer to **Appendix P**) which includes an assessment of Heritage Items on Cope Street, including Heritage Item 2078 ‘2-storey Victorian terrace houses’ and 2296 ‘Terrace Group’. It confirms that the Rezoning Proposal would not result in any additional impacts compared to what is contemplated under the existing planning controls. The SoHI also confirms the Concept SSDA would have the potential for minor adverse visual impacts due to the substantial alteration of the physical and visual setting of the heritage item, as envisaged by the existing planning controls.

The terrace group to the west of Cope Street, known as heritage item 2087 ‘Terrace Group “Gordon Terrace”’, was also assessed as part of the SoHI. The assessment confirms that the Rezoning Proposal would not result in any additional impacts compared to what is contemplated under the existing planning controls. The SoHI also confirms the Concept SSDA would have the potential for major adverse visual impacts due to the substantial alteration of the physical and visual setting of the heritage item, as envisaged by the existing planning controls and the scale of the proposed buildings. The SoHI recommends that the detailed design for future detailed SSDAs should seek to minimise the impacts of scale and mass on heritage items and open spaces, to help mitigate the adverse impacts of overshadowing and alteration to setting and skyline.

4.3.9 Stormwater and Flooding

4.3.9.1 Matter raised – Flood impacts on surrounding roads and properties

The Flood Impact Risk Assessment (FIRA) prepared by GRC Hydro in support of the Concept SSDA and Rezoning Proposal concluded that the proposed development will not, subject to future buildings and basement entrances being elevated above the flood planning level applicable to each land use be affected by flooding, worsen flooding on adjoining properties.

The impacts identified by CPHR relate to local roads serving the precinct rather than to adjoining properties. As set out at Section 9.13.3 of the EIS, the post-development modelling demonstrates that the proposed concept envelopes, road layout and drainage strategy generally maintain existing flood levels and flow paths across the site and do not cause material increases in flood levels on adjoining properties. Where minor localised changes in flood behaviour were identified in the preliminary modelling, the assessment concluded that those changes are capable of being mitigated through detailed design refinement at subsequent stages without altering the overall flood function of the site.

The FIRA will be reviewed and updated through the preparation of the detailed applications for Blocks 2, 3, 8 and 9. The modelling accompanying each application will identify where overland flow occurs in both the existing and proposed cases and will confirm the mitigation measures required to manage offsite flood impacts for that stage. Landscape and roadway levels will be established through the detailed design of each stage and tested against the model, so that the levels on which the assessment relies are confirmed rather than assumed.

4.3.9.2 Matter raised – Block 8 overland flow path

The design of Block 8 has considered the existing overland flow path, as detailed within the Stormwater Management Plan submitted with the Concept SSDA and shown in Figure 22 of the revised Waterloo South Design Guide 2026 (refer to Figure 25).

