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Our Ref: R/2025/15/C  
File No: 2026/242780  
Your Ref: SSD-93222706

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Via Major Projects Portal

Dear Jude,

**Advice on EIS – Waterloo Estate (South) Concept – SSD-93222706**

Thank you for your correspondence, dated 4 May 2026, inviting the City of Sydney Council (the City) to comment on SSD-93222706 for the concept approval for the staged redevelopment of Waterloo Estate (South), supported by a concurrent rezoning to modify Sydney Local Environmental Plan 2012 (SLEP 2012) and the Waterloo Estate (South) Design Guide (Design Guide).

The City supports the greater provision of social and affordable housing and **encourages the proponent to commit all affordable housing to be provided in perpetuity**. The City continues to call for the NSW Government to make a greater commitment to deliver housing stock and address the continuing housing affordability crisis through government-controlled sites, particularly through the renewal of the subject precinct, which has played, and should continue to play, a vital role in providing housing for all.

The City remains committed to supporting the delivery of market, social and affordable housing through design-led proposals that are anchored by affordable housing and high-quality public spaces.

The City also appreciates the engagement with the proponent and their consultant team through pre-lodgement consultation. Notwithstanding this pre-lodgement consultation, and as already been communicated to the proponent, the City has **concerns with the proposed changes to the existing planning controls and the associated building envelopes**, as they:

- adversely impact on the wind environment of the surrounding public domain, particularly on the future park and the new plazas within the site;
- reduce solar access to the future park and the new plazas;
- result in unreasonable additional overshadowing to neighbouring properties;
- undermines the height relationships with neighbouring developments and with the heritage items on the site;

- could do better to achieve reasonable amenity to the proposed apartments;
- fails to provide a proportional increase in communal spaces and non-residential (commercial and retail) floor space to support the proposed substantial increase in residential density; and
- limits the amenity of future residents and adversely affects the amenity of neighbouring existing developments and the public domain.

The City, therefore, **objects** to the application as currently proposed, and raises concerns and comments as provided below for your consideration.

Based on this submission, the discussion below is then supported by a response to, and recommendations for, the proposed updates/amendments sought to the Design Guide. These are included as Appendix 1 to this submission.

## 1 Rezoning

The application includes a rezoning proposal to amend the SLEP 2012 to align building height, floor space and related development standards with the proposed building envelopes for Waterloo South, as further detailed in the proposed amendments to the Waterloo Estate (South): Design Guide 2022.

### Height of Buildings and Floor Space Ratio Maps

The application makes it difficult to compare the existing master plan approved and proposed height and floor space controls that are applicable to the site, and as such, make it challenging to consider the change in impacts of the proposal in a comprehensive manner.

The Urban Design Report should clearly present the existing approved and proposed height and floor space controls.

It is also unclear what should be considered as the proposed height as the application makes reference to both the 'planning envelope' and the 'height plane', which in many cases are at different heights.

The application is presented to suggest the proposal is compliant with planning controls. However, it is clear that the proposal is not compliant and should be revised and clarified.

### Heights of buildings

Height controls are generally reflective of the concept plan but are too coarse. If the proposed concept envelopes and reference schemes are to demonstrate that future developments are capable of complying with the proposed controls, the proposed heights appear significantly more generous than the maximum yield. In particular, on some sites where there is a 40m difference in height between the LEP control and the reference scheme height.

The table below compares proposed LEP height controls with reference scheme heights and provides recommended amendments.

| Block | Proposed LEP height control | Reference scheme height | Recommendation                                     |
|-------|-----------------------------|-------------------------|----------------------------------------------------|
| 2D    | 37m                         | 31m                     | LEP height is too high and should be reduced by 6m |

| Block | Proposed LEP height control | Reference scheme height | Recommendation                                                                                                                                                           |
|-------|-----------------------------|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4C    | 74m                         | 30m                     | The eastern part of the site fronting West Street is too high. The height control should be split down the middle and a lower control put over the eastern half.         |
| 5A    | 65m                         | 25m/62m                 | The north and western parts are significantly too high and should be split off from the higher component. The control for the higher component should be reduced to 63m. |
| 6A    | 62m                         | 24m/40m                 | The western part of the block should have a lower height control(s) to reflect the significantly lower proposed form.                                                    |
| 8A    | 54m                         | 31m                     | The building fronting McEvoy is much lower than the height control. The control should be split to reflect the proposed form.                                            |
| 9B    | 56m                         | 40m                     | The eastern part of the block should have a lower height control to reflect the lower proposed form.                                                                     |
| 10A   | 39m                         | 35m                     | LEP height is too high and should be reduced by 4m                                                                                                                       |

#### Amend CI 7.27

The EIS / rezoning proposal seeks to amend clause 7.27 to permit 'educational establishments' and 'creative industries' as allowable land uses along designated active frontages. It is also proposed to amend the Active Frontage maps to reflect the revised building envelopes.

Whilst there is no objection to the inclusion of these two additional uses, uses at the ground floor should prioritise non-residential uses increasing public interaction. Clause 7.27(3)(b)(i) should be amended to reflect this.

#### Amend CI 7.29(3)(a)

The EIS / rezoning proposal seeks to amend clause 7.29(3)(a) to reduce the minimum non-residential gross floor area requirement for Waterloo South from 17,000sqm to 15,000sqm.

**The City is not supportive of a reduction in non-residential supporting floor space.** There will be significant demand for community serving uses, retail and recreation generated by the differing price point capacity of the new mixed tenure residential population and this should be accommodated in some part in the development.

**Amend Cl 7.29(3)(b)**

The EIS / rezoning proposal seeks to amend clause 7.29(3)(b) to include ‘*educational establishment*’ as an additional permitted land use that may contribute to the minimum 5,000sqm requirement under this clause. It is presumed that this may be to facilitate a future school that has been referenced in the Social Impact Assessment.

Whilst there is no issue with the inclusion of the educational establishment use, the original intent of the minimum floor space requirement for community service uses was based on identified needs to particular community uses to support the large residential population. Further analysis is required to justify why an educational establishment can contribute to community service floor space rather than in addition to the existing uses.

**Amend cl 7.29(6)**

The existing wording of this clause allows only solar panels and associated structures to breach the height control applicable to the site. The proposal to exclude communal open space structures as well is not supported and undermines the integrity of height controls and urban design analyses undertaken within the precinct thus far.

Communal open spaces are generally designed with integrated shade structures and taller parapets that add additional bulk to the top of the building, and it is unclear whether any additional heights and bulk have been tested in the proposed scenarios. It is recommended that no changes to this clause are made and all communal open spaces on rooftops be contained wholly within the maximum heights prescribed for each site.

**Concept Proposal**

**2 Planning Agreement**

On 23 February 2023, the City entered into a Planning Agreement in connection with a planning proposal to amend the planning controls that apply to Waterloo Estate (South) under SLEP 2012. The Agreement formalised a public benefit offer for:

- Land dedications and embellishment works to new road reserves;
- Embellishment of existing road reserves;
- Land dedication and embellishment of approximately 23,600sqm of public open space including one large open space and one small park;
- Land dedication and embellishment of approximately 2,400sqm of community facilities across no more than two locations.

The Agreement requires that the public open space and community facilities are delivered no later than the Occupation Certificate of 50% and 75% of the gross floor area of the development, respectively.

Based on the proposed staging and yield in this proposal, this would equate to the large public open space being delivered between the 2nd and 3rd phases and the community facilities between the 4th and 5th stages.

The proposal includes the smaller park in the first stage but does not indicate a timeframe for the larger open space. The community facilities are indicated in the 1st and 2nd stages which is supported.

**The proposed locations of the open space and community facilities are supported.**

The EIS indicates the quantum of public open space appears to be 20,000sqm for the large park and 1,000sqm for the small park, **well short of the 23,600sqm of park embellishment under the VPA**. This may be a discrepancy between the land to be dedicated and the incorporation of the road closure to form the large park.

**The application should be amended to reflect the actual open space to be delivered inclusive of any road closures.** The obligations of the applicant and the City for the permanent road closure are included in the terms of the VPA.

The concept SSDA proposes 5,389sqm of community uses, shown within the reference scheme, in accordance with the minimum 5,000sqm required under clause 7.29(3) of the SLEP 2012.

**The reference scheme produced by SJB provides for only 2,169sqm of GFA to be dedicated to the City, far short of the target 2,400sqm identified in the VPA.** Additionally, while this is only a reference scheme, the co-location of City-owned community facilities with other community and non-residential uses may not be the most efficient use of the floorplates of the buildings, and lead to the limitation of potential uses. **Where applicable, future City-owned community facilities should be consolidated to minimise the spread over multiple floors in the two locations.** This can be addressed in detailed applications but should be noted by the proponent.

The EIS has indicated the staging is indicative, however the following comments relate to the staging of the delivery of the infrastructure based on this proposal and items contained within the submitted Infrastructure Delivery and Staging Plan. Should the Developer elect to deliver the Stages in a different order than proposed in this application, then the completion of the dedication and embellishment of new roads may also need to be adjusted.

**Existing and New Roads**

The VPA obligates the Developer to undertake works to the immediate frontage of each development block in accordance with the Design Guide. Works to the road carriageway are generally limited to "make good" except where Australian Standards or flood management requires an adjustment of road levels and/or upgrade of storm water system. Further, Section 6.4 of the EIS describes the staged infrastructure delivery.

Whilst this extent is generally supported, the Infrastructure Delivery Plan has indicated various works on opposite sides of streets as needed to provide for the staged delivery. Consideration should also be given to a similar approach to public domain elements on opposite sides of streets and at intersections such as pedestrian ramps, kerb extensions, pedestrian crossings, street lighting and the like, where they are required for the effective function and to meet Australian Standards of the immediate frontage of each stage.

