



Submissions Report

Waterloo Mixed Use Development 881-885 Bourke Street
(SSD-80441462)

Submitted to Department of Planning, Housing and Infrastructure
on behalf of Waterloo Property Pty Ltd as trustee for Waterloo Property
Unit Trust

Prepared by Colliers Urban Planning

12 June 2026 | 2240721



'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.



'Dagura Buumarri'

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.



'Gadalung Djarri'

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Colliers Urban Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past and present.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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B. Revised Mitigation Measures Table	Colliers Urban Planning
C. Response to SDRP Comments Table	Colliers Urban Planning
D. Amended Architectural Plans	Design Team
E. Design Report Addendum	Design Team
F. Revised Pedestrian Wind Environment Study	Windtech
G. Revised Operational Waste Management Plan	Elephants Foot
H. Revised Transport Impact Assessment	Genesis Traffic
I. Revised Flood Impact Risk Assessment	Stantec
J. Flood Emergency Response Plan	Stantec
K. Revised Noise and Vibration Impact Assessment	Acoustic Logic
L. Revised Integrated Water Management Plan / Civil Plans	Stantec
M. Revised Landscape Architecture Plans	Design Team
N. Revised BCA Report	AED Group
O. Revised Accessibility Compliance Report	AED Group
P. Revised Groundwater Assessment	EI Australia
Q. Revised Public Art Plan	UAP
R. Market Demand Study	Colliers Urban Planning

Executive Summary

This Submissions Report has been prepared by Colliers Urban Planning on behalf of Waterloo Property Pty Ltd as trustee for Waterloo Property Unit Trust (the Applicant) to address the matters raised during the Public Exhibition of the Main Works for Waterloo Mixed Use Development (SSD-80441462) located at 881-885 Bourke Street, Waterloo, NSW, 2017.

The Main Works State Significant Development Application (SSDA) was public exhibited from 12 November 2025 until 25 November 2025, with the subsequent request for response to submissions issued on 17 December 2025. The SSDA, as exhibited, sought approval the construction of residential and mixed-use buildings across four development parcels, inclusive of build to rent (BTR) apartments, affordable housing including commercial and retail premises, ancillary BTR amenity and a consolidated basement.

Overview of Submissions

In relation to the Public Exhibition of the SSDA, a total of 81 submissions were received. These included submissions made by relevant government agencies and organisations, while 68 submissions were received from members of the public.

Specifically, submissions were received from the following relevant government agencies and organisations:

- Ausgrid
- Civil Aviation Safety Authority (CASA)
- City of Sydney
- Department of Climate Change, Energy, the Environment and Water (DCCEEW) Conservation Programs, Heritage and Regulation (CPHR)
- DCCEEW Water Group
- NSW Environmental Protection Authority (EPA)
- Fire and Rescue NSW
- GANSW
- Heritage Council of NSW
- NSW Ambulance
- NSW SES
- Sydney Water
- Transport for NSW (TfNSW)

The submissions related to a range of issues that included:

- Built form concerns, including excessive height, bulk and scale, inconsistent with surrounding character.
- Departure from the endorsed masterplan and planning framework.
- Quantum of affordable housing, including delivery, concentration and consistency with HDA EOI.
- Design quality and compliance issues, particularly relating to ADG requirements and residential amenity including overshadowing, privacy, view loss and visual dominance.
- Environmental amenity impacts, including wind and noise.
- Traffic, parking and infrastructure capacity constraints, including cumulative impacts on the local network and services.
- Flooding and emergency management, including adequacy of flood assessment and clarity of evacuation and response measures.
- Technical and design resolution matters, including basement layout, waste management, structural design, and access arrangements.
- Some support for increased density, housing supply and urban renewal outcomes.

Actions taken since Exhibition

Following the Public Exhibition of the SSDA, the Applicant has undertaken further engagement with the key relevant authorities. Part of the engagement was undertaken in relation to the Early Works SSDA (SSD-80911502).

In response to the submissions received, design refinements have been made including:

- Building heights and envelopes of the Building 3A Tower and Parcel 2 buildings have been reduced and refined to address overshadowing and solar access impacts.
- Flooding and wind modelling have been updated and integrated into the design.
- Internal apartment layouts have been refined, including changes to dwelling mix with an overall increased proportion of 3-bed dwellings and the size of City Starter units to be a minimum of 30m².
- The precinct's affordable housing offering has been realigned to be consistent with City of Sydney provisions and will be delivered as a monetary contribution.
- Ongoing structural and services coordination has informed adjustments to rooftops, basements and plant areas.
- Parcel 1 façades and layouts have been redesigned, including reconfiguration of apartments and communal spaces.
- Parcel 4 has been replanned, including updated apartment mix and relocation of the substation within the basement.
- Ground floor uses have been enhanced, including introduction of a small-format grocer and improved gym and lobby arrangements.
- Communal spaces and amenities have been reconfigured, including relocation of key facilities to optimise building performance and resident amenity.
- The basement layout has been undergone further changes with updates from recommendations from the updated Transport Impact Assessment and Operational Management Plan.
- Resolution of outstanding design excellence matters to ensure the proposal achieves design excellence.

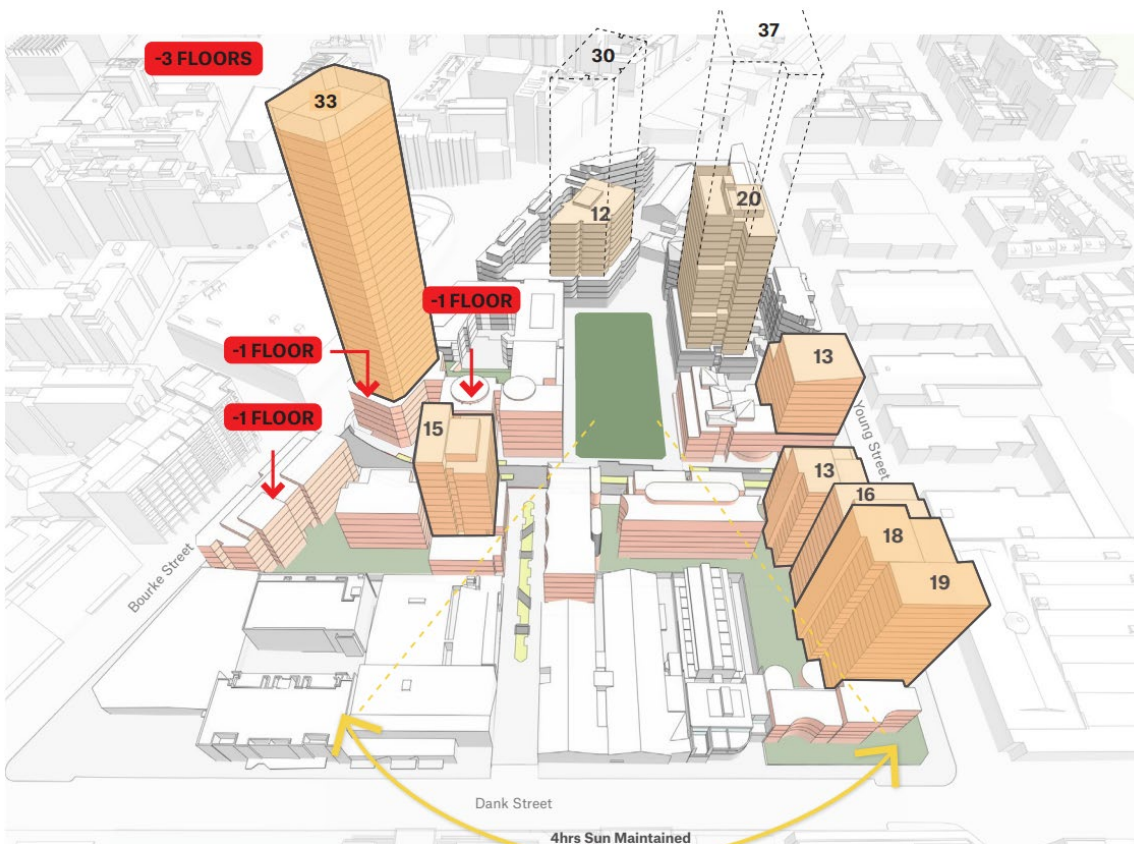


Figure 1 Project Massing Changes in response to submissions

Source: Bates Smart

Project Justification

For the reasons discussed above, the Proposal remains suitable for the site and is in the public interest and therefore recommended for approval.

Summary of Changes

Table 1 Key Project Information

Component	Submitted Project	Proposed Amendment																																																												
Land Use	- Residential Accommodation (residential flat building, mixed use, shop top) with build to rent and affordable housing - Retail/Commercial premises including food and beverage tenancies - Recreational facility (indoor)	No change																																																												
Site	Lot 1 DP1308636 and Lot 2 DP1308636	No change																																																												
Site Area	21,554m²	No change																																																												
GFA	The GFA and FSR is summarised as follows:<table><tr><th>Parcel</th><th>GFA (m2)</th></tr><tr><td>1 & 4</td><td>31,887</td></tr><tr><td>2 & 3</td><td>33,265</td></tr><tr><td>TOTAL</td><td>65,152</td></tr></table>	Parcel	GFA (m2)	1 & 4	31,887	2 & 3	33,265	TOTAL	65,152	The GFA and FSR is summarised as follows:<table><tr><th>Parcel</th><th>GFA (m2)</th></tr><tr><td>1 & 4</td><td>32,159</td></tr><tr><td>2 & 3</td><td>30,376</td></tr><tr><td>TOTAL</td><td>62,535</td></tr></table>	Parcel	GFA (m2)	1 & 4	32,159	2 & 3	30,376	TOTAL	62,535																																												
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FSR	3.02:1	2.91:1																																																												
Maximum Height	The maximum height is summarised below:<table><tr><th>Parcel</th><th>Maximum Height (RL m)</th><th>Maximum Storeys</th></tr><tr><td>1</td><td>90.20</td><td>18</td></tr><tr><td>2</td><td>82.55</td><td>16</td></tr><tr><td>3</td><td>152</td><td>36</td></tr><tr><td>4</td><td>70.81</td><td>13</td></tr></table>	Parcel	Maximum Height (RL m)	Maximum Storeys	1	90.20	18	2	82.55	16	3	152	36	4	70.81	13	The maximum height is summarised below:<table><tr><th>Parcel</th><th>Maximum Height (RL m)</th><th>Maximum Storeys</th></tr><tr><td>1</td><td>92.50*</td><td>19*</td></tr><tr><td>2</td><td>82.55</td><td>15*</td></tr><tr><td>3</td><td>144.60</td><td>33</td></tr><tr><td>4</td><td>73.20*</td><td>13</td></tr></table> <i>Note: minor amendments to the RLs and number of storeys in parcels 1, 2 and 4 to correct errors in the EIS. No change in maximum heights compared with what was proposed.</i>	Parcel	Maximum Height (RL m)	Maximum Storeys	1	92.50*	19*	2	82.55	15*	3	144.60	33	4	73.20*	13																														
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Deep Soil & Canopy	- Total Deep Soil: 15% - Canopy Coverage: 15%	No change																																																												
BTR Communal Space	- BTR Amenities: 2,447m² - Non-Residential Floorspace: 4,456m² - Communal Open Space: 5,021m²	- BTR Amenities: 2,500m² - Non-Residential Floorspace: 4,900m² - Communal Open Space: 4,450m²																																																												
Dwelling Mix	The dwelling mix is as follows:<table><tr><th>Parcel</th><th>CS</th><th>St</th><th>1</th><th>2</th><th>3+</th></tr><tr><td>Stage 1</td><td>54</td><td>40</td><td>140</td><td>77</td><td>22</td></tr><tr><td>Stage 2</td><td>176</td><td>0</td><td>88</td><td>94</td><td>11</td></tr><tr><td>Total</td><td>230</td><td>57</td><td>308</td><td>218</td><td>37</td></tr><tr><td></td><td>27%</td><td>7%</td><td>36%</td><td>26%</td><td>4%</td></tr></table>	Parcel	CS	St	1	2	3+	Stage 1	54	40	140	77	22	Stage 2	176	0	88	94	11	Total	230	57	308	218	37		27%	7%	36%	26%	4%	The dwelling mix is as follows:<table><tr><th>Parcel</th><th>CS</th><th>St</th><th>1</th><th>2</th><th>3+</th></tr><tr><td>Stage 1</td><td>36</td><td>132</td><td>118</td><td>104</td><td>27</td></tr><tr><td>Stage 2</td><td>165</td><td>6</td><td>124</td><td>94</td><td>20</td></tr><tr><td>Total</td><td>201</td><td>138</td><td>242</td><td>198</td><td>47</td></tr><tr><td></td><td>24.3%</td><td>16.7%</td><td>29.3%</td><td>24%</td><td>5.7%</td></tr></table>	Parcel	CS	St	1	2	3+	Stage 1	36	132	118	104	27	Stage 2	165	6	124	94	20	Total	201	138	242	198	47		24.3%	16.7%	29.3%	24%	5.7%
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Car Spaces	537 car parking spaces within the consolidated basement.	426 car parking spaces within the consolidated basement.																																																												

1.0 Introduction

This Submissions Report has been prepared by Colliers Urban Planning on behalf of Waterloo Property Pty Ltd as trustee for Waterloo Property Unit Trust (the Applicant) to address the matters raised during the Public Exhibition of the Main Works for Waterloo Mixed Use Development (SSD-80441462) located at 881-885 Bourke Street, Waterloo, NSW, 2017.

The Main Works State Significant Development Application (SSDA) was public exhibited from 12 November 2025 until 25 November 2025, with the subsequent request for response to submissions issued on 17 December 2025. Subsequently, 13 submissions were received from relevant government agencies and organisations, while 68 submissions were received from members of the public.

This Submissions Report provides an analysis of submissions, actions taken since Public Exhibition, the Applicant's response to submissions and provides an updated justification of the proposed development. It is accompanied by supporting information and technical reports (refer to the Table of Contents).

This Submissions 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 DPHI's *State Significant Development Guidelines*, including *Appendix C – Preparing a Submissions Report*.

1.1 Exhibited Development

The SSDA, as exhibited, sought approval the construction of residential and mixed-use buildings across four development parcels, inclusive of build to rent (BTR) apartments, affordable housing including commercial premises and creative industry floor space and a consolidated basement at 881-885 Bourke Street, Waterloo, NSW, 2017. Specifically, the exhibited development sought consent for the following:

- Site establishment and enabling works (that were not included in the preceding Early Works SSDA).
- Construction of 9 residential and mixed-use buildings across 4 development parcels for the purposes of:
 - Build to rent apartments and associated communal amenities.
 - Affordable rental housing (to be managed by a CHP for 15 years).
 - Artist in residence.
 - Non-residential floor space including commercial/retail premises and indoor recreation facilities and associated hours of operation.
- Construction of a consolidated basement with below-ground links between development parcels for car parking, plant and storage.
- Site-wide landscaping and publicly accessible open space (noting that the primary public domain works are subject to a separate approval).
- Works to site frontages.
- Extension and augmentation of infrastructure and services (that were not included in the preceding early Works SSDA) as required.
- Staging of development and CCs.

Refer to **Figure 2** for a comparative ground floor layout of the proposed development as lodged and as amended.

