

2 March 2021

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Our Ref: R/2020/7/B

Annie Leung  
Team Leader, Key Sites Assessments  
Planning and Assessment  
Department of Planning, Environment and Industry  
Level 17, 4 Parramatta Square,  
PARRAMATTA NSW 2124

Via Planning Portal

Dear Annie,

### **Response to RtS – Waterloo OSD – SSD 10438**

Thank you for your inviting the City to review and respond to the applicant's Response to Submissions for the subject application. The City would like to clarify that, regarding the specific application for excavation and basement construction, the following comments, concerns and recommendations should not be registered as an objection, rather for the consideration of the applicant and DPIE.

The following address comments raised in our submission dated 3 December 2020 relevant to the subject application and the applicant's response to those concerns:

#### *Non-compliance with development standards*

10. *It would have been preferable for loading facilities to be co-located underground within the basement car park to allow for greater activation on these streets and reduce vehicle crossings across the site. However, it is acknowledged that this option would require excavation under the Church which does not form part of the application site and that the driveway is required on Botany Road for servicing the metro.*

**Assessment:** No action taken.

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#### *Transport*

60. *Walking access*
  - (a) *Concerns remain as to the pedestrian priority and functionality of the new shared street and the surrounding intersections during peak hours (having regard to Section 3D of the Waterloo Metro Design and Amenity Guide), particularly morning peak is of concern. The area will experience high levels of people walking to and from the station in the morning and afternoon peaks. Vehicle parking on the site should be constrained further to reduce*

*conflicts between people walking to and from the site and people driving through the shared zone.*

- (b) *It is recommended that level of service for walking follow Transport for NSW's guidance to ensure that sufficient space is provided to achieve comfortable environments which encourage people to walk as relevant to the NSW context - <https://www.rms.nsw.gov.au/business-industry/partners-suppliers/document-types/guides-manuals/walking-space-guide.html>*

**Response:** Concerns remain regarding the Walking Space Level of Service and whether LoS 'C' is adequate for this site. It is a minimum under the new TfNSW Walking Space Guide.

Concerns remain regarding the functionality of the shared zones given parking supply in the area especially in relation to future traffic generation to the site (including from adjacent development areas) and how workable the shared space will be under the proposed design.

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#### 61. *Vehicle parking*

- (a) *The first objective of Section 3N of the Waterloo Metro Design and Amenity Guideline is to "prioritise walking and cycling trips in and around the Metro Quarter over vehicles". The vehicle parking proposed for residential and commercial use is excessive for a transit-oriented development and should be minimised to reflect and support the public transport access of the site and the significant investment in public transport.*
- (b) *The amount of parking directly impacts the overall objective of the new metro line which aims to shift people from car driving to using the train and, in line with the desired outcomes under the Waterloo Metro Design and Amenity Guideline "create an urban environment that drives high usage of the Sydney Metro network responding directly to the principle of transit oriented development". The mode share targets to shift private car users to public and active transport uses will never be achieved without making the parking supply competitive. Availability of car parking spaces at origin and destination points is considered the most difficult obstacle to shifting people to use more sustainable transport methods.*
- (c) *DPIE are strongly advised to insist the proponent work together with the development partners, TfNSW, RMS and strive for 'zero' car parking provision or absolute minimums. This way the development can be expected to generate much fewer new car trips and will not adversely affect the existing adjacent road network, which is already congested.*
- *This site should aim to be a world class transit-oriented development.*
  - *Providing car parking on the site contradicts the transport and sustainability objectives and the investment in public transport.*

- *The development aims to shift people from private vehicles into public transport.*
  - *65 spaces were outlined in the Explanation of Intended Effect accompanying the proposed SEPP (State Significant Precincts) amendment. The proposal is for more than double this.*
- (d) *If parking is to be provided, accessible car parking space provision should be prioritised and provided for as per SDCP. All accessible car spaces are to be allocated to adaptable units.*
- (e) *Parking for loading and servicing should be prioritised over general vehicle parking.*
- *Given the rate of vehicle parking provided the site should provide for the required amount of loading and servicing.*

**Response:** The applicant states that parking has been limited to 80% of the Sydney LEP maximum (130 vehicles in total). However, given the scale of this development and the justification as a Transport Orientated Development (TOD), the provision of up to 80% of the Sydney LEP for the surrounding Waterloo area remains excessive and sets an unacceptable precedent for future TOD.