A review of Table 10 in the EIS has identified the following errors or anomalies that require clarification and resolution for consistency:

- Stage 1 indicates the upgrade of public domain frontages to Mead Street; however, this street does not exist as yet. **The dedication and embellishment of Mead Street should be included in this Stage 1 to ensure pedestrian and vehicle access.**

- Stage 2 indicates delivery of the western extent of Cope Street; however, this should be the eastern extent between John Street and Wellington Street to the development site frontages.
- A similar error has been stated regarding Cooper Street. It is noted that the proposal is for both sides of Cooper Street upgrades to occur in this stage.
- The table also indicates Stage 2 is to include public domain improvements on the adjoining Block 3 development site along West Street. However, Block 3 does not adjoin West Street. It is possible this should reference West Street adjacent to Block 4 and requires clarification.

Stage 2 has frontages to the proposed new streets of a section of John St and the West Street extension. These sections of street dedication and embellishment should be included in this stage to ensure pedestrian and vehicle access and circulation.

Table 10 of the EIS also indicates a new street extension for West Street in Stage 4, allowing for its connection to Wellington Street. Notwithstanding comments above about including the new road in Stage 2, the section of West Street will connect to the new section of John Street not Wellington Street. Street widening is also proposed to the northern extent of West Street, improving the connection to John Street. This would be Wellington Street.

Stage 4 has frontages to John Street and the dedication and embellishment of this section of John Street should be included in Stage 4.

As only the first section of the Pitt Street extension is proposed in Stage 4, a temporary turning head for vehicles may be required. These comments on completion of road infrastructure should be read in conjunction with the below detailed infrastructure comments.

#### Electrical substations

Four existing substations are located across the development area, all within property boundaries.

One substation on Cope Street between Wellington Street and Raglan Street is proposed to remain and be located in the future large park. As this substation will be somewhat disruptive to the future design and use of the open space, it is the City's preference for this to be located to within a different development block or below ground, where it must remain. Then, the extent of the substation and required curtilage is to be excluded from the calculation and offset of open space.

#### Street lighting and power lines

The applicant should note that while underground powering of all proposed street lighting is supported, the extent of street lighting works does not demonstrate what existing street lighting is on the opposite side of streets to the development, particularly in relation to intersections. This may affect the location and number of light poles to meet the required standards.

#### Potable water and sewer works

New potable water infrastructure works are proposed in Stage 4 which includes works to the northern site of John Street between West Street and Block 3. These works would have been completed in Stages 2 and 3. The below ground works in this location should be undertaken in Stage 2 to avoid the need to dig up the earlier completed works.

Similarly, new sewer infrastructure proposed in Stage 4 includes works to the northern side of John Street between West Street and George Street which would have been completed in Stage 2. The below ground works in this location should be undertaken in Stage 2 to avoid the need to dig up earlier completed works.

### Flood impacts

Noting the highly urbanised area and the lack of opportunity to significantly alter flood paths, **previous advice obtained from the SES on other projects has noted a “shelter-in-place” strategy is not supported for certain land uses, particularly in relation to those people with reduced mobility such as education (children) and aged care (seniors).**

## 3 Design Excellence

### Design Excellence Strategy

The City's Competitive Design Policy applies to the Waterloo South as set out in GANSW's Design Competition Guideline. The existing Design Guide was prepared on this basis.

The application has now been accompanied by amendments to the Design Guide and a separate Design Excellence Strategy. The separate document should not be considered or endorsed in this application as all design excellence provisions should be wholly contained within the Design Guide. See Appendix 1 for further comments on the proposed Design Guide amendments.

### Competition Requirements

No change is supported to the competition requirements that apply to Waterloo South. While there is a competition exemption pathway currently in place by the NSW Government, this will lapse in November 2027 (next year). Given that Waterloo South is a long-term project to be delivered over the next 10-15 years, **the planning controls for Waterloo South must be on the basis that competition requirements will apply from 2027.** Any exemptions that may apply in the future would continue to apply, however, **amendments to the planning controls should not pre-suppose future exemptions.**

**The City has communicated to the proponent that it supports an alternative design review process for social and affordable housing, as reflected in its updated City of Sydney Competitive Design Policy (Policy), which applies to Waterloo South.** The Policy provides an alternative design review process (in lieu of a competition) to facilitate the timely delivery of social and affordable housing. As the provisions apply and are relevant to Waterloo South, they have been incorporated into the City's recommendations in Appendix 1.

### Gross Floor Area

The City acknowledges that 10% bonus floor space available under Section 6.21D of the SLEP 2012 has already been embedded in the LEP controls, against the City's previous advice. The new proposal is inconsistent with the existing controls however, as throughout the EIS and Urban Design Report, statements are made noting that either the proposed envelopes will be compliant with the permissible floor space in the LEP or will be able to accommodate the bonus available under Section 6.21.

**Concern is raised that the process of embedding additional floor space without demonstrating first that a building is capable of achieving design**

**excellence significantly weakens the integrity of the design excellence provisions standards the City upholds.**

Notwithstanding this, whilst it is the City's preference to maintain any height or floor space bonuses as a separate incentive under Section 6.21D of the SLEP 2012, **should DPHI continue to support embedding the additional floor space within the controls, the site-specific provisions of the SLEP 2012 should be amended to clearly state any other bonuses relating to design excellence under the SLEP 2012 are not applicable to the site, to avoid any ambiguity.**

#### State Design Review Panel

For development that is to be subject to design review, a specific 'State Design Review Panel – Homes NSW' is proposed. The 'SDRP-Homes NSW' is proposed to be utilised unless agreed between Homes NSW, GANSW and Stockland and is to be convened by the Proponent. The proposed constitution of the SDRP-Homes NSW is:

- 1 x GANSW nominee (including the chair)
- 1 x City of Sydney nominee
- 3 x Independent nominees

It is recommended that any SDRP for Waterloo South is to be convened in accordance with GANSW's requirements and, for transparency, should not be replaced by another (unknown) form of design review at the request of the proponent. The inclusion of 'independent' members is at odds with the SDRP terms of reference and should only include members from the pool of expert panel members.

## **4 Social and Affordable Housing and Social Impacts**

### Social and Affordable Housing

**The City supports the increase in social and affordable housing being provided in the development**, noting that it is the Council's view that affordable and social housing outcomes should be maximised on the site.

The NSW Government should consider more dwellings being assigned long term social housing within the precinct. Currently, the Waterloo South Estate includes around 749 public housing dwellings comprising approximately 1,555 bedrooms. While there will be an increase in dwellings, the application suggests social housing will provide approximately 1,782 bedrooms, equating to only a 14% increase in social housing bedrooms. Given the significant increase in housing stock within the precinct, the City strongly encourages Homes NSW to further explore a greater share of affordable/social housing.

Notwithstanding, the City notes the proposed allocation of at least 30% of the residential floor space (on land owned by Homes NSW) for social housing and at least 20% for affordable housing based on no more than 30% household income as per the City of Sydney Affordable Housing Program.

It is noted that of the 20% affordable housing, there is commitment that a minimum of 7% of residential GFA is proposed as affordable housing that will be owned and managed by a community housing provider – proposed as City West Housing (provided in perpetuity). **Any additional affordable housing delivered in the precinct must be used as affordable housing for a minimum of 25 years. This**

**is not inconsistent with the LEP requirement; however, we are concerned the remaining affordable housing may be lost after 25 years.**

The EIS states that affordable housing delivery, duration, allocation and management arrangements will be confirmed through future stages in collaboration with Homes NSW and CHPs. Whilst the City notes that this is a concept proposal only, further details on the long-term plan for affordable housing should be provided at this stage.

It is strongly advocated that all the affordable housing in all future stages be:

- provided in perpetuity, with any future sale of the property being directed towards affordable housing in the LGA; and
- subject to income-based rents, that is, it should not be rented using a discount to market model that, in many cases, will not provide an “affordable” home.

### Social Impacts

The application was submitted with supporting documents including a Social Impact Assessment (SIA), Preliminary Social Impact Management Plan (SIMP) and a Crime Prevention Through Environmental Design (CPTED) Assessment to consider the social impacts of the proposed development.

**All documents considered are insufficient and the City is not satisfied that the applicant has comprehensively considered the social impacts of the proposal.**

The Social Impact Assessment (SIA) is insufficient and does not align with the DPHI SIA Guidelines (2026). The City has concerns around the assessment methodology, identification and assessment of impacts and the appropriateness of management measures. This includes:

- The SIA is required to assess likely social impacts against baseline conditions (DPHI SIA Guidelines 2026, pg.26). The baseline conditions on which unmitigated impacts are assessed vary throughout, from using the current built form in Waterloo South as the baseline to using the proposed concept plan as the baseline. In other impacts, it is unclear what the baseline condition is. It is therefore unclear how the magnitude of social impact has been determined, resulting in some impacts appearing more positively mitigated than what would be expected.
- The SIA does not consistently evaluate, draw attention to and prioritise the social impacts that are important to people, as informed through engagement (DPHI SIA Guidelines 2026, pg.22). The SIA does not consider the potential social impact resulting from the proposed removal of the Health One facility, despite retaining health services identified as a key community priority in engagement feedback and several impacts which assess access to social infrastructure and health and wellbeing (impacts 7.2.3.3, 7.2.5.2, 7.2.5.5 and 7.2.7.3). Several impacts also assess substantially the same change and overrepresent the reported positive impacts. This includes the following groups of impacts: 7.2.2.2, 7.2.5.2 and 7.2.7.3; 7.2.1.1 and 7.2.1.2; and 7.2.3.3 and 7.2.5.5.
- The SIA identifies some impacted groups as ‘existing residents in Waterloo South Estate and surrounding areas’. It does not consider how relocated Waterloo South residents, residents in Waterloo Central and Waterloo North, and residents in private lots in Waterloo South will experience

different impacts over time and require different management measures. This is particularly relevant for impacts 7.2.2.1 and 7.2.5.3.