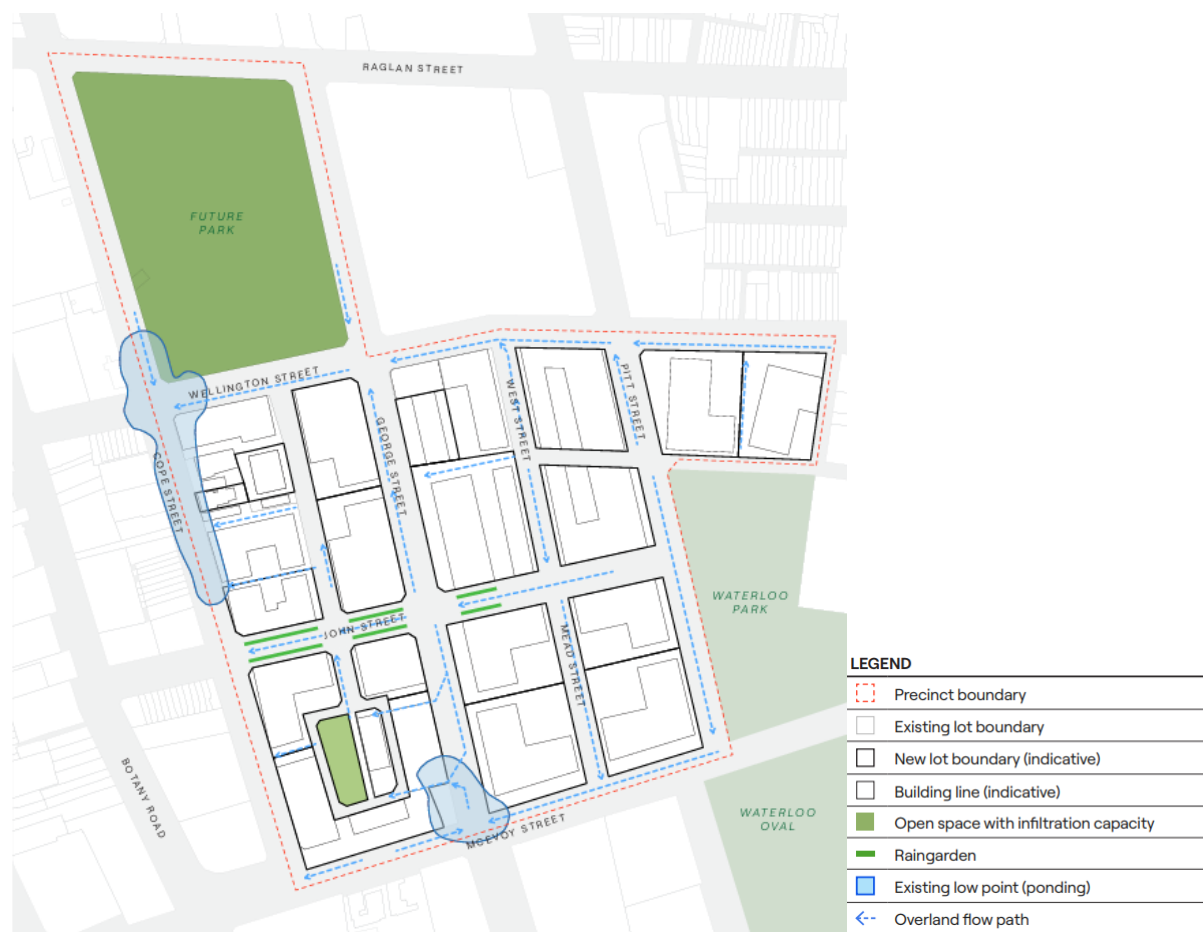


Figure 25 Revised Figure 19 Stormwater

Source: Revised Waterloo South Design Guide 2026

The flood modelling undertaken by GRC Hydro incorporated the proposed Block 8 building envelopes and confirmed that the proposed drainage design and ground levels maintain the existing low point at the southern end of George Street. Accordingly, no amendment to the Concept SSDA building envelopes is required.

The future detailed SSDA for Block 8 will establish the final ground levels through this area and include detailed flood modelling to demonstrate that flood impacts are appropriately managed, consistent with the requirements of the City of Sydney.

In relation to securing the overland flow path, an easement for stormwater drainage is capable of being provided over the relevant land. The extent and terms of any easement will be determined through the detailed design process, including confirmation of ground levels, flow path alignment and subdivision arrangements.

4.3.9.3 Matter raised – Flood mitigation within the Main Park

The potential for on-site detention within the Main Park (Block 1) has been investigated previously by WSce and Stockland has been raised by the City of Sydney and the SES. That investigation identified constraints arising from the staging of the works and other site factors which may preclude the use of the park for flood mitigation. GRC Hydro has further advised that detention within the park would be likely to achieve only a limited reduction in flood levels in the events which set the flood planning levels for the precinct, being the 1% AEP and PMF events.

Discussions with the City of Sydney on this matter are ongoing and will continue through the design of the Main Park, which is to be undertaken in collaboration with the City as recorded at **Table 6** and during the detailed design of each subsequent SSDA and DA. The identified constraints and the potential for detention and retention supporting water re-use and irrigation, will be considered through that process. The design of the park will retain flexibility in its use, consistent with the City of Sydney's position that it not be designed solely as a detention basin and with the embellishment and dedication requirements of the Planning Agreement.

The role of the Main Park in flood mitigation for the precinct will be addressed in the updated FIRA's for relevant detailed application stages.

4.3.9.4 Matter raised – Finished floor levels and passive protection

The finished floor levels and basement protection levels nominated in the FIRA are indicative at the concept stage and will be refined through the detailed design of each stage.

It is agreed that passive protection of entry points to buildings and basements is the required approach and that reliance on mechanical protection is not appropriate. The FIRA will be updated at each detailed application stage to confirm that flood planning level compliance, including protection of basements to the probable maximum flood, is achievable through passive measures. The entry points to be protected, including ramps, lift shafts, fire stairs and ventilation openings, will be identified and confirmed through the detailed application for each stage.

The SES recommendation that design solutions prioritise passive flood protection and rising road access away from flood-affected areas is accepted and detailed design will be progressed on that basis. Reliance on the successful implementation of individual Flood Emergency Response Plans will accordingly be minimised. Refer also to **Section 4.3.9.6**.

4.3.9.5 Matter raised – Climate change impacts on modelling

The flood modelling undertaken for the precinct adopts ARR2019, consistent with the City of Sydney's adopted hydrologic and hydraulic models for the Alexandra Canal catchment and published flood levels for the area.