Further, arguments as has been provided, including “the proposed basement parking will alleviate on-street parking pressures in the surrounding Waterloo area”, clearly do not understand the impact of the provision of parking in inducing demand (impacting modal share), nor do they take into account the impact on the overall road network (outside the direct site) or the ability to deliver sufficient pedestrian amenity, priority and Walking Space ‘Level of Service’.

The proposal incorporates parking rates that will assist in maintaining private vehicle dependence and compete against the success of the Metro, active and sustainable modes of transport.

## 62. *Traffic modelling*

- (a) *It is unclear from the submitted documentation if the traffic modelling includes the cumulative traffic generation from adjacent developments plus the projected traffic generation for the subject proposal.*
- (b) *The zero trip generation rates for student housing are unrealistic.*
- (c) *The traffic modelling should include changes to the street network and intersections proposed as part of the Metro development.*

**Response:** The response from the proponent is to advise that the traffic modelling does not currently include defined traffic generation from adjacent developments. The City understands that a fair bit of work has already gone into the likely adjacent development at the Waterloo Estate and so ignoring the accumulative impact is a case will lead to a significant underestimation of the “end state” traffic congestion that will occur in the area

in the future. By selecting to ignore the accumulative impact, there are concerns that significantly more parking is proposed than the street catchment can reasonably accommodate.

No sensitivity or capacity testing has been provided which would account for higher than expected traffic generations. Clearly poorly performing intersections such as “Botany Road / Henderson Road / Raglan Street intersection which is forecast to operate at Level of Service F during the morning and evening peak in all 2036 scenarios” have limited capacity to accommodate both traffic generation from this development and adjacent development without significantly reducing the pedestrian Level of Service and general walking and cycling amenity.

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63. *Bike parking*

- (a) *Bike parking and end of trip facilities should be maximised and world class in design and provision so as to assist in the transition away from private vehicle use. The quality design of end of trip facilities should not be underestimated.*
- (b) *Bike parking for the student accommodation should be provided as per residential studio apartment rates (i.e. 1 per studio apartment) in accordance with design criteria 3 Section 3N of the Waterloo Metro Design and Amenity Guideline.*

**Response:** While bike parking for residents of Building 3 are not provided within the basement, the City encourages strongly for greater bike parking provision than is proposed which (while not an ideal situation) could be provided within the basement. It is noted that the applicant is relying on provisions within the AHSEPP to justify the current provision of bike parking, even though this SEPP does not apply in accordance with Clause 1.9 of the Sydney LEP.

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64. *Loading and servicing*

- (a) *The proposal presents a shortfall of loading and servicing and should be provided as per the SDCP 2012 rates.*
- (b) *All loading and servicing should occur onsite and the development should not be potentially reliant on kerbside loading arrangements which are open to other users and subject to change.*
- (c) *Parking for loading and servicing should be prioritised over general vehicle parking.*
- (d) *The design of the loading areas to accommodate a City of Sydney 9.25m waste collection vehicle is supported. This needs to be ensured and should be conditioned.*

**Response:** The applicant acknowledges a shortfall in servicing spaces provided on site, estimated at being deficient one space regarding the City's controls. The City supports the adoption of a loading dock and servicing bay management plan. The proponent clarifies that all loading will be on-site which is supported. The proponent clarifies that the site will accommodate a council waste truck which is supported.

However, with increasing home deliveries, the applicant should be minded to provide more delivery spaces than car spaces.

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### **Sustainable development**

67. ...

*The City supports the "capability to expand the electric vehicle charging to 100% of spaces in the car park" (page 27 of ESD Report) however further information is to be provided accordingly. How will this be achieved?*

*Energy efficiency initiatives regarding lighting and mechanical ventilation, including technology and performance targets, are anticipated to be now known and should be committed up front.*

**Response:** The information provided is acknowledged. The City requests that this form part of any conditions of consent.

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Should you wish to speak with a Council officer about the above, please contact David Zabell, Senior Planner, on 9265 9333 or at [dzabell1@cityofsydney.nsw.gov.au](mailto:dzabell1@cityofsydney.nsw.gov.au)

Yours sincerely,



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