- The SIA largely does not include mitigation and enhancement measures which are tangible, relevant, deliverable and enduring (DPHI SIA Guidelines 2026, pg.25). Some impacts include vague details on project commitments, outcomes and strategies as mitigation measures which then lack tangibility (i.e. impacts 7.2.5.2 and 7.2.7.1), some do not address the key impact at hand (i.e. impacts 7.2.8.1, 7.2.8.2 and 7.8.2.3) and others don't outline who is responsible for implementation and the relevance of this measure in altering the impact from a negative to a positive impact (i.e. impact 7.2.5.3).

The Social Impact Assessment must be amended to include the following:

- Apply a consistent baseline across all impacts and reassess the unmitigated and mitigated assessment.
- Include the approved 2022 planning controls and Design Guide as part of the baseline to accurately assess the baseline change from the proposal.
- Identify and prioritise impacts that are important to people, as informed by engagement outcomes. The SIA should provide an assessment on the following impacts:
  - Access to health infrastructure and services, considering the removal of the health one facility. This should be supported by a community facilities and service needs analysis, per the Waterloo Estate (South) Design Guide Provision 6.1.1 (1) and 6.1.1 (2), or state why this is not applicable.
  - Access to social infrastructure (including education), considering the proposed population density on site and the capacity of infrastructure to accommodate.
  - Access to affordable services like health facilities and lower price point service offerings.
  - Ability for community to influence decision making. Note: impacts 7.2.8.1, 7.2.8.2 and 7.8.2.3 are not a suitable substitute given they only assess opportunities to be consulted on and don't address this key community concern.
  - Provision of inclusive access for all those who live in the estate, and for Aboriginal and social tenants generally, particularly regarding the risks and strategies to manage social conflicts between residents and security training.
  - Managing uses of public spaces including the new parks and any potential conflicts with existing community using public spaces and nearby social housing tenants
  - Impacts on social and mental health impacts of relocated social housing residents during all stages of relocation and return.
- All mitigation measures need to be reviewed and updated to ensure they are tangible, relevant, deliverable and enduring. Where mitigation and management measures are not defined or secured, the impact rating should be updated. This includes:
  - Impacts 7.2.5.2 and 7.2.2.1: clearly define project commitments, outcomes and strategies as mitigation measures.

- Impact 7.2.7.1: explain how the mitigated assessment can increase to high positive when the SIA states there are no existing enhancement measures or details on proposed targets.
- Impact 7.2.5.3: justify how residents in Waterloo South and surrounding areas (including Waterloo North, Waterloo Central and private lots) will experience a mitigated positive impact during construction and how proposed measures fully mitigate and enhance impacts.
- Impact 7.2.5.5: outline the proposed mitigation measures around how, when and where services will be accommodated on site during redevelopment. Appendix C – Mitigation Measures states the SIA notes temporary spaces are to be provided during construction, but no spaces are provided/referenced in the SIA.
- Impacts under 7.2.1: provide tangible mitigation measures on delivering dwelling diversity, including larger apartment sizes, and securing affordable housing in perpetuity.
- Provide details on the proposed skills exchange and redeployment centre as a mitigation measure, including GFA inclusion, concept plan staging and likely responsible entity for implementation.
- Provide clarity on the following:
  - Impact 7.2.3.1: relevance of impact given Waterloo Metro station is not part of the proposal.
  - Impact 7.2.5.2: how schools will have “improved access and stronger connection to Waterloo South through integrated site design”, noting the schools listed (including Alexandria Park Community School) are located several blocks away and the demand to capacity is unknown.
  - Impact 7.2.1.2: consider how the extent and duration of this impact will change over time, noting relocations may place supply pressure on the local social housing network.
  - the intended uses for non-council community spaces. The SIA notes this is not confirmed, while the EIS notes the reference schemes locates a new school fronting George Street (pg.118).
  - the development will ensure long-term affordable retail and service options are provided within the precinct. The SIA notes a retail strategy will be developed as part of project planning however, it is imperative that the parameters of this strategy include the consideration of a minimum percentage of retail floor space to provide goods and services for lower-income households. Clarification is also sought how this strategy will be implemented and complied with in the long-term.
  - whether there has been any consideration of including a commitment to prioritising commercial floor space for Aboriginal businesses. As above in the retail strategy, clarification should be provided on how Aboriginal businesses may be prioritised and managed in the long-term.

Similarly, the SIMP is insufficient and does not align with DPHI guidance under the SIA Guidelines (2026) and the Social Impact Management Toolbox for State Significant Projects (2023). Further, the Plan is still weak on the implementation of the People and Place Plan – Waterloo (South) Redevelopment. It provides no

details on how impacts will be monitored, evaluated or reported, which is the main purpose of a SIMP.

The Preliminary SIMP must be amended to include the following for each impact measure:

- Desired outcome
- Suggested indicators and targets to measure and monitor effectiveness
- Expected data collection method
- Monitoring and reporting frequency
- Adaptive measure if target is not reached

The Preliminary SIMP also needs to provide clarity on management responsibility, timing and the relationship to future development stages to ensure its effectiveness. To support this, the Preliminary SIMP must also be amended to include the project delivery stages as the indicative timing measure to support where the SIMP is required in future development applications and/or to inform conditions of consent.

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

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

All future detailed applications and the design of the public domain should then be required to respond to and incorporate recommendations provided in the amended comprehensive CPTED assessment.

## **5 Urban Ecology**

### Canopy cover

There is significant canopy both within and surrounding the site, mostly provided by large, healthy trees that are of substantial importance to the local environment and the character of the area. In particular, the high number of trees within the site

along McEvoy Street, the high value Fig trees located on the site corners, as well as street trees and trees listed on the City of Sydney's Register of Significant Trees on neighbouring properties to the north of Wellington Street.

The tree numbering has been adopted from the Arboricultural Impact Assessment (AIA) prepared by TMS, dated 30 March 2026, recommending that the proposed concept design requires the removal of 236 trees and retention and protection of 304 trees.

These trees provide important environmental, ecological, and amenity benefits and form part of the City's essential green infrastructure. The proposed significant extent of tree removal appears driven by the current proposed envelope layout and design of roads. **High-value trees must be treated as a key site constraint and integrated into planning and design** in accordance with Australian Standard for Trees on Development Sites - AS 4970–2025 and relevant Council policies.

**While the City raises no objection to the removal of 164 of the proposed trees, several of the remaining trees should be reconsidered for retention** as they are considered to be of high retention value or are mature, well-established assets that contribute significantly to streetscape character, urban forest canopy cover, biodiversity, local amenity and long-term environmental resilience.

Trees that are recommended to be reconsidered for retention are trees 50, 53, 58, 59, 60, 61, 62, 63, 64, 69, 70, 72, 90, 91, 92, 93, 101, 109, 127, 134, 135, 137, 138, 139, 140, 141, 154, 167, 168, 171, 175, 179, 181, 198, 199, 201, 202, 207, 213, 214, 215, 226, 230, 231, 233, 234, 235, 236, 243, 244, 245, 246, 247, 267, 280, 281, 282, 283, 284, 286, 290, 329, 330, 331, 340, 341, 385, 391, 406, 407 and 429.

The site currently has 60% greening, including 50% canopy cover, and while the submitted documentation states that the future development of Waterloo South will deliver additional open space, canopy planting and achieve a minimum 50% tree canopy cover target across the precinct at maturity, there is currently insufficient information to demonstrate that these outcomes can realistically be achieved. **The scheme appears to be heavily reliant on the canopy being provided in the new parks and the through relatively narrow through-site links.**

As a benchmark, the concept should establish public and private-domain expectations for canopy cover in accordance with the Greening Sydney Strategy targets including:

- 15% in private property
- 70% within streets
- 55% within neighbourhood parks
- 70% within pocket parks

### Soil Volumes

The concept plans indicate inconsistent provisions of deep soil with the Design Guide. It is recommended that envelope plans remove references to deep soil and future development applications rely solely on deep soil targets provided in the Design Guide. It is also encouraged that the Design Guide incorporate additional requirements for deep soil and on-structure planting design requirements as provided in the Sydney Development Control Plan 2012 (SDCP 2012).

### Green roofs

Consideration should also be given to the retention of green roof requirements on buildings above 15 storeys. It is acknowledged that the viability and environmental

performance of extensive green roofs unprotected decrease as building height increases, and that roof space has been allocated for servicing. However, green roofs are still viable options in these locations and should be considered at detailed design.

## 6 Built Form

### Flexibility

It is critical that the concept envelopes demonstrate an appropriate scale of future development in terms of bulk and height relative to the streetscape, public and private open spaces and block and lot sizes.

Whilst it is acknowledged that some degree in flexibility of envelopes is crucial to allowing future design development, some urban form controls must be established to ensure future developments are compatible with the desired urban form. For instance, critical setbacks should be reflected in the envelopes, both for building separation and guiding the desired building form (podium vrs tower). Building depths also support the delivery of good residential floor plates and guide future buildings to achieve the Design Guide objectives, design criteria and design guidance of the ADG.

As demonstrated by the reference scheme, many of the building depths are too deep, resulting in double-loaded corridors, where many apartments have single-aspects. Further, several buildings within the reference scheme do not include any setbacks above the street wall height, resulting in an undesirable public domain as buildings are overbearing over the street experience, incompatible with the human scale street wall at street level.