Climate change scenarios were assessed within the FIRA as sensitivity testing to understand the potential impact of future climate change on flood behaviour and flood levels across the precinct. The analysis identified increases in flood levels under future climate change scenarios.

The FIRA and flood planning levels will be reviewed and updated as part of future detailed applications to reflect the requirements and standards applicable at the time of each stage, including any future changes to climate change policy or the City's adopted flood information.

4.3.9.6 Matter raised – Flood evacuation and sensitive land uses

It is agreed that a precinct-wide approach to flood emergency response is preferable to fragmented building-by-building strategies. The flood management framework informing the future detailed applications will be developed on that basis and detailed design will prioritise passive flood protection measures and rising road access away from flood-affected areas, so that reliance on the successful implementation of individual Flood Emergency Response Plans is minimised.

The opportunity to address flooding constraints through a precinct-wide strategy is also agreed. The distribution of land uses will be considered in the preparation of the future detailed applications having regard to the areas identified in the FIRA which are sensitive to flood risk.

The support of the SES for the location of the proposed park Main Park at Block 1, being the most flood-affected part of the precinct, is noted. Refer also to **Section 4.3.9.3**.

4.3.9.7 Matter raised – Stormwater management

The City of Sydney's position that the stormwater concept is acceptable subject to approval of the proposed connections is noted. The design of the connections, including the location and configuration of the proposed inlet and connection pits, has been discussed with the City of Sydney through the PIWG and will be resolved through the future detailed applications for each stage. In relation to the overland flow path from the trapped low point at the southern end of George Street, refer to **Section 4.3.9.2**.

5.0 Updated Project Justification

This section outlines the updated project justification in response to the refinements made to the proposed development, in response to feedback provided during public exhibition. The proposal is consistent with the overarching objectives of the relevant strategic plans, policies and guidelines.

The anticipated impacts of the proposed development, as amended, are likely the same as those proposed under the original application. Where requested additional assessment has been provided as part of the response to submissions and detailed in **Section 3.2**. The additional assessment confirms that the proposed development will not have any adverse environmental impacts.

5.1 Site Suitability

The site is suitable for the proposed development for the following reasons:

- The site is strategically located in close proximity to high-capacity public transport infrastructure, including the Waterloo metro station, as well as existing bus, walking and cycling networks. This level of accessibility is capable of supporting the proposed increase in population and will not result in any adverse or significant impacts on surrounding development or land uses.
- The proposal represents an efficient and orderly use of underutilised government-owned land, enabling a substantial increase in housing supply within Waterloo South. Failure to redevelop the site would represent a missed opportunity to optimise the use of a large, strategically located inner-city site in accordance with State and Commonwealth housing objectives.
- The Concept SSDA recognises and responds to the cultural and heritage significance of the site, including through the incorporation of Designing with Country principles. Indigenous knowledge and narratives will be embedded throughout the precinct via the public domain, landscape strategy and future detailed design stages.
- The site has excellent access to a wide range of existing services and facilities, including education, health, open space, retail and employment opportunities, which will support the future community and benefit from increased activity generated by the redevelopment.
- The development has been designed to minimise impacts on surrounding properties and, in several respects, will improve the natural, historical and environmental qualities of the site through enhanced public domain, landscaping, environmental performance and place-based design.
- The proposal is expected to result in only minor environmental impacts, all of which can be appropriately managed and mitigated through the measures identified in this , this Submissions and Amendments Report and implemented at subsequent stages of development.
- The site is subject to the Sydney LEP 2012 and is zoned E1 Local Centre, MU1 Mixed Use, RE1 Public Recreation and SP2 Infrastructure. These zones permit a broad range of land uses and are appropriate to support the proposed mixed-use redevelopment.
- The site is well serviced by existing utility infrastructure, including water, wastewater, electricity and telecommunications, with capacity available or capable of being augmented to meet the servicing requirements of the proposed mixed-use precinct.
- The size of the site enables a coordinated master planned approach, with land uses appropriately distributed to ensure diversity, integration and high-quality public domain and infrastructure outcomes.

5.2 Public Interest

The proposed development remains in the public interest for the following reasons:

- The proposal will renew and expand the existing social housing stock, which is approaching the end of its functional life and replace it with high-quality contemporary housing supported by integrated amenities, landscaping and communal facilities. The redevelopment of Waterloo South presents a substantial opportunity to revitalise the precinct and significantly improve living conditions and amenity for both existing and future residents.
- The project will deliver high-quality mixed-tenure housing within a rapidly transforming inner-city area, including substantial social and affordable housing components. This will increase housing choice, promote social diversity and make a meaningful contribution to addressing the ongoing housing crisis.
- The proposal has the potential to generate significant social and economic benefits for the local community and Greater Sydney by delivering a diverse mix of land uses that support housing supply, employment generation, community services and educational opportunities.
- The development will deliver significant public domain improvements, including new and upgraded roads, road widenings, enhanced pedestrian infrastructure, improved streetscapes and the provision of publicly accessible open spaces that support community use and precinct-wide activation.
- The project will create employment opportunities during both the construction and operational phases, stimulating the local economy and contributing to sustained economic activity and growth.