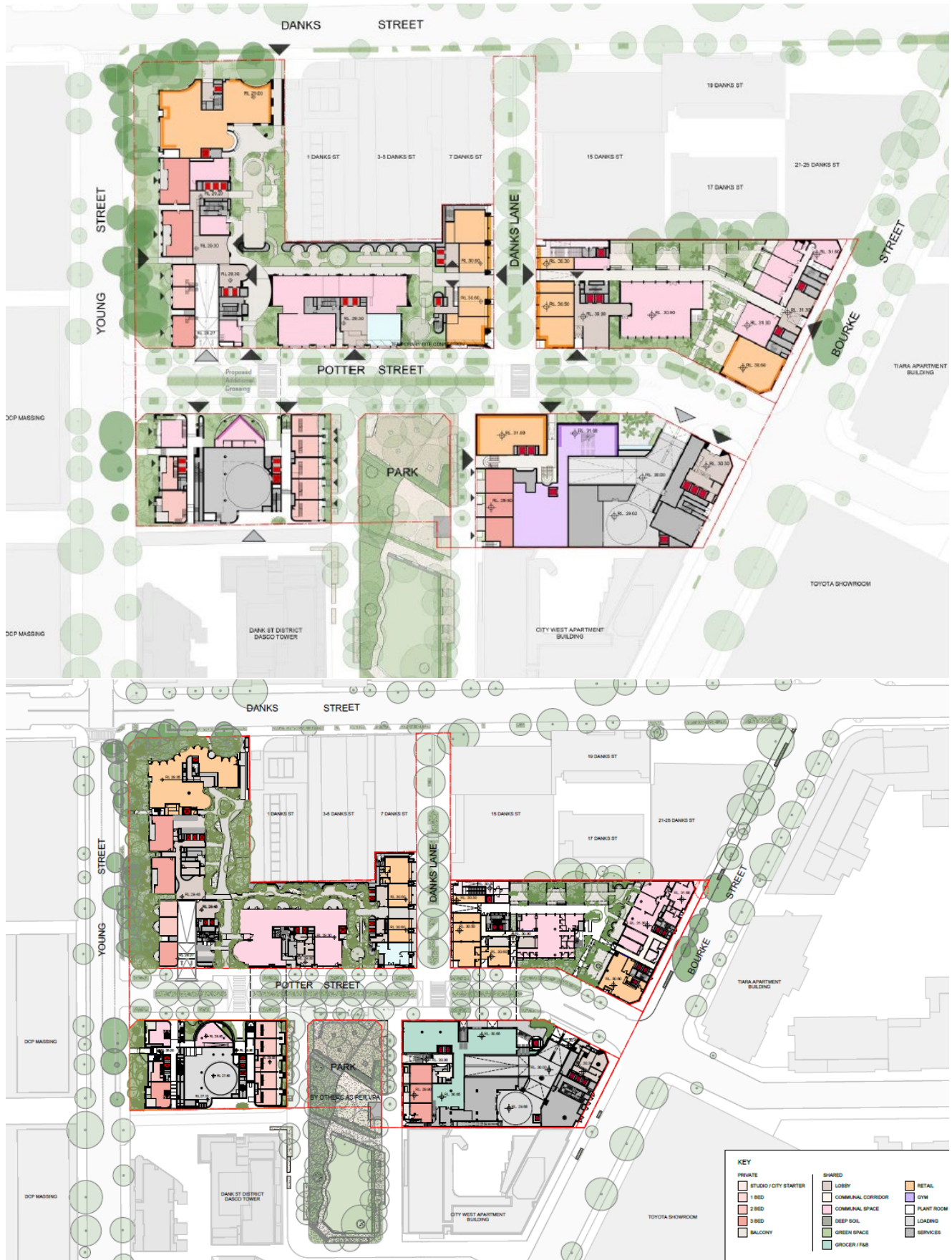


Figure 2 Comparison of SSDA Submission (above) and Amended Plans (below) Precinct Ground Floor layout and uses

Source: Design Team

2.0 Analysis of Submissions

This section analyses the submissions received by providing a breakdown of the type of submissions received and identifies the issues raised.

2.1 Breakdown of Submissions

In relation to the Public Exhibition of the SSDA, a total of 81 submissions were received which included submissions made by relevant government agencies, organisations and members of the public. A breakdown of the government agencies and organisation submissions received is provided in **Table 2** below.

In addition, a Request for Information Letter from DPHI was received by the proponent. The letter requests further information which align to the submissions received and as such have been considered within this report.

Table 2 *Summary of Submissions Received*

Submissions Received	Position
Government Agencies	
Ausgrid	Comments for consideration
Civil Aviation Safety Authority (CASA)	Comments for consideration
City of Sydney	Object
Department of Climate Change, Energy, the Environment and Water (DCCEEW) Conservation Programs, Heritage and Regulation (CPHR)	Comments for consideration
DCCEEW Water Group	Comments for consideration
NSW Environmental Protection Authority (EPA)	No comments
Fire and Rescue NSW	No comments
GANSW	Comments for consideration
Heritage Council of NSW	Comments for consideration
NSW Ambulance	Comments for consideration
NSW SES	Comments for consideration
Sydney Water	Comments for consideration
Transport for NSW (TfNSW)	Comments for consideration
Organisations	
City West Housing	Object
Young Street Property Investment (YSPI) 1	Support
YSPI 2	Support
Young Street Property Development (YSPD)	Support

2.2 Categorising of Issues

A summary of the issues raised in the submissions received is provided in **Table 3** below.

Table 3 *Summary of Issues Raised*

Summary of Issues Raised	Stakeholder
The Project	
Height, Bulk and Scale - Height far exceeds context and masterplan. - Excessive massing; inadequate transition. - Overdevelopment and density concerns. - Visual dominance; character mismatch. - Requests for reduced tower height.	Public Submissions
Departure from Masterplan and Strategic Alignment - Significant departure from endorsed Masterplan. - Earlier engagement suggested lower height. - Misalignment with strategic direction and planning expectations.	Council
Affordable Housing - Affordable Housing is not consistent with the HDA Expression of Interest. - Mixed views: support + concerns. - Lack of clarity on management and governance. - Perceived concentration of social housing. - Property value concerns.	- Public Submissions - DPHI
Support for the Project - Support for higher density and urban renewal. - Belief development achieves long-term precinct goals. - Support from landowners for upzoning and increased housing supply.	Public Submissions
Apartment Design Guide (ADG) - Additional amenities are needed to support the provision of apartments under the ADG minimum of 35m² for a studio. - Residential amenity must be achieved as 27% of units are proposed to be undersized. - Building separation should meet requirements of the ADG. - Floor to Ceiling Heights should meet the requirements of the ADG. - Additional information is required to assess cross ventilation.	DPHI
Basement Layout and Waste Collection - Concerns regarding the practicality of the basement layout. - Waste Management Plan does not include details of the transportation of waste for collection.	DPHI
Structural Engineering Additional information is required for the structural engineering.	DPHI
Procedural Matters	
Voluntary Planning Agreement (VPA) - The SSDA is inconsistent with the existing VPA as it introduces one location of below ground encumbrances. - The SSDA does not alter the staging of deliver or land dedication as per the existing VPA, however, the VPA is planned to be amended to allow for the basement connection links which are below the land to be dedicated to the City. - The links under land to be dedicated to Council are to be used for vehicular circulation only.	- CoS - DPHI
Conditions recommended - Conditions provided by Ausgrid - Conditions provided by NSW EPA - Conditions provided by TfNSW - Conditions provided by DCCEEW Water Group - Conditions provided by Sydney Water	- Ausgrid - NSW EPA - TfNSW - DCCEEW Water Group - Sydney Water

Consultation and Exhibition Concerns - Exhibition period too short. - Residents not notified. - Difficulty accessing documents. - Lack of clarity in diagrams.	Public Submissions
Impacts of the Concurrent Rezoning - Height is taller than most key sites in the broader area. - FSR of 3.05:1 is based on bonuses which have not been satisfied. - Clause 6.21D is not supported to be turned off. - Clause 7.23 is not supported to be turned off.	DPHI
Housing Delivery Authority - Affordable Housing is not consistent with the Expression of Interest. - Greater housing diversity is needed within the development.	DPHI
Concept Plan Consent The Stamped Concept Plan conditions of consent require amendments to the building envelopes to improve solar access to adjoining sites.	DPHI
State Design Review Panel (SDRP) The SDRP recommended that the review should take place pre-lodgement to ensure the development exhibits design excellence and this was not done.	DPHI
Economic, Environmental and Social Impacts of the Project	
Solar Access, Overshadowing and Natural Light - Significant sunlight loss to multiple buildings (1 Danks, Tiara, City West Housing, Lachlan St, Potter St, Cameo, Aria, Thread Lane). - Reduced daylight and sky exposure. - ADG non-compliance concerns. - Park overshadowing. - Missing analysis for several receivers.	- Public Submissions - DPHI
Privacy and Overlooking - Direct overlooking to apartments and balconies. - Insufficient setbacks and separation. - Roof terrace/pool privacy concerns. - Building setbacks need to be readdressed.	- Public Submissions - DPHI
Visual Impact and View Loss - Loss of views (including Redfern skyline). - Visual bulk and façade dominance. - VIA accuracy questioned. - Heritage view impacts.	- Public Submissions - DPHI
General Environmental Amenity (Acoustic and Vibration, Wind) - Wind tunnelling concerns; inadequate testing. - Wind environment must be made suitable for future pedestrian usage. - Setbacks may be contributing to the adverse wind impacts. - Noise, dust and vibration during construction. - Road noise will impact units facing Bourke Street, provide façade noise mapping. - Diminished liveability.	- Public Submissions - DPHI - Council
Traffic and Parking - Increased congestion and safety risks. - TIA considered inadequate. - TIA outlines that there will be a significant impact on the surrounding road network. - TIA modelling using 2021 data. - Public transport capacity insufficient. - Parking spillover concerns. - The proposed number of parking is 25% of the maximum, which is considered insufficient for 850 dwellings.	- Public Submissions - DPHI

• Parking to be provided in accordance with the Draft Sydney LEP. • Access to Parcel 4 requires further information. • Cumulative development impacts.	
Infrastructure and Community Services • Local schools, childcare, medical services under pressure. • Inadequate open space relative to uplift. • Need for more community amenities.	• Public Submissions
Construction Impacts • Long-term construction disruption. • Noise, dust, vibration, traffic impacts. • Lack of staging or CMP.	• Public Submissions
Crime Prevention through Environmental Design • Concerns regarding the narrow passageways for the ground level of Parcel 4.	• DPHI
Flooding • The Flood Impact Risk Assessment (FIRA) is limited in assessment. • The Flood Emergency Response Plan (FERP) must nominate a preferred flood response method. • Comments relating to flooding provided by SES, CPHR and Council.	• DPHI • SES • CPHR • CoS
Biodiversity • The proposal is consistent with the biodiversity development assessment report (BDAR).	• DPHI

3.0 Actions taken since Exhibition

This section summarises the further engagement undertaken by the Applicant, describes any refinements or amendments to the Proposal and further impact assessment undertaken.

3.1 Further Engagement Undertaken

Following the Public Exhibition of the SSDA, the Applicant has undertaken further engagement with the key relevant authorities, as described in **Table 4** below.

Table 4 *Engagement Undertaken*

Stakeholder	Engagement Undertaken
DPHI	14 January 2026: Initial discussion with DPHI regarding a preliminary response to the RtS letter. 12 February 2026: Presentation to DPHI outlining proposed changes to building massing in response to feedback in the RtS letter.' 2 June 2026: Feedback of the RTS Letter with revisions to building heights and apartments number.
City of Sydney	- December 16, 2025: A formal meeting with the CoS which was centred around Councils queries about basement layouts, traffic impacts, operational waste management and designs to the public domain. 17 February 2026: Consultation with CoS Public Art Department in regard to response and public art proposal. 5 March 2026: Driveway modification discussion with Public Domain and Planning Agreements team. - May 7 - May 21 2026: Ongoing communication with CoS in relation to the items raised in December 2025 meeting.

The project team remains committed to working with key stakeholders throughout the assessment period to address any issues raised. In accordance with SEARs requirements for communications and stakeholder engagement, the Applicant has implemented an engagement strategy that informs the most likely impacted and interested residents, landowners, businesses and key government agencies about the proposed development. This has not only ensured that the community have had the opportunity to be briefed on the proposal but has also provided an important mechanism to gather feedback for consideration prior to lodgement.

3.2 Refinements to the Proposed Development

Following the Public Exhibition of the proposed development, a number of design refinements and amendments have been made in response to the submissions received and further design development. Importantly, these refinements and changes remain consistent with the project description within the exhibited SSDA and do not raise any additional environmental impacts. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposed development is not required.

The proposed refinements to the proposed development are outlined in **Section 4.0** and include:

3.2.1 Overall Changes

- Updated flooding information has been incorporated into the design.
- Updated wind modelling has been incorporated into the design.
- Internal apartment layouts have been refined across all buildings.
- Ongoing structural and services coordination, including adjustments to rooftop plant areas and basement planning.

3.2.2 Parcels 1 & 4

- Redesign of the Building 1A.1 façade facing Danks Street.
- Conversion of two studio apartments on the corner of Building 1D to one two-bedroom apartment.

- Conversion of four one-bedroom apartments to six studio apartments within Building 1A.2.
- Replanning of communal areas at ground floor and Level 6 within Parcel 1.
- Conversion of one- and two-bedroom apartments to studio and three-bedroom apartments within podium levels of Parcel 4.
- Relocation of the substation within the Parcel 4 basement, including associated ground floor adjustments to accommodate stair access and exhaust.

3.2.3 Parcels 2 & 3

- Building 2A reduced by approximately half a storey to address overshadowing of the Tiara building.
- Reduction of one storey from the eastern volume of Building 3B and the podium of Building 3A to protect solar access to the City West communal open space.
- Reduction in height of the Building 3A tower from 36 to 33 storeys.
- Replanning of Building 2A.
- Increase in the size of City Starter dwellings to generally achieve a minimum of 30sqm.
- Conversion of one City Starter and one studio apartment to one two-bedroom apartment within the podium of Building 2B.
- Conversion of three one-bedroom apartments to one one-bedroom and one three-bedroom apartment within Building 2B.
- Redesign of the Parcel 3 ground floor to include a small-format grocer.
- Redesign of the Parcel 3 gym, including provision of a new ground floor entry.
- Replanning of communal areas and residential lobbies at ground floor level within Parcel 2.
- Relocation of the communal entertainment space from Level 4 of Building 2B to Level 32 of Building 3A.

As a consequence of the project changes outlined in **Section 4.1**, the key project information has been updated as outlined in **Table 4**.