### Upper-level Setback

Proposed envelopes now do not require the provision of an upper-level setback to mandate the provision of a podium. The proposed building envelopes will result in several sheer walls, poorer wind conditions and a poorer urban form outcome at street level. **This is not supported and appropriate setbacks with reference to similar built form controls of the SDCP 2012 should be incorporated into the Design Guide.**

### Height Transition

Block 7 is unique in that it extends out from the cohesive Waterloo South area into a lower scale residential area and is surrounding on three sides by heritage items, including "Our Lady of Mt Carmel Church and School" (I2088) and "Waterloo Park and Oval" (I2079), and the Waterloo Heritage Conservation Area (C70). The topography also rises in this area. The design for this block must respond to this context.

The proposed concept envelopes indicate the maximum storey height of buildings within Block 7 as 28 storeys, one of the highest within the precinct.

**A sheer wall to a height of RL 126.40m is proposed in Wellington Street. This does not present a gradual transition in heights from the adjacent heritage item and may create adverse visual impacts on the setting of the heritage item and greater conservation area. The building envelope should be amended to provide a podium level that mitigates between the low-scale terraces of the HCA to the north, the adjacent heritage items to the south and south-east, and the new tower development. An upper-storey setback should also be provided to Wellington, Gibson and Kellick Streets. The height in storeys should be reduced to respond to the unique topographical and heritage context of**

**Block 7. It is recommended that a total building height similar to those along Pitt Street opposite. Likely a 16 or 17 height in storeys.**

### Floor Space Ratio

There is insufficient information to confirm if the changes to the Floor Space Ratios on the maps are correct and are rationalised in the proposed envelopes and reference scheme. A comparative analysis will assist in confirming this.

Further, as the lots have not yet been subdivided, the areas that will become parks it would be prudent to have FSRs of 0:1:1 on them and not be left unrestricted.

### Building Separations

**Many of the building separations are insufficient and must be addressed.**

Except where there are thin profile one-sided buildings, the required separations are determined by the height of the lower building as per part 2F of the ADG and follows:

- 0-4 storeys – 12m
- 5-8 storeys – 18m
- >8 storeys – 24m

For thin profile buildings with enclosed no-vision access corridors, the required separation is half the above values. Note that where these lower values are used there cannot be cross ventilation through an access corridor.

Non-compliant building separations are shown in red text in the diagram below. The number in brackets indicates what a complying separation would be in that location. Compliant separations are not highlighted.



Further, the building envelopes are too deep for the side boundaries not to include windows to habitable rooms meaning compliant separations must be achieved for visual privacy. Consideration should also be given to providing a larger separation to the north of the substation (Building 8AB3) to provide windows.

**Overall, the built form should be adjusted so that non-compliant separations be made compliant and the corresponding reference scheme must demonstrate this.**

### Wind

Supporting documentation relating to wind impacts does not allow a comprehensive understanding of the comparison of impacts between the existing approved envelopes and proposed envelopes.

Wind studies should provide 5% exceedance speed data for comfort and data for safety, so it is possible to do a proper comparative analysis with the current Design Guide. Further, test locations in surrounding streets and parks need to be included in testing to understand the impact of the development.

Based on the submitted documentation, it is indicated that **wind conditions have worsened on George Street with fewer locations suitable for sitting which is the anticipated use.** There were not enough test points within the location of the future park and suitable conclusions are not able to be made. Further, there is insufficient testing in Waterloo Park except for some results indicating worsening conditions to walking, and not enough test points have been considered within the new small park to provide sufficient data.

At a minimum, concept envelopes should be informed by comprehensive wind assessments and ensure the following:

- That the wind environment on George Street is not made worse than the current Design Guide
- Comfort (walking - the 5% exceedance is not more than 8m/s) conditions are achieved at the base of all towers
- At least 50% of each park is suitable for sitting

### Noise

**The proposed envelopes included along McEvoy Street show wide frontages that are at the threshold of being too high to manage noise using acoustic plenums.** Building envelopes should be amended to instead provide thin-profiled single sided-buildings for the first 6 storeys where nighttime exposure is >60dB(A). This is demonstrated in the proposed built form of building 8AB2 whereas buildings 9AB1 and 10AB1 are unlikely to achieve acoustic comfort. This is more likely to achieve acoustic amenity and natural ventilation simultaneously and be consistent with ADG objective 4B-1.

Further, acoustic reporting must address the capacity of the proposal to achieve compliance with the NSW State Environmental Planning Policy (Transport and Infrastructure) 2021 and accompanying Interim Guideline in addition to the site specific Design Guide inclusions currently under 8.11. which includes references to the ADG, SDCP 2012 and the City of Sydney Alternative natural ventilation of apartments in noisy environments (draft).

Comprehensive acoustic and natural ventilation reporting is to be provided to enable assessment and to inform the Concept reference scheme, the design excellence strategy, the invited design competitive processes, and detailed

applications on how to mitigate noise to achieve the windows open criteria from first principles.

#### Solar access and daylight to public spaces

The proposed amended design redistributes solar access to public places which now reduces solar access to more important places including George Street, John Street and the new small park, which less important public places like Cooper Street and Pitt Street are provided with increased solar access.

Similarly, the daylight (sky view) levels follow a similar pattern and results in a diminution of light in George Street, which is of particular concern.

This is not supported and **the built form should be modified to ensure that there is no reduction of solar or daylight access to George Street or park spaces relative to the current Design Guide.**

#### Solar access to built forms

The proposed envelopes currently do not demonstrate that at least one of the buildings within the blocks achieve direct solar access compliance. Envelopes must be amended to ensure that all future reference scheme buildings achieve a minimum of 70% of apartments receiving at least 2-hours of direct solar access in mid-winter.

#### Overshadowing of neighbouring buildings

The submitted documentation indicates that only three sites have been formally modelled however, all sites appear to be below the established threshold (2 hours of solar access to at least 70% of apartments) and results in a poorer outcome than what the existing Design Guide anticipates.

**Built forms must be modified to ensure that there is no reduction of solar access to neighbouring residential buildings relative to the current Design Guide and where neighbouring buildings have <70% of apartments receiving 2 hours of sun in mid-winter the number of apartments achieving 2hrs should not be reduced.**

#### Private communal open space

The application allocates private communal open space per Block with some blocks being allocated a significantly lower amount than what is required by the ADG and SDGP. The concept should not establish communal open space areas lower than what the standard provisions are, particularly in Blocks 8 and 9.

## **7 Transport and Access**

#### Vehicle Access Locations

There are some **inconsistencies between the submitted Transport Study and the Design Guide**. The Transport Study does not show a vehicle access into Block 4A from West St, while the latter does. Additionally, the Transport Study does not show access into 2A, 2B or 2E, while Design Guide shows two access points. This should be clarified in documentation.

Further, the Transport Study indicates that driveways are much wider than driveway widths recommended by the City. **Street design should prioritise pedestrian safety and the driveway widths should be reduced as much as possible, preferably to a maximum of 6m.** This can generally be achieved by:

- Two-way yield driveway: Combining into a single lane serving both entry and exit, with movements controlled via signal. Entering vehicles given priority, while exiting vehicles can wait in a waiting bay. AND/OR
- Allowing entering and exiting vehicles to cross the centreline, which allows them to swing wider and enter the driveway from a more perpendicular angle.

Vehicle entries should generally be designed in accordance with the relevant provisions of the SDCP 2012, including distance from other driveways and intersections. Additional recommendations for vehicle entry locations are as follows:

| Block    | Recommendation                                                                                                                                             | Notes                                                                                                                                                                                                                                                                                         |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Block 3  | Offset from Block 8 access location                                                                                                                        | Vehicle access is not to be located opposite a busy driveway for a distance of 6m beyond the alignment of the driveway edges or within 15m of the alignment of an intersection where the proposed vehicle access is to be used by service vehicles                                            |
| Block 4  | Consolidate into one location OR narrow and separate driveways                                                                                             | Block 4 shows two access points; one for service vehicles (10m) and the other for residential parking (7m). These are both excessive and disrupt the pedestrian experience along the footpath. Update to either combine into one driveway or narrow both driveways to 5m and 6m respectively. |
| Block 5  | Location ok, narrow width.                                                                                                                                 | Careful consideration should be given as to the proximity of the entry location to Wellington Street, promoting unlawful turning. Further discussions with the City are recommended.                                                                                                          |
| Block 8  | Entry from John:<br>Consolidate into one driveway and offset from Block 3 access location<br><br>Exit to Cooper Place;<br>Update Design Guide to show this | Figure 50 of Transport Study shows that Block 8 relies on vehicle exit onto Cooper Place, however Design Guide only shows vehicle access from John St. The exit onto Cooper Place may be supported but only if safe to do so and in a forward direction. Further confirmation is required.    |
| Block 9  | Two accesses supported, but separated by at least 2m                                                                                                       | Separating residential and loading access is supported as it allows for a two-way yield driveway for the service vehicles (5m).<br><br>Proposed driveways need to be at least 2m apart, as per DCP 3.11.10.                                                                                   |
| Block 10 | Narrow width of driveway to 6m                                                                                                                             | Proposed width is 8m. Swept paths allow for B99 to exit and enter simultaneously, which is excessive, as given slow speeds and low volumes (~50 veh / hr based on their trip gen rate of 0.14 trips per dwelling).                                                                            |

### Site loading

The proposed Design Guide confirms that the rates for loading and service vehicles required by the SDCP 2012 apply to the site.

The submitted Transport Study however, notes that “*Each block shall meet the minimum recommendations of the TfNSW Freight Forecaster as outlined in Table 9*”.

As the TfNSW forecaster model is more appropriate for the subject land uses, particularly in regard to the proposed supermarket, it is recommended that reference to the DCP is replaced with reference to the TfNSW model.