6.0 Conclusion

This Response to Submissions and Amendments Report has considered all submissions received during and following the exhibition of the proposed Concept SSDA and Rezoning Proposal for the renewal of Waterloo Estate (South), known as 'Waterloo South'.

In response to issues raised in these submissions, as well as matters raised by the Department, the Project Team has undertaken further environmental assessment and proposed a number of design amendments in order to respond to the matters raised in the submissions and as a result of further project design development. In summary, the following amendments have been made to the Rezoning Proposal:

- Reduction in the proposed maximum building heights for Buildings 4C, 5A, 6A and 8A, with corresponding amendments to the LEP HOB Map, to better align the LEP controls with the proposed Concept SSDA Envelope Plans and supporting reference scheme.
- Refinement of the proposed maximum permitted GFA for Blocks 8A, 9A, 10A, 5A and 2C, with corresponding amendments to the proposed LEP FSR Map, to better align the controls with the proposed Concept SSDA Envelope Plans and supporting reference scheme.
- Amendment to the proposed HOB and FSR Maps for Blocks 9 and 10 to exclude land subject to the potential future road widening in DP 252609, consistent with the approach adopted for Block 8.
- Introduction of an FSR of 0.1:1 for the parks within Blocks 1 and 8 in response to feedback from the City of Sydney.
- Rationalisation of the proposed LEP Active Frontage Map for Blocks 8 and 9 to reflect the more detailed design development of these blocks.
- Removal of the proposed amendment to clause 7.29(6) of the Sydney LEP 2012 from the Rezoning Proposal.
- Amendments to the revised Waterloo South Design Guide 2026 including the introduction of upper-level setbacks along George Street, clarification of deep soil and planting-on-structure requirements, reinstatement of the Block 8 through-site link and updates to relevant figures, tables and street design provisions.
- Minor refinements to the Concept SSDA and associated documentation arising from ongoing design development and the progression of the Stage 1 detailed design.

The key design refinements of the amended Concept SSDA scheme include minor refinements to the Concept Envelopes and associated plans in response to submissions and ongoing design development including:

- Rationalisation of Concept Envelopes to reflect detailed design development as well for Buildings 8AB3, 8BB1, 8CB1 and 9BB1.
- The Concept Envelopes for Buildings 9AB1 and 10AB1 have also been amended to account for the future potential widening of McEvoy Street.

The proposal, as amended under this report, responds to the matters raised within the submissions, whilst also delivering an improved urban design outcome and public benefit for the community. Specifically, the proposal will continue to:

- Be consistent with relevant Commonwealth, State and local strategic policies and plans, and facilitate the renewal of Waterloo South as a well-located, mixed-use precinct delivering a substantial increase in residential accommodation, including social and affordable housing;
- Respond to the site's unique physical, social and urban context by providing an appropriate form, scale and distribution of built form across the precinct, with sensitive transitions to surrounding development;
- Support the objectives of the Australian Government's National Housing Accord (2023) by facilitating the delivery of approximately 3,300 well-located dwellings within an accessible, infrastructure-rich inner-city location during the Accord period (2024–2029), including a minimum of 30 per cent social housing, approximately 20 per cent affordable housing and up to 50 per cent market housing, measured as a proportion of residential GFA;
- Establish built form and development outcomes that are consistent with the proposed statutory framework being progressed through the concurrent State Assessed Rezoning Proposal, providing a clear, coordinated and robust planning framework for future stages of development;
- Accommodate a diverse mix of residential and non-residential land uses appropriate to the site, including retail, commercial and other non-residential uses that support the needs of the future community and surrounding neighbourhoods;
- Facilitate residential development capable of achieving a high level of residential amenity consistent with the objectives of the ADG and the revised Waterloo South Design Guide 2026;

- Avoid unreasonable adverse environmental impacts, with identified impacts capable of being appropriately managed through the mitigation measures outlined in the EIS and implemented at subsequent stages of development;
- Incorporate publicly accessible open spaces and essential services integrated with development, contributing to a connected, inclusive and high-quality public domain; and
- Establish a clear framework to guide the long-term, staged redevelopment of the site over an anticipated period of approximately 10 to 15 years, including building envelopes, indicative land use distribution and yields, public domain outcomes and infrastructure delivery parameters to inform future detailed development applications

Based on the additional information provided within this report, it is understood that the Department should now have all the information they require to complete their assessment of the proposal.