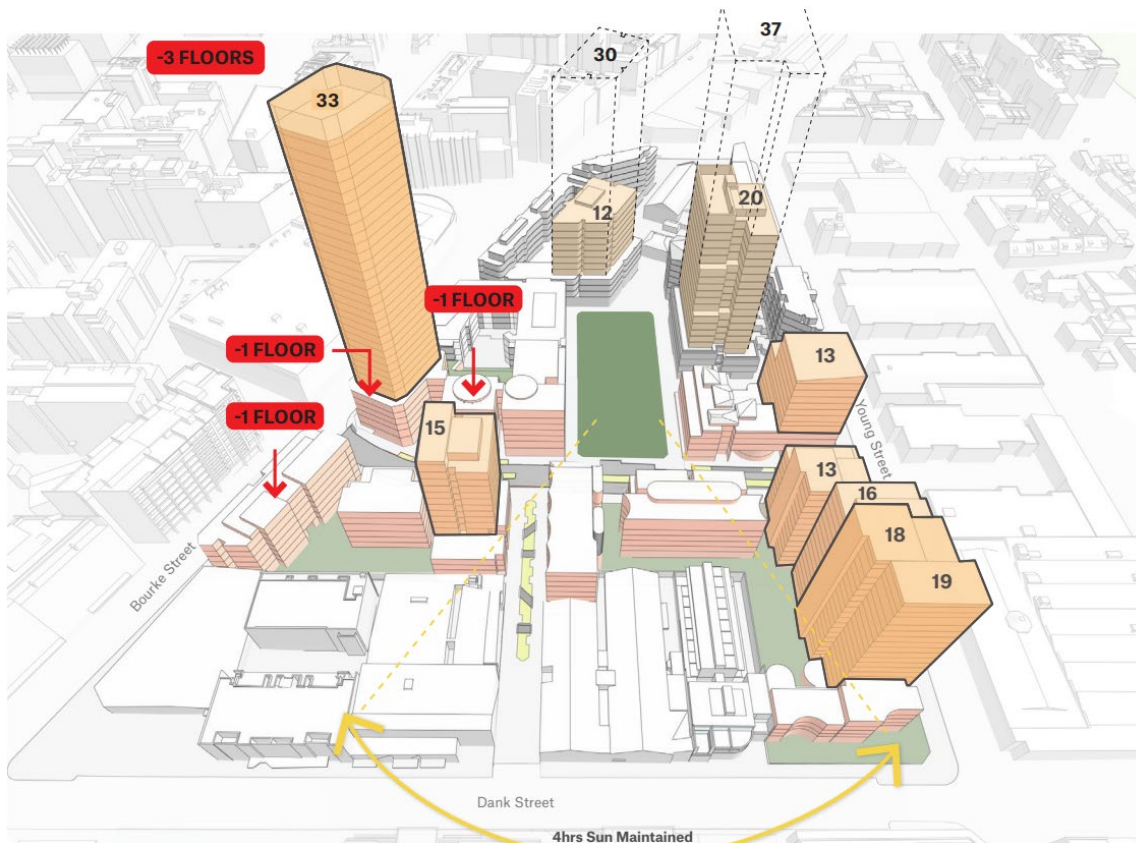


Figure 3 *Proposed site massing and reductions in built form*

Source: Design Team

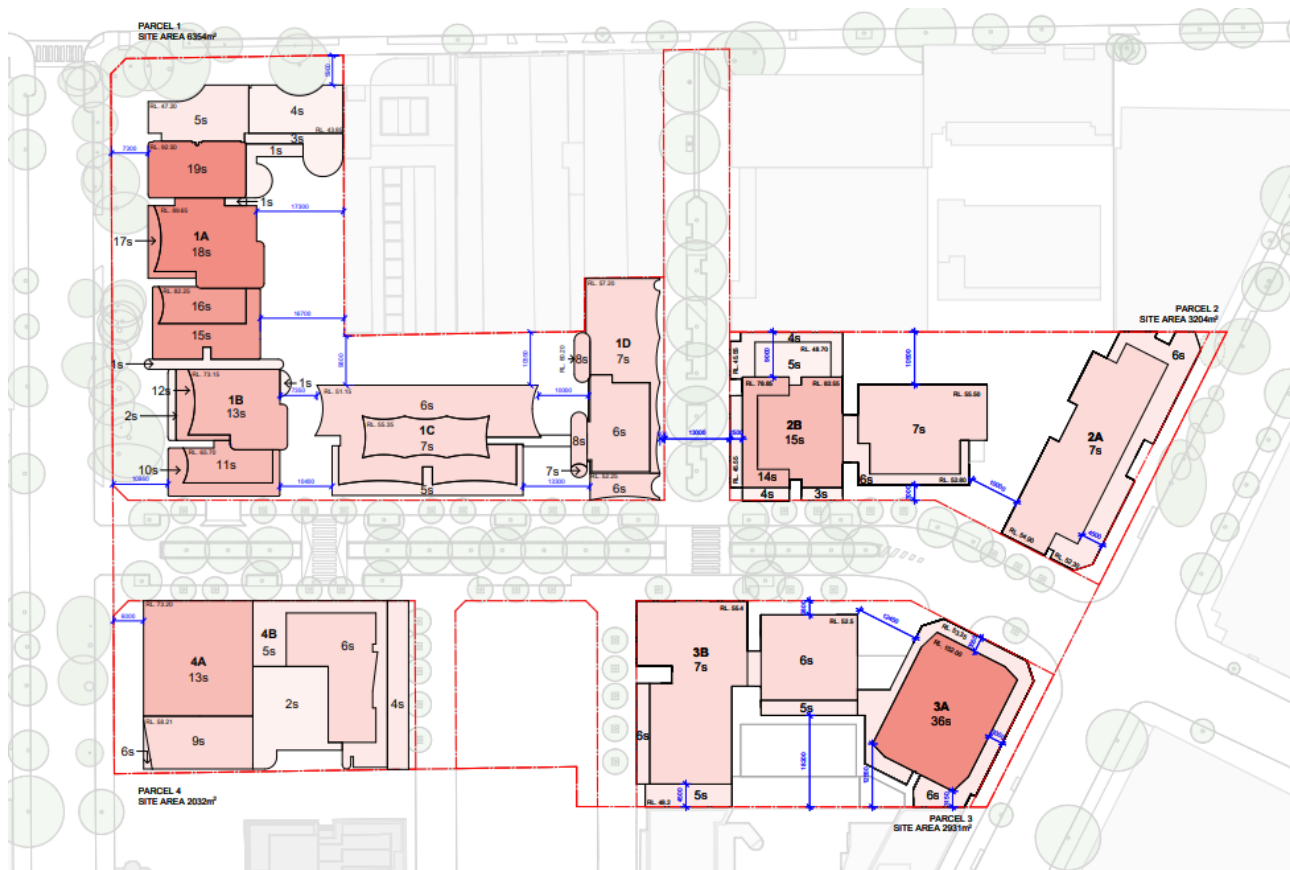


Figure 4 Precinct layout plan showing separation, height in storeys (as-lodged)

Source: Design Team

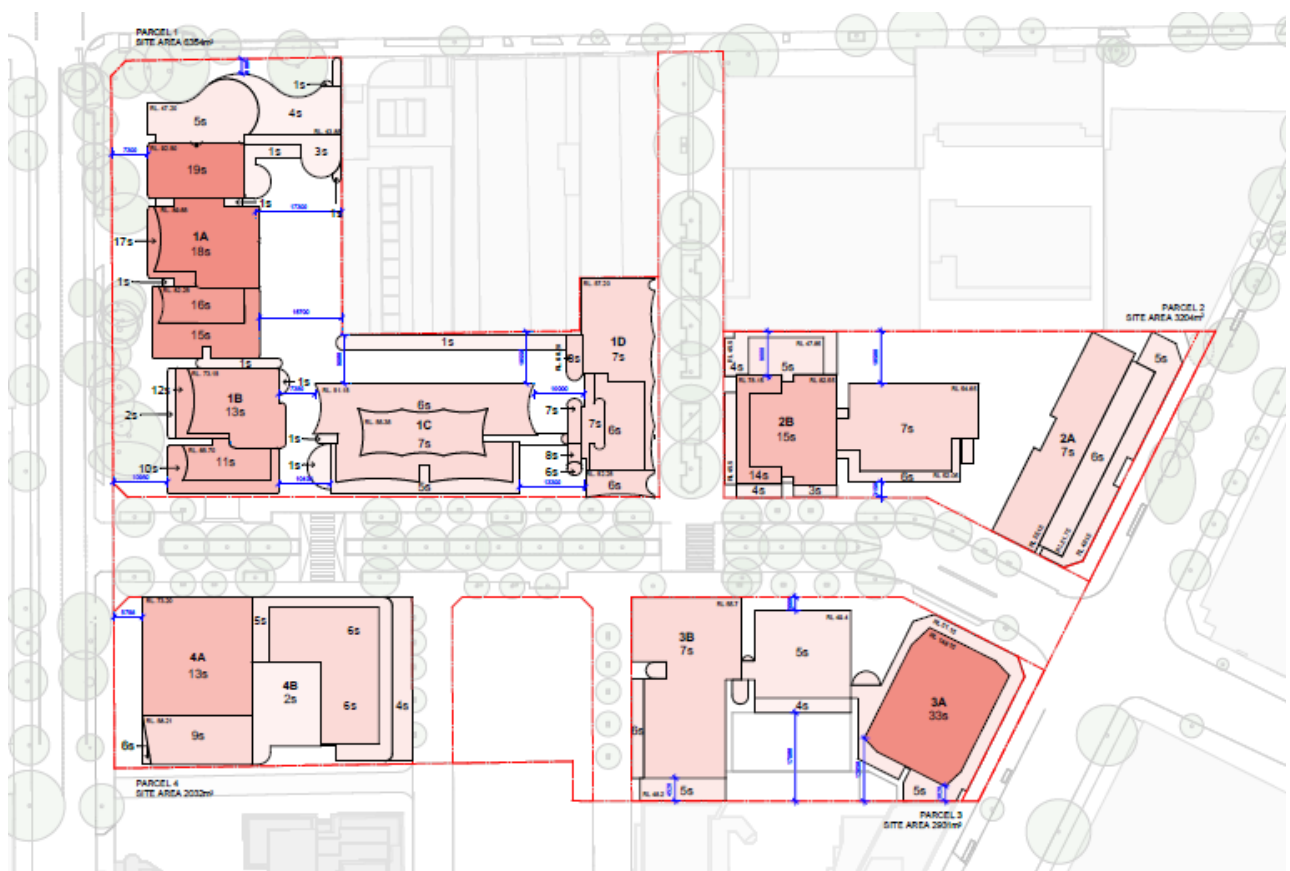


Figure 5 Precinct layout plan showing separation, height in storeys (amended)

Source: Design Team

3.3 Updated Mitigation Measures

As a consequence of the project amendments described in **Section 3.2**, the matters raised in submissions and the further environmental assessment discussed at **Section 4.0**, the Mitigation Measures for the project have been reviewed and updated where required. The Amended Mitigation Measures are outlined in **Appendix B**.

3.4 Refinements to the Proposed Description

As a result of design development and response to feedback from Council, the proposed development description has been updated. The additions are shown in ***bold italics***, with removal in ~~***bold strike through***~~:

Specifically, the development seeks consent for the following:

- Site establishment and enabling works (that were not included in the preceding Early Works SSDA).
- Construction of 9 residential and mixed-use buildings across 4 development parcels for the purposes of:
 - Build to rent apartments and associated communal amenities.
 - ~~***Affordable rental housing (to be managed by a CHP for 15 years).***~~
 - Artist in residence.
 - Non-residential floor space including commercial/retail premises and indoor recreation facilities and associated hours of operation.
- Construction of a consolidated basement with below-ground links between development parcels for car parking, plant and storage.
- Site-wide landscaping and publicly accessible open space (noting that the primary public domain works are subject to a separate approval).
- Works to site frontages.
- Extension and augmentation of infrastructure and services (that were not included in the preceding early Works SSDA) as required.
- Staging of development and CCs.
- ***Monetary contribution towards the provision of in-perpetuity affordable housing as per Council policy***

3.5 Refinements to the Proposed Rezoning

The department advised that the exclusions to Clause 6.21D and Clause 7.23 were not supported and as such these amendments have been excluded from the proposed concurrent rezoning. As such, the proposed amendments to the Sydney LEP were outlined in the EIS as follows. The additions are shown in ***bold italics***, with removal in ~~***bold strike through***~~:

- Clause 4.3 - Height of buildings: The height of building map was proposed to be amended to include building heights from 3m to 67m, with a localised ~~***125m***~~ ***115m*** in the south-eastern portion of the site to accommodate a tower along Bourke Street. Levels 31, 32 and 33 will have larger floor-to-ceiling heights as to accommodate greater residential amenity and functionality for residents.
- Clause 4.4 - Floor Space Ratio: The height of building map was proposed to be amended to 3.0**~~5~~**:1
- Clause 6.43 - Danks Street South Precinct: The Site Locality Map was proposed to be amended to remove of the site from the Danks Street South Precinct and creation of a new locality titled "207-229 Young Street, 881-885 and 887-893 Bourke Street" over the subject site.
- ~~***Clause 6.14 – Community infrastructure floor space at Green Square:***~~ It was proposed to exclude the site from Clause 6.14 as the mapped FSR captures the total FSR required for the proposed development.
- ~~***Clause 6.21D – Competitive design process:***~~ It was proposed to exclude the site from the provisions of the competitive design process.
- ~~***Clause 7.23 – Large retail development:***~~ It was proposed to exclude the site from the provisions of this clause limiting shops or markets with a gross floor area greater than 1,000 square metres.

The amendments to Clause 4.3 have been justified in the relevant sub-sections of **Section 4.0** below.

4.0 Response to Submissions

Responses to the key issues raised in the submissions are provided in this section of the report. Detailed responses to the remaining issues from, DPHI, Government Architect, State and local agencies and the general public are also provided in the Detailed Response to Submissions Table at **Appendix A**.

4.1 Strategic Merit

Much of the strategic planning framework predates the National Housing Accord, with the Regional and District Plans now seven years old and the LSPS five years old. In response to evolving housing needs, the NSW Government has introduced more targeted initiatives, including the HDA, in-fill affordable housing bonuses, and the Transport Oriented Development Program. These measures complement council-led actions across the southern and south-eastern parts of the Eastern City District, including the recalibration of height and density controls in areas such as Green Square, the Botany Road Corridor, and nearby Kensington, Kingsford and Eastgardens.

These initiatives are reshaping expectations regarding the scale and distribution of taller buildings, particularly in areas traditionally characterised by lower-rise development. Consistent with the NSW Housing Capacity Guideline (DPHI, 2023), it is appropriate to reassess the development capacity of large sites within growth areas such as Green Square to deliver increased housing choice and affordability.

The National Housing Accord and HDA pathway support a renewed role for the Danks Street South Precinct in delivering a substantial supply of well-located housing during the Accord period. This includes the subject Coronation landholding and the adjoining DASCO site, which together form a rare, consolidated site exceeding 4 hectares on the fringe of Surry Hills. The site is well positioned to accommodate additional housing while managing amenity impacts, given its proximity to high-frequency bus services along Bourke Road, its location approximately 850 metres from Waterloo Metro Station, and its inclusion within the Green Square urban renewal area.

The proposed planning controls allow for an FSR of up to 3:1, with the indicative scheme delivering 2.91:1. This has been informed by the Housing SEPP bonus benchmarks, local Green Square precedent, and urban design testing by Bates Smart and SJB. Comparable nearby areas range in FSR from 2.5:1 to 5:1 at similar transit distances (around 800m from Green Square Station), with the subject site similarly well-connected at approximately 850m from Waterloo Metro.

Higher densities are appropriately concentrated in nearby centres, including the Green Square Town Centre and Waterloo precincts (up to 11.5:1). In this context, the proposal maintains the established hierarchy of centres while recognising the site's transit accessibility and is therefore considered appropriate within its local and strategic setting.

In relation to the proposed building height:

- The proposed 33-storey height has been derived through a design-led approach that redistributes floor space to improve amenity, reduce bulk, and maintain solar access to the central park and surrounding dwellings. This is achieved by consolidating height into a single slender tower, enabling higher apartment quality, a smaller footprint, and faster-moving shadows across the site.
- The built form responds to City of Sydney feedback by reducing the height of the development to minimise overshadowing on neighbouring sites. The overall height is also capped to avoid additional overshadowing of surrounding properties and parks.
- The proposal is consistent with Sydney's established urban structure of clustered tall buildings within key nodes, transitioning to lower-scale areas. This is reflected in the surrounding context, where nearby developments are trending into the 30+ storey range.
- While exceeding heights in Green Square Town Centre and Waterloo Metro Quarter, the proposal is strategically justified as those centres are more constrained by PANS-OPS and site-specific limitations. In contrast, the Dank Street South Precinct has greater available airspace (271 AHD), allowing additional height.
- The increased height enables the delivery of the proposed floor space and housing yield while reducing environmental impacts, and reinforces the emerging cluster of taller buildings within the Green Square renewal area and the broader Eastern Economic Corridor.

4.2 Maximum Height of Building

DPHI raised concerns regarding the proposed maximum height of building control within the Concurrent Rezoning portion of the report, noting it exceeds that of some surrounding sites, and requested further strategic justification.

It is acknowledged that elements of the strategic planning framework pre-date recent housing policy initiatives, including the National Housing Accord. In response, the NSW Government has introduced targeted measures to increase housing supply, including the Housing Delivery Authority (HDA), in-fill affordable housing bonuses, and the Transport Oriented Development Program. These initiatives complement more localised changes to height and density controls within the broader Green Square area and surrounding precincts. In this context, the role of the Danks Street South Precinct in delivering additional housing supply has been reconsidered, particularly within the timeframe of the Housing Accord.

In response to DPHI's comments, the proposed tower height has been reduced from 36 to 33 storeys, as shown in **Figure 6**.

This amendment improves alignment with the surrounding context while maintaining the capacity to deliver well-located housing. The revised number of storeys would result in a parapet height of 144.4m RL or approximately 114.4m from natural ground level. It is noted that the parapet (lift overrun) has a height of 144.6m RL and is limited in area only comprising small portion of the tower floorplate, with the roof height being at 142.5m RL. The parapet comprises a combination of glazing and structural support elements, and the roof of the lower RL is the rooftop amenities/pool area.

The revised height is supported on the following basis:

- Providing a tall, slender tower form reduces overall bulk and supports high levels of residential amenity, while enabling a transitional built form across the remainder of the site.
- The reduction in height is consistent with the SDRP #2 presentation where no objections to height were raised .
- Reflecting established inner-city built form patterns, characterised by taller buildings within defined nodes, including nearby Green Square.
- Responding to overshadowing impacts by reducing building heights across other parts of the site (as described in **Section 4.3**).
- Ensuring no additional overshadowing of existing public open space, including The Rope Walk.
- Locating the tower to minimise separation and privacy impacts, with multiple road frontages providing an adequate buffer
- A modest reduction in height would not materially alter the perception of the building from the public domain.
- The PANS-OPS ultimate airspace limitation is set at RL271, approximately 130m above the proposed tower height.

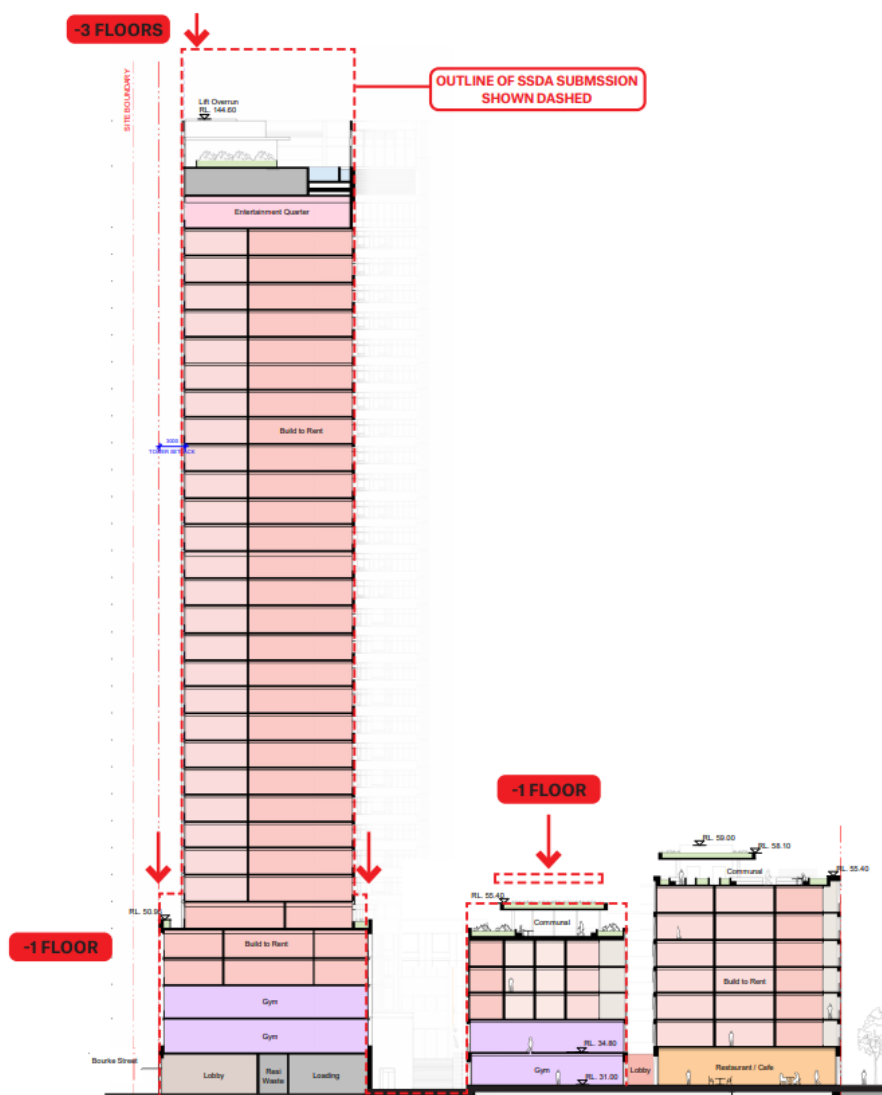


Figure 6 Comparison in Tower Height Reduction from SSDA Submission and Amended Plans

Source: Bates Smart

4.3 Solar Access/Overshadowing, Bulk and Scale

DPHI and Council raised a number of issues with regards to overshadowing, including impacts to the following existing and potential future developments with regards to standards within the ADG and Council's "Minimising Overshadowing of Neighbouring Apartments Documentation Guide":

- 1 Danks Street
- Western Side of Young Street
- 1-9 Lachlan Street
- Tiara Building (788-822 Bourke Street)
- City West

A full solar assessment to neighbouring properties has been undertaken and is included in **Appendix E**. A number of amendments to the proposed design have also been undertaken, which has the additional effect of reducing perceived bulk and scale. The modelling from Bates Smart confirms the proposed overshadowing complies with City of Sydney requirements and the built form outcomes of the Concept DA.

The below investigations have modelled the built form as follows.

4.3.1 Parcel 1 & 4

Impacts to 1 Danks Street

Detailed site investigations, including verification through drone photography, indicate that the massing adopted in the Concept Plan (which informed Condition 83(k)) did not fully account for the height and extent of existing party walls between apartments. These built elements contribute to existing overshadowing of living room windows during winter.

When the site model was updated to accurately reflect these conditions, it was identified that the affected apartments do not currently achieve a minimum of 2 hours of solar access at midwinter in the existing scenario. Accordingly, compliance with Condition 83(k) is not achievable.

The revised analysis confirms that solar access to west-facing apartments at 1 Danks Street is available between 2pm and 3pm, with overshadowing largely attributable to the existing party walls.

A comparative “eye of the sun” assessment (**Figure 7**) demonstrates that the SSDA scheme improves solar access during this period when compared to the approved Concept DA. On this basis, no further changes to the building massing for this parcel are proposed in response to this issue.

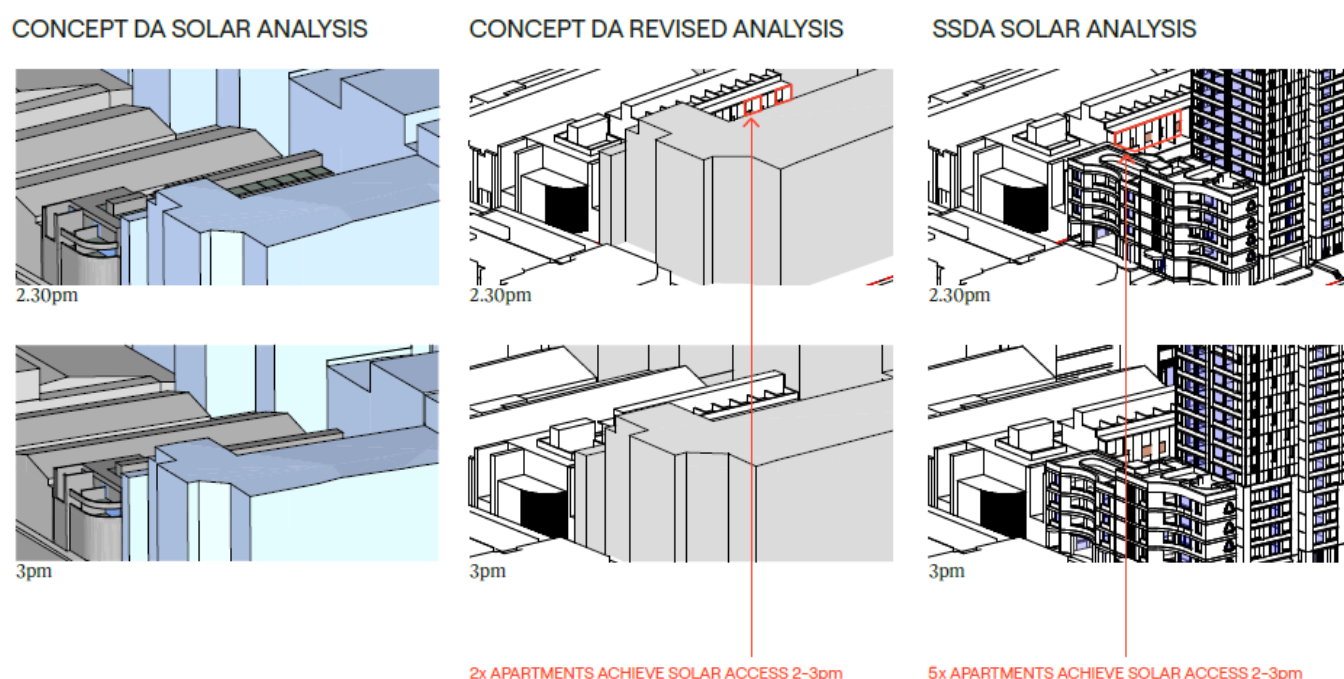


Figure 7 Comparison of Concept DA, Revised Concept DA and SSDA Scheme

Source: SJB

Impacts to the Western Side of Young Street

The solar analysis submitted with the SSDA demonstrates that the northern and western facades of the DCP envelope on the Western Side of Young Street are not materially impacted by the proposed massing of Parcels 1 and 4. These facades represent the primary aspects for achieving compliant solar access outcomes.

Test-fit analysis of the DCP envelope for buildings on the Western Side of Young Street demonstrate that a future development can achieve compliance with the Apartment Design Guide through appropriate apartment orientation to the northern and western facades.

Please refer to Figure for the shadow diagrams to the western side of Young Street.

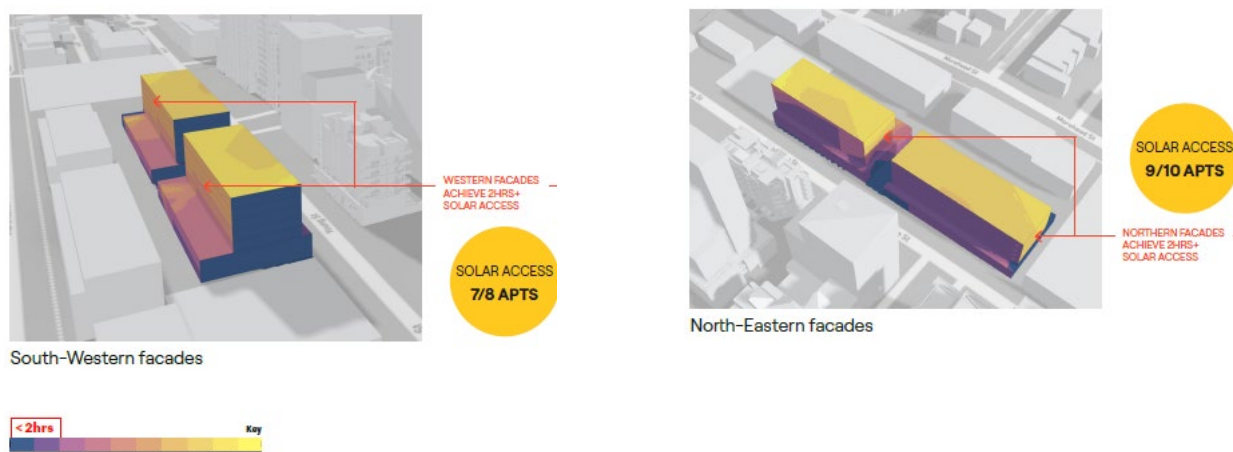


Figure 8 Shadow Diagram to Western Side of Young Street

Source: SJB + Curious Practice

4.3.2 Parcel 2 & 3

Impacts to 1-9 Lachlan Street

The proposed tower results in partial overshadowing of 1-9 Lachlan Street. Notwithstanding this, solar analysis indicates that 70.6% of apartments within the building achieve a minimum of 2 hours of solar access at midwinter. Solar access is also maintained to all north-facing living rooms.

Impacts to Tiara Building (788-822 Bourke Street)

In accordance with the City of Sydney's *Minimising Overshadowing of Neighbouring Apartments – Documentation Guide*, dwellings that currently achieve 2 hours of solar access at midwinter are to experience no more than a 20% reduction in solar access. Existing analysis confirms that 52% of dwellings within the Tiara Building currently achieve this benchmark.

Testing of the proposed scheme initially identified non-compliance with this requirement, particularly affecting first floor apartments. In response, the height of Building 2A was reduced by one storey to mitigate overshadowing impacts, as shown in **Figure 9** below.

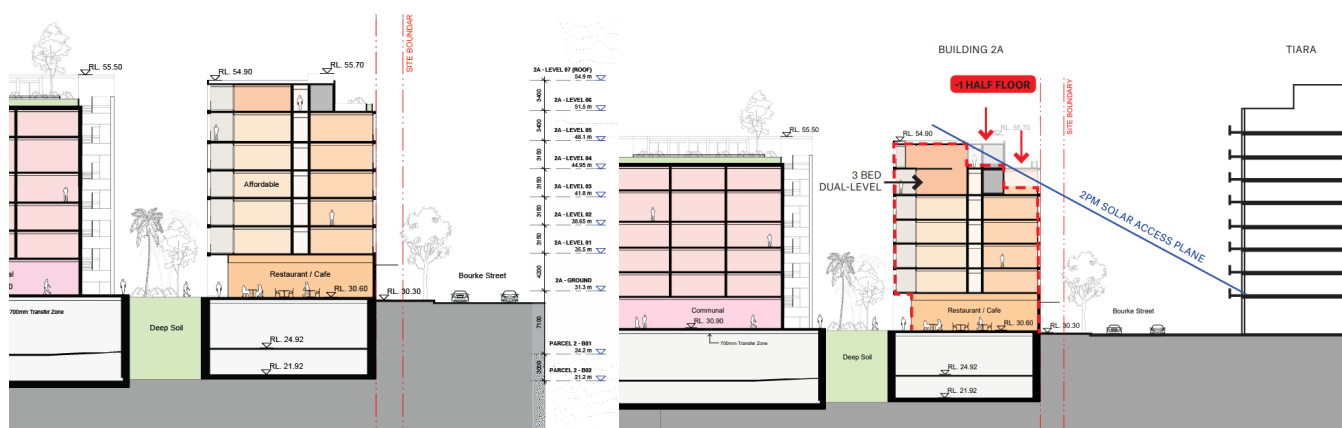


Figure 9 Comparison of Building 2A height from SSDA (left) and Amended Plans (right)

Source: Bates Smart

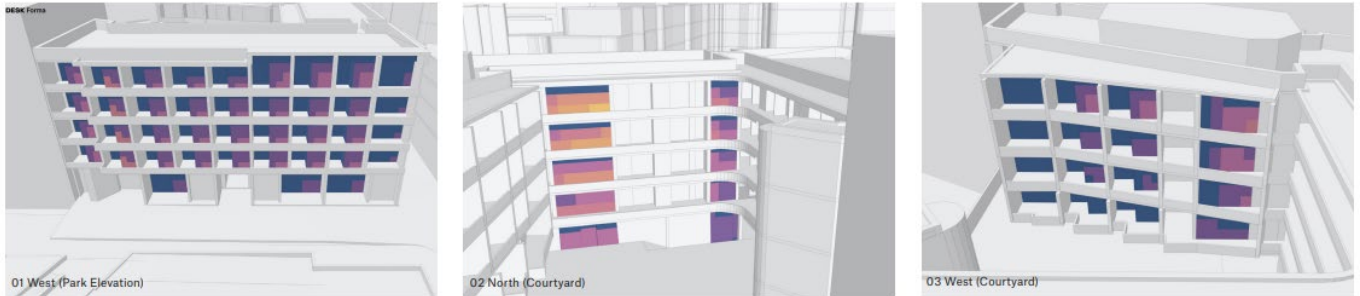
As amended, all dwellings fronting Bourke Street retain a minimum of 2 hours of solar access, with the exception of the three dwellings on Level 1, which experience a reduction of less than 20% and are therefore consistent with the City's documentation guide.

Impacts to City West Boronia Apartments

An existing assessment of the approved Concept DA identified that 67.5% of apartments achieved a minimum of 2 hours of solar access at midwinter. On this basis, the City of Sydney's *Minimising Overshadowing of Neighbouring Apartments – Documentation Guide* requires that no additional overshadowing be imposed on these compliant dwellings.

Further testing of the proposed scheme (refer **Figure 10**) demonstrates that solar access is maintained to all compliant dwellings, particularly those with northern and western aspects.

Approved Envelope



Proposed

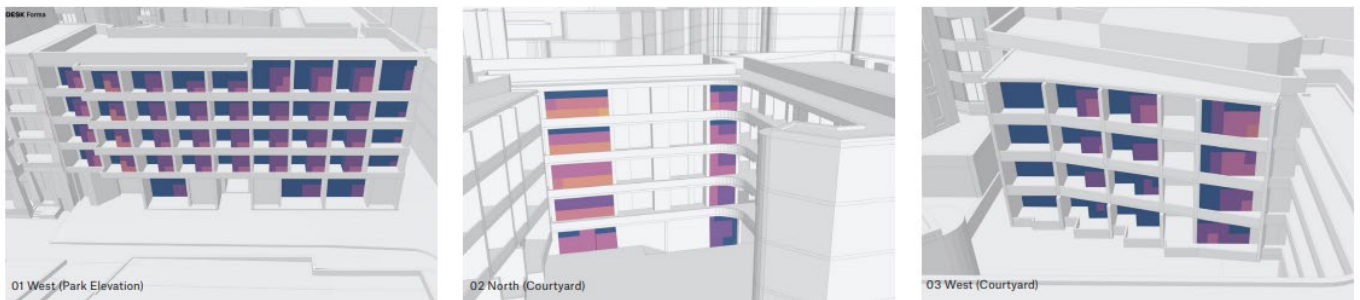


Figure 10 Comparison of Concept DA vs Proposed under SSDA

Source: Bates Smart

Notwithstanding the above, the proposed SSDA scheme initially resulted in additional overshadowing to the City West Housing Boronia Apartments communal open space (refer **Figure 11**).

In accordance with the City of Sydney's *Minimising Overshadowing of Neighbouring Apartments – Documentation Guide*, development is to achieve a minimum of 50% direct sunlight to the principal usable area of communal open space for at least 2 hours between 9am and 3pm on 21 June.

To address this, the scheme has been amended to reduce podium-level heights of Buildings 3A and 3B. As demonstrated in **Figure 12**, these amendments protect solar access to the adjoining communal open space and ensure compliance with the *Documentation Guide*.

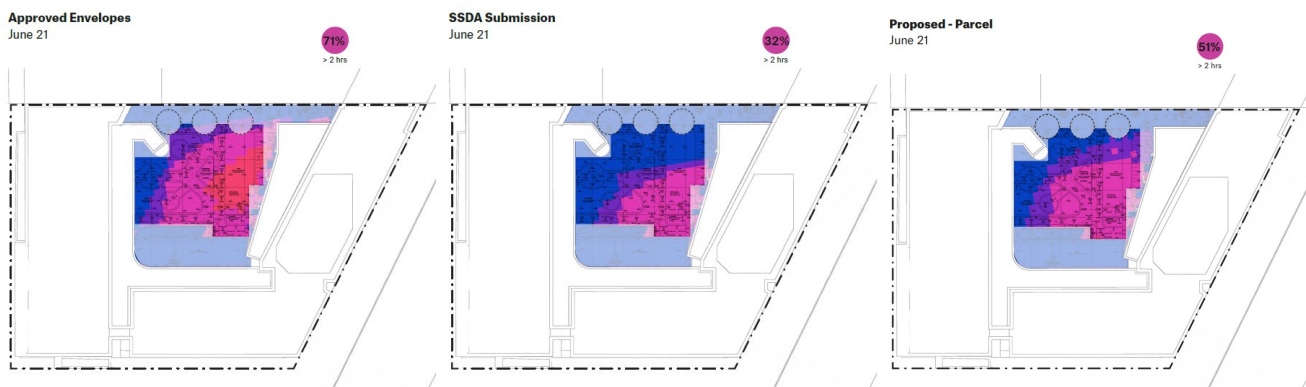


Figure 11 Comparison of Concept DA vs Proposed under SSDA vs Proposed Amended Scheme

Source: Bates Smart

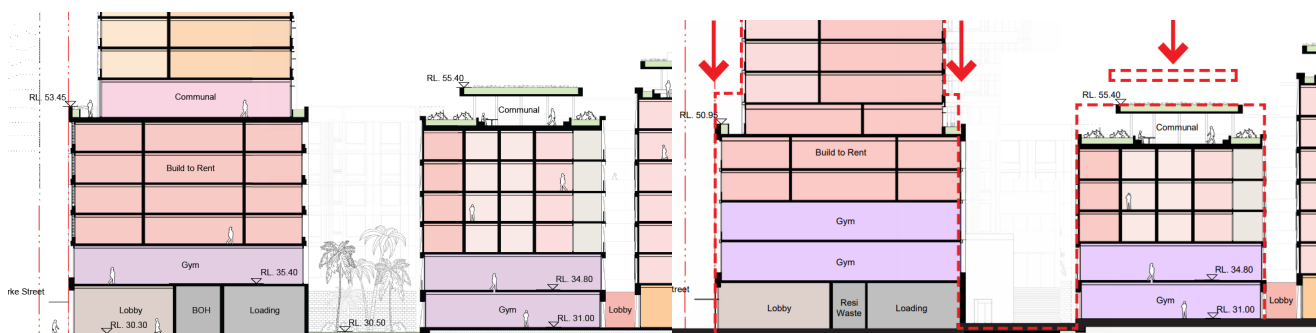


Figure 12 Comparison of Reduction in Building 3A and 3B height under SSDA (left) and Amended Plans (right)

Source: Bates Smart

4.4 Affordable Housing

Council's submission notes that, under the *City of Sydney Affordable Housing Program* (2023), a planning proposal applying to the site would ordinarily attract a 9% affordable housing contribution on residential uplift (in perpetuity), in addition to the 3% contribution applied at development application stage under the LEP. Council has indicated that the 9% uplift contribution should apply to the proposal.

In response, Coronation has committed to provide a monetary contribution equivalent to 9% of the residential uplift, in addition to the 3% levy under Section 7.13. This contribution will be directed towards the delivery of affordable housing in perpetuity, consistent with the City of Sydney's Affordable Housing Program.

This will be provided instead of delivering affordable housing within the precinct itself. It allows for the following benefits:

- It facilitates delivery of affordable housing in locations that best align with the City's strategic priorities and preferred distribution.
- It supports delivery of affordable housing outcomes in perpetuity in accordance with Council policy.
- It provides flexibility to respond to broader housing need across the LGA, rather than concentrating affordable housing within a single area.
- Coronation requests that the Affordable Housing Contribution be conditioned as to be paid with the issuing of the Stage 2 Occupation Certificate.

4.5 Housing Diversity & Minimum Apartment Sizes

DPHI and Council raised concerns regarding the proportion of studio and 1-bedroom apartments and the relatively low provision of 3-bedroom dwellings, noting the need for greater housing diversity to support changing household needs.

In response, the unit mix has been amended to increase the proportion of 3-bedroom apartments, reduce 1-bedroom apartments, and provide a broader range of studio ('City Starter') products. The minimum size of City Starter apartments has also been increased, with the majority now achieving a minimum of 30sqm.

The revised mix continues to respond to identified market demand, accommodating singles, professionals, young families and downsizers, while supporting more affordable housing outcomes through smaller dwelling typologies. The Market Demand Study (**Appendix R**) identifies a strong and ongoing need for smaller dwellings within the Sydney LGA.

The amended unit mix is as follows (City Starters, studios and 1-bedroom apartments combined: 70%):

- City Starters/Stayers: 24.3%
- Studios: 16.7%
- 1 Bed: 29.3%
- 2 Bed: 24%
- 3+ Bed: 5.7%



Figure 13 *City Starter Interior Render*

Source: Bates Smart

This distribution is consistent with comparable approved BTR developments, including:

- Novus on Victoria (SSD-63324208) which comprised 74% studio and 1-bedroom combined.
- Westmead IQ3 (SSD-65614712) which comprised 67% studio and 1-bedroom combined
- GQ Parramatta (SSD-35609161) which comprised 55% studio and 1-bedroom combined

Further, the BTR model provides additional flexibility, enabling tenants to transition between apartment types within the development as their needs change. The building design also allows for future reconfiguration of apartment layouts within the structural grid to respond to evolving market demand over time. An example of this is shown in **Figure 14** below.



Figure 14 *Building Conversions*

Source: SJB

4.6 Apartment Design Guide (ADG) Compliance

4.6.1 Building Separation

Council raised a number of matters with regards to building separation, including a number of non-compliances with Section 3F of the ADG, including:

- Parcel 1 and Parcel 2 (4-5 storeys) achieve only 13m separation across Danks Lane, where 18m is required.
- Building 2B (15 storeys) provides a 9m northern separation, which is below the 12m minimum required for buildings over 9 storeys.
- Building 3A (33 storeys) proposes a minimum 3.15m southern separation, including glazed façades, which is substantially below the 12m minimum required.
- Building 4A (9–13 storeys) presents a near-zero setback to the southern boundary, with units relying on future road dedication for light and air, and does not demonstrate adequate separation to the DASCO tower building.
- Building separation distances between Parcel 1 and Parcel 4, and Parcel 2 and Parcel 3 across Potter Street, are not clearly detailed and must demonstrate compliance with ADG requirements.
- Windows located on façades that do not achieve minimum separation distances are not supported and present unresolved privacy and amenity impacts.
- Following this, a number of amendments to the design are proposed as follows:

Separation between Parcels 1 & 2

While the overall building envelopes at Levels 4–5 do not achieve the minimum 18m separation, this distance is achieved when measured between the balconies on Parcel 1 and the glazing line on Parcel 2, as shown in **Figure 15**. The zone between the glazing line and the building edge is proposed to be densely landscaped to mitigate overlooking and privacy impacts.

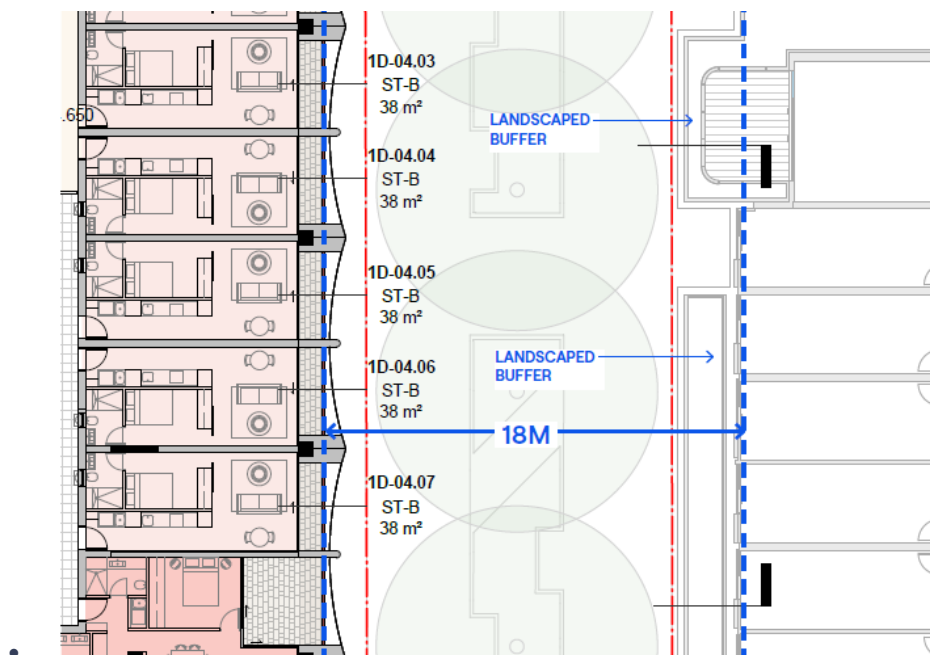


Figure 15 Building Separation between Parcel 1 and 2

Source: SJB

Separation between Parcels 1 & 4

Across Potter Street, the separation distance between Parcels 1 and 4 is 21m, which complies with the ADG requirements for the first eight storeys. For Levels 8–9, where a 24m separation is required, there is an opportunity on the Parcel 1 Potter Street elevation to introduce privacy fins to south-facing bedrooms to assist in mitigating potential overlooking between Parcels 1 and 4. Loftus Lane in Sydney demonstrates how active frontages can be achieved by orienting residential units and balconies toward a shared pedestrian laneway, providing passive surveillance and contributing to a vibrant public walkway.

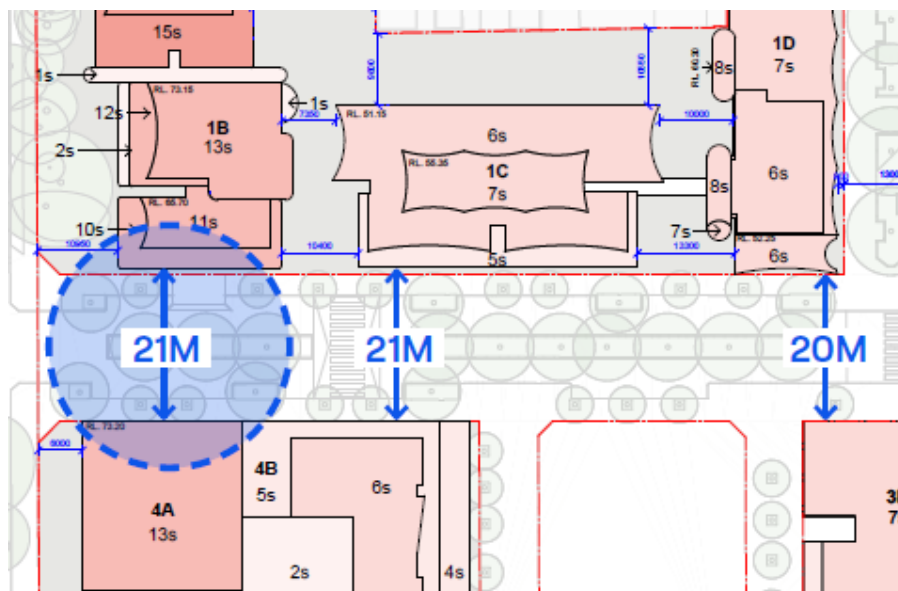


Figure 16 *Building Separation between Parcel 1 and 4*

Source: SJB

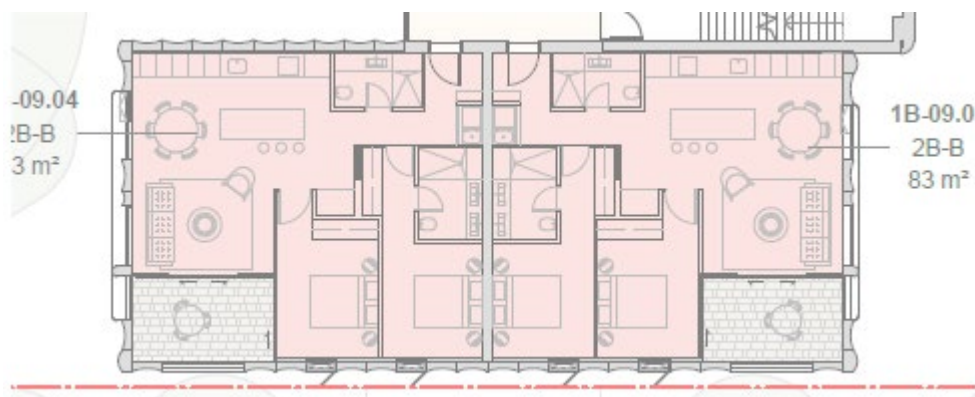


Figure 17 Proposed Privacy Fins

Source: S|B

Separation from Building 2B to the North

Additional screening has been introduced to the northern façade of Building 2B to maintain visual privacy to any future development adjoining the building.

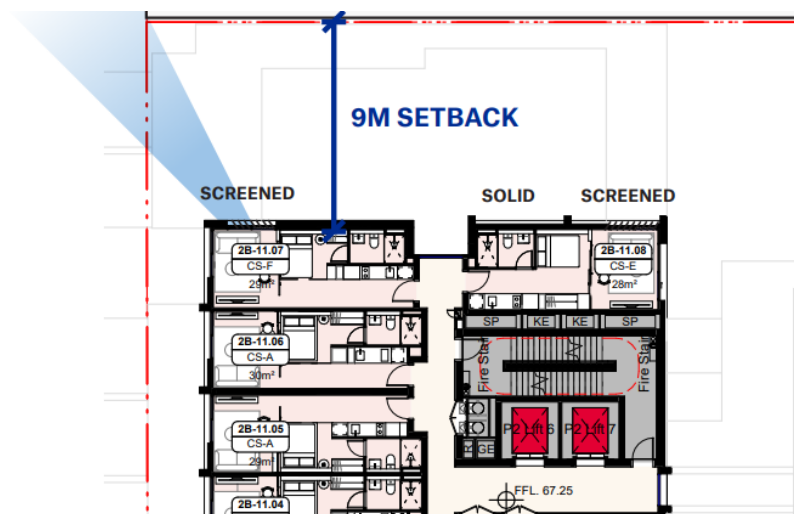


Figure 18 Proposed Privacy Fins

Source: Bates Smart

Separation from Parcel 3 to City West the south

The southern façade of the tower provides an average setback of 6m to the southern boundary, as shown in **Figure 17**. Due to the slope of the land, the tower sits lower than the adjoining building, resulting in a perceived building separation equivalent to approximately four storeys rather than five. Both the City West building and the development on the corner of the tower are oriented to the street, and the development does not have any windows fronting the common boundary, resulting in compliance with the ADG.

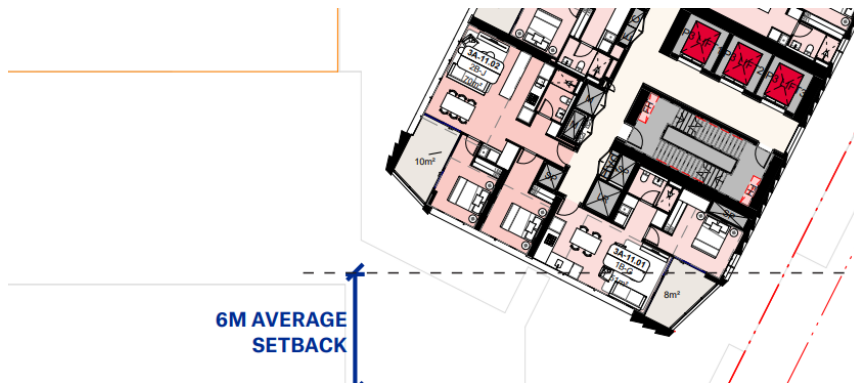


Figure 19 *Average Setback to the South*

Source: Bates Smart

Separation from Parcel 4 to DASCO Tower

While parts of the building envelope do not achieve the minimum separation to the southern DASCO development, the offset massing and articulation of Buildings 4A and 4B provide varied separation distances that generally exceed minimum requirements. This approach supports acceptable amenity outcomes, including visual and acoustic privacy, natural ventilation, sunlight access and outlook.

At ground to Level 2 (<12m), the separation is marginally below the minimum when measured building-to-building, however a 12m separation is achieved between the southern elevation of Building 4B and the inside edge of the DASCO tower's landscaped outdoor areas.

Between Levels 3–7 (<25m), minor non-compliances occur at balcony corners; however, the design directs views toward areas of greater separation along New Lane and away from adjacent buildings. Privacy is further managed through balcony design and the incorporation of screening to south-facing bedroom windows.

At Levels 8–11 (>25m), the south-east corner of the upper tower levels of Building 4A achieves greater than 24m separation between habitable rooms and balconies to the DASCO tower, consistent with ADG requirements.

4.6.2 Floor to Ceiling Heights

DPHI noted that the development proposes floor to ceiling heights for ground floor uses of 3.2m and first floor uses of 2.7m generally. It was noted that the ADG requires 3.3m for ground and first floors of mixed-use areas to promote future flexibility and adaptation.

The proposed ground floor ceiling heights exceed the minimum 3.3m requirement, as shown in the below sections, supporting activation and future flexibility at street level. While first floor levels do not achieve a 3.3m floor-to-ceiling height, this is considered appropriate in the context of a build-to-rent scheme, where long-term residential use is anticipated and future commercial adaptation is unlikely. The provision of communal facilities across multiple levels introduces flexibility within the building to accommodate evolving resident needs.

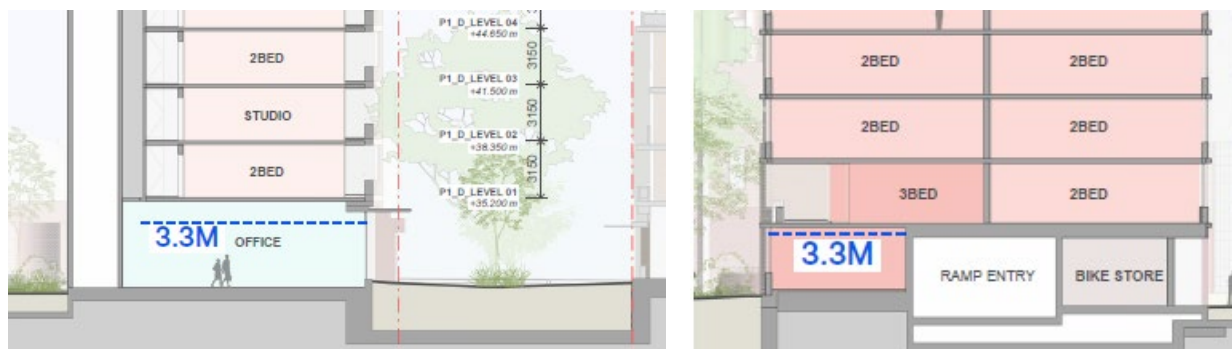


Figure 20 *Ground Floor Ceiling Cross Sections*

Source: SJB

4.6.3 Cross Ventilation

DPHI and Council raised concerns regarding the proposed level of natural cross ventilation, noting that the scheme relies on single-aspect units achieving ventilation via common corridors. Further clarification was sought into how this approach complies with NCC fire safety requirements to ensure that at least 60% of apartments achieve natural cross ventilation as required by the ADG.

In response, natural cross ventilation to single-aspect apartments is achieved via open breezeway corridors, with high-level operable windows provided in bathroom walls or above existing doors depending on the building design. These windows are designed as self-closing awning units with fusible links to allow operation under normal conditions and automatic closure in the event of fire.

This approach will require a performance solution to demonstrate compliance with NCC fire safety requirements, which has been supported by the project's fire engineer. The design outcome enables smaller apartment typologies (including studios and City Starters) to achieve an appropriate level of amenity while contributing to the overall cross ventilation performance of the development.

The revised design achieves an overall cross ventilation rate of 64% across the precinct, exceeding the ADG requirement of 60%.

4.7 Crime Prevention Through Environmental Design (CPTED)

DPHI and the SDRP raised concerns regarding the approach to CPTED within Parcel 4. This included the suggestion from the SDRP to:

- maximise openings to the New Street and Young Street to increase activation and engagement with the public realm
- improve the safety and activation of the southern laneway for pedestrians (noting it will form a future 'short cut' to the Metro station) while balancing waste and servicing requirements; and
- where possible, reconfigure the lower ground floor waste and servicing areas away from the New Street and use this additional space to improve the connection of the upper ground floor to the street

In response the design of the southern façade and entrance to the southern laneway has been revisited to improve safety and amenity, consistent with CPTED principles. The design of the southern façade has incorporated CPTED principles, including passive surveillance, clear delineation of public and private domains and minimisation of concealed spaces. These measures ensure that the southern interface contributes positively to safety and perceived amenity.

It is further noted that the site forms part of a broader network of east-west connections to the Waterloo Metro Station. While activation has been prioritised to the most publicly prominent frontages on New Street, it is not feasible to activate all four façades due to waste management and vehicle access requirements.

The following design measures have been included to facilitate a response to CPTED requirements. These include:

- The narrow stairs along New Street have been removed.
- There is no public entrance along Young Street, this entrance is for residential access only.

- Each ground floor lobby entry has secure gated and keyed access near the building edge for exclusive use of Building 4A and 4B occupants only - providing territorial reinforcement and a clear distinction between public, semi-private and private.
- Provision of curved walls and high openings and a variety of high-quality palette of building materials to promote natural access locations.
- Secured gate and keyed access at ground floor entries.
- The mezzanine opening over the New Lane has been increased in width and extended to the building edge to provide for on-site natural surveillance.
- The entries are located at the end of each lane to promote additional natural surveillance from adjoining streets, as shown in **Figure 21**.



Figure 21 *View of entries from New Lane*

Source: SJB

4.8 Wind

Both Council and DPHI raised a number of considerations with regards to wind comfort and pedestrian amenity. This includes:

- Several locations within the public domain and communal open spaces are identified as non-compliant with the required wind comfort levels, including misclassification of sitting areas as standing.
- Updated wind testing is required, including plotting points extending at least 60m from the tower, including along Potter Street and Bourke Street, and consideration of impacts to the Bourke Street cycleway.
- Rooftop communal areas have not been tested and must demonstrate compliance with sitting comfort criteria.
- The wind assessment submitted as part of the original SSDA does not comply with the requirements found within the SDCP 2012, and incorrectly applies wind comfort criteria and plotting point classifications.
- Further analysis is required to consider the impacts in conjunction with the adjoining DASCO site to ensure a cumulative assessment to wind impacts.

A revised Pedestrian Wind Environment Study (**Appendix F**) has been prepared that provides a response to the issues identified by Council and DPHI. The results of the study indicate that wind conditions for the vast majority of trafficable outdoor locations within and around the development will be suitable for their intended uses.

The wind testing has been undertaken based on DASCO's approved Concept DA scheme, located to the south of the site. Following submission of our proposal, DASCO has also incorporated and modelled our design within their SSDA testing scenario. Accordingly, the identified impacts should be considered reflective of our proposal. Noting that this application is ahead of DASCO's in the planning process, this approach is considered appropriate.

While some localised areas experience wind speeds that exceed the relevant comfort criteria, wind tunnel testing confirms that the architectural elements and mitigation measures incorporated into the proposal are already actively contributing to improved wind comfort across the site. It is noted that in all study points, the proposed scheme provided a better outcome than that under the existing conditions or that approved under the Concept DA.

These elements form an integral part of the overall wind mitigation strategy and are therefore required to be maintained as part of the final design, with additional targeted measures recommended where necessary to address remaining localised exceedances. The elements that are already included or will be included in the design post approval are as follows:

Ground Floor

- Retention of the proposed awnings with a minimum depth of 2m at Parcels 1 and 2 along the connecting corridor between Danks Street and Potter Street.
- Retention of 0.5m high planter boxes with the inclusion of 1m high densely foliated vegetation within the communal areas of Parcel 2 and near the Potter Street entrance of Parcel 3.
- Inclusion of proposed densely foliated evergreen trees along the connecting corridor between Danks Street and Potter Street, along Potter Street itself, within the communal areas of Parcels 1 and 2, and within the public park south of Parcel 1. These trees should have a minimum height of 3m and a minimum canopy width of 3m.
- Inclusion of a 2.4m high porous baffle screen with a maximum porosity of 30% within the communal area of Parcel 2.

Level 4 (Parcel 4)

- Retention of the standard height balustrade (minimum 1.2m) at the northern and southern ends of the communal space in Parcel 4.
- Retention of 1m high planter boxes with 0.5-1m high densely foliated vegetation at the northern and southern ends of the communal space in Parcel 4.

Level 5 (Parcel 3)

- Retention of 1m high planter boxes with the inclusion of 0.5-1m high densely foliated vegetation around the communal space on Level 5 of Parcel 3B.
- Inclusion of a 2m high impermeable screen (glazing if preferred) along the southern aspect of the communal space on Level 5 of Parcel 3B.

Level 6 (Parcel 1)

- Inclusion of 0.5-1m high densely foliating vegetation around the communal space on Level 6 of Parcel 1.
- Inclusion of 1.5m high impermeable screens (glazing if preferred) along the southern aspects of the communal space on Level 6 of Parcel 1.
- Inclusion of an awning extension with a minimum depth of 1m along the northern edge of the existing awning of the communal space on Level 6 of Parcel 1.

Level 7 (Parcel 3)

- Retention of 1m high planter boxes with the inclusion of 0.5-1m high densely foliated vegetation around the communal space on Level 7 of Parcel 3B.

Level 8 (Parcel 4)

- Retention of 1m high planter boxes with the inclusion of 0.5-1m high densely foliated vegetation around the communal space on Level 8 of Parcel 4.

Level 33 (Parcel 3)

- Inclusion of 2.4m high impermeable screens (glazing if preferred) along the north-eastern, north-western, and south-western aspects of the communal space on Level 33 of Parcel 3A.
- Inclusion of 3.5m high impermeable screens (glazing if preferred) along the south-eastern aspect of the communal space on Level 33 of Parcel 3A.

4.9 Waste

DPHI and Council raised a number of issues in relation to waste collection, including the location of collection points and the need to provide an interim solution for Parcel 4, which relies on a future road associated with the adjoining DASCO site to the south.

In the event that Parcel 4 is developed prior to delivery of this road, an alternative collection arrangement has been detailed in the Operational Waste Management Plan (**Appendix G**). Current timing expectations and advice from the adjoining landowner indicate that the road will be delivered prior to issue of an Occupation Certificate for this parcel. Accordingly, a temporary arrangement is not anticipated to be required.

Notwithstanding, an interim collection point has been identified on New Street, to the north of Parcel 4. Under this arrangement, the collection vehicle would be stationed on New Street, with waste collection staff transferring bins from the development to the vehicle in a safe and efficient manner.

The location of Residential Bin Presentation Areas has been consolidated to provide for increased efficiency in the development. The transportation of bins between parcels via the basement is an intentional and coordinated design outcome of the integrated development. This approach is not uncommon in large-scale, multi-building developments that utilise centralised waste collection points.

The movement of bins is facilitated by continuous and appropriately designed basement circulation paths, together with the use of mechanical bin transfer equipment. This ensures that waste can be conveyed safely and efficiently, without reliance on manual handling over extended distances. This approach is consistent with standard industry practice for developments of this scale and complexity.

4.10 Traffic, Carparking and Access

DPHI and Council raised a number of issues in relation to additional traffic, carparking requirements and access to and from the site. This includes:

- Traffic modelling is outdated, being based on 2021 surveys, and does not accurately reflect current conditions.
- The TIA notes that the development results in substantial impacts on key intersections, with significant degradation in levels of service that has not been adequately justified or mitigated.
- Parking provision, including visitor parking does not align with the Draft Local Environmental Plan – Policy and Housekeeping Amendments 2023 rates.
- Access to Parcel 4 is reliant on future infrastructure on adjoining land not controlled by the development. No clear interim access solution is provided for Parcel 4, including loading and vehicle access.
- Car parking is proposed beneath land to be dedicated to Council.
- Other inconsistencies and non-compliances.

In response, a revised Traffic Impact Assessment (TIA) (**Appendix H**) has been prepared that responds to the issues raised. The SIDRA models within the TIA have been updated to use the 2025 traffic data, and the revised analysis indicates that the intersection of Bourke Street and Lachlan Street continues to operate at LOS B during the weekday peak periods. On Saturdays, the results indicate a minor reduction in performance, with the intersection forecast to operate at LOS C compared to LOS B currently but still at an acceptable level.

It is noted that the amount of carparking proposed within the scheme has been reduced to be consistent with the Draft Local Environmental Plan – Policy and Housekeeping Amendments 2023. As identified within the TIA, the proposed development is to have a maximum of 621 carparking spaces. The proposal provides 426 parking spaces plus other ancillary spaces, complying with the maximum prescribed under the Draft Local Environmental Plan.

For visitor parking, the proposal provides 18 visitor car parking spaces within the basement. In addition, the development will deliver 26 on-street parking spaces along Potter Street, resulting in a combined capacity of up to 44 spaces to accommodate short-term visitor parking demand. The amount of visitor carparking space is 5% which is in accordance with the standards specified in AS890.6-2009. Please refer to the Revised Accessibility Compliance Report located at **Appendix O** which provides endorsements and justification of the proposed accessible parking provided.

DDA report for Justification and endorsement for the provided number of Accessible parking (5% of total number of residential parking numbers)

As identified in **Section 4.9**, Parcel 4 can be serviced via New Street in the event that the future road associated with the adjoining DASCO site to the south is not delivered prior to the development of this parcel.

There is no carparking proposed below New Street. Some carparking is proposed below the north-south through site link which will be retained as common property and not for lease, as shown in **Figure 22**. This has been discussed with Council and agreed on as part of the Voluntary Planning Agreement.

Other amendments to the TIA and architectural plans in response to Council and DPHI's comments have been addressed in **Appendix A**.

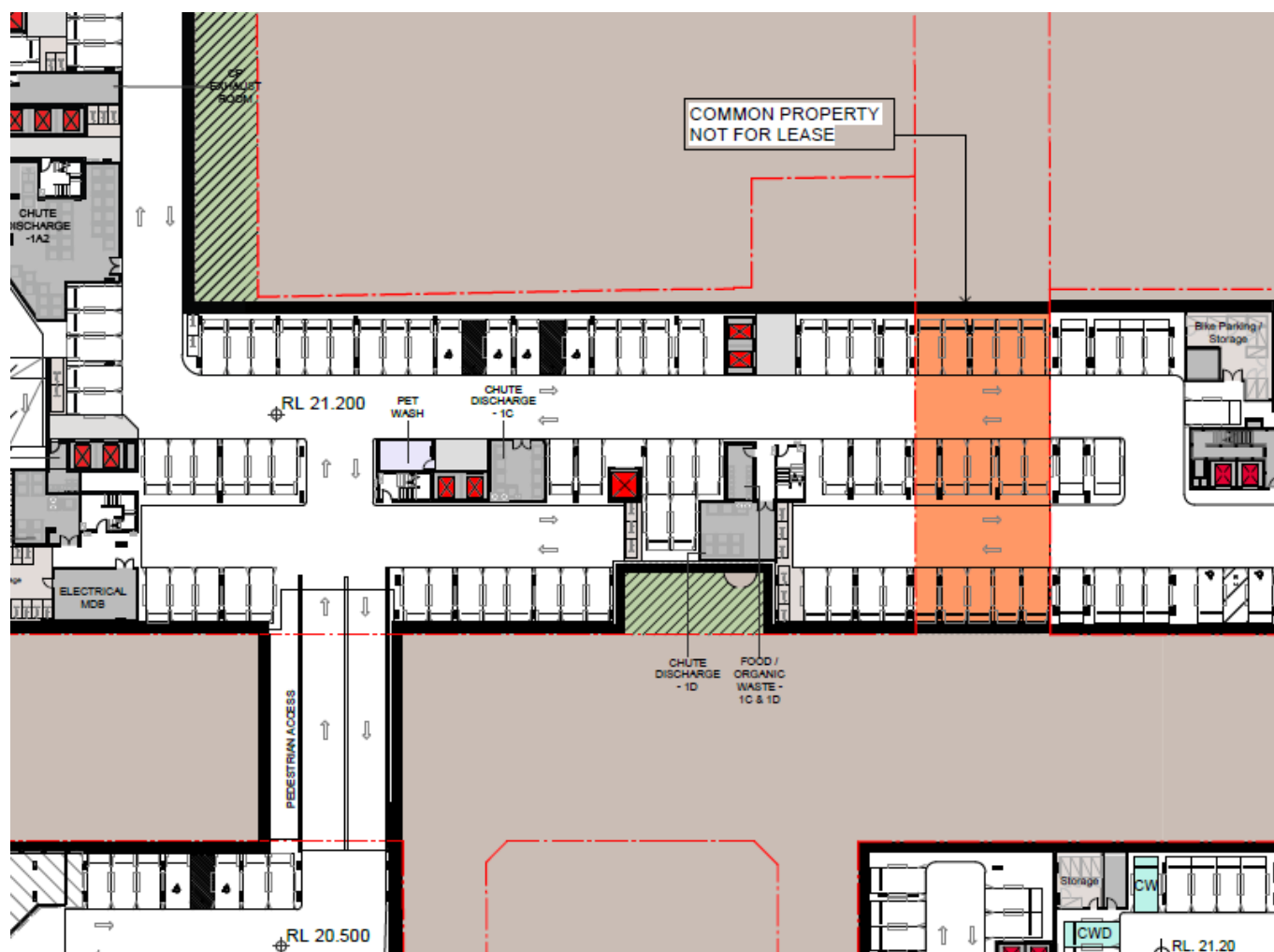


Figure 22 Extract of Basement Parking Plan

Source: SJB

4.11 Flooding

DPHI, Council, SES and CPHR have provided comments regarding the flooding impacts resulting from the proposed development. Further clarity was requested regarding the proposed mitigation measures to significant flooding events. Accordingly, a revised Flood Impact Risk Assessment (FIRA) (**Appendix I**) and Flood Emergency Response Plan (FERP) (**Appendix J**) has been prepared that responds to the issues raised.

4.11.1 Flood Impact Risk Assessment

The FIRA (**Appendix I**) has been updated to incorporate additional hydraulic modelling, assessing the potential impacts of the proposed development across a broader range of flood events. The assessment considers the following scenarios:

- 10% AEP
- 1% AEP
- 1% AEP with climate change
- 0.2% AEP
- PMF
- PMF with climate change

The FIRA demonstrates that the site remains flood free for events up to and including the 0.2% AEP event, and as such, no mitigation measures are required for these scenarios.

During the PMF and PMF with climate change events, shown in **Figure 23** below, the assessment indicates that future residents and visitors may be required to traverse low hazard (H1) floodwaters and undertake short-term shelter-in-place measures (less than six hours). This outcome represents a moderate level of consequence.

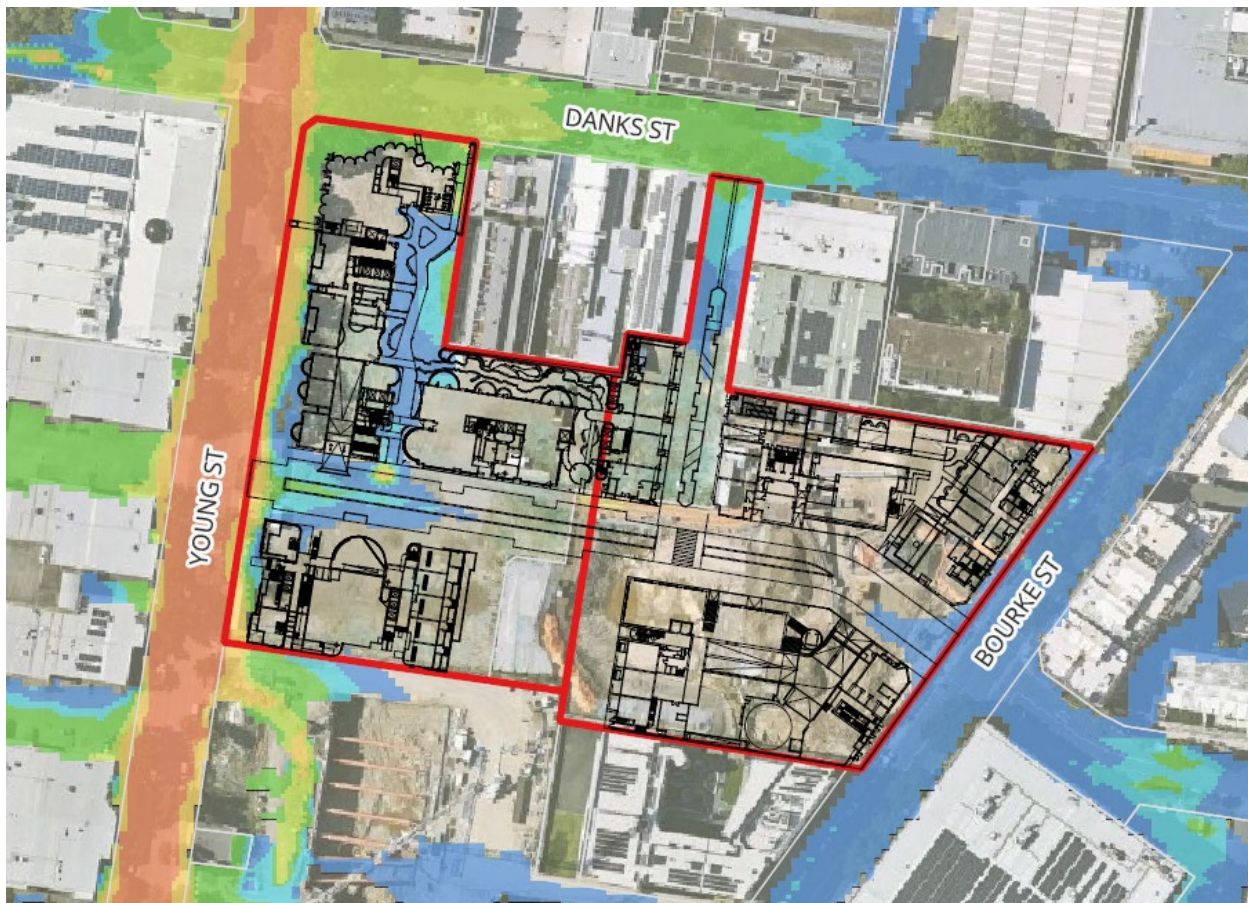


Figure 23 *Flood Hazard PMF with Climate Change*

Source: Stantec

A Flood Emergency Response Plan (FERP) has been prepared to address these scenarios, outlining appropriate emergency response procedures and identifying any mitigation measures required during extreme flood events.

4.11.2 Flood Emergency Response Plan

Flood emergency response measures for the operational phase are addressed in the FERP (**Appendix J**) prepared for the Main Works development, which outlines emergency egress and response procedures for site occupants. The FERP identifies shelter-in-place as the appropriate response where access to the site is cut during flash flooding associated with the PMF. A shelter-in-place assessment is included, demonstrating consistency with relevant guidelines for flash flooding events.

The FERP notes that while broader flood planning frameworks, including the State Flood Plan, typically prioritise evacuation as the primary response, evacuation is not recommended in this instance. The rapid onset of flooding results in limited warning time (less than one hour), which is insufficient to enable safe evacuation prior to inundation of surrounding routes. Attempting evacuation under these conditions would expose occupants to an unacceptable level of risk. In addition, off-site evacuation via Bourke Street may be compromised during the PMF, particularly for occupants within Parcel 1 in the north-west portion of the site. During this event, flood hazard within the site is predicted to reach category H5, with higher hazard conditions to the west (up to category H6), effectively restricting safe access and egress. Accordingly, evacuation is not considered a viable response under these conditions, and a shelter-in-place approach is required.

Nonetheless, an emergency egress route during the PMF is nonetheless available, as shown in **Figure 24** with flood hazard levels generally at H2 (unsafe for small vehicles) or lower, and some isolated, localised areas of higher hazard up to H5. These higher hazard areas are not continuous and can be avoided during emergency movements. The emergency egress route extends from Bourke Street to Potter Street, continuing to Gadigal Avenue, Lachlan Street and Dacey Avenue, which connects to Anzac Parade.

This route is intended solely for emergency use and is to be accessed by emergency vehicles only. It is not suitable for general evacuation of site occupants and should not be relied upon as a primary evacuation pathway.

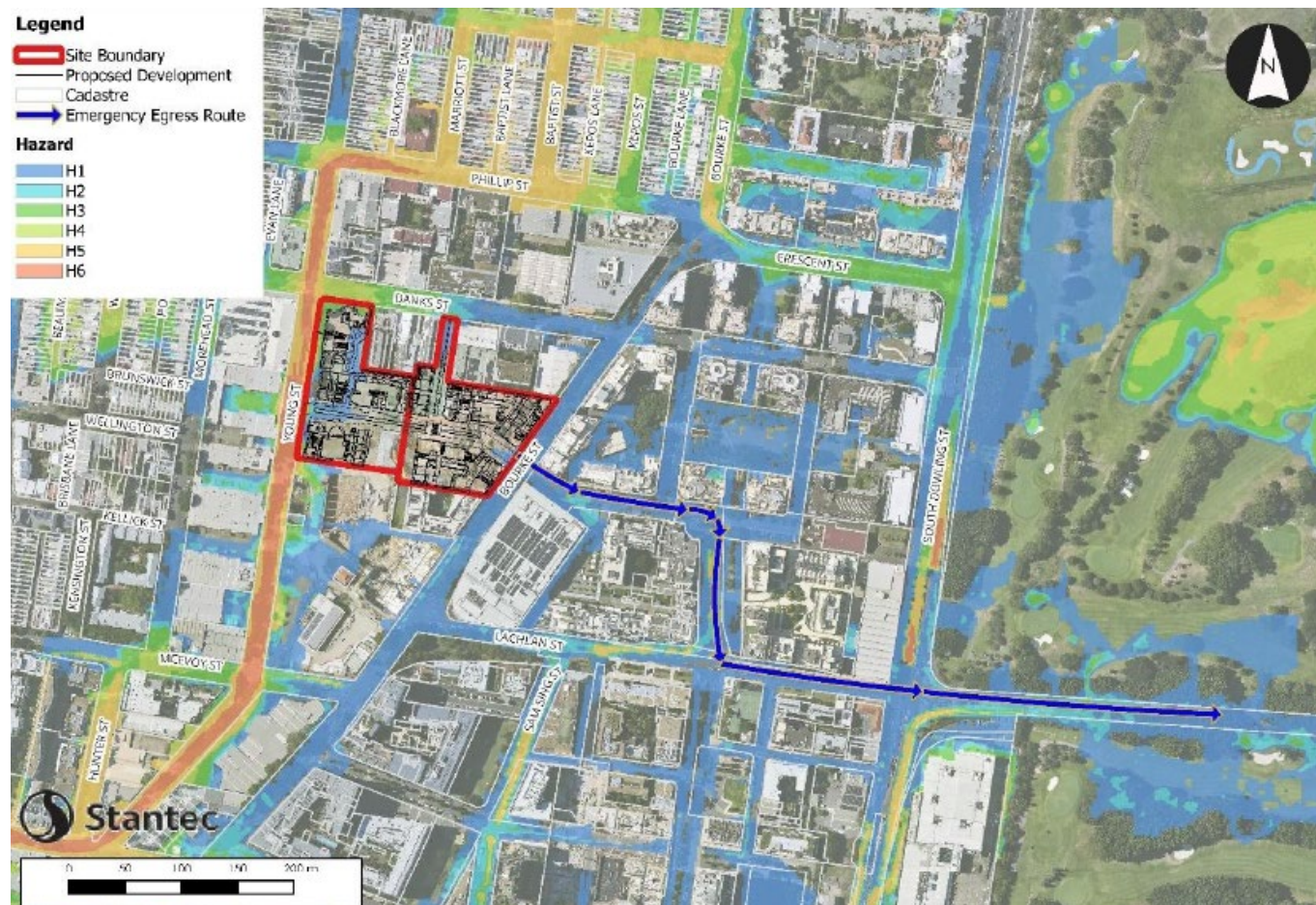


Figure 24 Emergency Egress Route

Source: Stantec

4.12 Noise

DPHI requested that façade noise mapping be prepared and mitigation measures proposed to ensure appropriate noise conditions in apartments throughout the site. An amended Noise and Vibration Impact Assessment has been prepared and is provided at **Appendix K** which includes façade noise mapping. The modelling shows that, as expected, apartments facing Bourke Street are impacted by traffic noise. The report provides minimum glazing requirements for buildings across the site to achieve compliance, and also identifies a range of supplementary ventilation requirements for some apartments in Building 2A, 2B and 3A where windows open noise criteria cannot be achieved. These measures include mechanical ventilation/air conditioning, ventilation from other building facades, design of balconies to include noise absorption measures (such as lined soffits) and fine-tuning of window opening sizes and mechanisms.

4.13 Voluntary Planning Agreement

Coronation Property have been in communications with the City of Sydney to discuss the terms of the Voluntary Planning Agreement (VPA) and respond to matters raised in the RtS letter. A formal meeting was held on December 16, 2025, which was centred around Councils queries about basement layouts, traffic impacts, operational waste management and designs to the public domain. Ongoing communications have occurred since (May 7 - May 21, 2026) in relation to the items raised with Council in December. Coronation agree with the general alignment with the following points:

- Transport for NSW has verbally confirmed to the City, through the public domain review process, that the proposed driveway locations and driveway design are supportable.
- The proposed tunnel connections are located within stratum and maintain a minimum 2m clearance between the gutter level and the top of the waterproofing layer, consistent with the approach previously addressed within the SSDA documentation.
- The proposed subdivision lots have been revised to accurately reflect the public domain elements to be dedicated, with updated subdivision plans, administration sheets and draft 88B Instrument provided accordingly.
- An amended Operational Waste Management Plan and Traffic Impact Assessment have been prepared and will accompany the Response to Submissions package, as agreed with Council officers.

4.14 Response to SRDP Feedback

DPHI has requested that the application respond to the comments provided by the State Design Review Panel (SDRP) and be presented back to the SDRP to demonstrate that the development achieves design excellence.

In response, the following is noted:

- The project has been undertaken in accordance with the endorsed Alternative Design Excellence Strategy (**EIS Appendix MM**), which commits to two SDRP meetings prior to lodgement. This requirement has been satisfied.
- SDRP Advice Letter 02 dated 2 July 2025 identified specific design matters requiring further work and recommended that these items be addressed through a pre-lodgement desktop design evaluation by the Government Architect NSW (GANSW), with remaining matters to be resolved through the EIS. This approach did not anticipate the need for a further full panel review.

Following lodgement, the Government Architect's submission comprised of a number of additional issues that were raised beyond the scope of the earlier advice and are not grounded in the framework established within the Alternative Design Excellence Strategy.

We note that the SDRP in their advice for Session 2 stated that *to support the delivery of design excellence and a streamlined planning process, it is recommended that some elements (highlighted below) return to GANSW for desktop design evaluation*. The outstanding items are identified and responded to in **Appendix C**. Therefore, pending satisfaction of these matters via desktop assessment and planning review, the consent authority can be satisfied that design excellence is achieved.

4.15 Public art

The proposal will deliver public art in accordance with the precinct Public Art Plan. A financial contribution in accordance with Council's Public Art Policy will be made toward public art associated with the development density approved under the original Concept DA, consistent with the quantum previously determined as appropriate for the site.

For the uplift associated with the HDA pathway there will be no additional percentage-based contribution to be proposed, however instead this requirement will be satisfied through the delivery of an on-site artist-in-residence program. This program will facilitate the ongoing creation and display of publicly accessible artwork throughout the precinct, ensuring continued cultural activation of the site. Further detail on the public art approach, including the artist-in-residence initiative, is provided at **Appendix R**.

5.0 Updated Project Justification

This section provides an updated justification and evaluation of the project as a whole, incorporating any relevant issues raised in submissions and the Applicant's response to these issues. Any design changes or assessments undertaken are in response to issues raised in submissions or further design development and have not increased the impact of the development. As such, the project justification for the project as previously outlined in the EIS is reiterated and strengthened through the presented responses which comprise meaningful amendments to the Proposal.

There are no amendments to the strategic or statutory context of the proposed development. Refer to Section 9.2 and 9.3 of the EIS for further information.

5.1 Ecologically Sustainable Development

Section 193 of the EP&A Regulation outlines four principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle;
- Intergenerational equity;
- Conservation of biological diversity and ecological integrity; and
- Improved valuation, pricing and incentive mechanisms.

An analysis of these principles is provided in the original ESD Report submitted with the SSDA (**Appendix EE** of the EIS) and remains unchanged in light of the design amendments.

5.1.1 Precautionary Principle

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This RtS and the EIS and its supporting reports and studies have not identified any serious threat of irreversible damage to the environment and therefore, the precautionary principle is not relevant to the proposal.

5.1.2 Intergenerational Equity

Intergenerational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The proposal has been designed to benefit both the existing and future generations by:

- Use of sustainable materials with low embodied emissions and low VOC values.
- Improving the biodiversity by incorporating native vegetation for landscaping.
- Incorporating water-efficient fixtures and systems to reduce water consumption and protect future water resources.
- Educating employees and occupants about sustainable practices and the importance of responsible resource use.

The proposal has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long-term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in this RtS and the EIS and the appended technical reports.

5.1.3 Conservation of biological diversity and ecological integrity

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration. The proposal would not have any significant effect on the biological diversity and ecological integrity of the study area.

A BDAR waiver was issued by the Department of Planning and Environment. The waiver states that the development will not be likely to have any significant impacts on biodiversity values.

5.1.4 Improved valuation, pricing and incentive mechanisms

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by the proposal, including air, water, land and living things. Mitigation measures for avoiding, reusing, recycling and managing waste during construction and operation would be implemented to ensure resources are used responsibly in the first instance.

5.2 Likely Impacts of the Development

Having regard to the natural environment, built environment and economic and social impacts of the proposed development, the likely impacts of development are considered acceptable as outlined below. Additionally, the proposed mitigation measures (Appendix C of the EIS) and Section 8 of the EIS outline that the mitigation and management measures will minimise the impact of the proposed development.

5.2.1 Natural and Built Environment

The EIS and RTS for the proposed development has demonstrated that the proposal adopts appropriate management strategies and will generate acceptable environmental impacts, due to the proposed mitigation measures and the design of the development.

All relevant environmental impacts are addressed within Section 8.0 of the EIS, and determined to be acceptable subject to implementation of the proposed mitigation measures set in the EIS, as revised in **Appendix B** of this RTS.

5.2.2 Social and Economic

An assessment of the likely social impacts of the project has been undertaken in the Social Impact Assessment within the EIS, prepared in accordance with DPHI's *Social Impact Assessment Guidelines 2021*. The assessment confirms that the proposal has the following positive social impacts:

- Introducing additional housing supply to Sydney, which includes both affordable and BTR housing choice.
- Improving the public domain and local character of the site and area by introducing high-quality new built form.

Any negative social impacts arising from the development, including cumulative construction impacts and cumulative demand on social infrastructure can be appropriately mitigated through the proposed mitigation measures set out in the EIS and as revised in **Appendix B** of this RTS.

The proposed development will generate a positive economic impact through the creation of jobs during both the construction and operational phases. The proposal offers non-residential GFA and will provide multiple retail tenancies to activate and stimulate the local economy.

5.3 Suitability of the Site

Having regard to the characteristics of the Site and its location, the proposed development (as refined and amended) remains suitable for the site in that:

- The site is located within the MU1 Mixed Use Zone and E1 Local Centre.
- Responds to the strategic vision enunciated by various levels of government regarding the delivery of additional housing supply in key locations, including those with locational proximity to key transport nodes.
- Is located within Waterloo and the City of Sydney which has a prevailing medium and high-rise built form that will continue to evolve over time as redevelopment occurs across the City of Sydney and the proposed development is consistent with that typology and also responds to the lower density character which surrounds the site through the careful placement of built form across the site and design of the podiums.
- Has been configured in a manner that minimises impacts on its surrounds and has been designed to (in association with subsequent development) improve the natural, historic and environmental qualities of the site.

- All necessary utility services are readily available to the proposal, and are capable of accommodating any additional demand that may be associated with the residential uplift proposed for the site.
- The size and dimensions of the site are suitable for the scale of the proposed development and can accommodate large building heights without adversely impacting the surround area.
- The site is proximate to a range of high-frequency public transport options, including buses along Elizabeth Street and Bourke Street and Green Square State and Waterloo Station.
- The proposal is sympathetic to surrounding existing residential premises, surrounding heritage items and the broader context of Waterloo and the Danks Street Precinct.

5.4 Public Interest

Having regard to the public interest, the proposed development (as refined and amended) continues to be in the public interest for the following reasons:

- It will increase the supply and choice of housing in a highly accessible location. The proposal presents an important opportunity to revitalise the site in accordance with the strategic vision for Waterloo.
- It will achieve significant diverse residential supply at the site (BTR, affordable housing dwellings, city starters), which is proximate to a range of employment opportunities in the Sydney CBD. This directly contributes to the achievement of diverse housing in City of Sydney in line with the National Housing Accord.
- Direct employment opportunities will be created during the construction and operational phases of the proposal.
- The development is consistent with planning controls under the Sydney LEP, Housing SEPP and implements the objectives of the ADG. The proposed rezoning addresses the height and FSR variations.
- The proposed development provides improved amenity by revitalising a currently underutilised property and remediating it for significant housing supply.

6.0 Conclusion

As set out in this Submissions Report, the Applicant has reviewed each of the submissions made by members of the general public and State and local Government agencies. In response to issues raised in these submissions, as well as matters identified by the Department, the Applicant has undertaken further environmental assessment and proposed a number of design amendments in order to respond to matters raised in the submissions, as well as a result of further project design development. This Submissions Report has set out these matters as required under section 59(2) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and in accordance with the DPHI's *State Significant Development Guidelines*, including *Appendix C – Preparing a Submissions Report*.



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