### George Street and McEvoy Intersection

The **desired future character of George Street is to be of a high street in nature. The proposed cul-de-sac design of the southern end of George Street at the McEvoy is not conducive to a local main street character and is recommended to be designed to allow for a left-in, left-out option.** Further, a cul-de-sac design requires a larger turning circle, reducing the widths of footpaths and landscaping, and requires larger service vehicles including waste vehicles to complete complicated turns to return north along George Street.

It is acknowledged that further analysis requires to be undertaken to ensure there are no adverse safety impacts to the existing bicycle network however, appropriate traffic impact modelling should be undertaken in this application to demonstrate an acceptable impact.

The Design Guide and accompanying documents should note the preferred option and prioritise the delivery of this design to avoid a separate approvals process in the future.

### Bicycle parking

As there is an increase in usership of e-bikes and cargo bikes, it is recommended that the Design Guide be updated to include a requirement that end of journey and bicycle storage areas must be designed in accordance with AS2890.3 relating to bicycle storage design however should increase the percentage of storage facilities for horizontal bike storage to 50%.

## **8 Flooding**

A precinct-wide Flood Impact Risk Assessment, prepared by GRC Hydro, dated April 2026 has been submitted. It has used the latest 2023 version of Councils TUFLOW hydraulic model of the Alexandra Canal catchment. The assessment has concluded that the proposed development will not be affected by flooding or worsen flooding on adjoining properties subject to proposed future buildings and entrances to basement parking areas being elevated above the appropriate Flood Planning Levels (FPL) for each proposed land use.

The concept proposal identifies the land bounded by Raglan, George, Cope and Wellington as a "Park Stage". This location adjoins Cope Street which is significantly affected by flooding. **There would appear to be an opportunity to incorporate on-detention infrastructure within the park that would lower downstream flood levels along Cope Street and improve flood conditions for surrounding areas.** This also then allows future design for on-site detention and retention for water re-use and irrigation. **The applicant is encouraged to discuss this matter further with the City** noting that on-site detention is subject to the design of the future park ensuring the park provides flexibility in uses and the park is not solely designed to be a detention basin.

Additionally, the FIRA identifies the need to maintain areas of land on Block 8 as an "overland flow path" in order to maintain existing flood paths through the site from George Street to John Street. It recommends lowering this land to RL16.6m AHD. This level will need to be established and maintained on title through an appropriate legal instrument preferably an easement or similar restriction. This may also have an impact of the design of building envelopes in this area as building setbacks at the ground level may need to be incorporated to provide this flood path.

## 9 Stormwater

This application has submitted a detailed stormwater concept plan that outlines compliance with Sydney Water specified stormwater quantity controls and the MUSIC Link storm water quality reduction targets. The concept relies on connecting site stormwater runoff to the Sydney Water trunk drainage system in Cope Street which will need the concurrence of Sydney Water as the Asset owner.

The stormwater management concept plan generally relies on introducing a number of new stormwater inlet/connection pits to match and improve the surface flow characteristics within the precinct. This will improve general overland flow for more frequent storm events however may result in earlier surcharging at the trunk drainage connection point in Cope Street. This concept is considered acceptable subject to Sydney Water approval of the storm water connections.

The lower (western) extent of the precinct is significantly affected by flooding along Cope Street with depths of water between 1m (1%AEP) and 2m (PMF). As noted above in the 'Flooding' section, there is an existing overland flow path from the trapped low point at the southern end of George Street at its intersection with McEvoy Street through private property to John Street at its intersection with Cope Street. The application must address this low point and amend the envelopes to maintain it.

## 10 Public Domain

**The City has been working through the design of the public domain discussing issues with the proponents at regular Public Infrastructure Working Group (PIWG) meetings chaired by DPHI as required by the VPA.**

The comments provided below have been discussed at these meetings and in the most part agreed to by all parties. However, some issues remain and require further discussions with the proponent before a final position is agreed.

**No consent should be granted to any public domain plan or public domain design in the Design Guide without formal endorsement by the City.**

The City encourages further discussions through the PIWG to address comments raised in this submission prior to the lodgement of any response to submissions.

The public domain design must be in accordance with the City's Streets Code, Public Domain Manual, Technical Specifications and all other relevant Council policies and guidelines. Comprehensive advice and public domain design expectations are provided in response to the submitted Public Domain and Landscape Report in Appendix 2.

Where recommendations are made in response to the Public Domain and Landscape Report, appropriate amendments should also be made to the Design Guide.

In regard to street design, while the general layouts of streets are supportable, the following recommendations are made and should be implemented in amended documentation:

- All locations
  - All street sections were tested with a 9.25m waste truck, not the City's 10.6m waste truck. The layouts need to be checked with the updated truck specs, paying particular attention as to whether the larger truck overhangs the footpath.
  - All drawings should show zebra line markings on raised crossings. As shown, it's unclear if they are speed humps or formal crossings.
  - All raised intersections throughout the precinct should have zebra crossings on each leg.
  - Raingardens require further analysis and design development (eg topographical, hydrological, water quality etc). It is assumed that a better outcome would be to disperse the raingarden WSUD elements throughout the precinct to correspond to different catchment areas of each street
- John Street
  - The street should be narrowed from 8.3m closer to 6.2m, to address cars passing too quickly, and to bring trees closer to the centre of the road
- Cooper Street north
  - Should be designed as a street not a shared zone as implied in the materiality diagrams in the Public Domain and Landscaping report
  - The kerb return on the east side north of the driveway should be chamfered, rather than at right angles.
- Cooper Street south
  - Road design is confusing for users. There are two parallel shared zones (6m on west and 3.9m on east) separated by landscaping, however only the 6m shared zone connects to John Street.
  - Eastern shared zone is designed as a pedestrian-only space and delineated either with kerb and gutter, furniture or different surface treatment.
- Cooper Place
  - The loading zones on the north-south sides should be marked so it is clear they are not traversable spaces. This would mean they would act as horizontal deflection with vehicles having to 'wobble' a little around them, slowing them down.
- Mead Street
  - Align pedestrian crossing with through-site links.

## 11 Remediation

The submitted Overarching Remediation Action Plan (O-RAP) provides a comprehensive remedial strategy to support the Concept application and future stage-specific works. Stage-specific Remedial Works Plans (RWPs) will be prepared as design plans for each stage become available and submitted with subsequent detailed planning application, as required. The O-RAP establishes the overarching strategy, outlines additional required work, and provides a framework for remediation, validation, and contingency measures in individual RWPs. Each

RWP will address site-specific remediation requirements necessary to render the land suitable for its intended use.

Based on the assessment of remedial options, the preferred approach for managing impacted fill is on-site containment. The O-RAP does not differentiate land to be dedicated to Council.

**Land to be dedicated should be fully remediated or have a cap of minimum 1.5m of clean fill between the containment cell and the surface level. It should be noted that the existing VPA does not allow the proposed remediation method to be applied to land that will be transferred to land. The O-RAP should be updated clarifying this.**

Further, the O-RAP must be updated to address remediation within the Notional and Structural Root Zones of retained trees, as the current approach requiring a minimum 0.5m clean fill across landscaped areas is not appropriate where existing trees are to be retained

## 12 Public Art

In general, the City supports the masterplan approach outlined in the submitted Preliminary Public Art Masterplan to satisfy the Design Guide requirement for a public art strategy, noting that \$9.2 million has been proposed as the indicative budget for the plan. There are, however, several amendments recommended to the masterplan to ensure the plan fulfils the objectives of the Design Guide.

- The plan should note that successful public art requires collaboration between architects, landscape architects, artists and community members, and should indicate that adequate provision for collaborative design team meetings, detailed design documentation for public art integration and coordination of design teams will be included in all stages across the development.
- As per Design Guide provision 1b), existing public art in the Waterloo South precinct and surrounding area should be identified and mapped for this plan to guide future plans and commissions.
- Additional information on Project Delivery is required. The City notes that the proposed locations for public art will be within private land site boundaries. The Plan should outline how public art planning will be delivered over the 30-year lifespan of the project including review and approval by the City of Sydney Public Art team. It is recommended that in line with the Design Guide provisions, that the Plan note that a Preliminary Public Art Plan is required to be prepared for each of the 6 stages of development to align with the Waterloo South Design with Country Framework and the development approval of the buildings and public domain in each stage, and that Detailed Public Art Plans will be submitted for approval prior to the relevant Construction Certificate in each stage, and that inspections will be undertaken and a Final Public Art Report submitted for approval prior to Occupation Certificates being issued for each stage.
- The project governance page (p.61) illustrates stakeholders, but it is not shown how projects will be developed, how artworks will be integrated into the public domain, and who will be responsible for the coordination of team inputs into the final detailed documentation, whether architectural, public domain and landscape plans, and who will own and maintain works at the completion of each stage. Additional information is required to guide the commissioning, delivery and future ownership and maintenance of artworks.

- The Precinct Public Art Budget (p.42) should be expressed as a % cost of construction and include a note that each Preliminary Public Art Plan submitted with each stage will be updated with a budget dollar figure targeting around 1% cost of construction at the time of the submission being lodged.

### 13 Waste Management

The Concept application was accompanied by a Concept Waste Management Plan which is deemed generally acceptable however, some aspects of the Plan require amendments to ensure consistency with relevant Council Guidelines and practice. All future developments must be designed to provide adequate waste storage areas and waste collection vehicle clearance spaces and should be reflected in the Design Guide.

The application assesses vehicle movements based on a 9.25m heavy rigid vehicle. This is a significant issue as the City's standard waste collection vehicle is sized 10.6m. **All future detailed applications and swept path analyses must be amended to accommodate the 10.6m waste vehicle to ensure functional access and egress across the precinct.**

### 14 Other

#### Subdivision

A draft plan of land subdivision should be included in the Design Guide

### Reference Scheme

### 15 Reference Scheme Design

In consideration of comments above, it is likely that the reference scheme design will change considerably when recommended envelope amendments are incorporated. Notwithstanding, the following comments are provided in response to the submitted reference scheme and matters to consider in the design of any amended reference scheme.

#### Natural Cross Ventilation

It is unclear how the figures on page 61 of the Urban Design Report are achieved as a review of the reference scheme indicates these levels cannot be met. It appears **some apartments rely on small gaps between the building to achieve natural ventilation just as open breezeways indented within buildings.** If relying on this design feature to achieve cross ventilation, **this also presents a privacy issue between apartments.**

The built form should be modified to ensure that all future reference scheme buildings achieve 60% of apartments achieving natural cross ventilation without ventilating across common circulation and where there is a building gap as part of the ventilation path that it is at least 6m wide.

#### Number of Apartments per Floor

Careful consideration should be given to the number of apartments off a circulation core as some buildings within the reference scheme exceed the design criteria in Objective 4F-1 of the ADG.

Should you wish to speak with a Council officer about the above, please contact Marie Burge, Senior Planner, on 9288 5850 or at [MBurge@cityofsydney.nsw.gov.au](mailto:MBurge@cityofsydney.nsw.gov.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G Jahn', with a large loop at the end.

**Graham Jahn** AM LFRAIA Hon FPIA  
**Chief Planner / Executive Director**  
City Planning | Development | Transport

## Appendix 1 – Design Guide Recommendations

| Section                              | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>3. Urban strategy</b>             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Figure 2                             | Add legend to figure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>4. Staging and implementation</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Figure 4                             | An easement is to be shown at the south of Block 8A from the small park to an adjoining street to address flooding and reduce the risk of entrapment. This is suggested in Figure 151 of the Public Domain and Landscape Report. All other relevant figures in the Design Guide are also to be updated.                                                                                                                                                                                                                                                       |
| 4.2(2)(c)                            | Include 'educational establishments' in discussion of distribution of non-residential floor space.                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>5. Land use</b>                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Figure 5                             | Reinstate 'Park' to legend                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 5.3.4                                | Reinstate requirement of active frontages to be consistent with Active Frontage controls of SDCP 2012                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>7. Public Space</b>               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 7.1(1)                               | Deletion of "City of Sydney" and inclusion of "prepared by Aspect Studios dated February 2026" is not supported. This is not consistent with the requirements of the VPA. While the VPA sets out a process for a to develop the design of the roads, any design is to be consistent with the City Design Guide and specifically with the City of Sydney Waterloo Estate (South) Public Domain Concept Plans referred to in that document. It is understood a Public Infrastructure Working Group has been established to guide the development of the design. |
| 7.3.2(3)                             | <p>The inclusion of the proposed wording implies that any changed traffic arrangements would be at the City's or TfNSW's cost. If the parties agree to these changes in a timely manner, the works should be incorporated with other public domain works.</p> <p>Text change suggested from "left turn into George Street" to "left-in/ left-out arrangement at George Street" which reflects the City's intention to pursue with Transport for NSW in ongoing discussions.</p>                                                                               |
| Figures 8(a) – (h)                   | <ul style="list-style-type: none"> <li>Replacement of street section drawings not supported. Drawings should include context of adjoining buildings from ground to at least two storeys above street wall. Proposed drawings fail to communicate any information relevant to building design or assist in understanding the quality of the public domain. All typical building sections must be</li> </ul>                                                                                                                                                    |

| Section                                    | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                            | <p>reintroduced, accounting for known flood planning levels, privacy provisions at ground level. This is to ensure the Design Guide clearly informs the desired built outcome.</p> <ul style="list-style-type: none"> <li>• Include John Street section (with noted amendments)</li> </ul>                                                                                                                                                                                                                                           |
| Figure 9                                   | Add notation at intersection of George /McEvoy Streets “Potential left-in/ left-out”                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 7.3.4                                      | Add through-site link from small park to George/McEvoy as per discussion in Figure 4 above. Table to be updated to include details of additional through-site link.                                                                                                                                                                                                                                                                                                                                                                  |
| 7.4                                        | <p>Include canopy cover targets:</p> <ul style="list-style-type: none"> <li>• 15% in private property</li> <li>• 70% within streets</li> <li>• 55% within neighbourhood parks</li> <li>• 70% within pocket parks</li> </ul>                                                                                                                                                                                                                                                                                                          |
| <b>8. Building layout, form and design</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| General objectives                         | Include requirement to achieve apartment mix described in the SDCP 2012                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 8.2(4)                                     | Deletion not supported. Communal open space and associated structures and lifts are to be compliant with height controls.                                                                                                                                                                                                                                                                                                                                                                                                            |
| 8.3                                        | <ul style="list-style-type: none"> <li>• Reinstate ‘Upper level setback’ definition.</li> <li>• Removal of all references to upper level setbacks above street wall heights are not supported. Reinstate controls to upper level setbacks and relevant figures. All relevant drawings throughout the Design Guide should be updated to include built forms with these setbacks.</li> <li>• Add provision that awnings and colonnades must be designed in accordance with the relevant design provisions of the SDCP 2012.</li> </ul> |
| 8.5.3                                      | Reinstate ‘continuous, unbroken’. This design feature is necessary to mitigate noise impacts from McEvoy Street                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 8.11(1) and (4)                            | Deletion not supported                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 8.12                                       | General                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

| Section          | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  | <ul style="list-style-type: none"> <li>Amendments to this section are not supported. Comments below are in response to existing approved Design Guide</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 8.12.1(3) – (5)  | Replace these provisions with confirmation that no bonuses are applicable to any site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 8.12.2           | <p>The standalone Design Excellence Strategy should not be approved or endorsed, and all design excellence strategy provisions should be contained within the Design Guide. Standalone Design Excellence Strategies are only relevant where a competition exemption is pursued, and an Alternative Design Excellence Strategy is required to be prepared. The City's Policy sets out an alternative design review process (in lieu of a competition) for social and affordable housing. It applies to Waterloo South and has been included in these recommendations.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 8.12.2 (1) – (4) | <p>Replace with the following:</p> <ol style="list-style-type: none"> <li>(1) Separate invited Competitive Design Processes are to be undertaken for each competitive design process site as shown in Figure 20: Competitive design process sites.</li> <li>(2) Competitive design process sites 'G', 'L', 'O' and 'P' are to include a minimum of five competing architects owing to the impact of tower buildings. All other competitive design process sites are to include a minimum of three competing architects.</li> <li>(3) Where buildings are to be used partly or wholly for Aboriginal, social or affordable housing: <ol style="list-style-type: none"> <li>a all competitors are to be from local or national Australian firms with Aboriginal heritage expertise, including but not limited to an architect with Aboriginal heritage expertise as the Design Lead</li> <li>b competitors are to have demonstrated experience working with Aboriginal communities or in the design and delivery of Indigenous projects</li> <li>c the competition brief is to address the design of those housing types and be prepared with the advice of an Aboriginal expert who has demonstrated knowledge and expertise in those types of housing.</li> </ol> </li> <li>(4) Invited competitors, including emerging practices, are to have demonstrated capabilities in design excellence by being the recipient of an Australian Institute of Architects architecture award or commendation or, in the case of international competitors, the same with their equivalent association.</li> <li>(5) Each competitor must be a person, corporation or firm registered as an architect in accordance with the NSW Architects Act 2003 or, in the case of interstate or overseas competitors, eligible for registration with their equivalent association.</li> <li>(6) A minimum of 50 per cent of invited competitors must be Australian based architects.</li> </ol> |

| Section | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|         | <p>(7) Each competitive process site should include a mix of emerging and established architectural practices.</p> <p>(8) A balanced gender mix within each competitors' design and leadership teams is encouraged.</p> <p>(9) The role of any Executive Architect appointed is to coordinate design development between individual buildings within each street block which have been the subject of separate competitive design process/optional alternatives design review processes. An Executive Architect must be a winner of a competitive design process within the same block.</p> <p>(10) Jury composition is to be in accordance with the policy/guideline requirements of the relevant consent authority.</p> <p>(11) Optional alternative design review process – social housing and affordable housing</p> <ul style="list-style-type: none"> <li>a Eligible development is development for the purposes of social and affordable housing with no market or other types of housing included. Non-residential floor space on the ground and first floor may be included where required for noise affected sites.</li> <li>b Eligible community housing providers must be not-for-profit and registered as Tier 1 or Tier 2 in the National Register for Community Housing Providers maintained by the National Regulatory System for Community Housing. Other community housing providers and Tiers may be considered, subject to endorsement by the City.</li> <li>c This section applies to eligible development by eligible community housing providers where a competitive design process is required.</li> <li>d For eligible development of social and affordable housing by an eligible community housing provider, the requirement for a competitive design process may be satisfied by undertaking an architectural design competition or an alternative design review process where: <ul style="list-style-type: none"> <li>i an architect, that is the recipient of an Australian Institute of Architects award or commendation, is appointed by an eligible community housing provider to prepare a development application</li> <li>ii a Design Excellence Strategy, addressing the matters set out in 2.2 of the City's Competitive Design Policy, is approved by the consent authority</li> <li>iii an independent design review panel (panel) is established before development application lodgement to review and provide design advice to the consent authority</li> </ul> </li> </ul> |

| Section              | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|                      | <p>on the initial concept and on the developed proposal and how it has addressed the panel's advice</p> <p>iv a statement from the panel is submitted with the development application setting out how the proposal demonstrates the potential to achieve design excellence under 6.21C(2) of the LEP</p> <p>v the panel comprises:</p> <ol style="list-style-type: none"> <li>1 three or five members nominated by the consent authority</li> <li>2 a majority of registered architects, with all members from the State Design Review Panel or the City's Design Advisory Panel</li> <li>3 at least one member of the City's Design Advisory Panel</li> <li>4 for Aboriginal housing, the panel is to have Aboriginal representation</li> </ol> <p>vi The decision of the panel will not fetter the discretion of the consent authority in its determination of any subsequent development applications associated with the development site.</p> <p>vii No other provisions of this Policy apply to this section, except for sections 2 Design Excellence Strategy and 13 Design Integrity, where:</p> <ol style="list-style-type: none"> <li>1 <i>competitive design process</i> in section 2 is taken to be a reference to the alternative design review process set out here</li> <li>2 designer of the winning scheme (as chosen via the competitive design process) in 13.1 and winning architect in 13.2 is taken to be a reference to the architect appointed by the community housing provider.</li> </ol> |
| 8.1.2(5)             | Retain existing provision (5) relating to ESD and renumber to (12)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Figure 20 (existing) | <p>Retain image and update to:</p> <ul style="list-style-type: none"> <li>• clearly define the boundary of each competitive design process site within each block</li> <li>• number each block to relate to the balance of the Design Guide</li> <li>• ensure the legend corresponds to the updated Figure noting that the lettered figure is not defined</li> <li>• be generally equivalent to the extent and number of sites as per Figure 20 of the Design Guide 2022</li> <li>• identify the sites dedicated to market, social and affordable housing.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

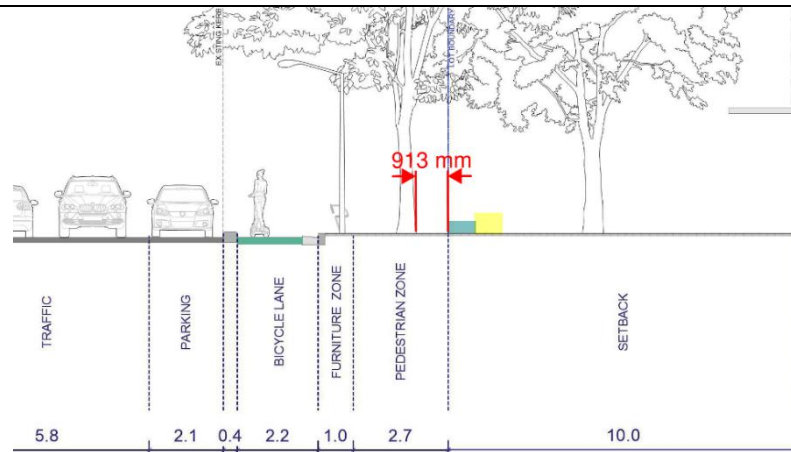
| Section                                            | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <b>9. Transport, movement and parking</b>          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 9.1                                                | <ul style="list-style-type: none"> <li>• Include reference that the provision of loading spaces must be consistent with TfNSW's Urban Freight Forecasting Model</li> <li>• Include a requirement that bicycle parking must be provided within developments in accordance with the SDCP 2012</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>10. Urban ecology</b>                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Provisions                                         | <ul style="list-style-type: none"> <li>• Canopy cover targets as per comment in Section 7.4</li> <li>• Include minimum soil volume targets</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>11. Environmentally sustainable development</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 11.2.2                                             | Include a provision that all blocks must be designed to accommodate the City of Sydney's standard waste collection vehicle size (10.6m) and a minimum vertical clearance of 4m                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>12. Stormwater and flood management</b>         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Figure 19<br>(previously Figure 22)                | <ul style="list-style-type: none"> <li>• Replace reference to 'Bioswale' with 'Raingarden'</li> <li>• Raingardens should be shown on both the northern and southern sides of John Street</li> <li>• Raingardens require further analysis and design development (eg topographical, hydrological, water quality etc). It is assumed that a better outcome would be to disperse the raingarden WSUD elements throughout the precinct to correspond to different catchment areas of each street</li> <li>• Overland flow path arrow shown between 8A and 8C from the intersection of George and McEvoy Streets is not possible given the building footprint abuts the Ausgrid substation. This causes extra flooding on the substation lot which is against Objective (b) of Section 12 Stormwater and flood management</li> <li>• Include reference to possible detention basin in new park</li> </ul> |

## Appendix 2 – Public Domain and Landscape Report Recommendations

| Section                             | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| <b>4. Public Domain Approach</b>    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Figure 73 – Street Typology Diagram | Through-Site Link is shown running east-west along northern boundary of the existing substation. This is inconsistent with the landscape plans and needs to be amended.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Figure 77 – Active Edges Diagram    | Update to show Public Plaza located on private land on the western side of Mead Street south of the small park as per Open Space Diagram                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Figure 78 – Materiality Diagram     | <ul style="list-style-type: none"> <li>• Extend concrete unit pavers on northern side of park</li> <li>• Shared Zone Trihex paving on Cooper Street North <ul style="list-style-type: none"> <li>○ Cooper Street North is not a shared zone</li> <li>○ Trihex shared zone pavement on road and path with kerb and gutter is not supported. Footpath reads the same as carriageway and is confusing for the user especially moving from Cooper St South and with a raised platform at either end</li> <li>○ This Type 2 shared zones (with kerb and gutter retained) typically is only acceptable as retrofit solution when footpath is non-compliant.</li> <li>○ Design solutions options: <ul style="list-style-type: none"> <li>▪ raise street to completely achieve design intent linking the two parks<br/>or</li> <li>▪ retain kerbs, change road material to asphalt and footpath to concrete/concrete unit pavers to reinforce separation between pedestrians and vehicles – this option achieves a simple low speed street rather design legible as such</li> <li>▪ add threshold treatment at entrance from John St (pavers/ cobblestones) or just let the raised platform at Cooper/ John streets be the threshold treatment</li> <li>▪ 10km/h speed limit applies for a shared zone design, otherwise it should be 20/km/h</li> </ul> </li> </ul> </li> </ul> |

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|                                                            | <ul style="list-style-type: none"> <li>▪ details to be reviewed in RSA process</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 4.7 Street Trees                                           | <ul style="list-style-type: none"> <li>• Generally, the City does not support the location of proposed trees.</li> <li>• While the proposed tree locations meet Sydney Water technical requirements, they are contrary to the City's greening and street design policies. This issue has been discussed at the technical meetings with the proponent and will be subject to future discussions.</li> <li>• The design proposes:             <ul style="list-style-type: none"> <li>○ small canopy sizes</li> <li>○ trees away from the road and closer to lot frontages</li> <li>○ placing trees in unusual locations to avoid services</li> <li>○ omitting trees altogether in several locations</li> </ul> </li> <li>• The City's objective is to have the greatest canopy cover possible. This is achieved by:             <ul style="list-style-type: none"> <li>○ selecting tree species with large canopies – aligning with the City's Street Tree Masterplan</li> <li>○ positioning trees as close to the centre of the street as possible – utilising inroad planting, parking lanes and kerb extensions</li> <li>○ regular spacing along corridor</li> </ul> </li> <li>• Awnings and basement boundaries are to be modified to retain the highlighted existing street trees</li> <li>• Proposed trees need to follow the City's Street Tree Masterplan</li> </ul> |
| 4.8.2 Through-Site Links                                   | Through-site links protected by easements must be shown at the south-east or south-west corners of Block 8 to avoid entrapment. Figures throughout this document and the Design Guide are inconsistent in showing locations of access areas in this location. At minimum, an indicative through-site link should be shown in this location subject to future design.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Figure 146 Primary Thresholds from Public to Private Space | 'Landscape setback' and 'Publicly Accessible Spaces' are not consistent with previous diagrams                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| <b>5. Design Guidelines</b>              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| Figure 151 Land Dedication and Easements | Additional Public Access/Easement/Through-site Link at south of Block 8 to be clarified throughout document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 153 Proposal Street Network Diagram      | <ul style="list-style-type: none"> <li>• Add 'Cooper Street' name on the diagram at Figure 153 and others.</li> <li>• Correct inconsistency - West Street is shown as narrowed where the existing lots are retained, Cooper Street North is not.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 5.3.1 – 5.3.10 Street Sections           | <p>General</p> <ul style="list-style-type: none"> <li>• No detailed plans are shown for the individual streets, so this review refers to and consolidates the comments for the plans on page 36, 37, 40, 44</li> <li>• Raised platform intersections on John and Wellington streets need to include formal pedestrian or combined crossing line marking to give priority to people crossing. E.g. Wilson and Shepherd in Redfern with Zebra crossing.</li> <li>• Show awnings in sections</li> <li>• Show section location plan in Design Guide</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 5.3.1 George Street                      | <ul style="list-style-type: none"> <li>• Include formal pedestrian and bike crossings over John St</li> <li>• Proposed tree planting to be within parking lane i.e. closer to the centre of the road, at approximately 15m centres. A typical set out would be a 3m planter bed between two parking spaces (6m+6m)</li> <li>• Noting that the 'swale' on George Street (as shown in the Design Guide) has been relocated to John Street with the potential for it to be dispersed across the precinct in future</li> <li>• Provide pedestrian crossings, kerb extensions and trees/plants in the parking lane in the northern section of George Street between Raglan and Wellington streets. This part of the design is underdeveloped</li> <li>• The proposed landscape treatment of Block 9A (and to a lesser extent 9B) at the interface with the eastern side of George Street is not acceptable. Planting and a level change has been pushed to the edge of the lot which in turn narrows down the available footpath width. This is most notable at the pinch points created by the retained existing street trees where the path appears to narrow to 900mm to the lot boundary. The street sections don't show the on-lot interface design but should.</li> </ul> |



- In plan show the proposed opening at the southern end of George Street to allow a left turn in from McEvoy Street as previously requested by the City. Include a revised street layout north of the intersection factoring in the changed conditions for the turning head. Liaise with TfNSW and the City to satisfy their requirements.

### 5.3.2 Wellington Street

- The Wellington Street sections are not acceptable
- Parking does not fit in the cross section on northern side of the road.
- Parking does not fit in the cross section east of Pitt Street.
- Cycleway is sufficiently wide
- The original Design Guide, that showed parking on both sides of the road, was produced without a survey and therefore without an accurate dimension of the road corridor.
- Applicant is to include the indicative design of the northern side of the street (outside precinct boundary) in the section, as this will influence the design of the southern side of the street that is within the precinct boundary.
- Refer to Wellington Street design discussed in the PIWG meetings. Sections also described below:
  - George to Pitt - No Buses
    - 2+0.4m cycleway

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|  | <ul style="list-style-type: none"> <li>▪ 2.75+2.75m travel lanes</li> <li>▪ 2.1m parking (south side)</li> <li>▪ 2+0.4m cycleway</li> <li>○ Pitt to Gibson - Typical with Buses <ul style="list-style-type: none"> <li>▪ No parking</li> <li>▪ 2.6+0.4m cycleway</li> <li>▪ 3.2+3.2m travel lanes</li> <li>▪ 2.6+0.4m cycleway</li> </ul> </li> <li>○ Bus stop east of Pitt intersection <ul style="list-style-type: none"> <li>▪ No parking</li> <li>▪ 1.8+0.4m cycleway</li> <li>▪ 3.1+3.1m travel lanes</li> <li>▪ 2.5m bus stop</li> <li>▪ 1.5m cycleway</li> </ul> </li> <li>○ Pitt intersection to Bus stop <ul style="list-style-type: none"> <li>▪ No parking</li> <li>▪ 1.8+0.4m cycleway</li> <li>▪ 3.2+3.2m travel lanes</li> <li>▪ 2+1.8m cycleway</li> </ul> </li> <li>• Bus stop location has been changed from the existing location. It is now further east and closer to the stop near Elizabeth Street. Proponent to coordinate location with TfNSW.</li> <li>• Raised platform intersection needs to include formal pedestrian crossing line marking to give priority to people crossing.</li> </ul> |
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|                           | <ul style="list-style-type: none"> <li>• Show the recently completed cycleway works between Cope and Geroqe streets as the existing condition in all plans. E.g. cycleway has priority over Cooper and George streets intersections, and there are two pedestrian crossings at the Cope Street intersection.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 5.3.3 Pitt Street         | <ul style="list-style-type: none"> <li>• Provide section of northern Pitt Street</li> <li>• Review alignment of Pitt Street north and south of Reeve Street</li> <li>• Include trees in parking lane</li> <li>• Resolve circulation around retained existing tree in footpath at the intersection with John Street</li> <li>• The eastern boundary with Waterloo Park needs further review and refinement. Planting is covering the existing entrances to the play and sport areas. The boundary line itself appears to be incorrectly drawn and overlaps the basketball court</li> <li>• The sections need to be reviewed for accuracy. Include the adjacent park elements, eg. entrance, steps or retaining walls for the play/sport areas for context.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 5.3.4 Cooper Street North | <ul style="list-style-type: none"> <li>• As road alignment is proposed to be changed, include design resolution for area east of Block 2A, eg paving, trees etc. Materiality page current shows as “As existing (outside private lot)” which is incorrect.</li> <li>• Trihex shared zone pavement on road and path with kerb and gutter not supported</li> <li>• Confusing for the user especially after leaving Cooper St South. Refer to Materiality comments above.</li> <li>• Unless the street is made an official shared zone, the traffic speed is to be a 20km/h not 10km/h as proposed.</li> <li>• Tree locations not supported.</li> <li>• Swept path out of driveway should be run with a 10.6m waste vehicle. As raised at PIWG meeting and related drawings, a 800mm overhang on a 2m footpath is significant and dangerous. Possibly widen driveway to the south such that the vehicle body remains within the carriageway (mirrors are acceptable to overhang).</li> <li>• Chamfer kerbs that are cut short to enable turning movements out of driveway.</li> <li>• Option to move the southern portion of the street further to the west, this slows traffic and aligns better with Cooper Street South over John Street.</li> </ul> |

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|                           | <ul style="list-style-type: none"> <li>Planting on the eastern side of the road just north of the driveway entrance, extends the narrow 2m path for longer than needed. It is suggested that the planter narrows to run parallel with the kerb.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 5.3.5 West Street         | <ul style="list-style-type: none"> <li>Kerb alignment is crooked. Align with Mead Street.</li> <li>Stagger trees in plan so that one side is half offset to the other to maximise canopy cover.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 5.3.6 Mead Street         | <ul style="list-style-type: none"> <li>Additional canopy cover is required.</li> <li>Resolve circulation around retained existing tree in footpath at the turn around near McEvoy Street.</li> <li>Ensure furniture is min 600mm offset from kerb.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 5.3.7 Cooper Street South | <ul style="list-style-type: none"> <li>As per PIWG comments, move road reservation or make the street a shared zone without a kerb and gutter and design as per shared zone guidelines. Refer to Materiality section comments.</li> <li>Review the proposed planting on the interface between public and private lots to ensure appropriate pedestrian circulation.</li> <li>The road paving is shown as a different colour/material to the footpath paving. This would not be the case if it was a shared zone.</li> </ul>                                                                                                                                                                                                                                                                                                                                |
| 5.3.8 Cooper Place        | <ul style="list-style-type: none"> <li>The City requires 3m for the colonnade section as 2m is too narrow when factoring column width. The proposed 2m is an unacceptable departure from the original Design Guide which shows 3m.</li> <li>Loading dock and carpark locations are to be addressed during RTS.</li> <li>Swept paths need to be run with 10.6m service vehicle.</li> <li>The overland flow path from George Street running westwards along the northern boundary of the Ausgrid substation is blocked as no site through link is proposed. This is an unacceptable departure from the Design Guide. Flooding would be pushed onto Ausgrid substation land which is unacceptable. The proposed substation in this area further blocks the overland flow.</li> <li>The design of Cooper Place is to follow shared zone guidelines.</li> </ul> |
| 5.3.9 John Street         | <ul style="list-style-type: none"> <li>Add the John Street Section to the Design Guide.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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|                                                    | <ul style="list-style-type: none"> <li>• As per PIWG discussions, the City has requested the road is narrowed from 8.3m closer to 6.2m, to address vehicles passing too quickly, and to bring trees closer to the centre of the road. Current carriageway proposal aligns with the Design Guide. One option to do this would be to add WSUD between parking and footpath.</li> <li>• Refer to previous comments on raised platform intersections.</li> <li>• A raised crossing at the intersection of John and Cope streets is preferred.</li> <li>• The WSUD zone is shown on both sides of the section, but not on the WSUD plan in the Design Guide.</li> <li>• The number of street trees is to be increased once rain gardens are rationalised.</li> <li>• The Design Guide Compliance table makes no reference to the addition of a bioswale/raingardens to John Street.</li> <li>• A continuous footpath treatment crossing over Mead Street to access John Street closure stairs is preferred.</li> </ul> |
| 5.3.10 Boundary Streets                            | <ul style="list-style-type: none"> <li>• Furniture zones are not shown – furniture zones and parking signage are to be co-located with the parking/kerb extension lane due to non-complaint width of the footpath if furniture is installed.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Figure 214 Proposal Access and Circulation Diagram | <ul style="list-style-type: none"> <li>• Cooper Street is to be 20km/h not 10km/h unless converted to a shared zone.</li> <li>• The publicly accessible north-south connections provided at south-west and south-east corner of Block 8 should be shown on the Access and Circulation diagram.</li> <li>• Remove 'no right turn' ban on Botany and Wellington streets. i.e. allow right turn as per the existing condition. This is as agreed with TfNSW in discussions with the City.</li> <li>• Several items are not shown on the plan but are listed in the legend <ul style="list-style-type: none"> <li>○ Public access elevator</li> <li>○ Signalised intersection</li> </ul> </li> <li>• The legend/line colours are inverted for the "Cycleway – existing / future"</li> <li>• Show pedestrian ramps in proposed John Street closure</li> </ul>                                                                                                                                                          |
| 5.8 WSUD                                           | <ul style="list-style-type: none"> <li>• The term "bioswale" is used, this is incorrect. The proposed WSUD areas will be rain gardens and a mix of passively irrigated garden beds.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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|                     | <ul style="list-style-type: none"> <li>• The City has provided background information and requirements regarding the design of WSUD for Waterloo Estate (South) as per the original planning proposal supporting documentation, i.e. Water Quality, Flooding and Stormwater Reports.</li> <li>• The City has requested in technical meetings discussions with the proponent that the calculations in the submitted reports (e.g. 2-4%) are applied to the public domain WSUD. Further water quality assessments and modelling need to occur.</li> <li>• The proponent and the City have agreed that the WSUD requirements can be achieved via a dispersed series of rain gardens. Additional detailed work is to be completed with optimal locations.</li> <li>• Southern end of George Street – The north-westerly overland flow path is blocked as no site through link is proposed (unlike the Design Guide). Flooding pushed onto the Ausgrid substation land is unacceptable.</li> <li>• The proposed substation in this area further blocks the overland flow.</li> <li>• The proposed substation In Mead Street should be set back in line with the façade of the podium, outside path of travel.</li> </ul> |
| 5.9 Awning Strategy | <ul style="list-style-type: none"> <li>• 2-3m Colonnade width is noted. The City requires 3m. 2m is too narrow when factoring in columns widths.</li> <li>• Add requirements for any other street awnings to reflect similar controls in the SDCP 2012, particularly in relation to setbacks from kerbs, trees and light poles.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |