Environmental Impact and Rezoning Statement

Main Works for Waterloo HDA Mixed-Use Development

881-885 Bourke Street, Waterloo, NSW 2017

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

SSD-80441462



Prepared by Ethos Urban, a Colliers Company.

21 October 2025 | 2240721



'Gura Bulga'
Liz Belanjee Cameron

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



'Dagura Buumarri'
Liz Belanjee Cameron

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



'Gadalung Djarri'
Liz Belanjee Cameron

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

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

We pay our respects to their Elders past, present and emerging.

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

In March 2025, Ethos Urban took a major step toward future growth by partnering with leading professional services firm, Colliers. While our name evolves, our commitment to delivering high-quality solutions remains unchanged—now strengthened by broader access to property and advisory services and expertise.

Contact:	Jacob Dwyer Associate Director	jdwyer@ethosurban.com	

This document has been prepared by:		This document has been reviewed by:	
Mara Conde / Jack Storch	29 September 2025	Jacob Dwyer	29 September 2025

Version No.	Date of issue	Prepared by	Approved by
1.0 (DRAFT)	12/09/2025	MC/JS	JD
2.0 (ToA)	12/09/2025	MC/JS	JD
3.0 (FINAL)	29/09/2025	JS	JD
4.0 (FINAL – UPDATED)	21/10/2025	JD	JD

Reproduction of this document or any part thereof is not permitted without written permission of Ethos Urban Pty Ltd. Ethos Urban operates under a Quality Management System. This report has been prepared and reviewed in accordance with that system. If the report is not signed, it is a preliminary draft.

Ethos Urban Pty Ltd | ABN 13 615 087 931 | Sydney NSW | Melbourne VIC | Brisbane QLD | ethosurban.com

Contents

Signed Declaration **12**

Executive Summary **13**

1.0 Introduction **21**

1.1 The Applicant 21

1.2 Overview of Proposed Development 21

1.3 Objectives of the Development 22

1.4 Background 23

1.5 Housing Delivery Authority and National Housing Accord 25

1.6 Design Excellence Strategy 26

2.0 Strategic Context **27**

2.1 Site Location and Context 27

2.2 Site Description 28

2.3 Existing Surrounding Development 33

2.4 Recent and Approved Surrounding Development 35

2.5 Strategic Planning Context 37

2.6 Statutory Planning Context 39

2.7 Cumulative Impacts 39

2.8 Project Agreements 40

2.9 City of Sydney Development Contribution Plan 2015 41

2.10 Analysis of Alternatives 41

3.0 Project Description **44**

3.1 Key Project Information 47

3.2 Design Principles 48

3.3 Designing with Country 49

3.4 Site Preparation Works 49

3.5 Precinct Layout 50

3.6 Parcel 1 55

3.7 Parcel 2 64

3.8 Parcel 3 71

3.9 Parcel 4 77

3.10 Diverse Housing 81

3.11 Landscaping 82
3.12 Public Art 83
3.13 Transport, Vehicle and Site Access 84
3.14 Waste Management 84
3.15 Stormwater Management 85
3.16 Ecologically Sustainable Development Infrastructure 85
3.17 Staging and Delivery 86
3.18 Construction Details 86
3.19 Non-Residential Uses 86
3.20 Art Studio 87
3.21 Ongoing Operation and Management 87

4.0 Proposed rezoning amendments 88

4.1 Objectives and intended outcomes 88
4.2 Explanation of provisions 88

5.0 Justification of strategic and site-specific merit 93

Strategic merit 93

5.1 Section A – need for the Planning Proposal 93
5.2 Section B – relationship to the strategic planning framework 94

Site-specific merit 106

5.3 Section C – environmental, social and economic impact 106
5.4 Section D – Infrastructure (Local, State and Commonwealth) 107
5.5 Section E – State and Commonwealth Interests 107

6.0 Statutory Context 108

6.1 Power to Grant Approval 108
6.2 Permissibility 108
6.3 Other Approvals 109
6.4 Pre-Conditions to Exercising the Power to Grant Consent 110
6.5 Mandatory Matters for Consideration 111

7.0 Stakeholder Engagement 115

7.1 Engagement Carried Out 115
7.2 Stakeholder Views 117
7.3 State Design Review Panel 118
7.4 DPHI engagement and agencies consulted prior to lodgement 118
7.5 City of Sydney Council 119
7.6 Engagement to be Carried Out 119

8.0 Assessment of Impacts 121
8.1 Built Form and Urban Design 121
8.2 Residential Amenity 125
8.3 Overshadowing 132
8.4 Wind Impacts 136
8.5 Visual Impact 137
8.6 Traffic and Parking 139
8.7 Noise and Vibration 142
8.8 Flooding 143
8.9 Ground and Water Conditions 145
8.10 Water Cycle Management 146
8.11 Waste Management 148
8.12 Social Impact 150
8.13 Adequacy of Surrounding Social Infrastructure 151
8.14 Economic Impact 151
8.15 Assessment of Other Impacts 152
9.0 Project Justification 154
9.1 Design of the Proposed Development 154
9.2 Consistency with the Strategic Context 154
9.3 Consistency with the Statutory Requirements 154
9.4 Likely Impacts of Development 156
9.5 Suitability of the site 156
9.6 Public Interest 157
10.0 Conclusion 158

Figures

Figure 1 Site Aerial 14
Figure 2 Artist render of the proposed development, looking south from Danks Street from above 16
Figure 3 Affordable Housing Layout (Level 1) 16
Figure 4 Precinct Ground Floor layout and uses 17
Figure 5 Development parcels and architectural design team 18
Figure 6 Four development parcels and public domain land established in VPA and D/2020/45 24
Figure 7 Proposed bulk excavation extent (Early Works SSDA) 25
Figure 8 Site Context 27
Figure 9 Site Aerial 28

Figure 10 Photography surrounding and within the site 29
Figure 11 Pedestrian and Vehicular Access 30
Figure 12 Heritage context surrounding the site 31
Figure 13 Existing 1% AEP Flood Characteristics 32
Figure 14 Existing PMF Flood Characteristics 32
Figure 15 Surrounding existing development 35
Figure 16 Surrounding Future Context 36
Figure 17 Public Domain Elements of VPA 41
Figure 18 Artistic Render of Proposed Development (looking North from Central Park) 44
Figure 19 Artistic Render of Proposed Development (looking West from Potter Street and Danks Lane) 45
Figure 20 Artistic Render of Proposed Development (looking East from Central Park) 45
Figure 21 Artistic Render of Proposed Development (showing activation within proposed pocket park) 46
Figure 22 Artistic Render of the Proposed Development (aerial view, looking south) 46
Figure 23 Project design principles 48
Figure 24 Site layout and design team for each parcel 50
Figure 25 Proposed amended public domain design (subject to City of Sydney agreement) 51
Figure 26 Site plan with building names identified 52
Figure 27 Precinct Ground Floor layout and uses 52
Figure 28 Proposed allocation of housing tenure and typology within the proposed development 53
Figure 29 Basement Level 1 plan 54
Figure 30 Basement Level 2 plan 54
Figure 31 General arrangement of Parcel 1 buildings with height in storeys 55
Figure 32 Proposed materiality for Parcel 1 57
Figure 33 3D artistic render of Building 1A and Building 1B from Danks Street 58
Figure 34 Ground plane of Building 1A and Building 1B 58
Figure 35 Typical floorplate of Building 1A and Building 1B 59
Figure 36 3D artist render of Building 1C from the central park 60
Figure 37 Ground floor of Building 1C with communal spaces and office premises 60
Figure 38 Typical floorplate of Building 1C 61
Figure 39 Rooftop pool on Building 1C 61
Figure 40 Photomontage of Building 1D from the park 62
Figure 41 Ground plane for Building 1D with retail premises shown 63
Figure 42 Typical floorplate for Building 1D 63
Figure 43 Building 1D, Level 6 floor plan showing communal spaces 64
Figure 44 Building 1D, Level 7 floor plan showing communal open space 64
Figure 45 General arrangement of Parcel 2 with height in storeys 65
Figure 46 Materiality for Parcel 2 66

Figure 47 Building 2A artistic render viewed from Bourke Street 67
Figure 48 3D artistic render of Building 2B viewed from Potter Street 68
Figure 49 Ground plane for Building 2A and 2B showing Retail and communal spaces 69
Figure 50 Typical floorplate of Building 2A 69
Figure 51 Typical floorplate of Building 2B 70
Figure 52 Communal spaces on Level 4 of Building 2B 70
Figure 53 General arrangement of Parcel 3 with height in storeys 71
Figure 54 Materiality for Parcel 2 72
Figure 55 3D artistic render of Building 3A viewed from Bourke Street 73
Figure 56 3D artistic render of Building 3B viewed from the central park 74
Figure 57 Ground plane for Building 3A and 3B showing retail, loading dock and gym 74
Figure 58 Level 1 floor plan of Parcel 3 75
Figure 59 Typical floorplate in the podium of Building 3A 75
Figure 60 Typical floor plate of Building 3A affordable levels (8-13) 76
Figure 61 Typical floor plate of Building 3A tower 76
Figure 62 Typical floorplate for Building 3B 77
Figure 63 General arrangement of Parcel 4 with height in storeys 77
Figure 64 Parcel 4 proposed materiality 78
Figure 65 3D view of Building 4A 79
Figure 66 Ground floor of Building 4A 80
Figure 67 Mezzanine level of Building 4A 80
Figure 68 Typical floorplate for Building 4A 81
Figure 69 Landscape Design Principles 83
Figure 70 Public art samples and location 84
Figure 71 Proposed OSD system locations and stormwater drainage plan 85
Figure 72 Existing height of buildings map 89
Figure 73 Proposed height of buildings map 89
Figure 74 Existing FSR map 90
Figure 75 Proposed FSR map 90
Figure 76 Existing Site Locality Map 91
Figure 77 Proposed Site Locality Map 91
Figure 78 Built form and massing principles for uplift at the site 122
Figure 79 Proposed maximum building height within the context of adjacent buildings 122
Figure 80 Proposed building height within the context of the surrounding area 123
Figure 81 Precinct ground level plan showing street setbacks 124
Figure 82 Parcel 3 interface with City West Housing Development to the south 125
Figure 83 Precinct materiality strategy 125

Figure 84 Rooftop communal amenity for the precinct 127
Figure 85 Ground level communal landscape areas 128
Figure 86 Ground level internal communal amenities 128
Figure 87 Typical City Starter and City Stayer layouts 130
Figure 88 Precinct Rooftop Plan 131
Figure 89 Solar Analysis for Proposed Park 132
Figure 90 Surrounding properties assessed for overshadowing impacts (refer to Table 40) 133
Figure 91 Overshadowing to 824 Bourke Street to the south-east 135
Figure 92 Overshadowing to industrial estate to the west 135
Figure 93 Sun eye diagrams between 9am and 11am at midwinter 136
Figure 94 Location of Viewpoints assessed 137
Figure 95 Viewpoint 1: Existing (left) versus the proposed development (right), as viewed from Danks and Young Street looking southeast 137
Figure 96 Viewpoint 2: Existing (left) versus the proposed development (right), as viewed from Bourke Street looking northwest 138
Figure 97 Viewpoint 6: Existing (left) versus the proposed development (right), as viewed from Bourke and Danks Street looking southwest 138
Figure 98 Existing On-Street Parking on Bourke Street 141
Figure 99 Flood impact associated with the proposed development during the 1% AEP eventS 144
Figure 100 ..... Flood impact associated with the proposed development during the PMF 144
Figure 101 Site layout plan showing flood planning levels are met 145

Tables

Table 1 Key metrics of the proposed development 15
Table 2 Applicant Details 21
Table 3 Summary of Existing Surrounding Development 33
Table 4 Recent and Approved Surrounding Development 35
Table 5 Contribution Rates – South Precinct 41
Table 6 Key Project Details 47
Table 7 Precinct wide built form by each parcel 53
Table 8 Parcel 1 Built Form Breakdown 55
Table 9 Parcel 1 Dwelling Type and Mix 55
Table 10 Parcel 1 Uses by Level 56
Table 11 Parcel 2 Built Form Breakdown 65
Table 12 Parcel 2 Dwelling Mix 65
Table 13 Parcel 2 Uses by Level 66
Table 14 Parcel 3 Built Form Breakdown 71

Table 15 Parcel 3 Dwelling Mix 71
Table 16 Parcel 3 proposed uses by level 72
Table 17 Parcel 4 Built Form Breakdown 78
Table 18 Parcel 4 Dwelling Mix 78
Table 19 Parcel 4 uses by level 78
Table 20 Indicative Project Phasing for Each Parcel 86
Table 21 Existing and Proposed SLEP 2012 Controls 88
Table 22 Consistency with GSRP directions 94
Table 23 Consistency with Eastern City District Plan directions 95
Table 24 Consistency with City Plan 2036 Local Strategic Planning Statement 96
Table 25 Consistency with City of Sydney Local Housing Strategy 97
Table 26 Sustainable Sydney 2030—2050: Continuing the Vision 98
Table 27 Consistency with the Objectives of GANSW's Better Placed 100
Table 28 Consistency with the Objectives of GANSW's Greener Places 101
Table 29 Consistency with State Environmental Planning Policies 101
Table 30 Assessment of Section 9.1 Directions 102
Table 31 Power to Grant Consent 108
Table 32 Permissibility 108
Table 33 Other Approvals 109
Table 34 Pre-Conditions to Exercising the Power to Grant Consent 110
Table 35 Mandatory Matter for Consideration 111
Table 36 Consultation Methods 116
Table 37 Stakeholder Views 117
Table 38 Record of State Government agency and authority meetings and correspondence 118
Table 39 Record of City of Sydney Council meetings and correspondence 119
Table 40 Summary of overshadowing impacts to the surrounding properties 134
Table 41 Maximum Car Parking Rate and Spaces 139
Table 42 Traffic Generation During Peak Hours 141
Table 43 Summary of Geotechnical Model 145
Table 44 OSD Design for AEP 1% across each Parcel 147
Table 45 Stormwater Component Maintenance Schedule 147
Table 46 Construction Waste Volumes and Management 148
Table 47 Construction Waste Disposal Pathways 149
Table 48 Commercial and Retail Bin Collection Summary 150
Table 49 Other Issues 152

Appendices

Appendix		Author
A.	SEARs and Concurrent Rezoning Compliance Table	*Ethos Urban*
B.	Statutory Compliance Table	*Ethos Urban*
C.	Mitigation Measures	*Ethos Urban*
D.	Architectural Drawings	*SJB, Curious Practice, Bates Smart, Chenchow Little (Design Team)*
E.	Architectural Design Report	*SJB, Curious Practice, Bates Smart, Chenchow Little (Design Team)*
F.	Visual Impact Assessment	*Ethos Urban*
G.	Transport Impact Assessment	*Genesis Traffic*
H.	Noise and Vibration Impact Assessment	*Acoustic Logic*
I.	Groundwater Assessment	*EI Australia*
J.	Geotechnical Report	*EI Australia*
K.	Status of Remediation Statement	*EI Australia*
L.	Acid Sulfate Soil Assessment	*EI Australia*
M.	Landscape Plans	*Dangar Barin Smith and TURF*
N.	Social Infrastructure Assessment	*Ethos Urban*
O.	Arborist Impact Assessment	*Elke Landscape Architect*
P.	ESD Report	*JHA*
Q.	BDAR Waiver Determination	*Department of Planning, Housing and Infrastructure*
R.	Construction Waste Management Plan	*Elephants Foot Consulting*
S.	Operational Waste Management Plan	*Elephants Foot Consulting*
T.	Social Impact Scoping Study	*Ethos Urban*
U.	Flood Impact Risk Assessment	*Stantec*
V.	Preliminary Public Art Plan	*UAP*
W.	Aviation Assessment	*TGCS*
X.	Pedestrian Wind Environment Study	*Windtech*
Y.	Integrated Water Management Report	*Stantec*
Z.	Accessibility Compliance Report	*AED*
AA.	BCA Report	*AED*
BB.	CHP Letter of Support	*Evolve Housing*
CC.	Site Survey	*SDG*

Appendix		Author
DD.	**Housing Diversity Strategy**	*Nation*
EE.	**BASIX, Nathers, Section J, EEF, Green Star Documentation**	*JHA*
FF.	**Statement of Heritage Impact**	*Curio Projects*
GG.	**Connecting With Country Report**	*Bangawarra*
HH.	**Engagement Report**	*Ethos Urban*
II.	**Soil Salinity Assessment**	*EI Australia*
JJ.	**LEP Maps**	*Ethos Urban*
KK.	**Services Utilities Report**	*Goldfish & Bay*
LL.	**Construction Traffic Management Plan**	*Genesis Traffic*
MM.	**Alternate Design Excellence Strategy and Endorsement Letter**	*Ethos Urban and Government Architects NSW*
NN.	**Desktop Aboriginal Cultural Heritage Assessment Report**	*Curio Projects*

Signed Declaration

Project Details			
Project Name	Main Works for Waterloo Mixed Use Development		
Application Number	SSD-80441462		
Land to be Developed	881-885 Bourke Street, Waterloo, NSW		
Applicant Details			
Applicant Name	Waterloo Property Pty Ltd as trustee for Waterloo Property Unit Trust		
Applicant Address	Level 2, 66 Wentworth Avenue, Surry Hills, 2010		
Prepared by			
Name	Mara Conde	Jacob Dwyer	Jack Storch
Qualifications	B.Plan	B.E. (Hons) B.Sc. MCP	B.Des. Arch. (Hons) M.Urb Des
Address	Level 4, 180 George Street, Sydney NSW 2000		
Declaration			
Name	Schandel Fortu		
Qualifications	B Env Plan, B Urb Reg Plan, M Env Mg, Registered Planner + EIA		
Registration Number	9852		
Organisation Registered With	Planning Institute Australia		

The undersigned declares that this EIS:

- has been prepared in accordance with the Environmental Planning and Assessment Regulation 2021;
- contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates;
- does not contain information that is false or misleading;
- addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project;
- identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments;
- has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement;
- contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development;
- contains a consolidated description of the project in a single chapter of the EIS;
- contains an accurate summary of the findings of any community engagement; and
- contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.

Signature 

Date 29/09/25

Executive Summary

Purpose of this report

This Environmental Impact and Rezoning Statement (EIS) has been prepared on behalf of Waterloo Property Pty Ltd as trustee for Waterloo Property Unit Trust (The Applicant) in support of a State Significant Development Application (SSDA) identified as SSD-80441462. The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) for proposed Main Works associated with a mixed-use development with concurrent rezoning under the NSW Housing Delivery Authority (HDA) process.

The NSW State Government has agreed to a National Housing Accord with other states and territories, local government, institutional investors and the construction sector. The Accord includes an initial aspirational target agreed by all parties to build 1.2 million new well-located homes over 5 years from mid-2024. NSW has a target to deliver 377,000 new homes over 5 years by July 2029 under the Accord.

To accelerate the delivery of much needed homes and help meet NSW's target under the Accord, the NSW Government established the HDA.

The HDA offers a clear planning pathway for large residential and mixed-use developments to be assessed as State Significant Development (SSD) with a concurrent rezoning if required. This process aims to improve consistency in planning decisions and speed up assessment, without sacrificing housing quality.

This project was nominated as SSD under the HDA at its first meeting, after being identified as being capable of supporting additional housing to assist in alleviating the housing crisis. The State Significant Declaration Order 2025 (Order) dated 17 February 2025 declares development specified in EOI application 229420 dated 8 January 2025, including development for the purposes of mixed-use development (Build to Rent including affordable housing) with ground floor non-residential uses at 881-885 Bourke Steet, as identified in Schedule 3, as SSD.

This application is preceded by a separate 'Early Works SSDA' which will prepare the site for the 'Main Works' which are proposed in this SSDA (SSD-80911502). The Early Works SSDA was submitted on 25 July 2025 and publicly exhibited from 20 August to 16 September 2025.

On 5 March 2025, the DPHI issued SEARs (SSD-80441462) and concurrent rezoning requirements for the project, described as: *construction of a mixed-use development comprising over 600 residential apartments (BTR), affordable housing and commercial*.

The proposal will provide 73 affordable rental housing dwellings that will be managed by a CHP for 15 years, which equates to 25% of the uplift in gross floor area as a result of the concurrent rezoning. This is in addition to a monetary contribution being made under the City of Sydney Affordable Housing Policy of 3% for residential uses and 1% for non-residential uses, which would fund approximately 28 additional dwellings being provided off-site, in-perpetuity.

As the site is already cleared and a separate early works application is currently under assessment by DPHI, the proposal has the capacity to deliver significant urban renewal within the Accord Period.

The site is subject to an existing Voluntary Planning Agreement (VPA) that sets out dedication of public domain between 4 development parcels. The public domain includes a new east-west street, a through site link and public open space area (comprising future shared zones and park). The development parcels and public domain as set out in the VPA will be delivered notwithstanding the works proposed in this SSDA.

The site and context

The site is legally described as Lot 1 DP1308636 and Lot 2 DP1308636 and is located at 881-885 Bourke Street, Waterloo. The site has an area of 21,554m^2. It has an irregular shape, is generally flat and has been cleared of all light industrial and large format commercial buildings. The site currently has vehicle access from Young Street and Bourke Street. Refer to Figure 1.

The site is located within Gadigal Land, in the Sydney Local Government Area (LGA) and is approximately 4km south of the Sydney CBD. The site is approximately 950m walking distance east of an entrance to the Waterloo Metro Station, approximately 1.1km northeast of the Green Square Train Station and approximately 1.5km southeast of Redfern Train Station. The site is also immediately adjacent to a bus stop on Bourke Street. The Site is identified as being within the Danks Street South Precinct in the *Sydney Local Environmental Plan 2012* (SLEP 2012).

There are a number of trees along the Danks and Young Street frontages. There are commercial and business premises to the west, high-density residential and business premises to the north, primarily high-density residential to the east and high density residential under construction to the south.



Figure 1 Site Aerial

Source: Nearmap, Ethos Urban

Proposal Overview

This SSDA seeks consent for the following Main Works for the mixed-use development at the site:

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

To accommodate the proposed development, amendments to the SLEP 2012 are proposed as part of the concurrent rezoning process. Specifically, the proposed amendments are as follows:

- Amend the Height of Buildings Map under Clause 4.3 to increase the building height from 3m to 29m to 3m to 125m.
- Amend the Floor Space Ratio Map under Clause 4.4 to increase the maximum FSR from 2.15:1 to 3.05:1.

- Amend the site-specific Clause 6.43 - Danks Street South Precinct as its provisions are no longer applicable to SSD 80441462.
- Exclude the site from the following clauses:
  - Clause 6.14(4) - Community infrastructure floor space at Green Square.
  - Clause 6.21D(3) - Competitive design process.
  - Clause 7.23 – Large retail development outside of Green Square Town Centre and other planned centres.

A detailed description of the proposed development is provided in Section 3.0 of this EIS. The proposal will be undertaken in accordance with the Architectural Drawings prepared by Bates Smart, SJB, Curious Practice and Chenchow Little (hereafter referred to as the 'Design Team') (Appendix D).

The key metrics of the proposed development are shown in Table 1.

Affordable Housing and Public Benefits

The proposal includes the provision of 73 dwellings on-site as affordable housing for a period of 15 years. This represents 25% of the proposed uplift, or 10% of the total gross floor area (GFA) of the overall development.

This 25% GFA uplift is in addition to the City of Sydney's affordable housing contribution requirement under Clause 7.13 of the Sydney LEP. This requirement is calculated at a rate of 3% for residential floor area and 1% for non-residential floor area. In this case, a monetary contribution would be made in line with the requirement, which would then be used to fund affordable housing provided in perpetuity.

Based on the proposed development's GFA and land use mix, this contribution would equate to an additional 28 affordable dwellings being funded. Combined with the 25% uplift provision, the development would therefore directly contribute to approximately 101 new affordable dwellings. This aligns with the intent of the Expression of Interest (EOI).

Table 1 Key metrics of the proposed development

Parcel	GFA (m^2)	FSR	Maximum Height (RL m)	Maximum Storeys	Apartments
1	23,533	1.09:1	90.20	18	279
2	12,635	0.59:1	82.55	15	208
3	20,630	0.96:1	152	36	245
4	8,311	0.39:1	70.81	13	118
TOTAL	65,109	3.05:1	152	36	850



Figure 2 Artist render of the proposed development, looking south from Danks Street from above

Source: Design Team



Figure 3 Affordable Housing Layout (Level 1)

Source: Design Team

Design Excellence and Precinct Composition

The layout for the Precinct is dictated by the existing VPA and Concept Approval, which divide the site into 4 development parcels separated by areas of public domain. In order to meet the HDA and Housing Accord timeframes prescribed for lodging an application, an alternative design excellence strategy was endorsed by the NSW Government Architect and undertaken by the project team prior to preparing this SSDA.

As part of the Design Excellence Strategy and in order to achieve architectural diversity at the site, a design team of 2 established and 2 emerging architects were appointed to design different parcels of the development (refer to Figure 5). Additionally, landscaping was shared across the Precinct with Dangar Barin Smith on Stage 1 and TURF on Stage 2. The Design Team have incorporated precinct-wide design principles thoughtfully throughout their design to create a cohesive and collaborate precinct, while still achieving architectural diversity.

As part of the alternative design excellence process, the proposal has been the subject of 2 reviews by the NSW State Design Review Panel, who provided feedback on the scheme and indicated that design excellence could be demonstrated provided the feedback was addressed. The Design Team have made refinements to the scheme in response to feedback provided to ensure the design can achieve design excellence. Further feedback has been sought from the SDRP via a desktop review, concurrently with lodgement of this application.

Each development parcel is broken down further into buildings, with a total of 9 buildings proposed. The precinct ground plan is shown at Figure 4. The ground plane seeks to be a porous and highly connected public realm, prioritising pedestrian movement, walkability, legibility and social interaction. The design includes communal residential areas, green courtyards and active retail frontages. Retail activation is prioritised along the Danks Lane, the Bourke/New Street corner and the Young Street/Danks Street corner. An art studio and artist-in-residence use also interfaces with the street at the northern end of the Parcel 4.

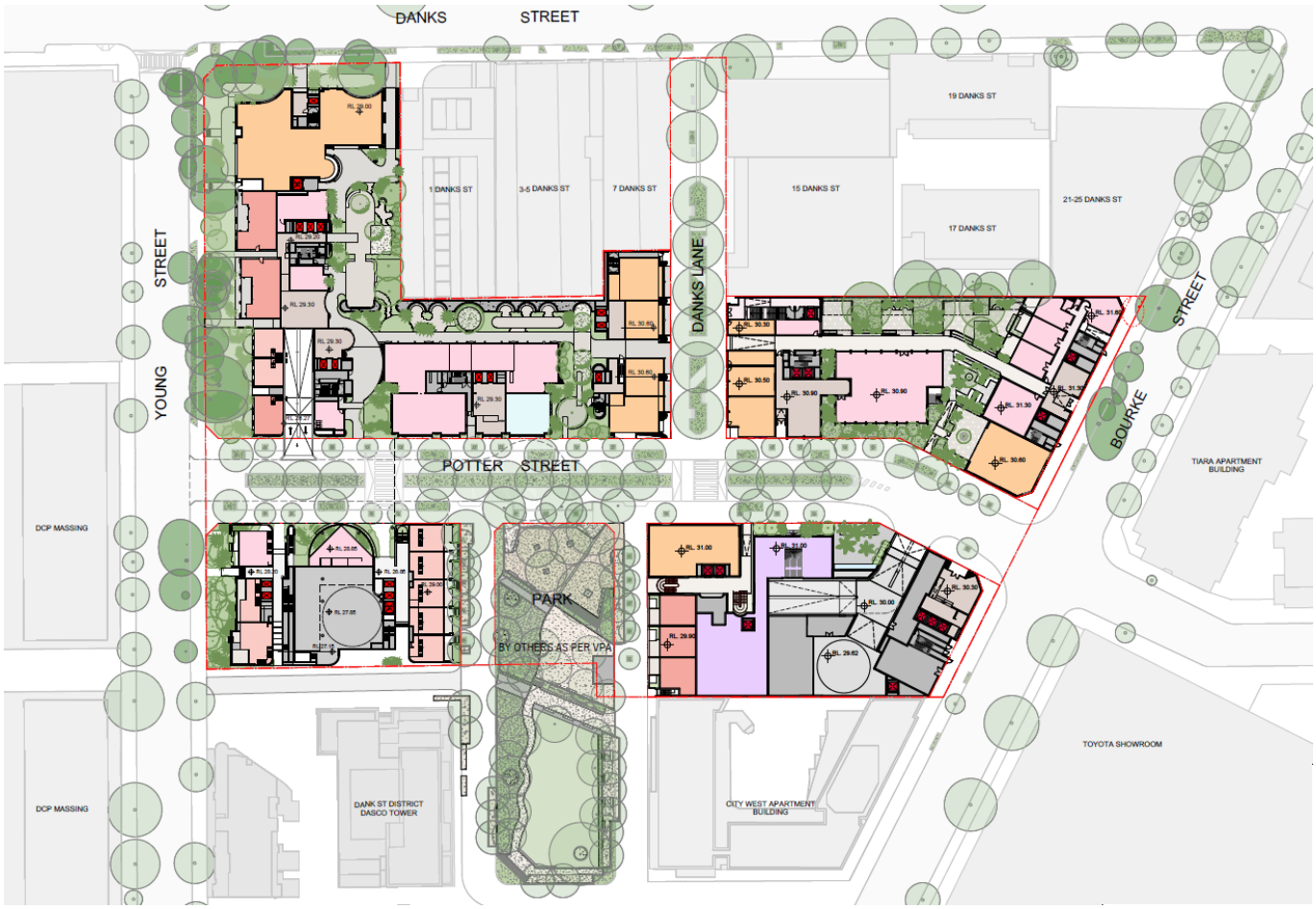


Figure 4 Precinct Ground Floor layout and uses

Source: Design Team

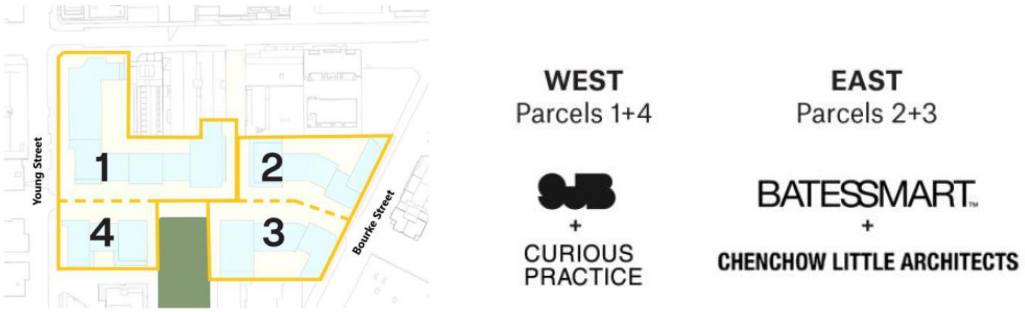


Figure 5 Development parcels and architectural design team

Source: Design Team

Relationship with existing concept approval

Consent was previously granted by the City of Sydney on 23 August 2021 (D/2020/45, as amended) for a concept development application with first stage of works. The first stage of works under the Concept SSD comprises demolition, remediation and subdivision to create 4 new development parcels and transfer lands, and embellishment works including the delivery of a road subject to dedication under a VPA. The first stage of works is approved to be carried out in 2 stages. The Applicant is separately proceeding with these works (which had commenced prior to the Applicant's acquisition of the site), including subdivision of the site to create the 4 development parcels (with remaining land to be dedicated as per VPA), as well as the public domain embellishment works (including a new east-west road through the site, pedestrian link to Danks Street and part central public park).

Importantly, the proposed Main Works do not depart from the 4 parcels and the extent of land to be dedicated to the City, which is secured through the VPA. However, the VPA is planned to be amended to allow for a below-grade stratum to be excluded from dedication, in order to accommodate the proposed basement links between parcels and minor refinements to pedestrian crossings and kerbs to optimise precinct connectivity between parcels.

Relationship with Early Works SSDA

The Early Works SSDA (SSD-80911502) was submitted to the DPHI for the *early works associated with a mixed use development (this EIS, SSD-80441462) including site establishment, construction of piled shoring wall and capping beam, bulk excavation, anchoring of shoring wall and ancillary works*. The Early Works EIS was exhibited from 20 August 22025 to 16 September 2025 and is currently under assessment at the time this EIS is submitted to DPHI. It is anticipated that the Early Works SSDA will be determined prior to the determination of the Main Works SSDA.

The Early Works SSDA will facilitate the works undertaken in the Main Works SSDA to ensure the timely and efficient delivery of diverse housing. The objectives of the Early Works SSDA are to facilitate housing in a well-serviced location and as follows:

- Support broader regional and district planning goals by laying the groundwork for increased housing supply, in an accessible, well-connected precinct, 950m walking distance to the new Waterloo Metro Station.
- Facilitate a future development that will reflect key strategic priorities relating to design excellence, environmental sustainability, integrated transport and connectivity, and the delivery of local jobs and services.
- Directly address the current housing affordability and supply crisis by facilitating future delivery of a significant quantum of dwellings, including affordable rental dwellings, in a precinct in Waterloo that is zoned for this purpose.
- Facilitate an activated ground plane to enhance the vibrancy of the locality and provide convenience to residents and visitors, as well as retain existing and add to the green cover of the site.
- It will facilitate future revitalisation of a currently underutilised site in a key transforming precinct nearby to the recently opened Waterloo Metro Station, which will help in furthering the growth of the precinct with a significant future residential living component that demonstrates design excellence.
- The Early Works SSDA will fully retain the preceding approval for dedication of public domain, being a major public benefit in the form of a newly publicly accessible park and through-site link that will act as a new focal point for Waterloo, increase pedestrian permeability and provide much needed public amenity for the local community.

Strategic Context

The project will deliver a wide range of rental living solutions, complemented by recreation spaces and local retail, all underpinned by Connection to Country and environmentally sustainable design principles.

The proposed Main Works will facilitate the redevelopment of a large parcel of land in Waterloo for the delivery of a rental housing precinct development comprising of Build to Rent housing (BTR) and affordable housing, which will assist in alleviating and reducing the pressure of the current housing affordability crisis in NSW, which is a common goal and objective across several State and Federal government initiatives, including the following:

- National Housing Accord 2022
- NSW State and Premier's Priorities
- Greater Sydney Region Plan – A Metropolis of Three Cities
- Eastern City District Plan
- Housing 2041
- City Plan 2036: Local strategic planning statement
- Housing for All: City of Sydney local housing strategy
- Future Transport
- Better Placed
- NSW Connecting with Country Framework.

Section 2.5 of this EIS outlines the relevant strategic framework. The proposal aligns with this framework for the following key reasons:

- The proposal responds to the *Greater Sydney Region Plan* by positioning BTR housing in an accessible location.
- The proposal supports the vision of the *Eastern City District Plan* by delivering a neighbourhood centre. The proposal promotes place-based planning through establishing area for a new public park, pedestrian thoroughfare, and a well-integrated public domain.
- The Main Works will deliver a quantum of BTR housing by establishing key access, infrastructure and enabling works that support a future mix of dwelling sizes, facilitating diverse and inclusive housing outcomes in the Green Square renewal precinct as envisioned by the *City of Sydney Local Strategic Planning Statement*.

Statutory Context

Development approval is sought for the proposal under the State Significant Development provision of Part 4 of the EP&A Act. The State Significant Development Declaration Order 2025 dated 17 February 2025 declared the site as State Significant Development under the Environmental Planning and Assessment Act 1979. Section 4.36 Development that is State significant development of the Act states that:

> *(3) The Minister may, by a Ministerial planning order, declare specified development on specified land to be State significant development*

The State Significant Development Declaration Order 2025 states the following:

> *4 Specified development on specified land declared State significant development*
>
> *(1) The following development is declared to be State significant development –*
>
> *(c) development specified in EOI application 229420 dated 8 January 2025 including development purposes of mixed-use development (Build to Rent including affordable housing) with ground floor non-residential uses at 881 – 885 Bourke Street Waterloo as identified in Schedule 3.*

Therefore, the proposed Main Works at the site is declared as SSD.

Environmental Impacts and Mitigation Measures

This EIS provides an assessment of the proposal's environmental impacts in accordance with the SEARs, including an assessment of the below mentioned matters. The proposed measures to manage and minimise potential impacts arising from the development are also provided in this EIS. Key potential environmental matters identified included:

- Built form and urban design.
- Environmental and residential amenity, including overshadowing, solar access, wind and the provision of communal space.
- Visual Impact.
- Traffic, parking and access.
- Noise Impact.
- Social impact.
- Construction Management.

The proposed development has been assessed in each of these instances by technical experts across a range of disciplines, as guided by the SEARs and industry best practice. These assessments confirm that while there may be potential impacts resulting from the change of the existing site conditions, these impacts are acceptable outright or can be appropriately managed and mitigated. A complete assessment of each issue identified within the issued SEARs is provided in Section 8.0. A consolidation of mitigation measures proposed is provided at Appendix C.

Conclusion and Justification

Having regard to environmental, economic, and social considerations, the carrying out of the proposal is justified for the following reasons:

- The proposed development will not result in adverse environmental impacts, with appropriate mitigation measures that will minimise any potential impact.
- The proposal will provide significant, diverse residential supply at the site (including 777 BTR and 73 affordable housing apartments) proximate to a range of employment opportunities in the southern fringe of inner Sydney. This will contribute directly to the objectives of the HDA and the National Housing Accord.
- The proposed development is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including the SLEP 2012 (where it is not proposed to be amended). Where not compliant, amendments to the SLEP 2012 are proposed and justified to accommodate the development.
- The proposal has been the subject of 2 SDRP processes, with refinements to the scheme made in response to feedback provided to ensure the design can achieve design excellence.
- Direct employment opportunities will be created during the construction and operational phases of the proposal.
- The proposed development provides improved amenity by revitalising a currently underutilised property for significant housing supply. Further, the large size and scale of the site in single ownership makes it appropriate to accommodate a high-density development while mediating taller built form to integrate with the surrounding area.
- The proposed development is suitable for the site and in the public interest.

Given the merits described above, and the significant benefits associated with the proposed development, it is requested that the application be approved.

1.0 Introduction

This Environmental Impact Statement (EIS) has been prepared by Ethos Urban on behalf of Waterloo Property Pty Ltd as trustee for Waterloo Property Unit Trust (the Applicant) in support of a State Significant Development Application (SSDA). The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) for proposed Main Works for a mixed-use development with concurrent rezoning (the Proposal).

This application is preceded by a separate SSDA for Early Works that prepare the site for the proposed development (SSD-80911502). For ease of reference, the preparatory application will be referred to as the 'Early Works SSDA', and this application (for construction of buildings) will be referred to as the 'Main Works SSDA'.

The proposed development was nominated to be State Significant Development (SSD) by the Housing Delivery Authority (HDA) and declared as such pursuant to State Significant Declaration Order 2025 (Order) issued on 17 February 2025. The Order identifies that development specified in Expression of Interest (EOI) 229420 dated 8 January 2025, being development for the purposes of a mixed-use development (Build to Rent (BTR) including affordable housing) with part ground floor non-residential uses at 881-885 Bourke Steet is declared to be SSD.

In July 2025, an SSDA for Early Works associated with the project was lodged for assessment by DPHI.

The SSDA subject to this report (SSD-80441462) seeks consent for the construction of a new mixed-use development at the site with concurrent amendments to the *Sydney Local Environmental Plan 2012* (SLEP 2012) to accommodate the proposed development.

The site is subject to an existing Development Application (Concept DA (D/2020/45)) that sets out dedication of public domain and infrastructure elements between the 4 development parcels. The public domain includes a new east-west street, a through site link to the north of the site and public open space area (comprising future shared zones and the northern portion of a park). The development parcels and public domain as set out in the Concept DA will be delivered notwithstanding the works proposed in this SSDA.

This EIS is based on the Architectural Drawings prepared by SJB Architects, Bates Smart, Curious Practice and Chenchow Little (hereafter referred to as the 'Design Team') (see Appendix D) and other supporting technical information appended to the report (see Table of Contents).

This EIS has been prepared in accordance with the requirements of Part 4 of the EP&A Act, clause 175 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), and the issued SEARs. A SEARs Compliance Table provided at Appendix A that identifies where the SEARs have been addressed in this EIS. This EIS should be read in conjunction with the supporting information and plans appended to and accompanying this report. The EIS intends to inform the community and stakeholders about the Proposal, including its social, economic and environmental impacts, mitigation measures and benefits, as well as providing an environmental assessment of the proposal.

1.1 The Applicant

The Applicant's details are presented in Table 2 below.

Table 2 Applicant Details

Applicant:	**Waterloo Property Pty Ltd as trustee for Waterloo Property Unit Trust**
Address:	Level 2, 66 Wentworth Avenue, Surry Hills
ABN:	90 244 028 669

1.2 Overview of Proposed Development

This SSDA seeks consent for the following Main Works mixed-use development at the site. Specifically, this SSDA seeks approval for the following:

This SSDA seeks consent for the following Main Works for the mixed-use development at the site:

- Site establishment and enabling works (that were not included in the preceding Early Works SSDA).
- Construction of 9 residential and mixed-use buildings across 4 development parcels for the purposes of:
  - Build to rent apartments and associated communal amenities.

    - Affordable rental housing.
    - Non-residential floor space including commercial/retail premises and indoor recreation facilities and associated hours of operation.
- Construction of a consolidated basement with below-ground links between development parcels for car parking, plant and storage.
- Site-wide landscaping and publicly accessible open space (noting that the primary public domain works are subject to a separate approval).
- Works to site frontages.
- Extension and augmentation of infrastructure and services (that were not included in the preceding early Works SSDA) as required.

The above is proposed to be carried out across 2 stages, in alignment with the prior consent's staging (Stage 1 to Young Street and Stage 2 to Bourke Street). This EIS provides further description of the proposal in Section 3.0. The proposal will be undertaken in accordance with the Architectural Drawings prepared by the Design Team (Appendix D).

The Main Works will be undertaken within the following hours:

- Monday to Friday: 7:30am to 5:30pm.
- Saturday: 7:30am to 3:30pm.
- Sunday and Public Holidays: No construction unless by special arrangement.

This SSDA includes a rezoning request to amend the Sydney LEP. The proposed amendments specifically seek to (refer to Section 4.0 for further information):

- Amend the Height of Buildings Map under Clause 4.3 to increase the building height from 3m to 29m and 3m to 125m.
- Amend the Floor Space Ratio Map under Clause 4.4 to increase the maximum FSR from 2.15:1 to 3.05:1.
- Amend the site-specific Clause 6.43 - Danks Street South Precinct as its provisions are no longer applicable to SSD 80441462.
- Insert a site-specific provision within Part 6 of the SLEP 2012 to facilitate the exclusion of the site from the following clauses:
    - Clause 6.14(4) - Community infrastructure floor space at Green Square.
    - Clause 7.23 – Large retail development outside of Green Square Town Centre and other planned centres.
    - Clause 6.21D(3) - Competitive design process.

1.3 Objectives of the Development

The objectives of the proposed development are to:

- Provide much-needed housing in a well-located site within the City of Sydney and contribute to NSW's housing targets under the National Housing Accord 2022 and NSW Housing Targets 2023.
- Deliver diverse, build-to-rent residential apartments with excellent amenity leveraging the site's strategic location.
- Contribute to alleviating the NSW Housing Crisis, in particular by delivering new, fit-for-purpose affordable rental housing.
- Revitalise an underutilised land parcel near Waterloo Metro Station and Green Square Train Station, supporting community and commercial needs.
- Design the building envelope to ensure appropriate solar access, wind comfort, and daylight in adjoining public areas.
- Create a visually interesting podium and tower design, ensuring unique massing and height that integrates well with the surrounding urban context.
- Incorporate a publicly accessible east-west road and through-site link, enhancing pedestrian connectivity and site permeability, linking to Waterloo Metro Station and Green Square Train Station.
- Ensure a high-quality design guided by the State Design Review Panel, incorporating recommendations for sustainability and public space integration.
- Develop high-performance buildings with strong sustainability features.

- Contribute to housing diversity in Waterloo with build-to-rent and affordable housing, along with necessary social infrastructure and communal facilities.

1.4 Background

1.4.1 Prior Approvals

Consent was granted by the City of Sydney on 23 August 2021 (D/2020/45, as amended) for a concept development application with first stage of works (Concept DA). The consent grants approval for:

- Staged demolition of all existing structures including ground floor slabs and footings.
- Remediation of the entire site across 2 stages.
- Staged subdivision to create 4 new development parcels, transfer lands (for transfer and dedication to the City of Sydney Council) and associated works.
- Temporary relocation of the existing substation.
- Tree removal.
- Staged construction of the new east-west street, augmentation of the traffic signals at the intersection of the new east-west street and Bourke Street, construction of the through site link, temporary access paths and public open space area (comprising future shared zones and parks).

The 4 development parcels, as well as the public domain land (to be delivered in 2 stages and in 4 phases), is illustrated at Figure 2.

The development consent has since been modified on 3 occasions:

- Modification A was approved on 29 August 2022 in relation to a section 4.55(1A) application, granting consent to modify conditions and allow for the commencement of preliminary demolition works (facilitating tree root investigations and mapping prior to substantive demolition works being undertaken).
- Modification B was approved on 1 December 2022 in relation to a section 4.55(1A) application, granting consent to modify conditions to refer to an updated Arborist's report and to allow for the removal of 2 trees that were not identified in the original consent.
- Modification C was approved on 7 March 2024 in relation to 4.55 (1A) application granting consent the modification of concept consent to amend Conditions 2 (Approved First Stage of Development), 5 (Substation), 61 (Sydney Water Certificate - Subdivision).

In accordance with the approval, remediation, demolition and subdivision works have commenced (and further remediation is ongoing in accordance with D/2020/45, following the site's acquisition by the Applicant). The subdivision of the site to create 4 development parcels and public domain land, as well as the embellishment of the public domain, is undertaken pursuant to the D/2020/45 approval and as per the associated VPA. The public domain includes a new east-west street, a through site link to the north of the site (connecting to Danks Street) and public open space area (comprising future shared zones and the northern portion of a park). The development parcels and public domain as set out in the Concept DA will be delivered notwithstanding the works proposed in this SSDA.

It is noted that while concept consent was granted for development envelopes on each parcel (establishing heights and maximum floor space for development on each parcel), this Main Works SSDA is an entirely distinct development application. That is, they do not represent detailed development applications that are subsequent to the approved Concept DA. Notwithstanding, the Main Works SSDA will incorporate the overarching principles established in the approved concept envelopes.

The site is subject to a Voluntary Planning Agreement which is further discussed at Section 2.8.1.

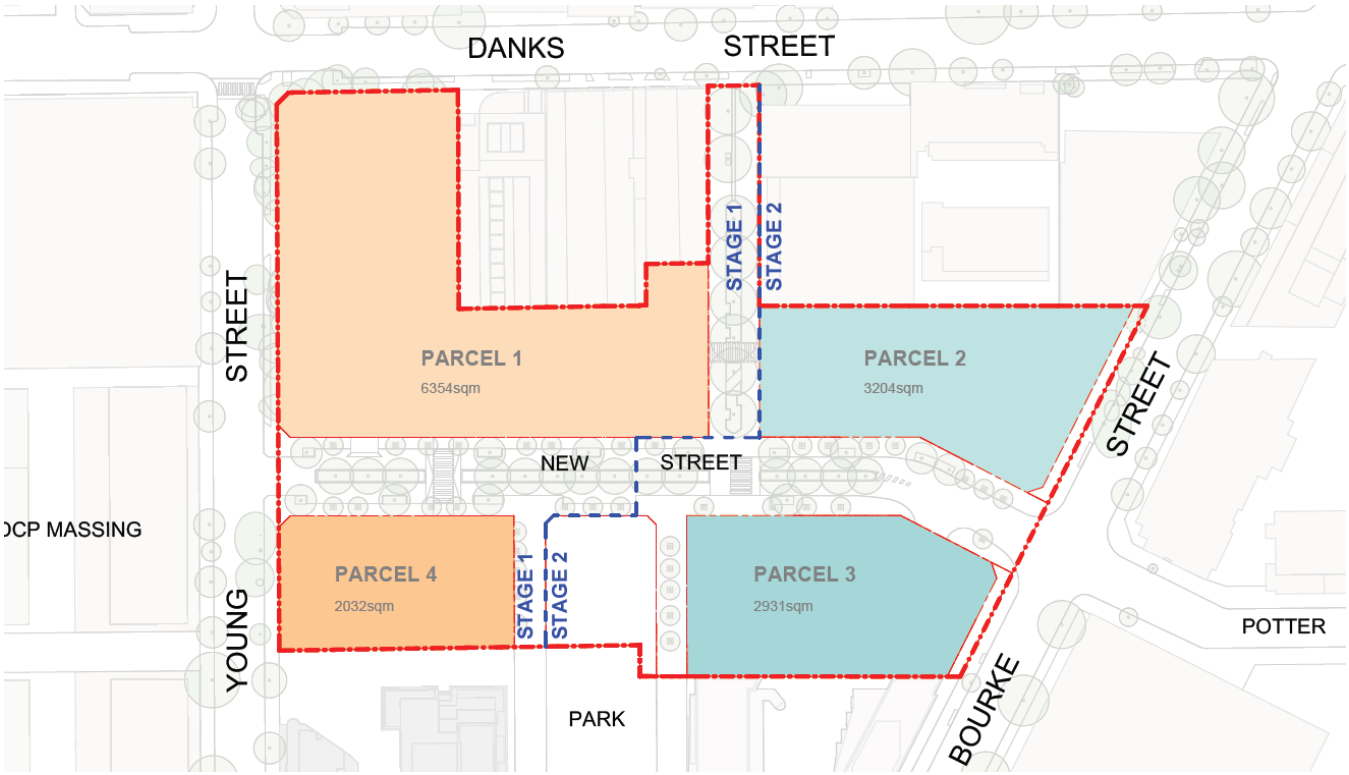


Figure 6 Four development parcels and public domain land established in VPA and D/2020/45

Source: Turner

1.4.2 Related Development

This Main Works SSDA is preceded by an Early Works SSDA (SSD-80911502) to facilitate the future redevelopment of the site. The Early Works comprise the following, to be carried out in 2 stages (illustrated in Figure 7 below):

- Site establishment.
- Erosion and sediment control.
- Removal of 1 tree.
- Bulk excavation for future basement and tunnel links.
- Construction and anchoring of piled shoring wall and capping beam.
- Infrastructure services coordination and augmentation.
- Ancillary site works.

Bulk excavation is proposed to be carried out across all 4 future development parcels. Further, a minor portion of excavation is proposed to be carried out between development parcels 1 and 2 (below the future through site link, between parcels 2 and 3 (below the future new public road) and between parcels 1 and 4 (also below the future public road). Excavation will be accompanied by construction and anchoring of a piled shoring wall and capping beam.

The proposed early works development requires the removal of 1 tree to facilitate the proposed works. In addition, the site is currently being remediated (Stage 2) or has been remediated (Stage 1) in accordance with the Concept DA consent D/2020/45/C. The statement confirms that these remediation works are sufficient to facilitate residential development on the site. As such, no further remediation is required, notwithstanding the proposed bulk excavation and early works proposed.

The Early Works SSDA was lodged with DPHI on 25 July 2025 and was publicly exhibited during August and September 2025. At the time of writing, the Early Works SSDA was under assessment with DPHI.

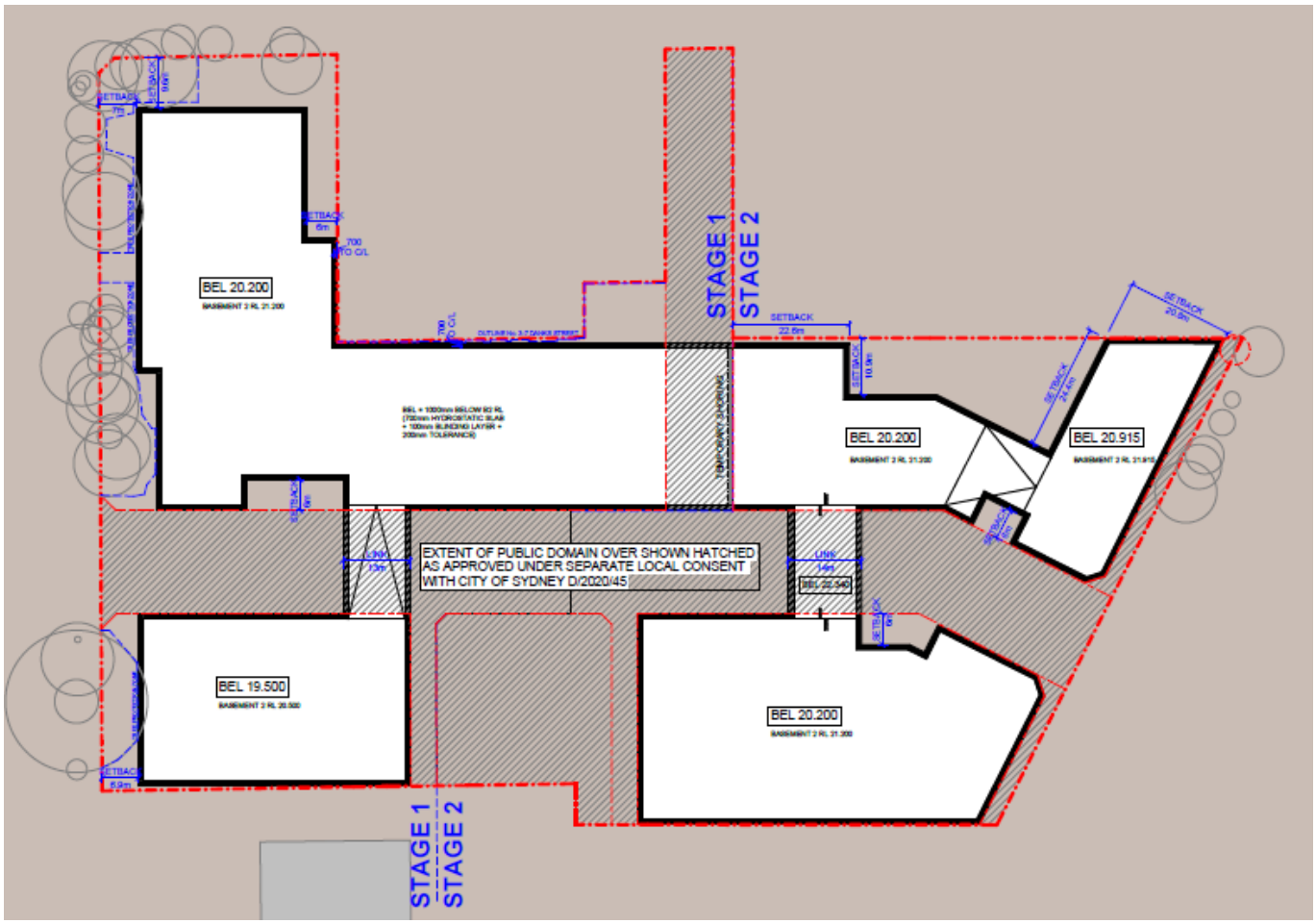


Figure 7 Proposed bulk excavation extent (Early Works SSDA)

Source: Design Team

1.4.3 Restrictions or Covenants

A survey is provided at Appendix CC, identifying the restrictions and covenants that apply to the subject lots. The easements and covenants noted are addressed in the previously approved public domain works SSDA and subdivision (to any extent those works relate to the identified restrictions and covenants), and have been considered in the proposed Early Works, to any extent those works relate to the identified restrictions and covenants.

1.5 Housing Delivery Authority and National Housing Accord

The NSW State Government has agreed to a National Housing Accord (Accord) with other states and territories, local government, institutional investors and the construction sector. The Accord includes an initial aspirational target agreed by all parties to build 1.2 million new well-located homes over 5 years from mid-2024. NSW has a target to deliver 377,000 new homes over 5 years by July 2029 under the National Housing Accord.

To accelerate the delivery of much needed homes and help meet NSW's target under the Accord, the NSW Government established the HDA.

The HDA offers a clear planning pathway for large residential and mixed-use developments to be assessed as state significant development and state significant development with a concurrent rezoning. This process aims to improve consistency in planning decisions and speed up assessment, without sacrificing housing quality.

This project was nominated as SSD under the HDA, also providing for a concurrent rezoning to facilitate the intended development to deliver 850 apartments, including 73 affordable housing apartments. This will contribute to the 5-year housing target of the City of Sydney of 18,900.

1.6 Design Excellence Strategy

The SLEP 2012 requires the proposed development to exhibit design excellence (clause 6.21C).

Clause 6.21D of the SLEP 2012 also requires the undertaking of a competitive design process in accordance with the City of Sydney Competitive Design Policy 2020 (the Policy). The SLEP 2012 and the Policy enables the Consent Authority to grant up to an additional 10% of building height (for this site) if it is satisfied that the development is the result of a competitive design process and exhibits design excellence.

Ordinarily, this requirement is satisfied prior to the preparation and lodgement of a detailed development application. However, as the proposal is subject to a Ministerial Order as per recommendation by the HDA for the progression of a concurrent rezoning and SSDA, a pathway established to accelerate delivery of housing, the proponent sought endorsement of an Alternative Design Excellence Strategy. The proponent acknowledges that by not undertaking a competitive design process, the proposed development can no longer utilise the 10% height bonus.

Importantly, the HDA mandate sets out the following timeframes to achieving accelerated housing supply during the Housing Accord Period:

- Proponents must lodge an application within 9 months of approval.
- HDA targeting 275 days for issuing SSD and concurrent rezoning approvals.
- Proponents must commence construction within 12 months of approval.

The undertaking of a design competition, particularly at this scale, would eliminate any ability to meet these timeframes. Notwithstanding, the proponent remains committed to achieving design excellence on the site, and accordingly this Strategy seeks to fulfil the intention of the design excellence provisions within the SLEP by setting out the processes for achieving a high-quality design outcome at the site.

To ensure the Main Works SSDA could meet the required HDA timeframes, an alternative design excellence process was prepared by Ethos Urban in consultation with the City of Sydney and endorsed by the NSW Government Architect. The strategy was undertaken prior to lodgement of this application. The alternative strategy did not involve a Competitive Design Process – instead it involved the selection of a team of proven architects with a track record of delivering high-quality buildings, along with emerging practices. The design team presented to the State Design Review Panel on 2 occasions prior to lodgement, and the SDRP commended the design team and acknowledged that many elements of the proposed development were capable of achieving design excellence, provided their commentary is addressed.

Further feedback has been sought from the SDRP concurrently to the lodgement of this application. A response letter prepared by the design team has been provided to the SDRP relating to additional matters for desktop review. Any commentary will be considered as the assessment of this application progresses.

For a detailed response to the design commentary, please refer to the Design Report at Appendix E.

2.0 Strategic Context

This section identifies key strategic matters relevant to the assessment of the proposal, including the site's features, context, strategic context and other development in the surrounding area. This section also provides an analysis of feasible alternatives that were considered in light of the proposal's objectives.

2.1 Site Location and Context

The site is located within Gadigal Land, in the City of Sydney Local Government Area (LGA).

The site is located within Waterloo, a suburb with a varied character, historically charactered by terrace and cottage housing, commercial and industrial premises which have been progressively transforming into modern mixed-use and medium to high density residential development, with retention of specialised and boutique commercial premises. Waterloo is undergoing significant transformation driven by the City of Sydney's long-term master planning for the Green Square precinct, which contains the Danks Street South precinct to encourage a mix of residential, commercial and retail uses.

The site is well connected to public transport and is approximately 950m walk east of an entrance to the Waterloo Metro Station, approximately 1.1km northeast of the Green Square Train Station and approximately 1.5km southeast of Redfern Train Station. It is also serviced by frequent bus routes along Bourke Street and McEvoy Street.

A Site Location and Context Map is provided in Figure 8 below.

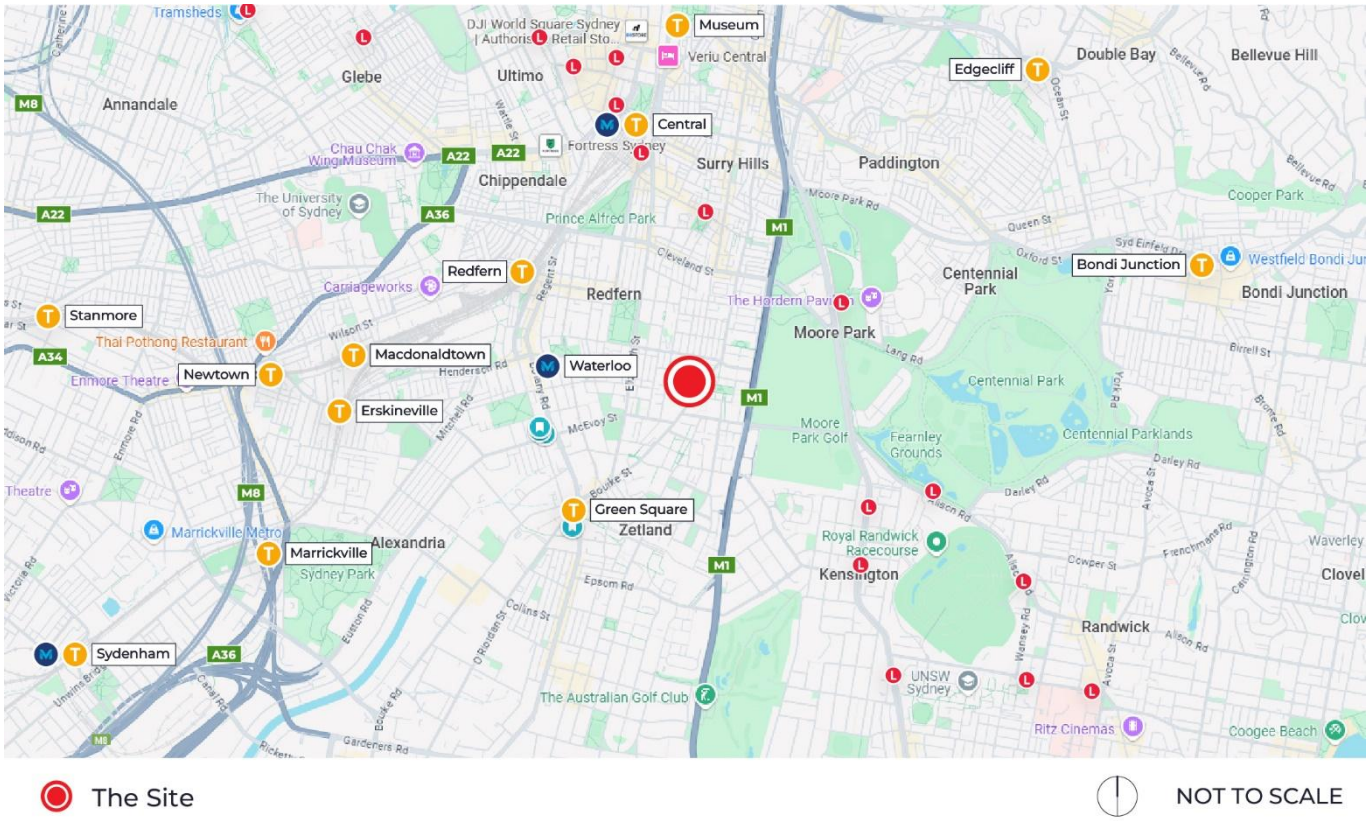


Figure 8 Site Context

Source: Nearmap/ Ethos Urban

2.2 Site Description

The site is legally described as Lot 1 DP1308636 and Lot 2 DP1308636 and is located at 881-885 Bourke Street, Waterloo. The site has an area of 21,554m^2. It has an irregular shape, is generally flat and has been cleared of all light industrial and large format commercial buildings. The site currently has vehicle access from Young Street and Bourke Street.

There are a number of trees located in the public domain on the Danks and Young Street frontages, within the site boundary. Additional trees on these frontages are located outside the site boundary. There are commercial and business premises to the west, high-density residential and business premises to the north, primarily high-density residential to the east and high density residential under construction to the south.

An aerial of the site is provided in Figure 9 below. Photography around and within the site is provided at Figure 10.



Figure 9 Site Aerial

Source: Nearmap, Ethos Urban



The site from corner of Young Street and Danks Street



The site from Young Street



The site from Bourke Street



The site internally, looking to Young Street



The site internally, looking to the DASCO site at south



The site internally, looking to Danks Street

Figure 10 Photography surrounding and within the site

Source: Virtual ideas

2.2.1 Transport and Access

Pedestrian Access

Pedestrian footpaths are located to the perimeter of the site along Danks Street, Young Street, and Bourke Street. As the site is undergoing remediation and demolition works, pedestrian access into the site is restricted.

The approved public domain Works SSDA includes a pedestrian link from Danks Street known as Danks Lane, pedestrian paths either side of a new east west street connecting Young and Bourke Streets (with a central raised pedestrian crossing), and shared zones either side of a new park. The site will therefore be permeable to pedestrian movement and connect to existing and future adjacent pedestrian paths.

Vehicular Access

Vehicular access to the site is provided off Young Street to the west and Bourke Street to the east. Limited vehicular access is provided off Danks Street.

The approved vehicular access network includes a new east west street connecting Young and Bourke Streets, and shared zones either side of a new park. Limited vehicular access will be maintained off Danks Street for residents of 9-15 Danks Street as required by easement.

Bicycle Access

Bicycle routes adjacent the site as identified in the City of Sydney's Cycling Map. Danks Street includes bicycle route signage. Bourke Street has an off-road shared path with cycle. Both Danks and Young Streets are identified as low-traffic and safer for cyclists.

Public Transport Access

A bus stop is located along the Bourke Street frontage and several other bus stops are located within an 800m radius of the site. The newly opened Waterloo Metro Station is located 950m walking distance from the site. The South East Light Rail network includes a Surry Hills Stop approximately 1.4km from the subject site and a Moore Park stop approximately 1.5km from the subject site.

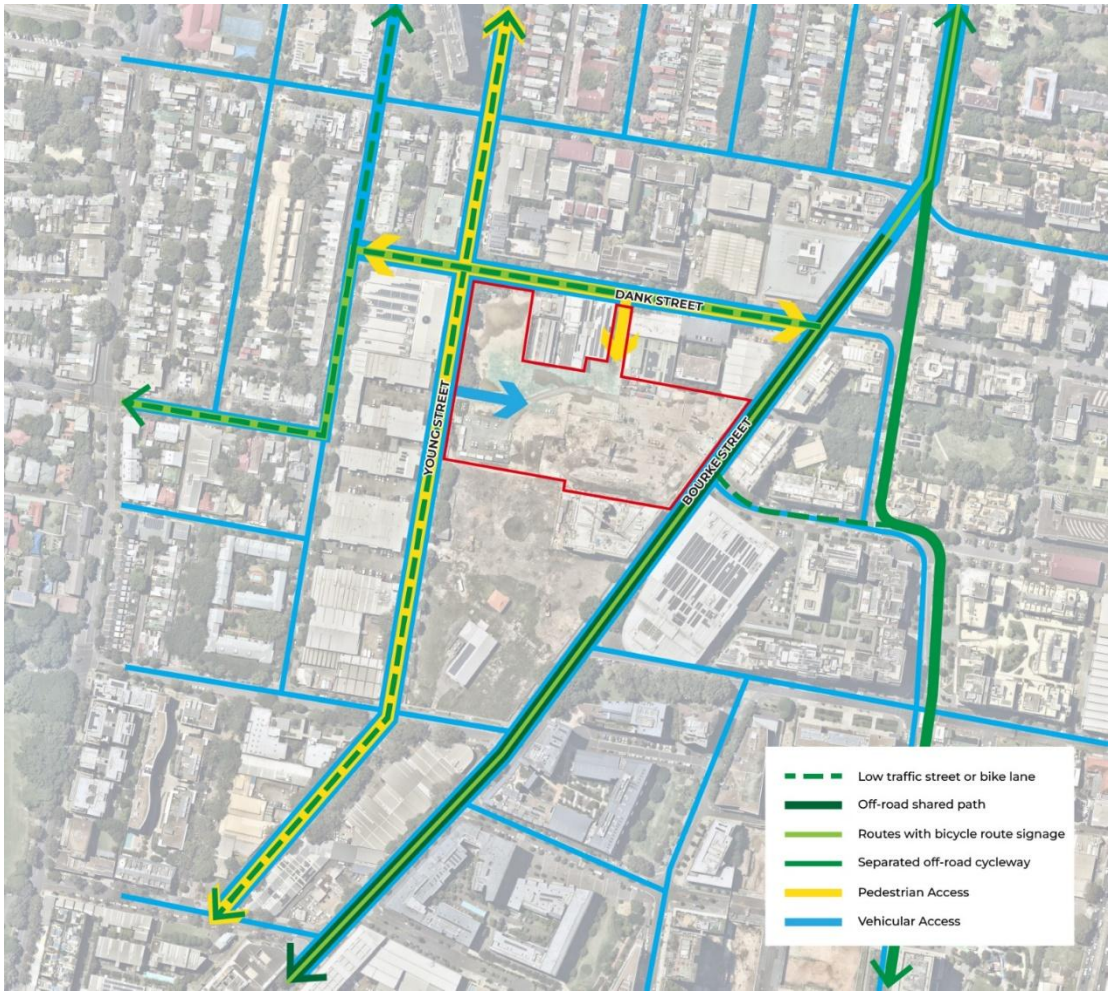


Figure 11 Pedestrian and Vehicular Access

Source: Ethos Urban

2.2.2 Heritage

The site is not identified as a heritage item and is not located within a Heritage Conservation Area (HCA). There are several items in proximity, or in view of, the site. These include 4 items located within close proximity and 2 heritage conservation areas. These include (refer to Figure 12):

- 'Waterloo' – Heritage Conservation Area – LEP C70. The Waterloo HCA is located 105m west of the site, off Morehead Road. This heritage conservation area is of local significance.

- ‘Baptist Street’ – Heritage Conservation Area – LEP C53. The Baptist Street HCA is located 135m north of the site. This heritage conservation area is of local significance.
- Commercial Building Part of “Federation Business Centre” (222 Young Street)’ – LEP #I2103. The Federation Business Centre is located at 222 Young Street, Waterloo and lies approximately 95m to the southwest of the site. Views of the item are primarily experienced from the public domain along Young Street.
- ‘Former Sydney Water Pumping Station and Valve House’ – LEP #I2073. The Waterloo Pumping Station and Valve House sit within the adjacent (largely undeveloped) property which is listed as a complex/group item within the SLEP 2012. The Sydney Water Pumping Station sits approximately 100m from the site’s southern boundary. The Valve House sits approximately 100m from the southern boundary of the site. Views to the buildings are currently available from Bourke Street looking west, McEvoy Street looking north and Young Street, looking east. The buildings are also visible within views looking south, from the site.
- ‘Electrical Substation’ – LEP #I2104. Located at 241 Young Street, Waterloo, the Electrical Substation lies 75m to the southwest of the site.
- ‘Pressure Tunnel and Shafts’ – SHR #01630. The Pressure Tunnel and Shafts are located 100m south of the site in the adjacent property. This tunnel and shaft are located in a sub-surface capacity and are not visible from the site or surrounding public domain.

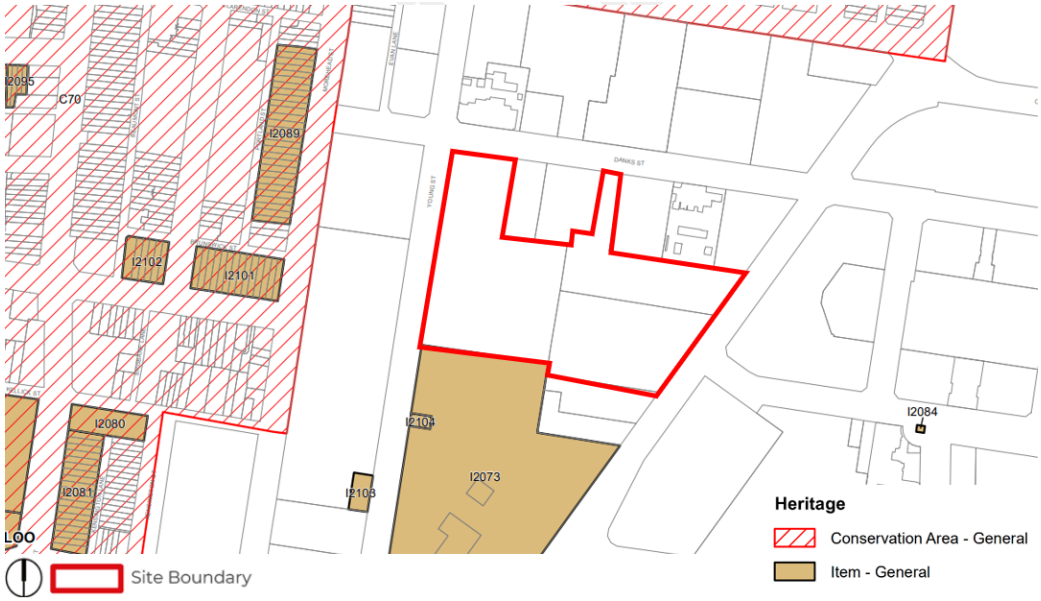


Figure 12 Heritage context surrounding the site

Source: NSW Legislation, Ethos Urban

2.2.3 Flooding

The site is partially affected by flooding. A Flood Impact and Risk Assessment has been prepared by Stantec (refer to Appendix U) and provides a summary of the flood hazards applicable to the site under both pre and post-development conditions.

The site is not affected by flooding during the 1% AEP event under the existing conditions, as identified in Figure 13. It is mostly flood-free during the 1% AEP event with adjustment for climate change, resulting in minor flooding on the western side of the site. This results in a flood hazard category of H2, with floodwater velocities reaching 1.05 m/s at the site’s western boundary.

Surrounding streets are impacted by flooding during the 1% AEP event. Flood depths beyond the site are mostly below 60mm on Bourke Street but reach 1,010mm at the intersection of Young Street and Danks Street. This results in a flood hazard category of H5 on Young Street at the site’s entry and H4 at the intersection of Young Street and Danks Street.

During the PMF event under existing conditions, floodwater enters the site from the northern and western boundaries, as identified in Figure 14. Flood depths reach 1,200mm along the western boundary with Young Street and 1,115mm along the northern boundary with Danks Street. Floodwater velocity reaches 3.90 m/s in the site’s south-western corner along Young Street and 0.45 m/s along the northern boundary with Danks Street. Flood hazard during the PMF ranges from category H1 to H5 on the site, with the most hazardous areas (H5) concentrated along the western boundary with Young Street.

Off-site during the PMF event, flood depths reach 120mm on Bourke Street and up to 2,040mm at the intersection of Young Street and Danks Street. Velocities reach 1.50 m/s on Bourke Street and 5.20 m/s at the site's entrance from Young Street. The resulting flood hazard is category H6 along Young Street and category H1 on Bourke Street adjacent to the site.

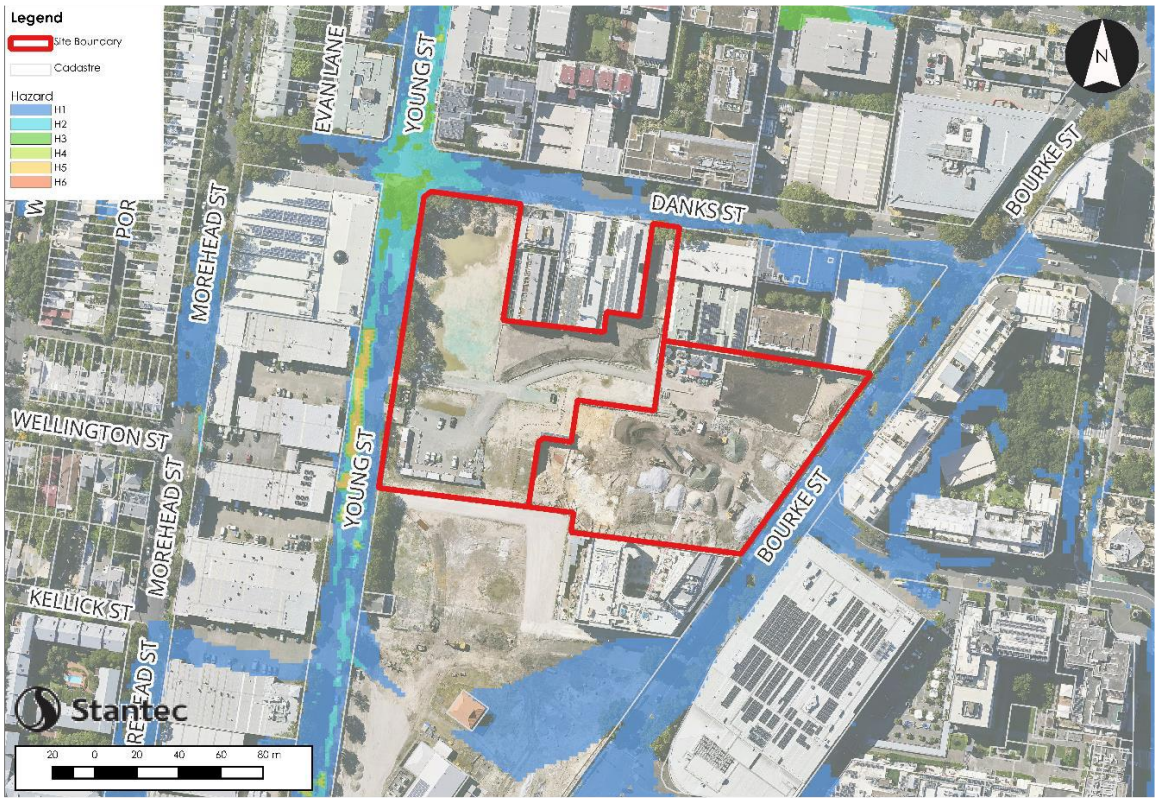


Figure 13 Existing 1% AEP Flood Characteristics

Source: Stantec

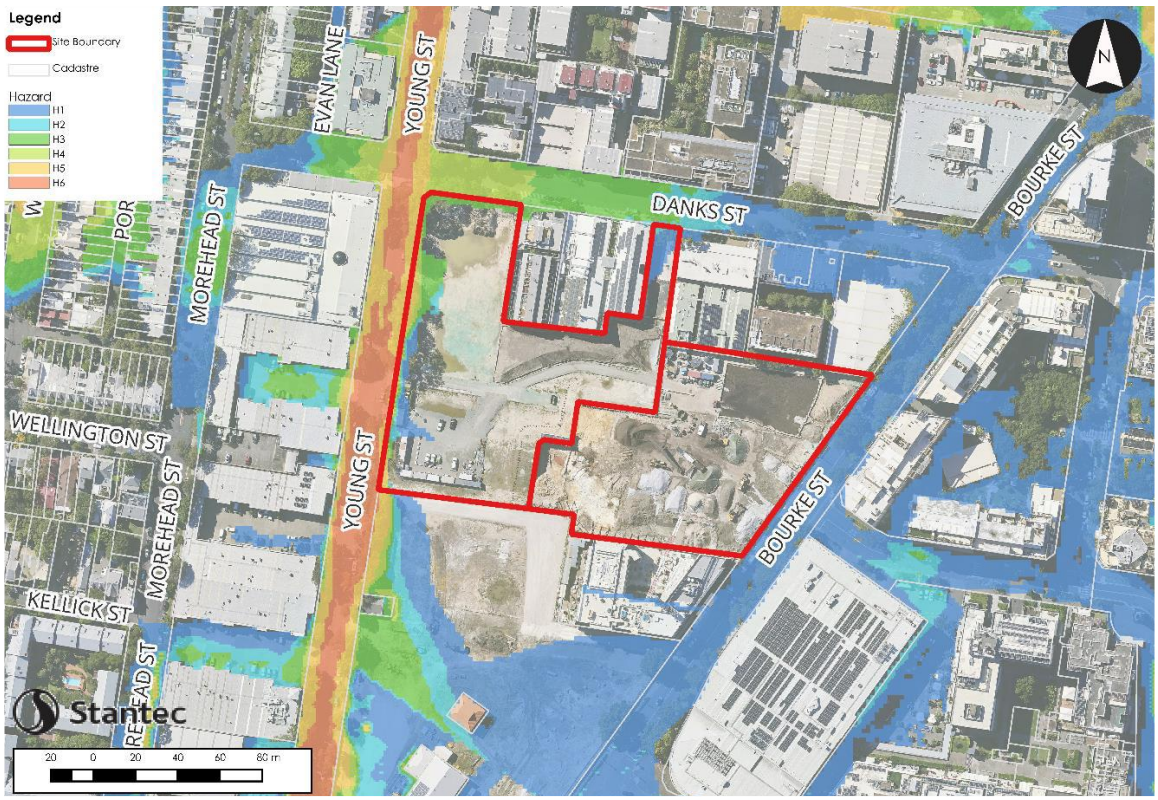


Figure 14 Existing PMF Flood Characteristics

Source: Stantec

2.2.4 Trees

As identified in the Arboricultural Report (found at Appendix O), there are a total of 66 trees on the site or adjacent to the site, with 19 trees located within the site's boundaries. The majority of these trees, ranging in age from 35 to 45 years, are associated with the planting of newer commercial buildings during the 1980s to 1990s. Additionally, several trees are located in the western and north-western portions of the site, which were previously near historical commercial premises along Young Street and Danks Street before their demolition.

2.2.5 Contamination

Demolition and remediation works are being carried out (Stage 2) and have been completed (Stage 1) pursuant to the Concept DA consent D/2020/45/C. As identified in the Status of Environmental Remediation and Reporting (found in Appendix L) these works will fully remediate the site and as such, environmental reporting that would normally be expected to address the relevant SEAR (such as the PSI, DSI, RAP, etc) is not required, and the land will be suitable for future residential development. The works in this SSDA do not affect the outcome or change the scope of remediation undertaken on the site.

Stage 1 (207-229 Young Street)

Remediation of the Stage 1 area (207-229 Young Street) was performed in accordance with the Senversa (2021) Remediation Action Plan and Senversa (2023a/b) Work Plans. It was completed by October 2024. The remediation was effective in removing the identified contamination, which was derived from historical land filling and activities associated with the dry-cleaning industry. The validation program confirmed that all soils within the Main Area, Recreational Area, Substation Area and Pedestrian Area were suitable for the proposed development. The GDH (2024) Site Audit Report, prepared by the independent EPA-accredited auditor Mr Andrew Kohlrusch of GHD Pty Ltd, imparted the necessary sign-off for these areas.

Stage 2 (881-885 Bourke Street)

Stage 2 remedial works are currently being performed in accordance with the Senversa (2021) Remediation Action Plan and Senversa (2023a/b) Work Plans. They are expected to be completed by the end of 2025. The remediation and validation programs shall be reviewed by an independent, EPA-accredited site auditor, in order to acquire the necessary sign-off for this area.

2.2.6 Topography

The site is generally flat. There is a minor, gradual slope from the north of the site at approximately RL28.40 to the south of the site at approximately RL26.5.

2.3 Existing Surrounding Development

The surrounding locality comprises of mix of land uses including residential, retail, commercial and light industrial uses in buildings of varied height, age and form. Table 2 includes a summary of existing surrounding development.

Table 3 Summary of Existing Surrounding Development

Image Reference	Address	Description
To the North		
1	2 Danks Street Waterloo	A 5-storey mixed use development with 42 residential units comprising basement level 40 car parking spaces and ground level commercial tenancies.
2	8-10 Danks Street Waterloo	2 storey building with a retail and food and drinks premises.
3	18 Danks Street Waterloo	Mixed-use development comprising 4 buildings up to 6 storeys in height with basement car parking, residential apartments and retail tenancies, a through-site-link and courtyard.
4	169-175 Phillip Street Waterloo	4 storey apartment building.
To the East		

5	1 Danks Street Waterloo	Former industrial warehouse building that has been converted to a mixed-use commercial and residential building. This building is commonly known as 'Warehouse 1'.
6	788-822 Bourke Street Waterloo	Approximately 8 storey residential building with ground floor retail.
7	28 Crystal Street Waterloo	Approximately 5-6 storey residential building with ground floor retail.
8	22 Crystal Street Waterloo, 7 Broome Street Waterloo	Approximately 5-6 storey residential building with ground floor retail.
9	22A Crystal Street Waterloo	Crown Park – Public open space between 28 Crystal Street, 22 Crystal Street and 7 Broome Street Waterloo.
10-12	895-901 Bourke Street Waterloo	Demolition of existing structures on site and the construction of a mixed use building containing affordable housing dwellings above car parking spaces and a commercial tenancy. The proposal involves amending existing conditions relating to site contamination and to allow for the staging of construction works.
To the South		
13	895-899 and 901 Bourke Street Waterloo	5 storey mixed use building, the City West Housing site, which is recently completed.
14	903-921 Bourke Street Waterloo	Commonly known as the 'Danks St District', a precinct development by Dasco. The development retains land owned by Sydney Water that includes heritage items 'Value House' and 'Pumping Station'. The development will comprise 6 mixed use buildings containing residential apartments (373), commercial tenancies and a combined basement. This development has recently been nominated by the HDA to be declared SSD by that pathway, in order to increase the height and yield of the approved development.
15	923 Bourke Street Waterloo	Currently a mixed-use zone that is home to a variety of businesses and retailers including Smart Energy and Hogan Prestige Luxury Cars. Changes to the planning controls for 923-935 Bourke Street include enabling the mixed use development on the site which will include residential, commercial and retail uses with a below ground supermarket. The proposed changes also include uplifting building height to 5 (5) and 7 (7) storeys.
16	824 Bourke Street Waterloo	Commonly known as the Toyota Showroom site. Car sales and showroom for Toyota and Lexus.
To the West		
17	188-195 Young Street Waterloo	The Hillsong Church Waterloo Campus.
18	198-222 Young Street Waterloo	Federation Business Centre including, but not limited to, BBB Gym Waterloo, Peak Health Services, Burson Auto Parts Waterloo, Orion Mechanical Services, Koda Lighting, Central Security Distribution and BT Imaging.
19	54-120 Morehead Street Waterloo	Two storey terrace houses identified as heritage item I2089 – Terrace group 'Grosvenor Terrace' of local significance.
20	3-7 Danks Street, Waterloo	Two storey commercial building currently being used by Eco Outdoor as well as Studio Gallery (an Art Gallery) and Monster Children (publishing studio).

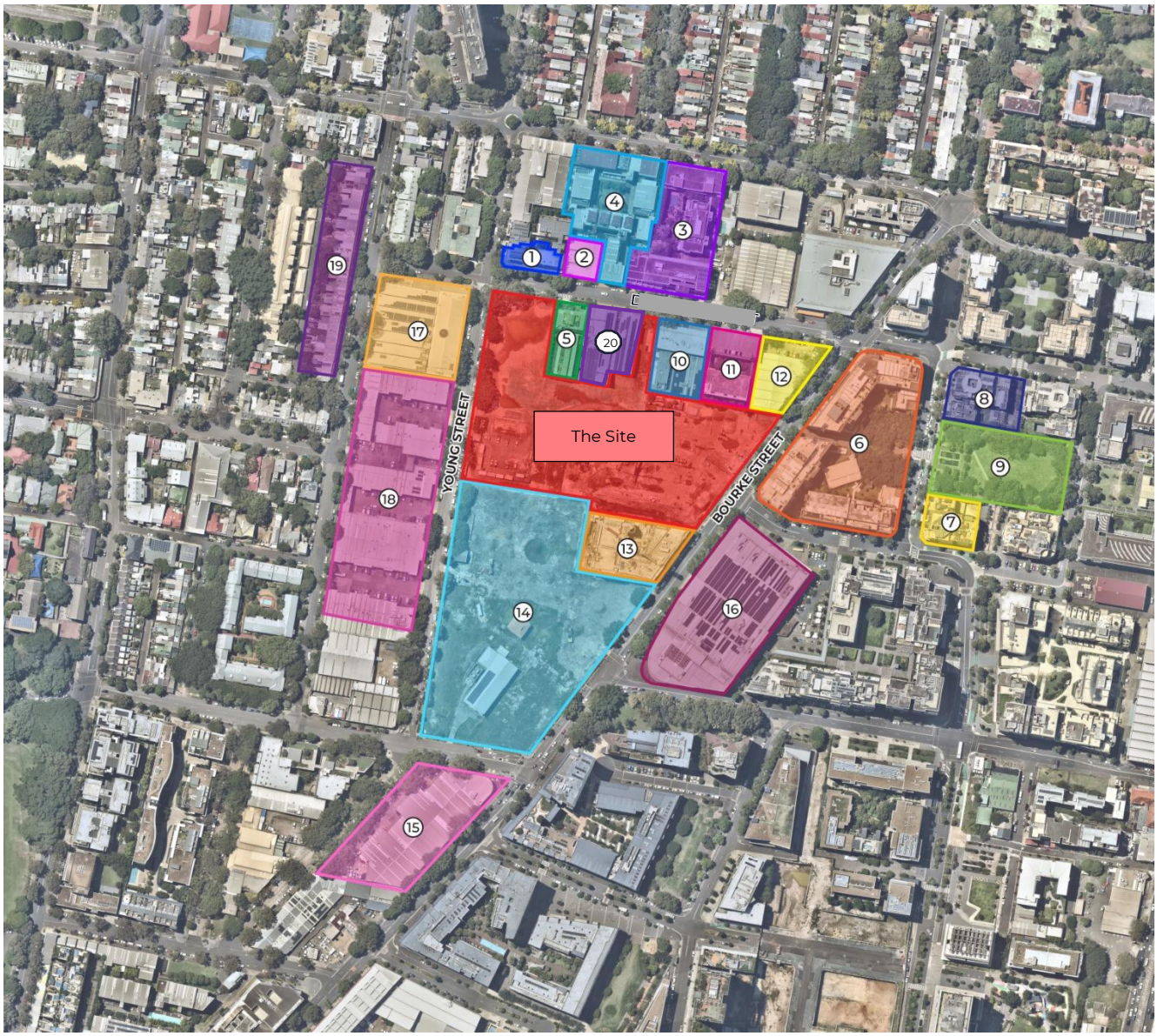


Figure 15 Surrounding existing development

Source: Ethos Urban

2.4 Recent and Approved Surrounding Development

In alignment with the ongoing revitalisation of the precinct, the site is in proximity to recent and approved residential and mixed-use development. Table 3 includes a summary of future surrounding context.

Table 4 Recent and Approved Surrounding Development

Ref	Address	DA Number	Description	Status
1	903-921 Bourke Street Waterloo and 3 McEvoy Street Waterloo	D/2021/1415	Demolition of structures, and the construction of 6 x mixed use buildings containing residential apartments (376 units) above commercial uses and basements. The proposal includes public domain and site landscaping works and subdivision. Two construction stages are proposed. The application is Integrated Development, pursuant to the Water Management Act 2000 and the Heritage Act 1977.	Under Construction 09/05/2024 This development has recently been nominated by the HDA to be declared SSD by that pathway, in order to increase the height and yield of the approved development.

Ref	Address	DA Number	Description	Status
3	923 Bourke Street Waterloo	VPA/2022/14	Planning Proposal for affordable housing. Propose changes include building height increase to 3-7 storeys, additional floorspace for supermarket below ground level, contribution of affordable housing, active street frontages and additional building setbacks for tree retention.	Executed 18/01/2024
4	890-898 Bourke Street Zetland	D/2017/1672	Detailed Proposal for the demolition of existing buildings, excavation, and the construction of a 6 storey mixed used development with 2 levels of basement car parking, comprising 145 apartments, 1 ground floor retail tenancy, and landscaping works. The application is Integrated Development requiring the approval of Water NSW under the Water Management Act 2000.	Under Construction 04/03/2022
5	888 Bourke Street Zetland	D/2020/93	Detailed development application for 2 7 storey buildings containing 89 serviced apartments and 1 retail space in Building A and 92 residential apartments in Building B with associated basement parking. The application also includes construction and dedication of a new road, footpath widening and site remediation and associated public domain Works SSDA. The application is integrated development requiring the approval of Water NSW under the Water Management Act 2000 and the Roads and Maritime Service under the Roads Act 1993.	Under Construction 10/12/2020



Figure 16 Surrounding Future Context

Source: Nearmap, Ethos Urban

2.4.1 Danks Street South Precinct

The site is currently identified as being located within the Danks Street South mixed-use urban renewal precinct (DSSP).

The DSSP is bounded by Bourke Street to the east, McEvoy Street to the south, and Morehead Street to the west. It lies directly adjacent to Danks Street to the north.

The City identifies that, building on the vibrancy and diversity of the surrounding area, the precinct will primarily be residential, complemented by retail and commercial spaces fronting a heritage plaza. Larger floorplate buildings along Bourke Street, Young Street, and McEvoy Street will offer flexible spaces suitable for a range of non-residential uses.

The redevelopment will transform existing large industrial lots through subdivision and the introduction of a new internal street network designed to enhance legibility and permeability. As part of the renewal, a new park of approximately 3,900 square metres will be created for passive recreation, along with a 1,400 square metre public square surrounding the heritage-listed Sydney Water Valve House.

The precinct will prioritise walkability and cycling, with pedestrian-friendly streets and reduced vehicle speeds to create a safe and accessible environment for all users.

2.5 Strategic Planning Context

This section demonstrates how the vision and intended outcomes for the site are consistent with a range of strategic planning objectives established by both the City of Sydney and the NSW State Government. Specifically, the Main Works supports the strategic planning context relating to the following themes:

Housing Supply & Affordability	Integrated Transport & Connectivity	Social & Community Vibrancy
Environmental Sustainability & Resilience	Design Excellence & Placemaking	Employment & Productivity

2.5.1 Housing Supply & Affordability

Sydney is experiencing a significant shortfall in housing supply and affordability. To meet the needs of a growing population, there is a critical need for more diverse and accessible housing options. This SSDA will facilitate a mixed use development that will deliver an increased number of dwellings in a well-established and connected area.

The National Housing Accord (2022) and NSW Housing Strategy (2023) set an ambitious target for NSW to deliver 377,000 new homes by July 2029, equating to an additional 25,000 new dwellings per year. The Main Works will facilitate development that contributes to that target through the delivery of 777 build-to-rent dwellings in a highly accessible and well-serviced location, supporting both housing diversity and affordability through increased supply.

The Region Plan (Objectives 10 and 11) and the Eastern City District Plan emphasise the importance of increasing housing supply in a sustainable manner. Priority E5 of the District Plan identifies the need for diverse and affordable housing close to jobs, services, and public transport. In the context of the Sydney CBD, the Plan supports urban renewal and infill development to accommodate population growth while ensuring accessibility and high amenity. This proposal aligns with those priorities by facilitating the delivery of build-to-rent and affordable housing within close proximity to Waterloo Centre, employment hubs, and key transport infrastructure.

Affordable and social rental housing is recognised as critical social infrastructure (LSPS, 2020; Sydney LHS, 2020). The City of Sydney has identified a need for approximately 11,000 affordable rental dwellings and 2,000 social housing dwellings by 2036. This development will ensure the delivery of 73 affordable housing dwellings, helping to meet those local housing needs which will be managed by a Community Housing Provider (CHP) for 15 years.

2.5.2 Integrated Transport & Connectivity

The site is strategically located within a well-connected transport network that includes heavy rail, metro, and high-frequency bus services, providing excellent accessibility to the Sydney CBD and surrounding areas. The proposed Main Works will leverage existing infrastructure, including Redfern Railway Station and Waterloo Metro Station, both of which are within easy walking distance, to support sustainable, transit-oriented development.

The Region Plan and the Eastern City District Plan highlight the importance of integrated land use and transport planning to support the "30-minute city" concept, ensuring residents can access jobs, services, and amenities within a short travel time. Specifically, Priority E10 of the District Plan supports higher-density development in areas with strong public transport connectivity, like the Green Square and Waterloo renewal precincts. The proposed Main Works meets that objective by creating a mixed-use neighbourhood centre within walking distance of existing transport hubs, reducing the need for private vehicle use and enhancing overall accessibility.

The proposed Main Works also prioritises active transport and pedestrian permeability. New through-site links and the proposed east-west street will improve walkability and cycling opportunities both within and beyond the site. These initiatives are consistent with the NSW Future Transport Strategy 2056 and Active Transport Strategy 2056, which aim to deliver connected walking and cycling networks and support the creation of 15-minute neighbourhoods.

2.5.3 Social & Community Vibrancy

The proposed Main Works establishes the framework necessary to accommodate future community uses, gathering places, and activation opportunities that foster a sense of local identity and belonging. The configuration of the site, including the provision of deep soil zones, public plazas, and through-site pedestrian connections, has been designed to support inclusive movement, future civic and cultural infrastructure, and a public realm that invites passive recreation, and social participation consistent with the Build to Rent model. These elements align with Planning Priority E4 of the Eastern City District Plan, which seeks to foster healthy, creative, culturally rich and socially connected communities through place-based planning and high-quality public spaces.

The proposal also supports Priority L1 of the City of Sydney's Local Strategic Planning Statement 2020, which identifies the need to deliver places that respond to the area's social make-up and create diverse, accessible, and safe environments for people of all ages, backgrounds and abilities. The public domain will support everyday social encounters as well as programmed community and cultural events. Future ground floor uses, such as fine-grain retail, food and beverage, and community-focused spaces, will activate the street, enhance vibrancy, and contribute to a lively precinct.

These outcomes are further reinforced by Direction 8 of Sustainable Sydney 2030–2050: Continuing the Vision, which aims to deliver a thriving cultural and creative life, and recognises the role of well-designed public places and built form in supporting social resilience and creative expression. The proposed urban design prioritises permeability, human-scaled streetscapes, and active frontages, in line with the design objectives of Better Placed (GANSW), specifically Objective 3: Better for community and Objective 4: Better for people, which advocate for places that are inclusive, liveable, and socially engaging.).

2.5.4 Environmental Sustainability & Resilience

Environmental sustainability and resilience are critical considerations in the shaping of mixed-use developments, ensuring that the outcome responds to ecological values, climate adaptation, and long-term resource efficiency. The proposed Main Works supports these objectives by embedding sustainability principles throughout the design, including the retention of deep soil zones to support significant canopy planting, contributing to improved urban cooling, biodiversity, and urban amenity. These outcomes directly support Objective 33 of the Greater Sydney Region Plan and Planning Priority E17 of the Eastern City District Plan, which seek to increase urban tree canopy cover and deliver Green Grid connections to promote liveability and urban cooling.

The built form has been carefully configured to maximise solar access, facilitate cross-ventilation, and protect the amenity of surrounding public and private domains, consistent with Objectives 34 and 35 of the Greater Sydney

Region Plan, which promote energy and water efficiency in buildings. The layout supports integrated water-sensitive urban design and passive environmental performance, which is aligned with Priority S1 of City Plan 2036, which require developments to incorporate stormwater reuse, green infrastructure, and ecologically responsive design.

The development will exceed the minimum BASIX requirements, targeting energy and water scores at least 5 points above standard, and will deliver buildings designed to achieve a minimum 5 Star Green Star Design & As Built rating for commercial components. These outcomes are consistent with Direction 2 of Sustainable Sydney 2030–2050, which seeks to make the city a leading environmental performer through net zero building. The proponent is also committed to meeting the City of Sydney's Net Zero by 2035 Policy, incorporating initiatives that reduce embodied carbon, encourage active transport, and support long-term climate adaptation.

2.5.5 Design Excellence & Placemaking

Design excellence and placemaking are fundamental to delivering a high-quality urban environment that integrates built form with landscape, accessibility, and long-term environmental performance. The proposed development advances these principles through the implementation of a range of architectural buildings that exhibit design excellence. This approach facilitates the retention of key open space areas and the incorporation of deep soil zones critical to supporting urban tree canopy, enhancing biodiversity, and promoting urban cooling. This approach is consistent with the Eastern City District Plan (Priority E6), Sustainable Sydney 2030–2050 (Direction 4), and City Plan 2036 (Priority L1).

The proposed buildings have been informed by iterative design review and collaboration with the State Design Review Panel (SDRP), ensuring the built form and communal and public open space responds meaningfully to site conditions and placemaking objectives, including:

- Additional deep soil to improve street and public amenity.
- Additional setbacks and improved connections.
- Active courtyards with retail interface improved.
- Low rise heights adjusted to improve solar access to park, streets and neighbours.
- Refinement of taller buildings to improve solar to the park, streets and neighbours.
- Park overshadowing to be consisted with the approved envelopes.

2.5.6 Employment & Productivity

Employment and productivity relate to supporting economic vitality through the strategic provision of employment spaces and commercial activities. The proposed Main Works facilitates the delivery of future commercial and retail tenancies at ground level. These spaces will accommodate a diverse range of businesses and services, enabling the creation of ongoing employment opportunities during both the construction and operational phases of development

This approach is aligned with the Greater Sydney Region Plan (2018), which encourages the creation of 30-minute cities where most people can access jobs and services within 30 minutes of where they live. In particular, Objective 23 of the GSRP and Priority E5 of the District Plan seeks to strengthen the economic self-sufficiency of strategic centres through the co-location of housing, jobs, and services.

The Main Works are also aligned with the City Plan 2036, which promotes economic growth through the renewal and activation of underutilised land which will be delivered as part of the future development, particularly in areas well-served by infrastructure. It supports mixed-use precincts that combine living, working, and leisure in walkable and vibrant neighbourhoods.

2.6 Statutory Planning Context

A detailed description of the statutory planning context of the site with regards to the relevant Environmental Planning Instruments (EPIs), and an assessment of SSD-80441462's consistency with this context, is provided at Section 6.0 of this report. This includes an assessment against the key provisions of relevant State Environmental Planning Policies and the *Sydney Local Environmental Plan 2022* (SLEP 2012).

2.7 Cumulative Impacts

The proposed Main Works facilitate the delivery of key housing in the transforming DSSP in Waterloo and they are not expected to give rise to any unacceptable or cumulative environmental impacts that cannot be

appropriately managed. The nearby relevant approved and recently constructed developments that have the potential to result in cumulative impacts are referred in Section 2.4 above.

An assessment of the cumulative impacts associated with these proposals are considered under the relevant issue in Section 6.0.

2.8 Project Agreements

2.8.1 VPA

A VPA was executed between Jeffman Pty Ltd and Red Breast Pty Ltd (the previous landowner to the Applicant) and the City of Sydney for 881-893 Bourke Street and 207-229 Young Street, Waterloo on 11 March 2022, and is registered on title. The VPA secures the provision of public domain (community infrastructure) to address clause 6.14 of the SLEP 2012. It is intended that the principal intent of the VPA will be retained, notwithstanding the Applicant being registered as the new agreement party.

The public domain elements of the VPA are illustrated in Figure 17. These will continue to be delivered by the Applicant, and public domain works will progress on site concurrent to the assessment and determination of this SSDA. The elements are structured in 4 phases across 2 stages, which align with the proposed staging of the early works the subject of this SSDA. These are:

Stage 1 Phase 1:

- Embellishment and dedication of land for Public Road Stage 1 (1,733m^2) – a temporary turning head terminates this road until Stage 2 public domain works are constructed. It is noted that the early works propose excavation for a future basement connection between Parcels 1 and 4, below the new road. The VPA will clarify that the dedication of the new public road to Council excludes a below ground stratum to facilitate this connection.
- Embellishment and dedication of land for the western portion of future shared zone and future park (369.8m^2).
- Embellishment and dedication of land for the pedestrian link (from Danks Street) (1,172m^2).

Stage 2 Phase 2, 3 and 4:

- Embellishment and dedication of land for the Public Road Stage 2 (2,188m^2).
- Embellishment and dedication of land for the eastern portion of future shared zone and future park (1,188.9m^2).
- Embellishment and dedication of land for the Bourke Street footpath widening (266.7m^2).

The above is due prior to the issue of the first Occupation Certificate for any building on Stage 1 and Stage 2, respectively.

Design of the public domain elements has been subject to further design development in parallel to preparation of the HDA application. The final design of the public domain has will be subject to negotiations with the City of Sydney in relation to the VPA. The Applicant will continue to work with the City of Sydney on progressing minor refinements to the approved public domain design, including shifting existing driveway crossings and pedestrian linkages to better optimise the precinct's connectivity. An indicative amended public domain design is provided in the Design Report at Appendix E.

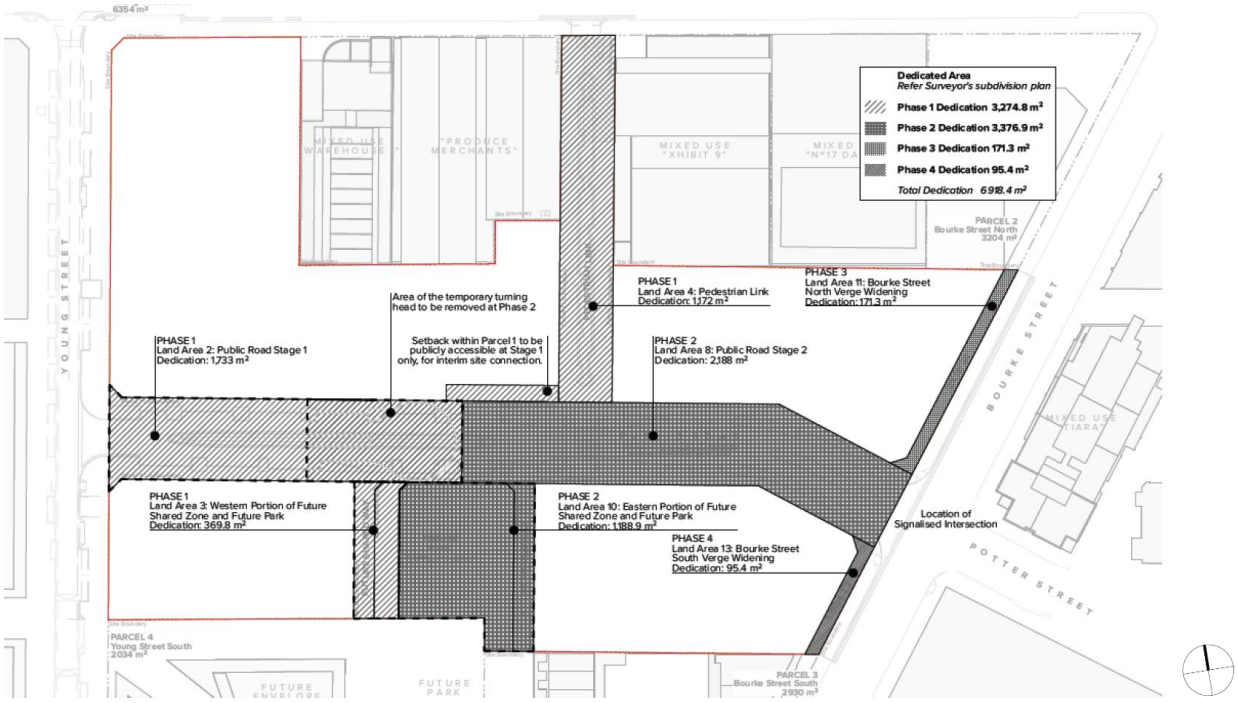


Figure 17 Public Domain Elements of VPA

Source: Turner

2.9 City of Sydney Development Contribution Plan 2015

The City of Sydney Development Contribution Plan 2015 applies to development outside of Central Sydney that will result in a net population increase. The plan applies to development applications and complying development applications made on or after 1 July 2016.

The development is located within the South Precinct of the Development Contribution Plan. The following rates will apply (indexed to June 2025) as shown in Table 5:

Table 5 Contribution Rates – South Precinct

	South
Per worker	$5,817
Per visitor	$13,456
Per resident	$15,434
Per 1-bed dwelling	$20,000
Per 2-bed dwelling	$20,000
Per 3-bed dwelling	$20,000

The contribution will be paid as part of a condition of development consent.

2.10 Analysis of Alternatives

Alternative options have been considered by the Applicant in response to the strategic need and objectives for the development of the site. This includes not undertaking any works on the site ('do nothing'), proceeding with a different use on the site, and alternative design options for the redevelopment of the scheme.

2.10.1 Option 1 - Do Nothing

Under the 'Do Nothing' scenario, the existing vacant site would be retained and continue to underperform and be out of step with the evolving character of the locality. The option does not provide a desirable outcome as it fails to adequately plan for future growth and opportunities to increase the diversity of housing types and need for more rental housing within the Sydney LGA and across Sydney more broadly.

Additionally, this approach would represent a missed opportunity to contribute to the growth and character of Waterloo, which as per its rezoning is envisaged to transform into a vibrant and well-connected mixed-use neighbourhood. The failure to deliver housing and urban renewal envisaged in the rezoning would directly impact on the capacity to deliver well-located housing to meet the future needs of the community within the Waterloo and broader Sydney.

On this basis, the 'Do Nothing' scenario is not considered to be an acceptable approach.

2.10.2 Option 2 - Use of the site for an Alternative Purpose

As the site is currently zoned for Mixed Use (MU1) and Local Centre (E1), the site may be redeveloped for the purposes of business, office, residential and retail uses. Despite the variety of land uses available for the site, the site is recognised as being best used for delivery of housing, reinforced by the fact the project was declared State Significant through the HDA process to provide housing, contributing to the State's target of 377,000 over 5 years. The proposed Main Works will deliver housing to assist in meeting the target, and therefore, using the site for an alternative purpose is not considered to be an appropriate approach.

2.10.3 Option 3 – Redevelopment in accordance with the Approved Concept Plan

The existing Concept Plan that was approved for the site (D/2020/45, as amended) would provide an additional development option for the site. However, with detailed analysis and massing by the Architects, it was concluded that development under the Concept Plan would be inferior as it would not provide sufficient housing in line with the Housing Accord priorities and targets. Therefore, Option 4 is considered the appropriate pathway to deliver additional housing in the City of Sydney.

2.10.4 Option 4 - The Proposed Development

Following the highest and best use analysis of the site, it was determined that a mixed-use BTR housing scheme, including affordable rental housing, with supporting ground floor commercial premises was the most appropriate outcome for the site. The Early Works will facilitate the timely delivery of housing on the site proposed under this Main Works development and in turn contribute to housing growth within Waterloo and the City of Sydney LGA.

The proposed main works, includes the delivery of 850 dwellings including BTR and affordable housing – refer Figure 13. The proposed development will deliver a precinct with diverse housing types that is highly connection and prioritises walkability, landscape integration and social interaction.

The design has been informed by key considerations of the previous concept approval determination including solar access to the central park, retention of significant trees along Danks Street and Young Street and overshadowing of existing residential properties.

Overall, the proposed development will contribute to the supply of BTR housing with convenient access to employment opportunities, essential services, and public transport for the growing and evolving population of Waterloo and the broader Sydney LGA.

This proposed development will deliver effective buildings and dwellings of a high-quality and supports the overall constructability and servicing of the site, ensuring that future residents and users benefit from a high level of service, amenity, and accessibility.

For these reasons, '*Option 4 – The Proposed Development'* is considered the most appropriate and preferred outcome for the site.

2.10.5 Option 4 Variation – The Proposed Development without a consolidated basement

As an alternative to the preferred proposed development, the team considered the option to provide a standalone basement to each parcel (rather than a consolidated basement with sub-grade connections below the public domain between each parcel). This option is considered to result in a poor development outcome for the following reasons:

- It does not align with support received by the City of Sydney to consolidate the basement, which is commonly adopted for major renewal sites in the City of Sydney
- It results in greater vehicular impact, as a result of the requirement for 4 separate loading docks and car park entries.
- It results in greater impacts that result from earthworks, with deeper basement excavation required.

- It results in less active frontage and a poor street address, with a greater proportion of frontage required for vehicle and loading access.
- It results in a reduction to pedestrian safety, with an increased number of vehicle crossovers required to enter and exit each parcel independently.

For the above reasons, '*Option 4 – The Proposed Development*' remains the most appropriate and preferred outcome for the site.

3.0 Project Description

This chapter of the report provides a detailed description of the proposal. The Applicant seeks development consent under Division 4.7 – Stage Significant Development of the EP&A Act to develop the site as diverse, mixed-use housing precinct comprising BTR housing, affordable housing, retail/commercial premises, food and drinks premises, indoor recreation facilities and public and private open space across 4 development parcels. The SSDA seeks to build upon the Early Works SSD-80911502 to deliver additional residential uplift to help tackle the Sydney housing crisis and achieve the goals of the NSW Housing Delivery Authority and National Housing Accord, providing 850 dwellings on the site.

Specifically, SSD 80441462 seeks consent for:

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

Artistic 3D imagery of the proposed development is provided below and on the following pages.



Figure 18 Artistic Render of Proposed Development (looking North from Central Park)

Soruce: Design Team



Figure 19 Artistic Render of Proposed Development (looking West from Potter Street and Danks Lane)

Soruce: Design Team



Figure 20 Artistic Render of Proposed Development (looking East from Central Park)

Soruce: Design Team



Figure 21 Artistic Render of Proposed Development (showing activation within proposed pocket park)

Soruce: Design Team



Figure 22 Artistic Render of the Proposed Development (aerial view, looking south)

Source: Design Team

3.1 Key Project Information

3.1.1 Project Area

The project area is inclusive of 881-887 Bourke Street and 207-229 Young Street, Waterloo. Some public domain works will be required in the Council road reserve to facilitate the proposal. The technical and environmental assessments undertaken to support the development assess all the land located within the site boundary.

3.1.2 Project Details

The key project details regard the proposal are outlined in Table 6 below.

Table 6 Key Project Details

<table>
<tr><th>Component</th><th>Description</th></tr>
<tr><td>Proposed Land Use</td><td>• Residential Accommodation (residential flat building, mixed use, shop top) with build to rent and affordable housing
• Retail/Commercial premises including food and beverage tenancies
• Recreational facility (indoor)</td></tr>
<tr><td>Legal Description</td><td>Lot 1 DP1308636 and Lot 2 DP1308636</td></tr>
<tr><td>Site Area</td><td>21,554m^2</td></tr>
<tr><td>GFA</td><td>
<table>
<tr><th>Parcel</th><th>GFA (m^2)</th><th>FSR</th></tr>
<tr><td>1</td><td>23,533</td><td>1.09:1</td></tr>
<tr><td>2</td><td>12,635</td><td>0.59:1</td></tr>
<tr><td>3</td><td>20,630</td><td>0.96:1</td></tr>
<tr><td>4</td><td>8,311</td><td>0.39:1</td></tr>
<tr><td>TOTAL</td><td>65,109</td><td>3.05:1</td></tr>
</table>
</td></tr>
<tr><td>FSR</td><td>3.05:1</td></tr>
<tr><td>Deep Soil</td><td>Total Deep Soil: 15%
Canopy Coverage: 15%</td></tr>
<tr><td>BTR Communal Space</td><td>Total 34.7% of site area.
Total: 7,470m^2</td></tr>
<tr><td>Car Spaces</td><td>537 car parking spaces within the consolidated basement.</td></tr>
<tr><td>Maximum Height</td><td>
<table>
<tr><th>Parcel</th><th>Maximum Height (RL m)</th><th>Maximum Storeys</th></tr>
<tr><td>1</td><td>90.20</td><td>18</td></tr>
<tr><td>2</td><td>82.55</td><td>15</td></tr>
<tr><td>3</td><td>152</td><td>36</td></tr>
<tr><td>4</td><td>70.81</td><td>13</td></tr>
</table>
</td></tr>
<tr><td>Dwellings</td><td>Total: 850 dwellings
BTR: 777 dwellings
Affordable Housing: 73 dwellings</td></tr>
<tr><td>Construction Hours</td><td>The Main Works will be constructed within the following hours:
• Monday to Friday: 7:00am to 6:00pm
• Saturday: 7:00am to 3:00pm
• Sunday and Public Holidays: No construction unless by special arrangement.</td></tr>
</table>

Component	Description
Operational Hours	Retail Premises: 7am - 10 pm Indoor Recreation Facility: 24hrs, 7 days per week.
Cost (EDC)	$496,735,113 (excl GST)

3.2 Design Principles

Urban Design Principles

The following design principles and urban approaches have been adopted to ensure the overall vision and objectives for the site are achieved across all parcels, as outlined in the Architectural Design Report at Appendix E. The design principles are also shown at Figure 23.

- Housing Diversity:
  - The precinct aims to ensure a diverse range of housing typologies that cater for different ways of living and set the tone for a new people-oriented village.
- Embedded Landscape and Country:
  - The precinct will deliver a diverse range of landscapes and open spaces that place a strong emphasis on connected landscapes, building on the established and historic character of Waterloo.
- Placemaking & Retail:
  - The precinct will establish a retail strategy that supports the existing and future character of Danks Street South, enhancing public life with a variety of retail opportunities to key public areas.
- Scale and Grain:
  - The precinct will create a human scaled neighbourhood through built form, landscape and activated pedestrian experiences.

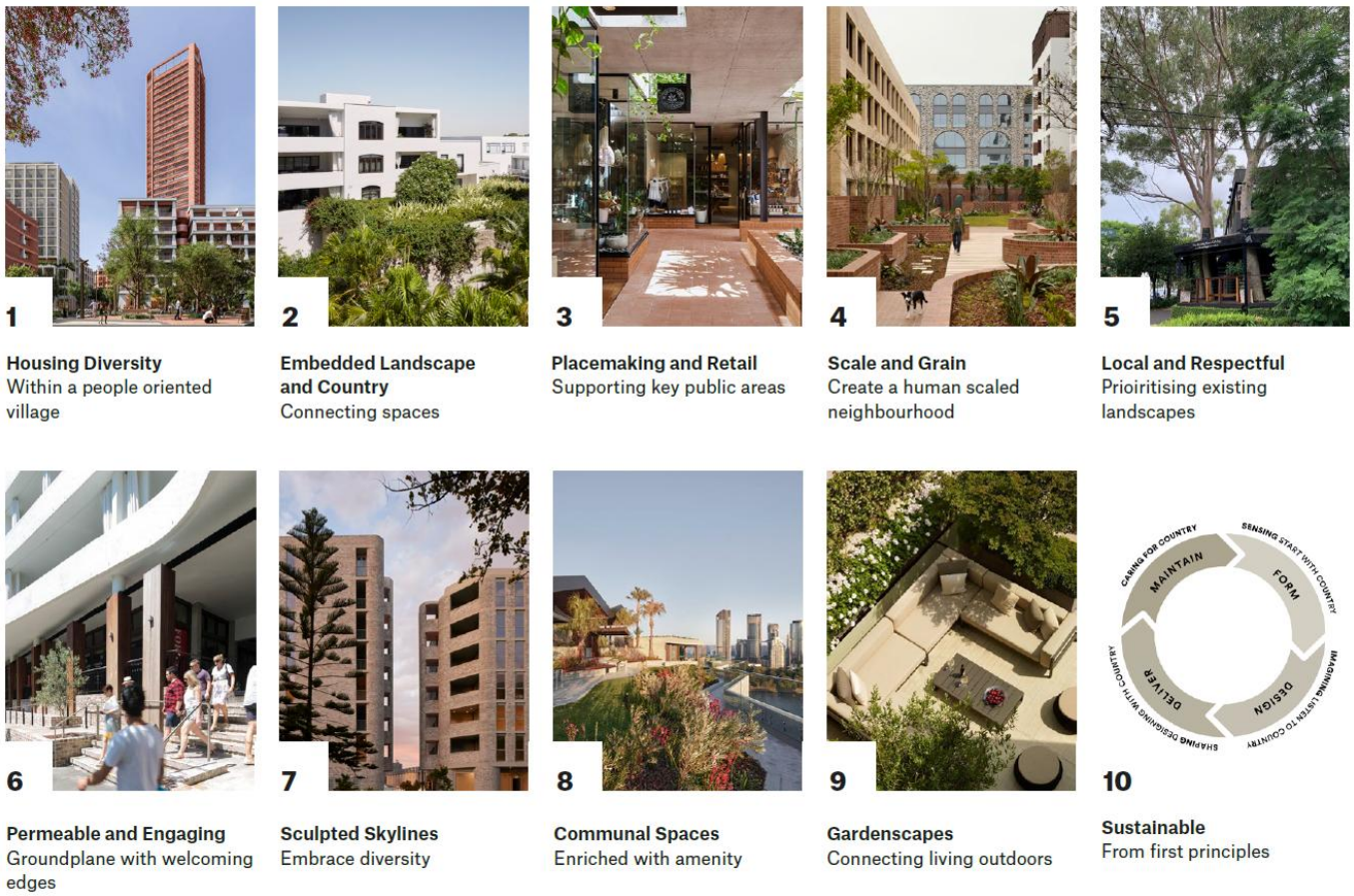


Figure 23 Project design principles

Source: Design Team

3.3 Designing with Country

The site is located on the traditional land of the Gadi people. Throughout the design process, the Design Team have worked collaboratively with Bangawarra as Connecting with Country experts.

Through a series of Co-design workshops, the proposal has sought to embed Aboriginal stories and culture into the masterplan, architecture, and landscape design of the site.

As detailed in the Connecting with Country Report at Appendix GG, the design has been developed to incorporate the Connecting with Country values of enduring spirit of Country, Country provides, and protection Country. This resulted in the following design principles:

- Generosity and reciprocity
- Home and habitat
- Protection and care.

As detailed in the Design Report and Connecting with Country Report, the proposal incorporates communities of humans and non-humans living together, providing habitat for non-humans, and bringing nature into the building facades to provide dwell space for habitat and residents. Bangawarra have provided input into key elements of the deisgn in order to tell stories through the architecture. Connecting with Country will continue during operation of the development with these elements embedded into the proposal.

3.4 Site Preparation Works

3.4.1 Remediation

As identified in the Status of Environmental Remediation and Reporting letter found in Appendix K, the site is currently being remediated (Stage 2) and has been remediated (Stage 1) in accordance with the Concept DA consent D/2020/45/C. The statement confirms that these remediation works are sufficient to facilitate residential development on the site. As such, no further remediation is required, notwithstanding the proposed bulk excavation and early works proposed.

3.4.2 Tree Removal

Tree removal at the site will be undertaken under the Early Works SSDA and therefore no tree removal is proposed in this SSDA.

3.4.3 Excavation and Earthworks

Basement excavation works and earthworks will be undertaken under the Early Works SSDA and therefore, no additional basement excavation or earthworks are proposed in this scope of works. The bulk excavation will be carried out for all parcels to facilitate the main works proposed in this EIS.

3.4.4 Site Servicing and Utilities

An assessment has been undertaken to determine the capacity for the site to be serviced by relevant infrastructure and utilities. All relevant utility and service providers and authorities have confirmed that the site can be serviced subject to some infrastructure upgrades. Utilities connections are detailed as:

- Electricity: The development will provide 3 x 1500 kVA substations for Stage 1 and 3 x 1500kVA substations for Stage 2.
- Water: There is existing water infrastructure surrounding the site and there is potable water infrastructure in each of the 3 streets that the site is bound by. This includes DN200 water mains in Danks Street and DN1200 and DN100 mains in Young Street.
- Sewerage: There is existing sewerage infrastructure surrounding the site includes a DN225 concrete encased sewer main along Danks Street with 2 potential connection points available.
- Telecommunications: The surrounding telecommunications network is sufficient to accommodate the proposed development with internal site connections to the network.

3.5 Precinct Layout

The layout for the Precinct is dictated by the existing VPA and Concept Approval, which divide the site into 4 development parcels separated by areas of public domain. The precinct layout proposed in this application is consistent with the previously approved layout as shown in Figure 6.

Due to the size of the site and in response to the existing Design Excellence Strategy required and as part of developing the alternative design excellence, the Applicant maintained a similar approach for diversity where a total of 4 architects and 2 landscape architects were engaged to create a meaningful design that has a shared commitment to quality, innovation, and community impact to shape the vision for the site.

As shown in Figure 24, the Design Team for Stage 1 of the development includes SJB on Parcel 1 and Curious Practice on Parcel 4 and Stage 2 includes Bates Smart on Parcel 2 and Chenchow Little and Bates Smart on Parcel 3. Additionally, landscaping was shared across the Precinct with Dangar Barin Smith on Stage 1 and TURF on Stage 2. The Design Team have incorporated the precinct design principles thoughtfully throughout their design to create a cohesive and collaborate precinct, but while still achieving architectural diversity. The diversity of established and emerging architectural practices has been included as part of the alternative design excellence strategy in response to consultation with the NSW Government Architect and City of Sydney.

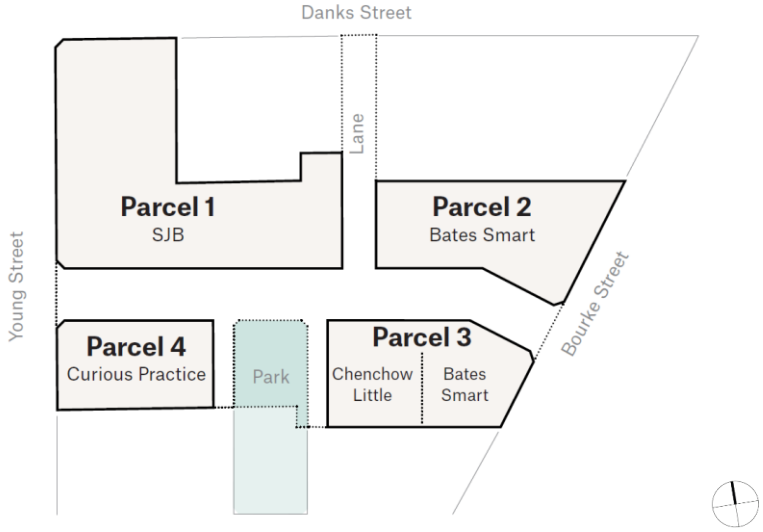


Figure 24 Site layout and design team for each parcel

Source: Design Team

3.5.1 Public Domain Elements

The project is built on the delivery of extensive and high-quality public domain elements between each development parcel. As described in Section 1.4, the public domain elements are subject to approved under the existing Concept DA and per the VPA and as such are not subject to approved in this SSDA. The public domain elements include:

- Dedication and embellishment of land for the purposes of a new public east-west street.
- Dedication of land to be provided as a central park in combination with the Dasco site to the south (improvements to be delivered by Council).
- Dedication and embellishment of land between Parcel 1 and Parcl 2 for the purposes of a north-south pedestrian only link from Danks Street to the new street.

The current layout of the public domain elements within the site, tying in with the development proposed in this SSDA, is shown at Figure 25. The proposed design will be subject to separate agreement with the City of Sydney.

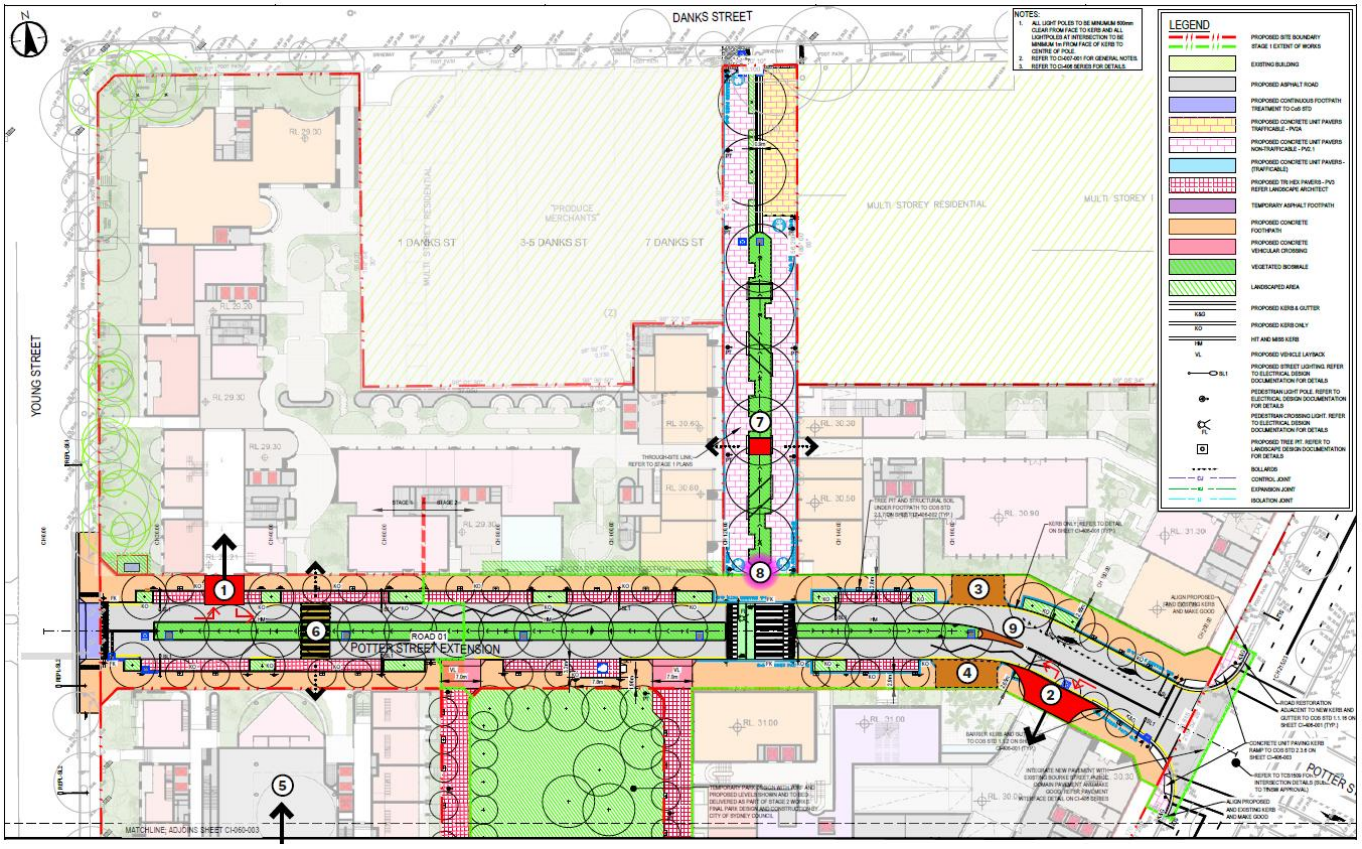


Figure 25 Proposed amended public domain design (subject to City of Sydney agreement)

Source: Design Team

3.5.2 Precinct Built Form and Building Arrangement

Each development parcel is broken down further into buildings, with a total of 9 buildings proposed. The building site plan with building names is shown at Figure 26. The names of the buildings are for the purpose of identification only in this SSDA. The heights, GFA and land uses for each building is summarised in Table 7.

The precinct ground plan is shown at Figure 27. The ground plane seeks to be a porous and highly connected public realm, prioritising pedestrian movement, walkability, legibility and social interaction. The design includes communal residential areas, green courtyards and active retail frontages.

Retail activation is prioritised along Danks Lane, the Bourke/New Street corner and the Young Street/Danks Street corner. An art studio and artist-in-residence use also interfaces with the street at the northern end of the Parcel 4.

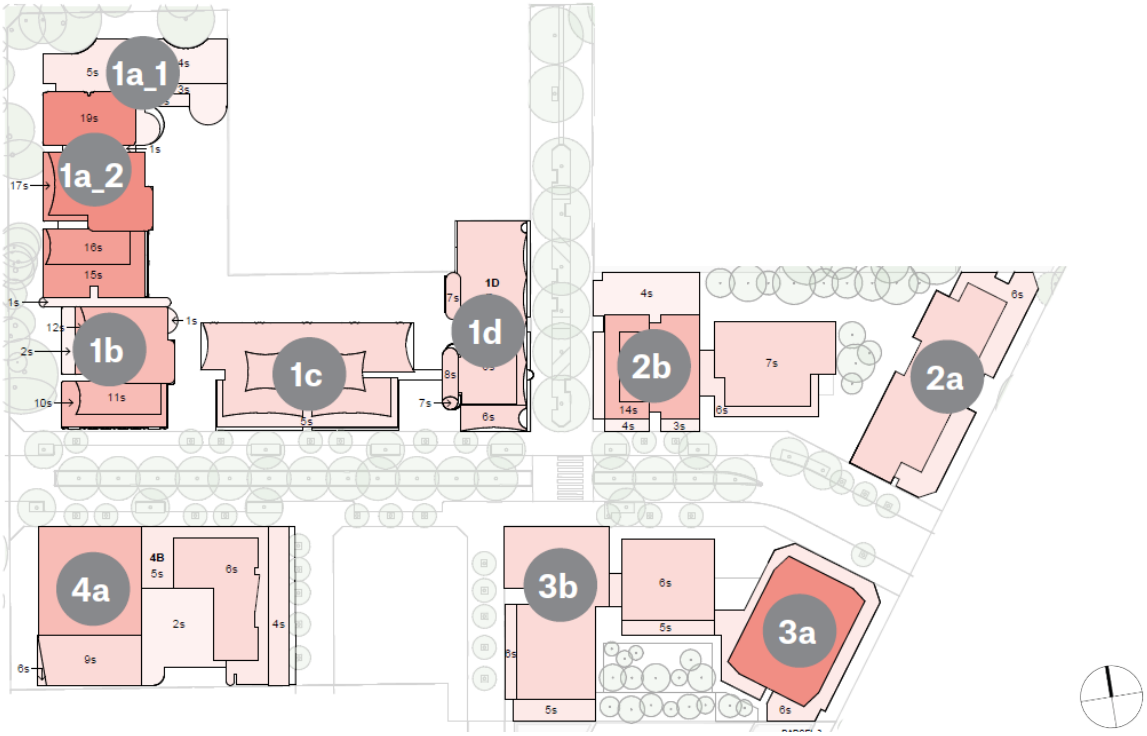


Figure 26 Site plan with building names identified

Source: Design Team



Figure 27 Precinct Ground Floor layout and uses

Source: Design Team

Table 7 Precinct wide built form by each parcel

Parcel	Architect	Landscape Designer	Number of Buildings	Maximum Height (Storeys)	Maximum GFA (m^2)	General Land Use
1	SJB	Dangar Barin Smith	4	18	23,533	• Residential accommodation – BTR • Retail Premises • Ancillary Residential Communal Space (internal and external)
2	Bates Smart	TURF	2	15	12,635	• Residential – Affordable Housing, City Starters • Retail Premises • Ancillary Residential Communal Space (internal)
3	Bates Smart and Chenchow Little	TURF	2	36	20,630	• Residential – Affordable Housing, City Starters • Ancillary Residential Communal Space (internal and external) • Recreational Facility (indoor) – gymnasium
4	Curious Practice	Dangar Barin Smith	1	13	8,311	• Residential – BTR, City Starters • Recreational Facility (indoor) – bathhouse • Artist residence and artist studio

3.5.3 Housing Tenures and Typologies

The proposed development seeks to deliver a diverse range of housing tenures and typologies to contribute to housing choice and supply. Overall, the proposal will deliver a total of 547 BTR dwellings, 73 affordable housing dwellings (equivalent to 25% of the uplift in GFA, in addition to a monetary contribution based on floor space of the entire development contributing to a further ~28 dwellings provided in perpetuity) and 230 City Starter/Stayer dwellings. The distribution of housing tenures and typologies is shown in Figure 28.

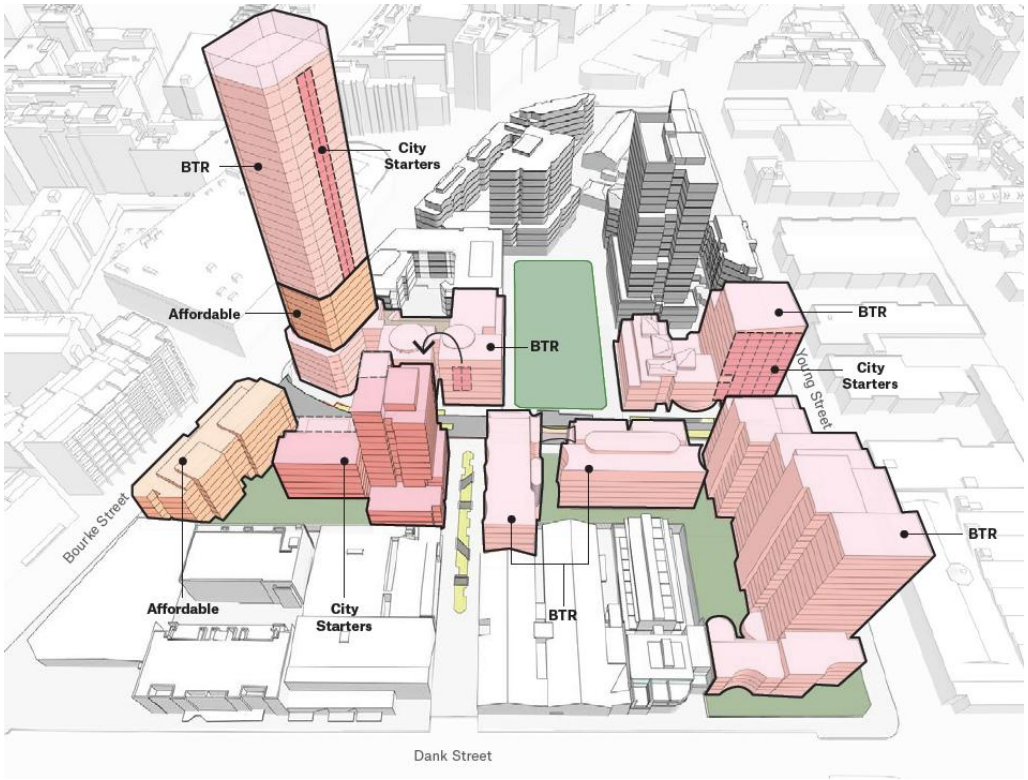


Figure 28 Proposed allocation of housing tenure and typology within the proposed development

Source: Design Team

3.5.4 Consolidated Basement

The proposed development includes a consolidated basement across all 4 parcels, to minimise vehicle crossovers and driveway, meaning more of the ground plane can be activated. Excavation works for the basement are under the Early Works SSDA (SSD-80911502).

The consolidated basement will involve a 2-storey basement and is configured to provide the following parking, building services and storage:

- 524 car parking spaces and bicycle parking spaces.
- 2 loading docks.
- Separate building cores for each parcel.
- Storage lockers.
- Garbage chute discharge rooms, bin holding rooms and bulk waste room.
- Mechanical plant and services.

The basement footprint underneath the new road is minimised and will only be used for circulation (no parking).

The basement vehicle access will be provided along the Potter Street into Parcel 1 and Parcel 3.

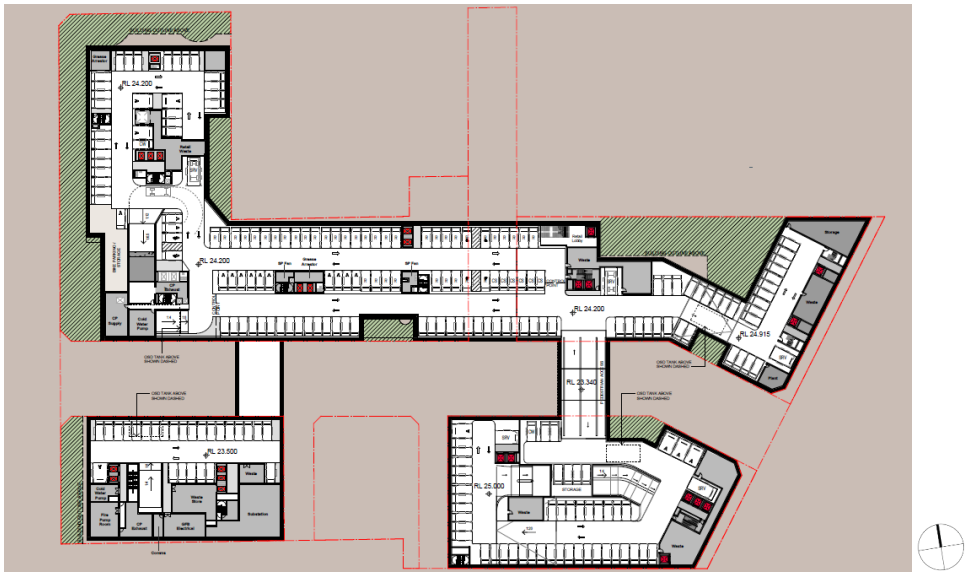


Figure 29 Basement Level 1 plan

Source: Deaign Team

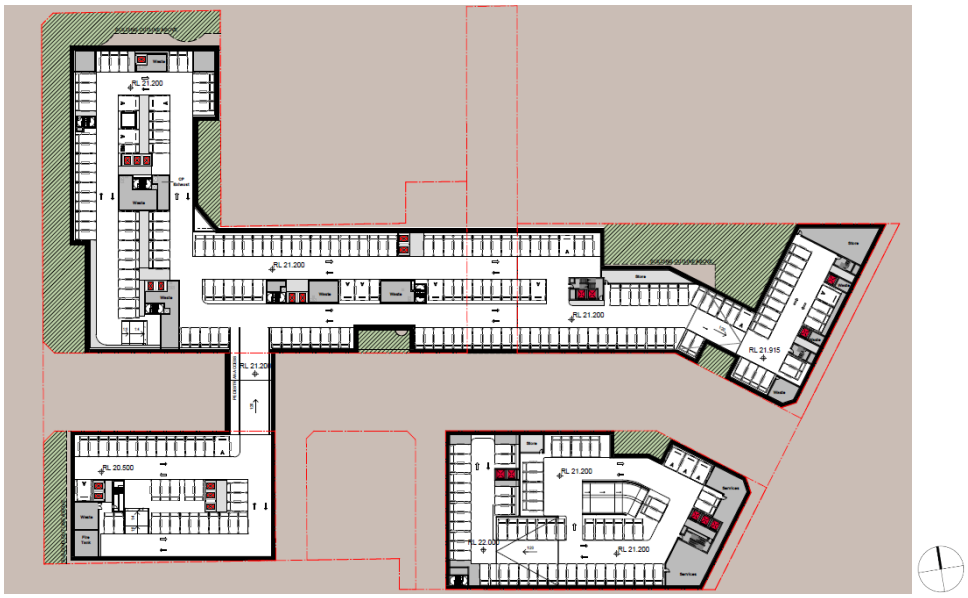


Figure 30 Basement Level 2 plan

Source: Design Team

3.6 Parcel 1

3.6.1 Parcel 1 General Layout

The proposed floor plan of Parcel 1 is shown at Figure 31. Parcel 1 consists of 4 buildings which are connected at the ground floor.

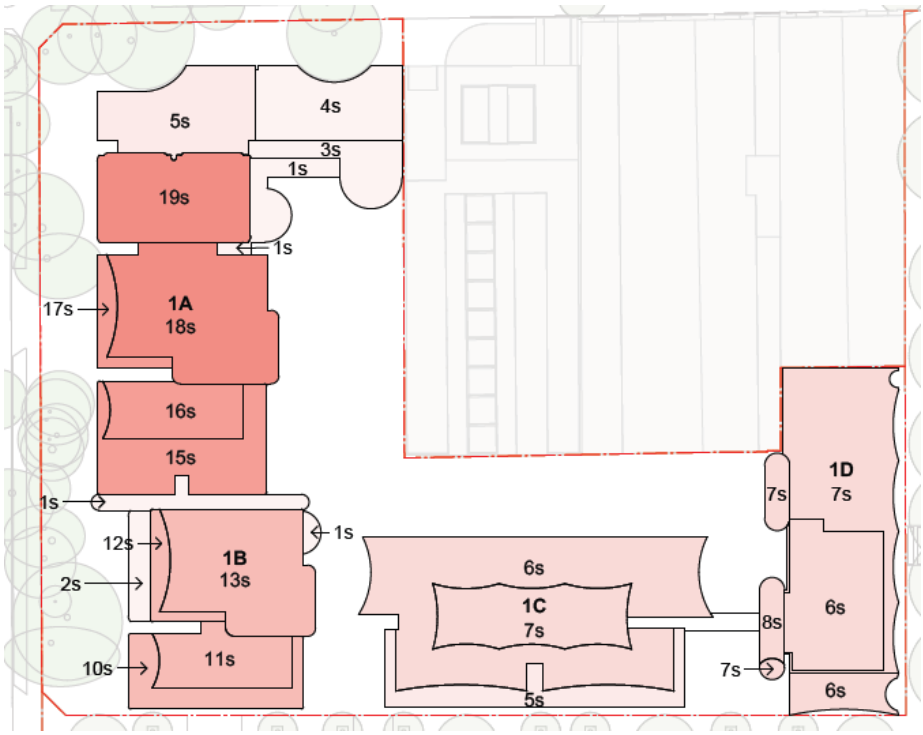


Figure 31 General arrangement of Parcel 1 buildings with height in storeys

Source: Design Team

Form and Setbacks

Parcel 1 is located at the north-west corner of the site and has frontages to Young Street and Danks Street. Parcel 1 is made up of 4 buildings connected by at grade footpaths and connecting bridges. The names, building heights and descriptions are shown in Table 8.

Table 8 Parcel 1 Built Form Breakdown

Building	Maximum Height (RL m)	Setbacks
Building 1A	90.20m	5.9m setback to the Danks Street 7.3m setback to the Young Street
Building 1B	70.50	10.95m setback to the Young Street 0m setback to the Potter Street
Building 1C	54.50	9.8m setback to 1 Danks Street 0m to Potter Street
Building 1D	54.50	0m to Potter Street. 0m to 3-5 and 7 Danks Street

Dwelling Mix

Parcel 1 contains BTR dwellings. Table 9 outlines the dwelling mix for Parcel 1.

Table 9 Parcel 1 Dwelling Type and Mix

Building	Dwelling Mix	Total Dwellings	GFA
Building 1A	• Studio: 0 • 1 Bedroom: 105	152	Total: 12,599m^2

Building	Dwelling Mix	Total Dwellings	GFA
	• 2 bedroom: 39 • 3+ bedroom: 8		
Building 1B	• Studio: 0 • 1 Bedroom: 12 • 2 bedroom: 20 • 3+ bedroom: 12	44	Total: 4,229m^2
Building 1C	• Studio: 0 • 1 Bedroom: 18 • 2 bedroom: 18 • 3+ bedroom: 2	38	Total: 3,878m^2
Building 1D	• Studio: 40 • 1 Bedroom: 5 • 2 bedroom: 0 • 3+ bedroom: 0	45	Total: 2,827m^2
Total	• Studio: 40 • 1 Bedroom: 140 • 2 bedroom: 77 • 3+ bedroom: 22	279	Total: 23,533m^2

Uses by Level and Communal Spaces

The summarised uses by level of Parcel 1 are in Table 10. A more detailed description of each buildings uses and communal spaces is provided in later sections.

Table 10 Parcel 1 Uses by Level

Building	Level	Uses
Building 1A	Ground	• Retail • Lobby • Internal communal space (cinema, bar, music room) • BTR apartments (3 bedrooms)
	Levels 2-3,	• BTR apartments (1-3 bedrooms)
	Levels 4-5	• BTR apartments (1-2 bedrooms) • Outdoor communal rooftop • Plant and lift overrun
	Levels 6-17	• BTR apartments (1-3 bedrooms)
	Level 18	• BTR apartment (split storey 3 bedroom) • Mechanical plant • Lift overrun • Solar panels
Building 1B	Ground	• Lobby • Internal communal space • BTR apartments (3 bedrooms)
	Levels 2-12	• BTR apartments (1-3 bedrooms)
Building 1C	Ground	• Lobby/concierge • Nation office • Internal communal space (co-working, lounge, private dining)
	Levels 2-5	• BTR apartments (1-3 bedrooms)

Building	Level	Uses
	Level 6	• Outdoor communal open space • Mechanical plant • Internal communal open space • Connection bridge to Building 1D
Building 1D	Ground	• Retail • Lobby
	Levels 2-5	• BTR apartments (studio and 1 bedrooms)
	Levels 6-7	• Outdoor communal open space • Internal communal open space (gym) • Mechanical plant

Façade and Materiality

The proposed materiality for Parcel 1 is shown at Figure 32.

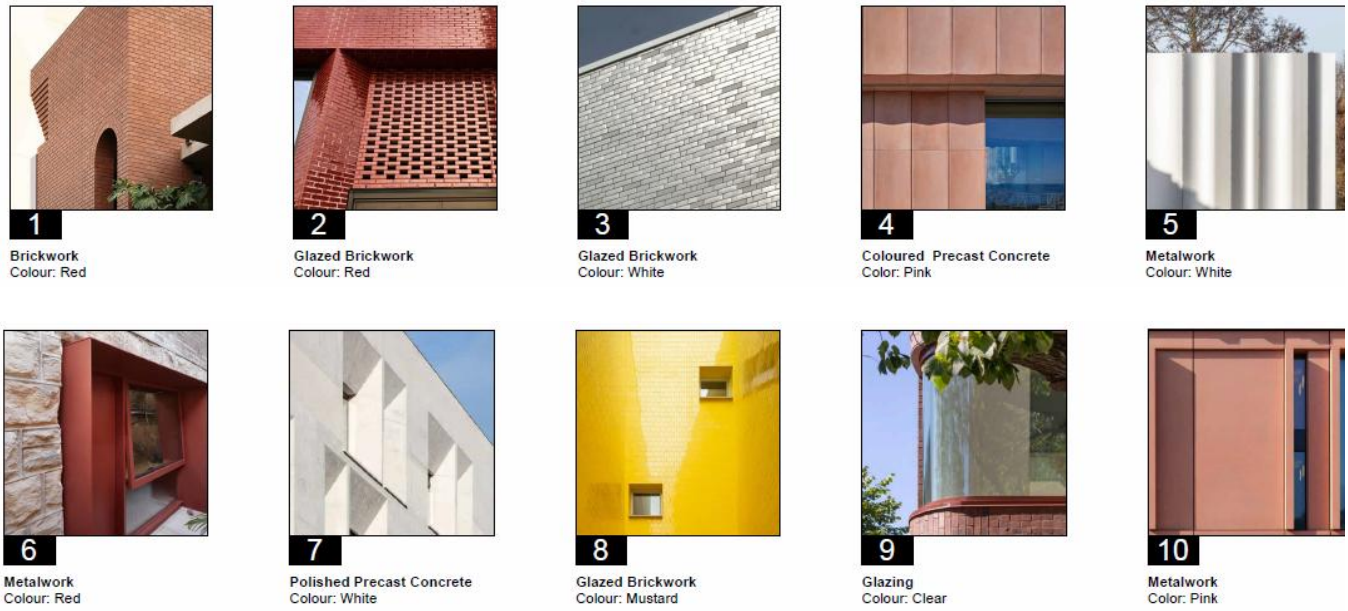


Figure 32 Proposed materiality for Parcel 1

Source: SJB

3.6.2 Building 1A and Building 1B

Built Form and Urban Design

Building 1A and Building 1B are a connected mixed-use and residential flat building at the north western corner of Parcel 1 designed by SJB. The buildings are conceived as tall, slender forms that step carefully around the trees with a simple landscape with active street fronts. The buildings are designed to sit quietly and cohesively within the existing context of the surrounding area, by implementing generous landscaped setbacks to Young Street and Danks Street. The proposed buildings comprise of varied heights with Building 1A ranging from 1 storey to 18 storeys and Building 1B ranging from 1 Storey to 13 storeys. Both buildings comprise of a stepped built form to reduce the bulk and scale of the building. Building 1A has frontages to Danks Street and Young Street and Building 1B has frontages to Young Street and Potter Street.

Photomontages of the proposed building form from the Design Report (Appendix E) have been provided at Figure 33.



Figure 33 3D artistic render of Building 1A and Building 1B from Danks Street

Source: Design Team

Ground Plane of Building 1A and Building 1B

Building 1A includes ground floor corner retail premises along the corner of Danks Street and Young Street. The retail tenancies activate key corners of the site and laneway frontages and enhance local retail activity through active, landscape integrated spaces that contribute to public amenity. Refer to Figure 34 for the location of the retail premises. The ground plane also includes the residential lobbies for Buildings 1A and 1B to provide access to the communal spaces include music room, play area and bike storage areas within the ground floor. Additionally, ground level apartments and 2-storey apartments are provided with access from the street. Additionally, a communal garden is located adjacent to Buildings 1A and 1B which can also be accessed through the lobbies or from Danks Street or Potter Street.

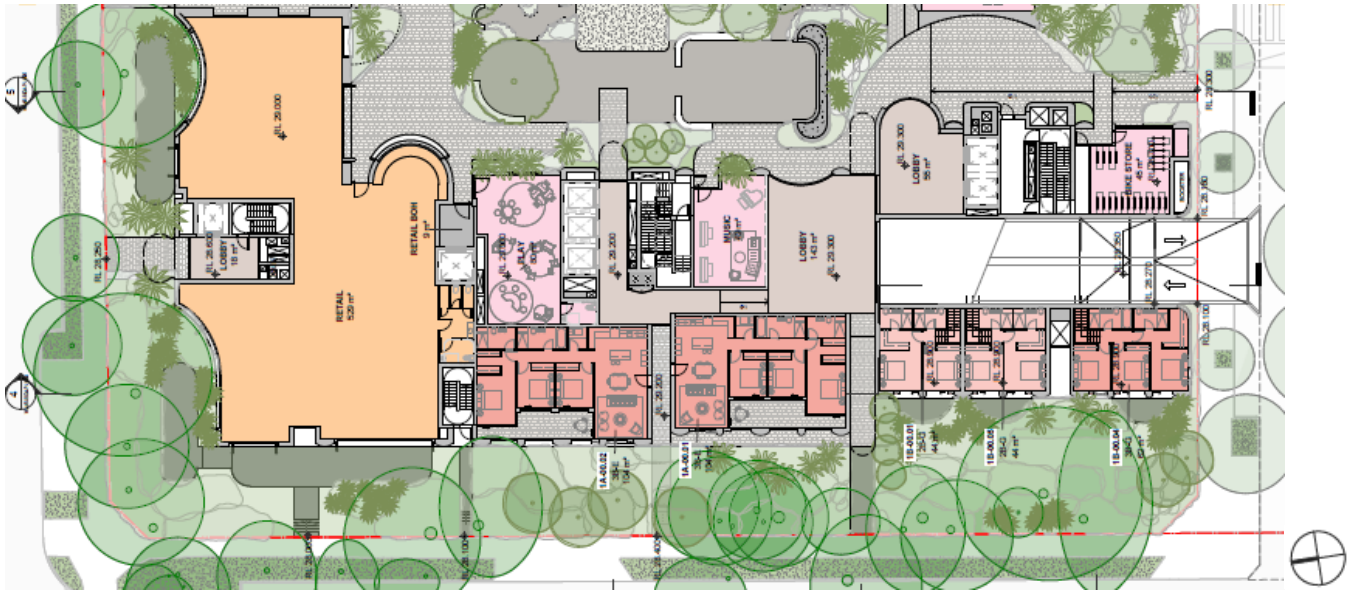


Figure 34 Ground plane of Building 1A and Building 1B

Source: Design Team

Residential Uses for Building 1A and Building 1B

Buildings 1A and 1B are comprised of BTR dwellings ranging from 1-bedroom to 3-bedroom apartments. The breakdown of apartments is shown at Table 9 and identifies the total number of each apartment in the buildings. The typical floorplate is shown at Figure 35.

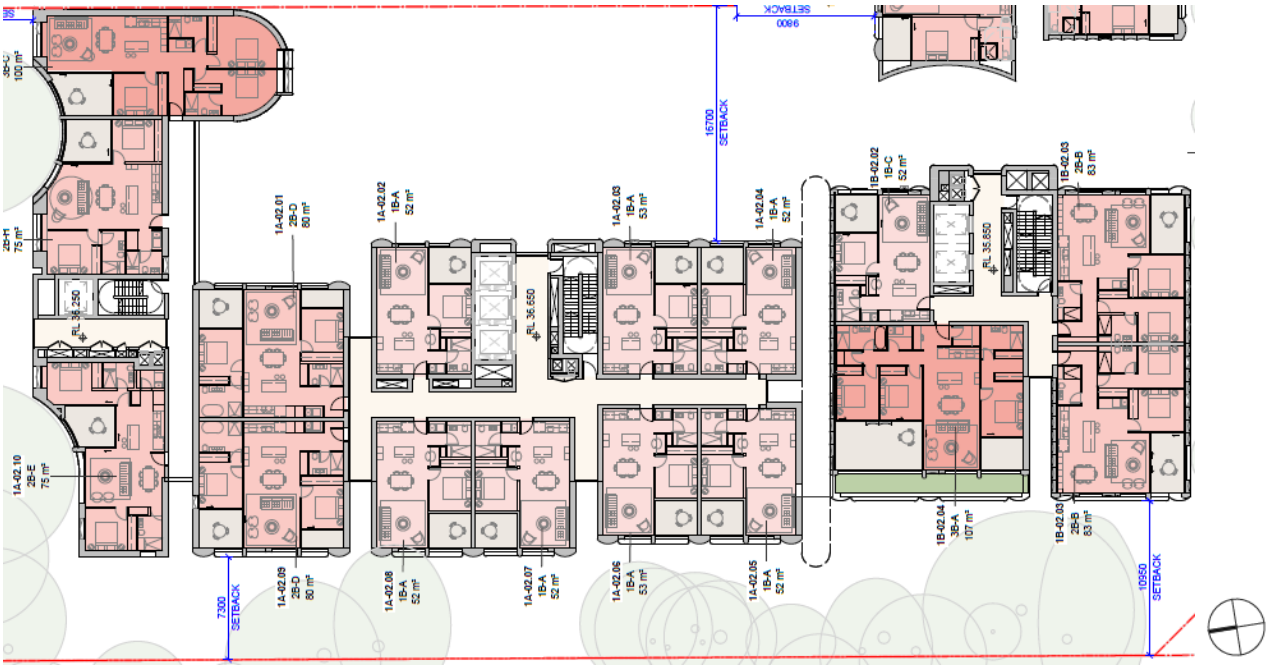


Figure 35 Typical floorplate of Building 1A and Building 1B

Source: Design Team

Communal Spaces of Building 1A and Building 1B

Building 1A and Building 1B comprise of mainly ground floor communal spaces and general landscaped communal outdoor spaces on the ground floor, level 4 and level 5. The internal communal spaces include a play area, a music room and bike store which can be utilised by all residents.

3.6.3 Building 1C

Built Form and Urban Design

Building 1C is a residential flat building and is within the southern portion of Parcel 1 and designed by SJB. The building is a 6-storey building and includes a connecting bridge on level 6 to Building 1D. Building 1C has frontages to Potter Street and is not setback from the footpath along Potter Street.

Imagery of the proposed building form from the Design report (Appendix E) has been provided at Figure 36.



Figure 36 3D artist render of Building 1C from the central park

Source: Design Team

Communal Ground Plane of Building 1C

Building 1C includes ground floor communal spaces which include a cinema, co-working spaces, lounge, bar and private dining spaces. There is an office premises which can be tenanted. The lobby and concierge is located at the entry to Building 1C. The communal spaces can be utilised by all residents across the precinct, with entry from Potter Street.

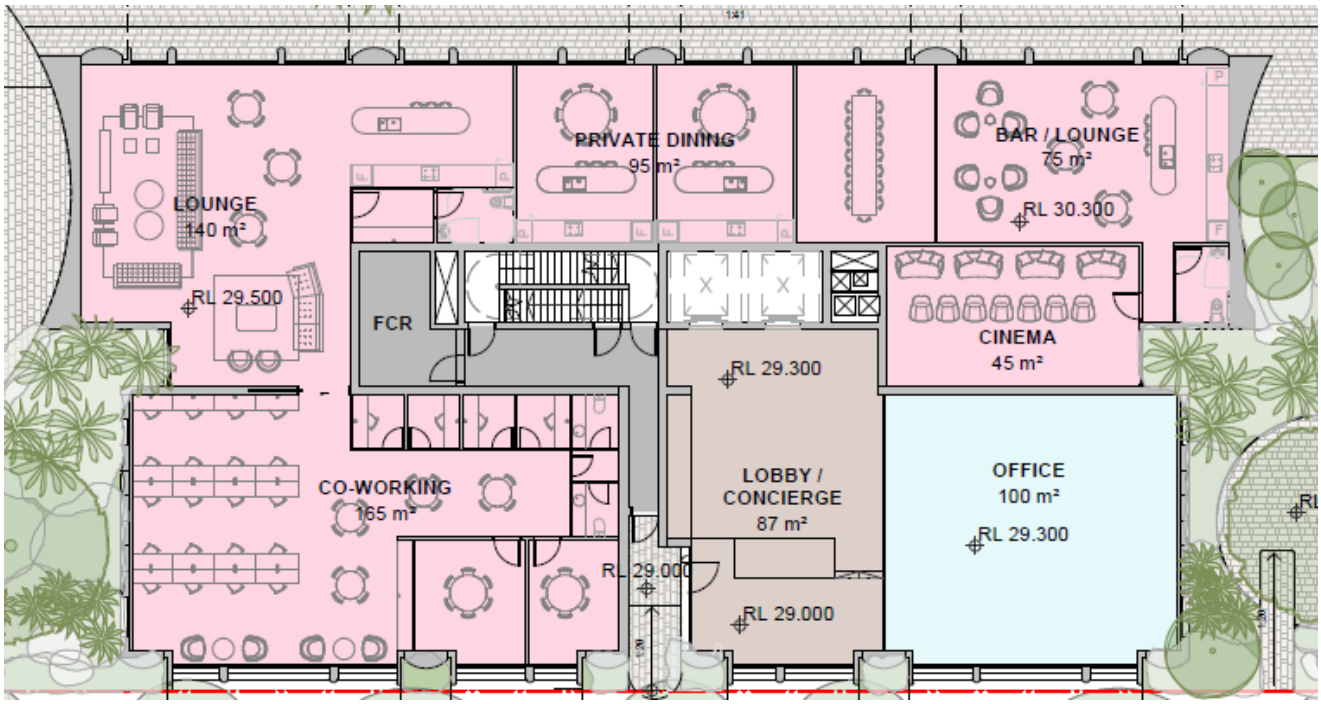


Figure 37 Ground floor of Building 1C with communal spaces and office premises

Source: Design Team

Residential Uses for Building 1C

Building 1C is comprised of BTR apartments which range from 1-bedroom to 3-bedroom apartments across level 1 to level 5. The breakdown of apartments is shown at Table 9 and identifies the total number of each apartment in the building. The typical floorplan layout is shown at Figure 38.



Figure 38 Typical floorplate of Building 1C

Source: Design Team

Rooftop Communal Space for Building 1C

Building 1C includes the Level 6 rooftop communal amenity which includes an outdoor pool and hydrotherapy and cold plunge pools as well as lounge chairs to relax and general landscaped areas and associated amenities such as bathrooms. These facilities can be utilised by all residents. Refer to Figure 39.



Figure 39 Rooftop pool on Building 1C

Source: Design Team

3.6.4 Building 1D

Built Form and Urban Design

Building 1D is a shop top housing building along the eastern portion of Parcel 1 designed by SJB. The building is 7 storeys and includes a connecting bridge on level 6 to Building 1C which connects the communal spaces. Building 1D has frontages to Potter Street and the north-south Danks Lane.

An artistic render of the proposed building form from the Design Report (Appendix E) has been provided at Figure 40.



Figure 40 Photomontage of Building 1D from the park

Source: Design Team

Ground Plane Retail for Building 1D

Building 1D includes ground floor retail activation with a total of 4 tenancies along the pedestrian link street and on the corner of the pedestrian link and Potter Street. These tenancies with activate the pedestrian link and enhance local retail activity through active, landscape integrated spaces that contribute to public amenity.

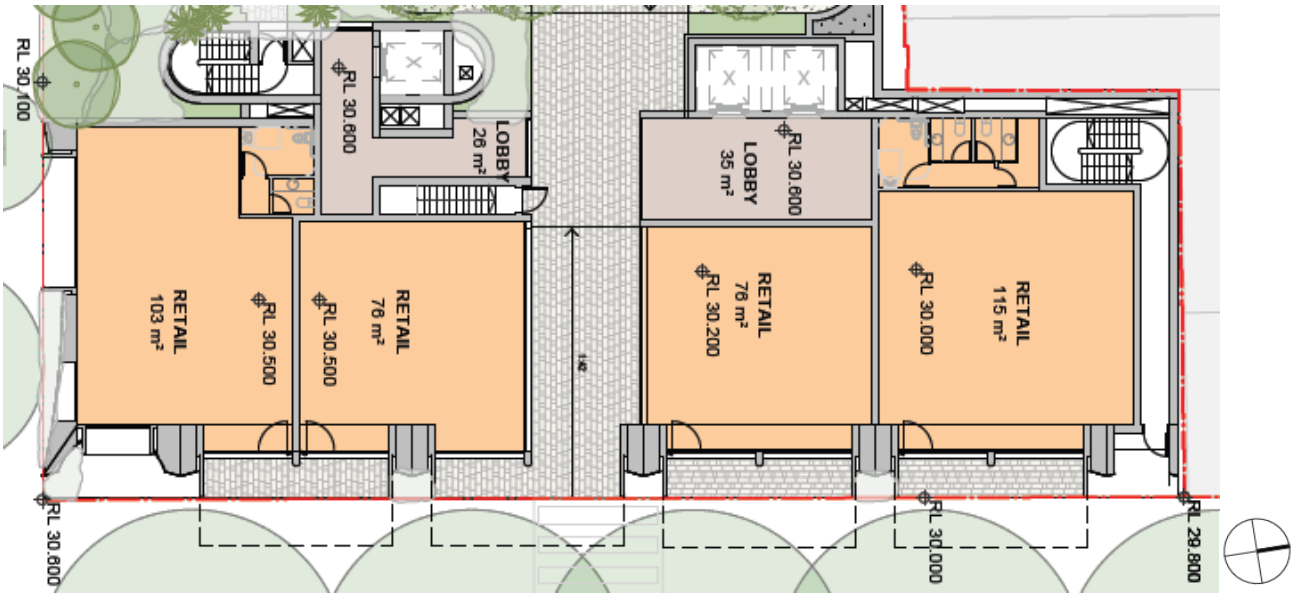


Figure 41 Ground plane for Building 1D with retail premises shown

Source: Design Team

Residential Uses for Building 1D

Building 1D comprises BTR apartments which include mostly studios and 1-bedroom dwellings. All studios for Parcel 1 are located in Building 1D. The typical floorplate for Building 1D is shown at Figure 42.

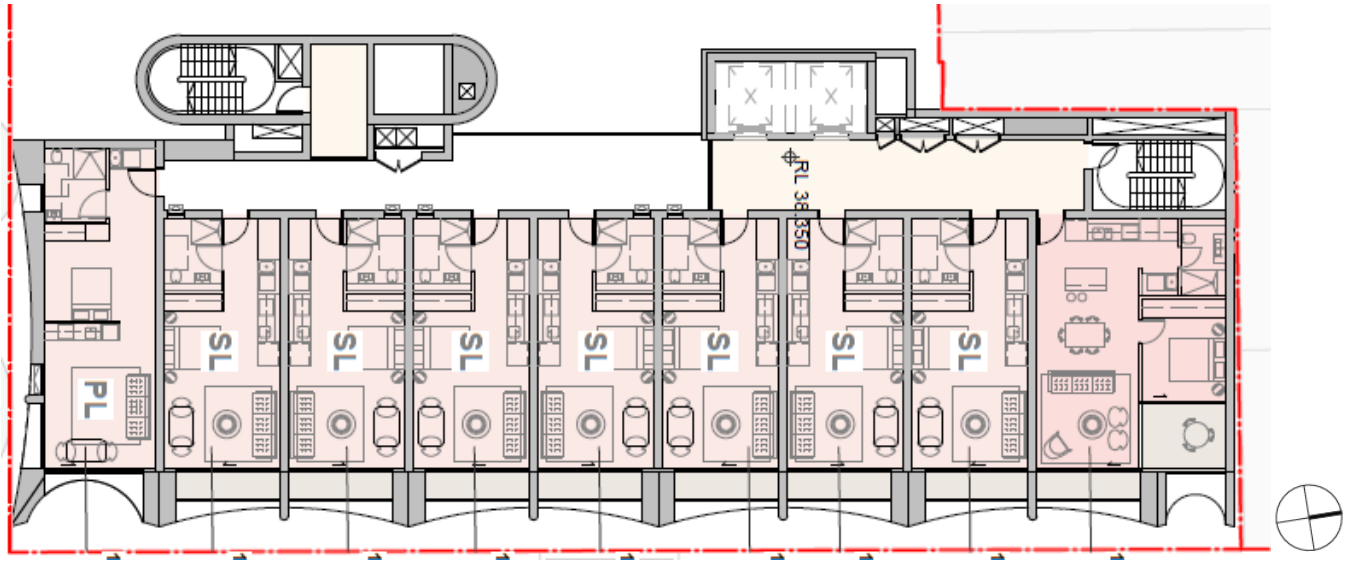


Figure 42 Typical floorplate for Building 1D

Source: Design Team

Communal Space for Building 1D

Building 1D includes both internal and external communal spaces. The building features a communal gym (for use by residents) and an outdoor pickleball court on level 6. Level 7 includes additional rooftop communal space with barbeque and seating areas. The level 6 and 7 floor plans with communal spaces are shown at Figure 43 and Figure 44.

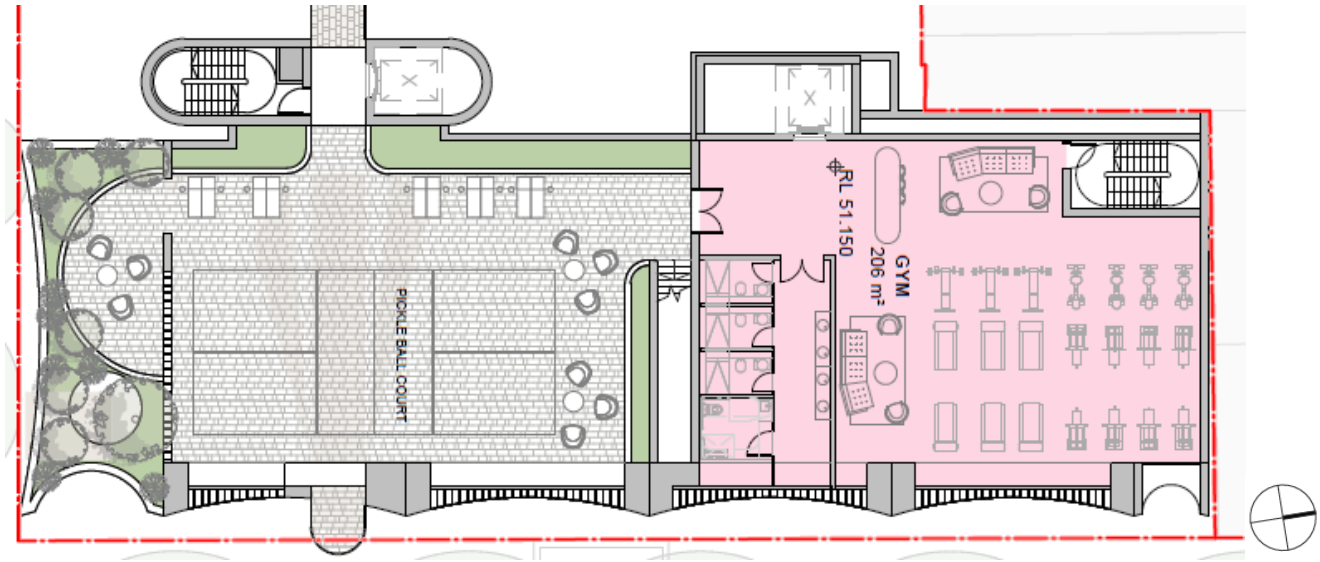


Figure 43 Building 1D, Level 6 floor plan showing communal spaces

Source: Design Team

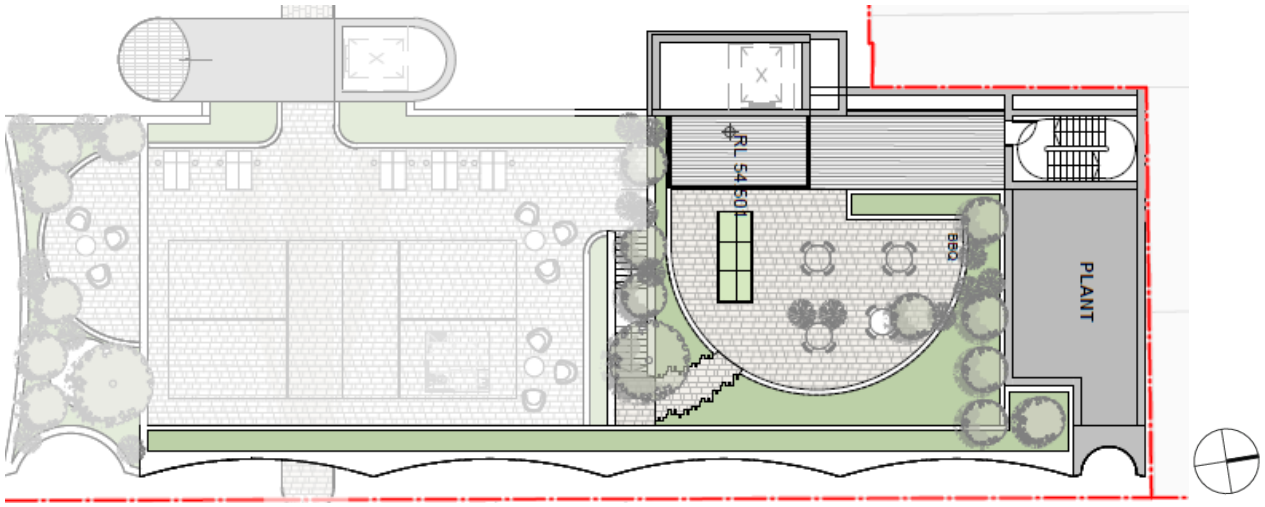


Figure 44 Building 1D, Level 7 floor plan showing communal open space

Source: Design Team

3.7 Parcel 2

3.7.1 Parcel 2 General Layout

The proposed general arrangement and storeys of Parcel 2 is shown at Figure 45. Parcel 2 consists of 2 buildings which are connected at the ground floor. Building 2A is a dedicated affordable housing building with no market housing. Building 2B includes BTR apartments.

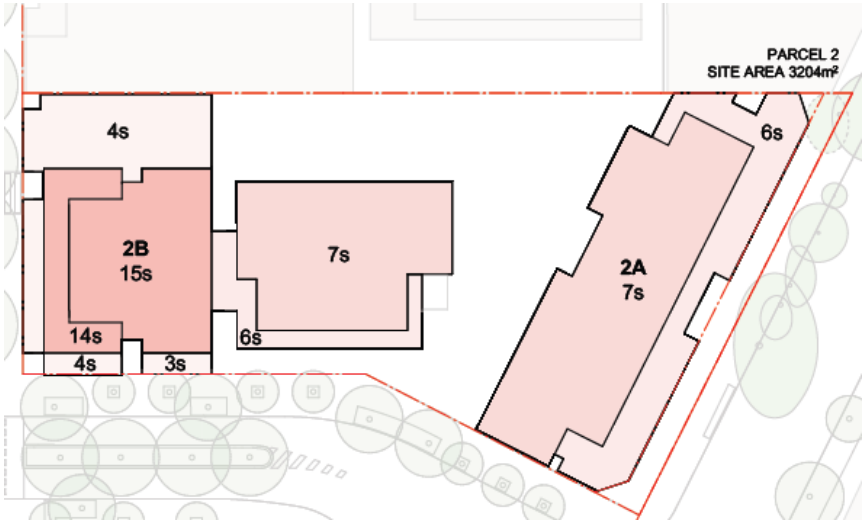


Figure 45 General arrangement of Parcel 2 with height in storeys

Source: Design Team

Form and Setbacks

Parcel 2 is located at the north-east corner of the site and has frontages to Danks Street and Bourke Street. Parcel 2 is made up of 2 buildings connected by at grade footpaths and connecting bridges. The building height and descriptions are shown in Table 11.

Table 11 Parcel 2 Built Form Breakdown

Building	Maximum Height (RL m)	Setbacks
Building 2A (Affordable)	55.70	5.9m setback to the Danks Street 7.3m setback to the Young Street
Building 2B (BTR)	82.55	10.95m setback to the Young Street 0m setback to the Potter Street

Dwelling Mix

The proposed dwelling mix for Parcel 2 are detailed in Table 12.

Table 12 Parcel 2 Dwelling Mix

Building	Dwelling Mix	Total Dwellings	GFA
Building 2A (Affordable)	• Studio: 0 • 1 Bedroom: 21 • 2 bedroom: 20 • 3+ bedroom: 2	43	Total: 4,314m^2
Building 2B (BTR)	• Studio: 12 • 1 Bedroom: 27 • 2 bedroom: 1 • 3+ bedroom: 1	165	Total: 8,321m^2
Total	• Studio: 136 • 1 Bedroom: 48 • 2 bedroom: 21 • 3+ bedroom: 3	208	Total: 12,635m^2

Uses by Level

The uses by level of Parcel 2 are summarised in Table 13.

Table 13 Parcel 2 Uses by Level

Building	Level	Uses
Building 2A and 2B	Ground	• Lobby • Retail • Bike storage • Internal communal areas (wine cellar, private dining, residents lounge, lounge, work spaces, office) • Outdoor communal open space
	Levels 2-3,	• BTR apartments (studio and 1-2 bedrooms) • City Starter Apartments
	Level 4	• BTR apartments (studios and 1-2 bedrooms) • Internal communal areas (lounge, games music room, podcast room and cinema) • City Starter Apartments
	Levels 5-14	• BTR apartments (studio, 1-3 bedrooms) • City Starter Apartments • Plant

Façade and Materiality

The proposed materiality for Parcel 2 is shown at Figure 46.

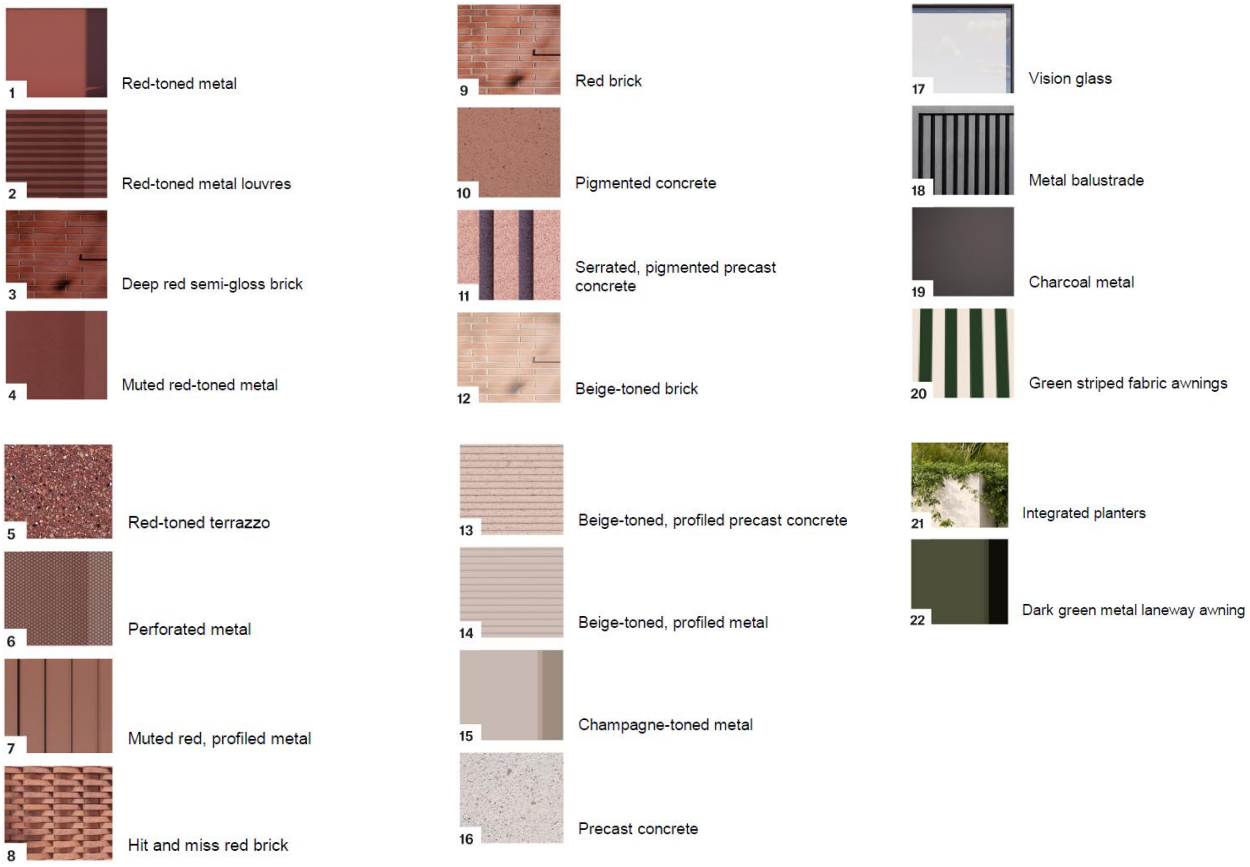


Figure 46 Materiality for Parcel 2

Source: Bates Smart

3.7.2 Building 2A and 2B

Built Form and Urban Design

Building 2A and Building 2B are residential flat buildings with Building 2A located on the eastern portion of Parcel 2 and Building 2B located on the western portion of Parcel 2 and are designed by Bates Smart. Building 2A is part 6 storey and part 7 storey to appropriately address the streetscape and surrounding properties. Building 2A has frontages to Bourke Street and Potter Street. Building 2B is a part 7 storey and part 15 storey and has frontages to Potter Street and Danks Lane. Photomontages of the proposed building form from the Design Report (Appendix E) have been provided at Figure 47.



Figure 47 Building 2A artistic render viewed from Bourke Street

Source: Design Team



Figure 48 3D artistic render of Building 2B viewed from Potter Street

Source: Design Team

Ground Plane of Building 2A and Building 2B

Building 2A includes ground floor corner retail on the corner of Danks Street and Potter Street to activate the street corner and Building 2B includes ground floor retail along the pedestrian link and the corner of the pedestrian link and Potter Street. Additionally, a variety of communal spaces are spread across the ground plan of both buildings and outdoor landscaped areas. The communal areas include additional communal work spaces, office, residents lounges, private dining rooms, wine cellar and bikes store. The lobbies for the respective buildings are located on the ground plane. Refer to **Figure 49**.

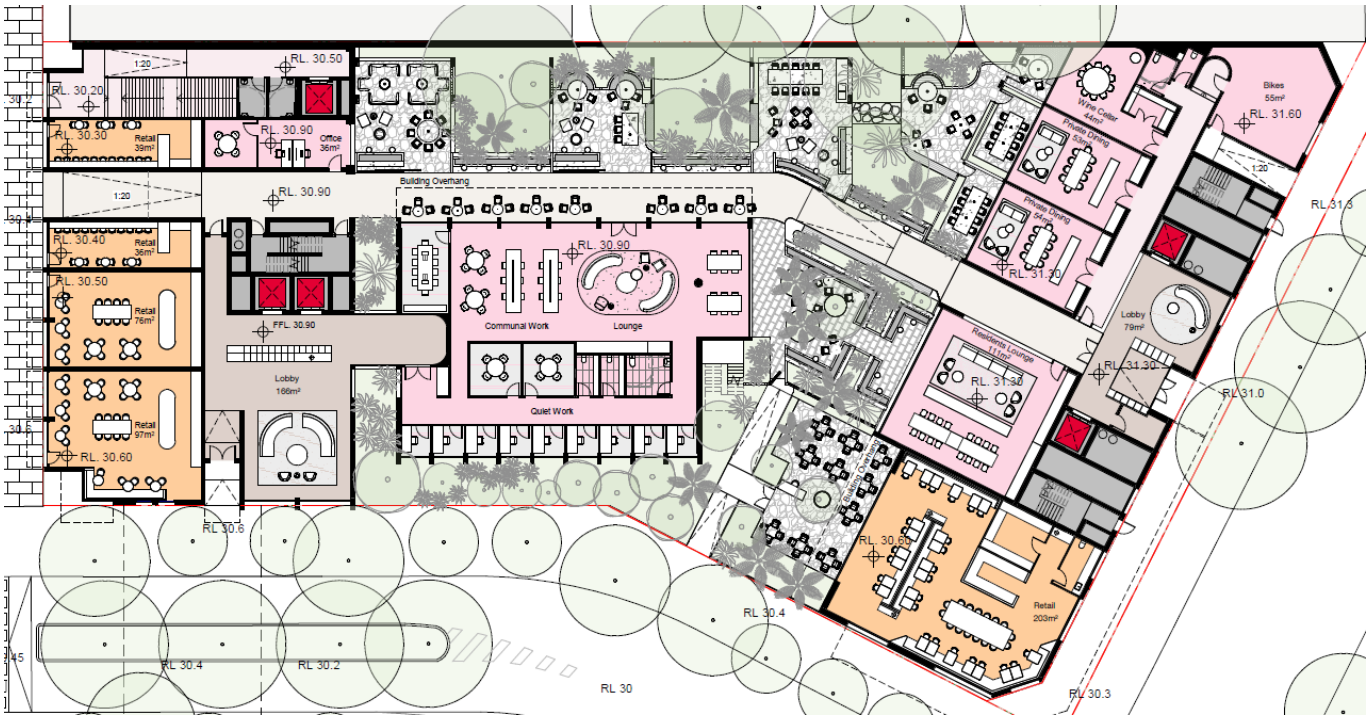


Figure 49 Ground plane for Building 2A and 2B showing Retail and communal spaces

Source: Design Team

Residential Uses for Building 2A

Building 2A comprises of affordable housing dwellings only, including 1-bedroom to 3-bedroom apartments. The breakdown of apartments is shown at Table 12 and identifies the total number of each apartment in the buildings. Building 2A will be managed as affordable housing by Evolve Housing, a Community Housing Provider. The typical floorplate is shown at Figure 50.



Figure 50 Typical floorplate of Building 2A

Source: Design Team

Residential Uses for Building 2B

Building 2B comprises of both BTR apartments and City Starter apartments. Building 2B includes 124 City Starter apartments which makes up majority of the building. The breakdown of apartments is shown at Table 12 and identifies the total number of each apartment in the buildings. The typical floorplate is shown at Figure 51.



Figure 51 Typical floorplate of Building 2B

Source: Design Team

Communal Spaces of Building 2A and Building 2B

As discussed previously, a variety of communal spaces are spread across the ground plan of both buildings and outdoor landscaped areas. The communal areas include additional communal work spaces, office, residents lounges, private dining rooms, wine cellar and bikes store. The lobbies for the respective buildings are located on the ground plane. Additionally, on level 4 of Building 2A there is communal space that is inclusive of a music room and podcast spaces, cinema, cinema lounge, games area and a bar. Rooftop outdoor seating and landscaping is provided on Level 4 of Building 2A. Refer to Figure 52 for the ground floor communal spaces and Figure 53 for the level 4 communal spaces.

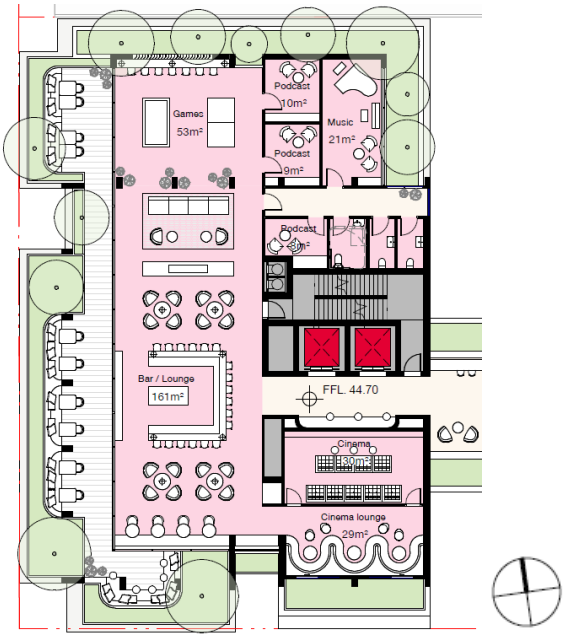


Figure 52 Communal spaces on Level 4 of Building 2B

Source: Design Team

3.8 Parcel 3

3.8.1 Parcel 3 General Layout

The proposed general arrangement and storeys of Parcel 3 is shown at Figure 53. Parcel 3 consists of 2 buildings which are connected at the ground floor, Building 3A and 3B. Building 3A is the tallest building across the precinct at 36-storeys.

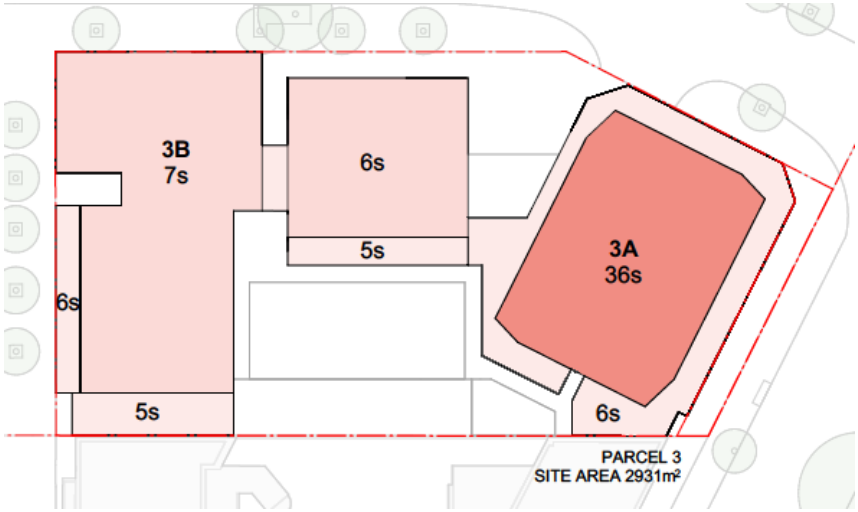


Figure 53 General arrangement of Parcel 3 with height in storeys

Source: Design Team

Form and Setbacks

The building height and descriptions are shown in Table 14.

Table 14 Parcel 3 Built Form Breakdown

Building	Maximum Height (RL m)	Setbacks
Building 3A	152	0m setback to the Bourke Street 0m setback to the Potter Street
Building 3B	57.8	0m setback to the Potter Street

Dwelling Mix

The proposed dwelling mix are provided at Table 15.

Table 15 Parcel 3 Dwelling Mix

Building	Dwelling Mix	Total Dwellings	GFA
Building 3A	• Studio: 44 • 1 Bedroom: 62 • 2 bedroom: 72 • 3+ bedroom: 8	186	Total: 15,705m^2
Building 3B	• Studio: 8 • 1 Bedroom: 26 • 2 bedroom: 22 • 3+ bedroom: 3	59	Total: 4,925m^2
Total	• Studio: 52 • 1 Bedroom: 88 • 2 bedroom: 94 • 3+ bedroom: 11	245	Total: 20,630m^2

Uses by Level

The proposed uses by level are shown in Table 16.

Table 16 Parcel 3 proposed uses by level

Building	Level	Uses
Building 3A and 3B	Ground	• Lobby • Retail • Recreational facility (indoor) – One Playground (Gym) • Residential and retail waste storage area • Substation • 10.6m waste collection vehicle turntable • Affordable Housing and BTR apartments (3 bedrooms)
	Level 1	• Affordable Housing and BTR apartments (3 bedrooms) • Recreational facility (indoor) – One Playground (Gym)
	Levels 2-5	• City Starter and BTR apartments (studio, 1-3 bedrooms)
	Levels 6-7	• Internal communal space (lounge) • Outdoor communal open space • Plant • Affordable Housing
	Levels 8-13	• Affordable housing
	Levels 14-34	• BTR apartments (1-3 bedrooms)
	Level 35	• Plant • Outdoor communal space (pool, sauna)

Façade and Materiality

The proposed materiality for Parcel 2 is shown at Figure 54.

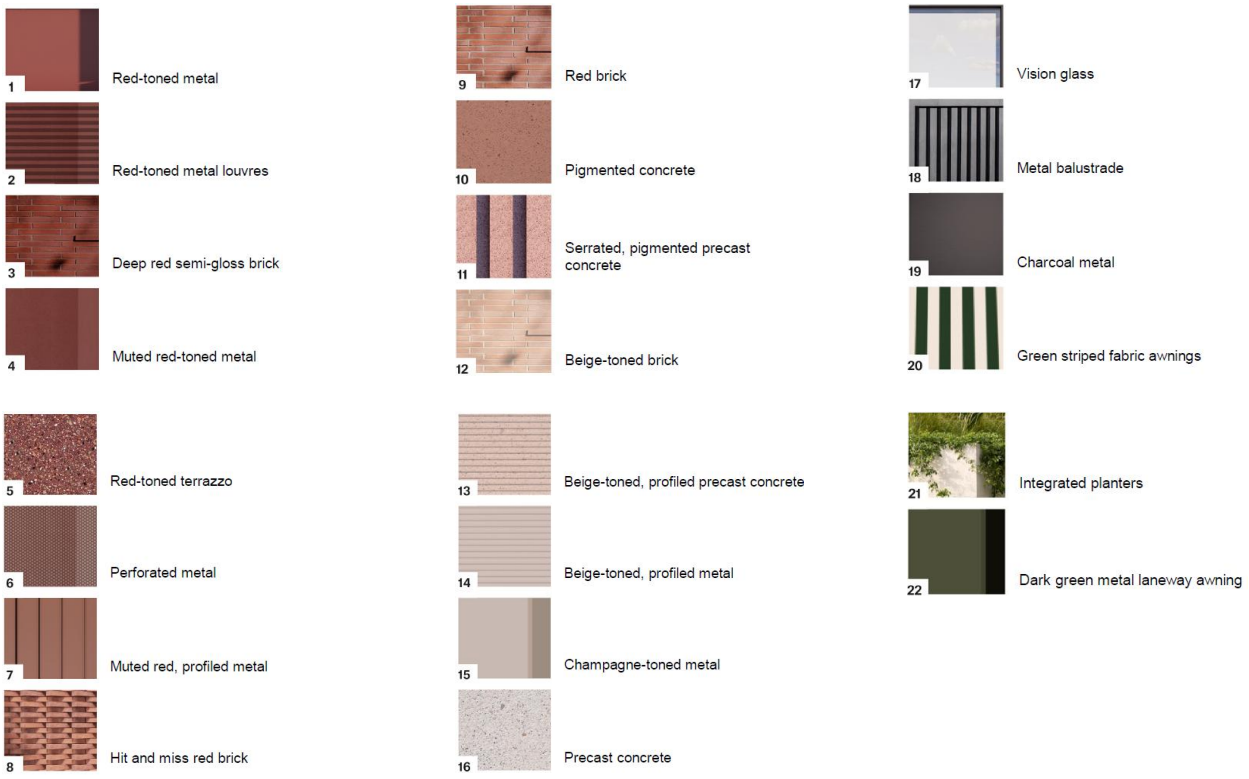


Figure 54 Materiality for Parcel 2

Source: Bates Smart

3.8.2 Building 3A and Building 3B

Built Form and Urban Design

Building 3A and Building 3B are residential flat buildings with Building 3A located on the eastern portion of Parcel 3 and Building 3B located on the western portion of Parcel 3. Building 3A is a 36 storey building with a 6 storey podium and is identified as the tower building on the site. Building 3A is slender to minimise the perceived bulk and scale of the building. Building 3B is a varied between 5 storeys and 7 storeys. Photomontages of the proposed building form from the Design Report (Appendix E) have been provided at Figure 55 and Figure 56.



Figure 55 3D artistic render of Building 3A viewed from Bourke Street

Source: Design Team



Figure 56 3D artistic render of Building 3B viewed from the central park

Source: Design Team

Ground Plane and Level 1 of Building 3A and Building 3B

The ground plane of Parcel 3 is diverse and includes corner retail on the corner of Potter Street and the proposed park, a commercial gym (recreational facility – indoor), waste holding space, substation and lobby. The loading dock entry and waste collection vehicle turn table is also located on the ground floor of Parcel 3. The commercial gym continues on Level 1. Refer to Figure 57 and Figure 58.

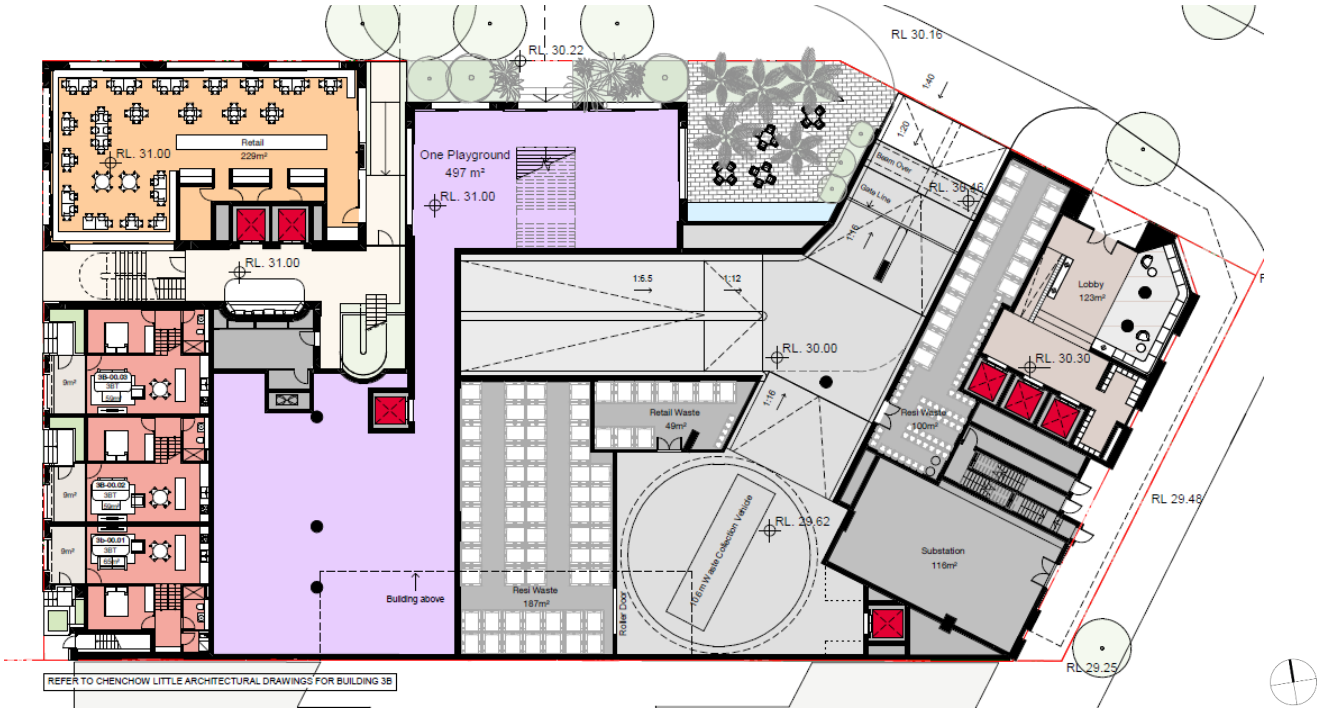


Figure 57 Ground plane for Building 3A and 3B showing retail, loading dock and gym

Source: Design Team

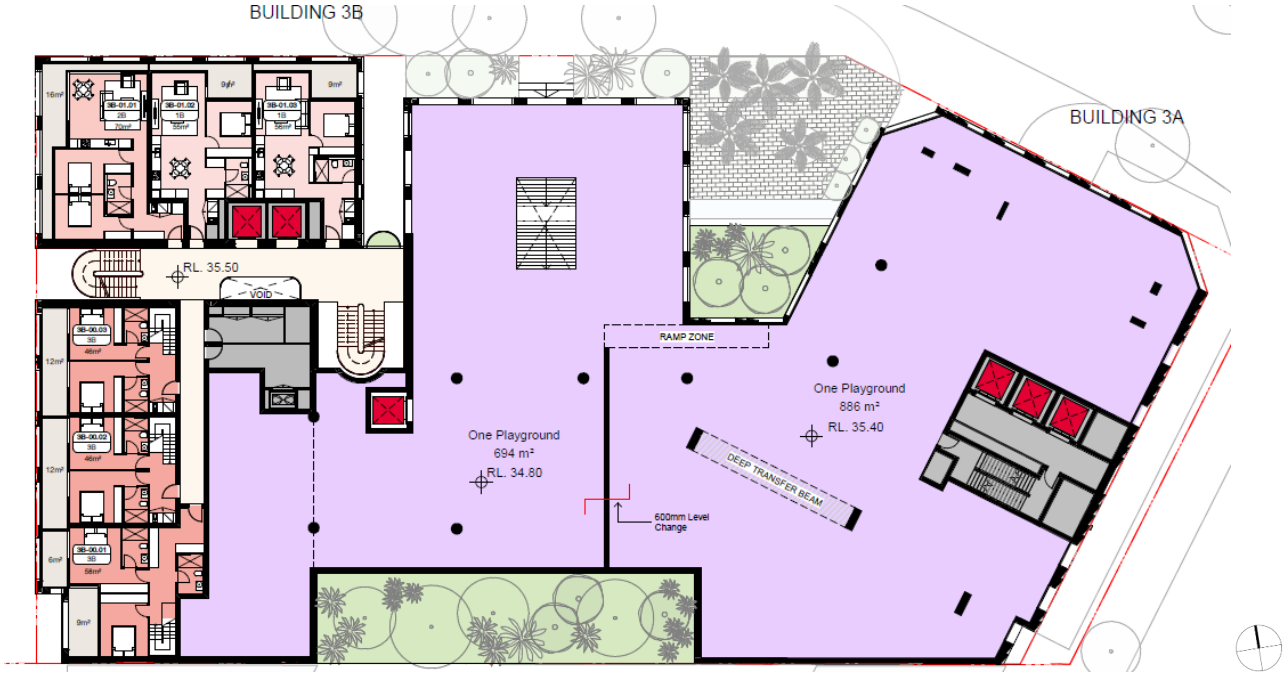


Figure 58 Level 1 floor plan of Parcel 3

Source: Design Team

Residential Uses for Building 3A

Building 3A accommodates BTR apartments, City Starter apartments and affordable housing apartments. The affordable housing is provided above the podium and in the lower part of the tower and includes 1 and 2-bedroom apartments. The BTR is located within the podium and in the upper tower with the City Starter apartments along the centre of the northern façade. Levels 8-13 are affordable housing and are the same floorplate as the remainder of the tower, but with 2 of the City Starter apartments replaced by a single 1-bedroom apartments. The typical floorplate is shown at Figure 59, Figure 60, and Figure 61.

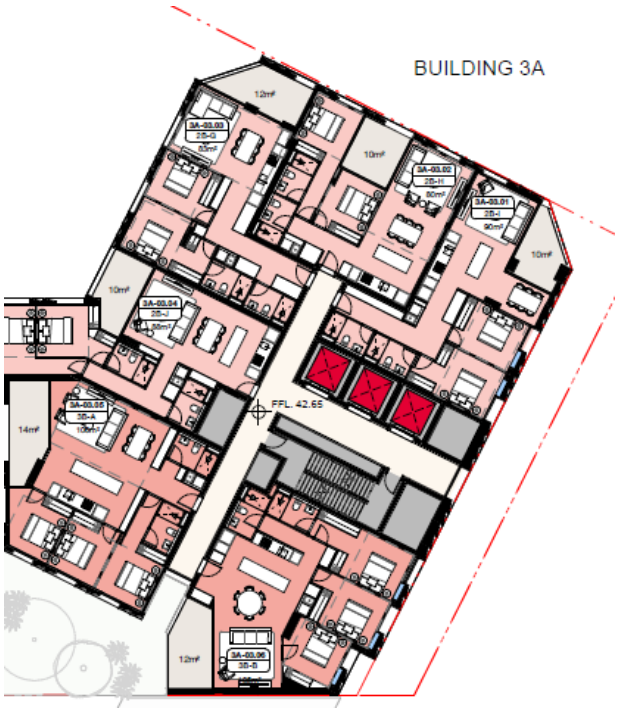


Figure 59 Typical floorplate in the podium of Building 3A

Source: Design Team



Figure 60 Typical floor plate of Building 3A affordable levels (8-13)

Source: Design Team



Figure 61 Typical floor plate of Building 3A tower

Source: Design Team

Residential Uses for Building 3B

Building 3B accommodates BTR apartments and City Starter apartments. The building includes studios and 1 to 3 bedroom apartments. The typical floorplate is shown at Figure 62.

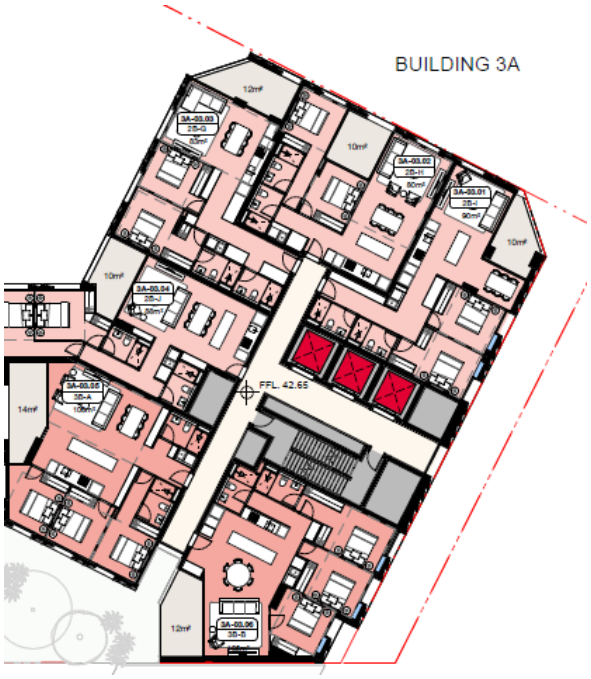


Figure 62 Typical floorplate for Building 3B

Source: Design Team

3.9 Parcel 4

Parcel 4 is located in the south-west corner of the site and has frontages to Potter Street and Young Street. The proposed floor plan of Parcel 4 is shown at Figure 63. Parcel 4 consists of 1 building split that is split across multiple different heights.

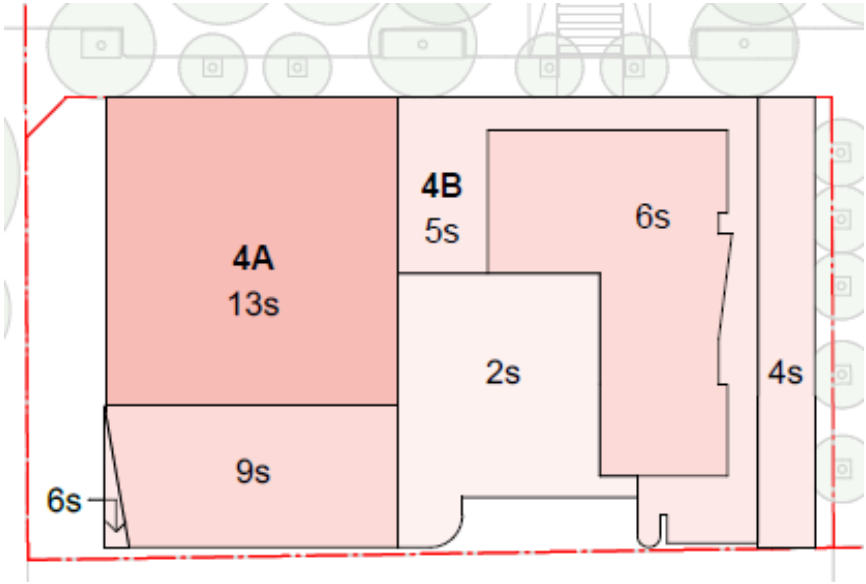


Figure 63 General arrangement of Parcel 4 with height in storeys

Source: Design Team

From and Setbacks

The building height and descriptions are shown in Table 17.

Table 17 Parcel 4 Built Form Breakdown

Building	Maximum Height (RL m)	Setbacks
Building 4A	70.810	6m setback to the Young Street 0m setback to Potter Street

Dwelling Mix

The proposed dwelling mix are provided at Table 18.

Table 18 Parcel 4 Dwelling Mix

Building	Dwelling Mix	Total Dwellings	GFA
Building 4A	• Studio: 59 • 1 Bedroom: 32 • 2 bedroom: 26 • 3+ bedroom: 1	118	Total: 8,311m^2

Uses by Level

The proposed uses are proposed in Parcel 4 as shown in Table 19.

Table 19 Parcel 4 uses by level

Building	Level	Uses
Building 4A	Ground Ground Mezzanine	• Lobby • Artist lounge space and artist exhibition and community space • Artist studio • Residential and retail waste storage area • Temporary waste and loading area • BTR apartments (2-3 bedrooms) • Plant • Bike storage
	Levels 1-3	• BTR apartments (studio, 1-2 bedrooms)
	Level 4	• Recreational facility (indoor) – Bathhouse • BTR apartments (studio, 1-2 bedrooms) • Plant
	Level 5-7	• BTR apartments (studio, 1-2 bedrooms)
	Level 8	• BTR apartments (studio, 1 bedroom) • Outdoor communal space (green rooftop area)
	Levels 9-11	• BTR apartments (studio, 1 bedroom)

Façade and Materiality

The proposed materiality for Parcel 4 is shown at Figure 64.



Figure 64 Parcel 4 proposed materiality

Source: SJB, Curious Practice

3.9.1 Building 4A

Built Form and Urban Design

Building 4A is a residential flat building located within Parcel 4. Building 4A is varied in height which ranges from 2 storeys to 13 storeys. Photomontages of the proposed building form from the Design Report (Appendix E) have been provided at Figure 65.



Figure 65 3D view of Building 4A

Source: Design Team

Ground Plane and Mezzanine

The ground plane of Building 4A includes the artist exhibition and community space and artist living. This space will be able to be utilised by artists as a practicing studio and the community for shared uses. Additionally, the temporary waste and loading area is located on the ground floor.

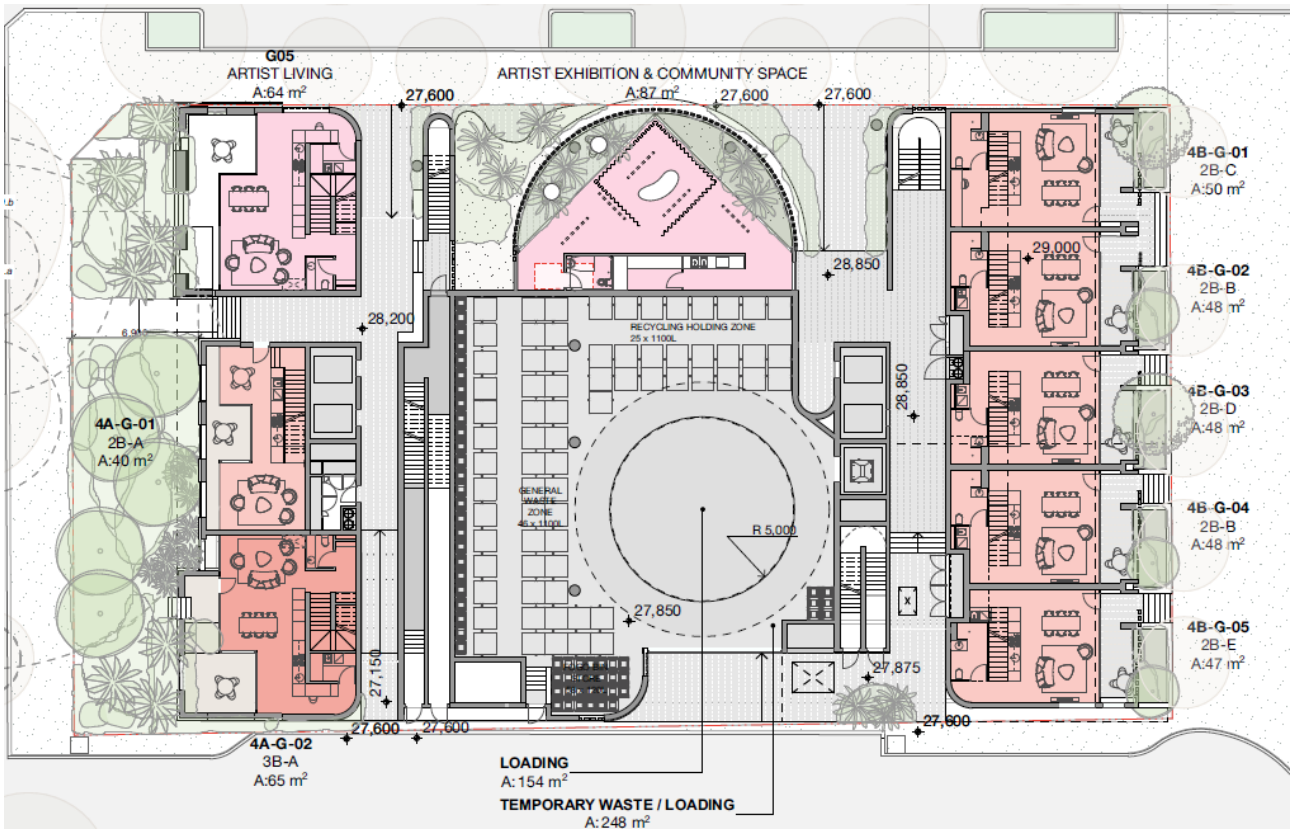


Figure 66 Ground floor of Building 4A

Source: Design Team

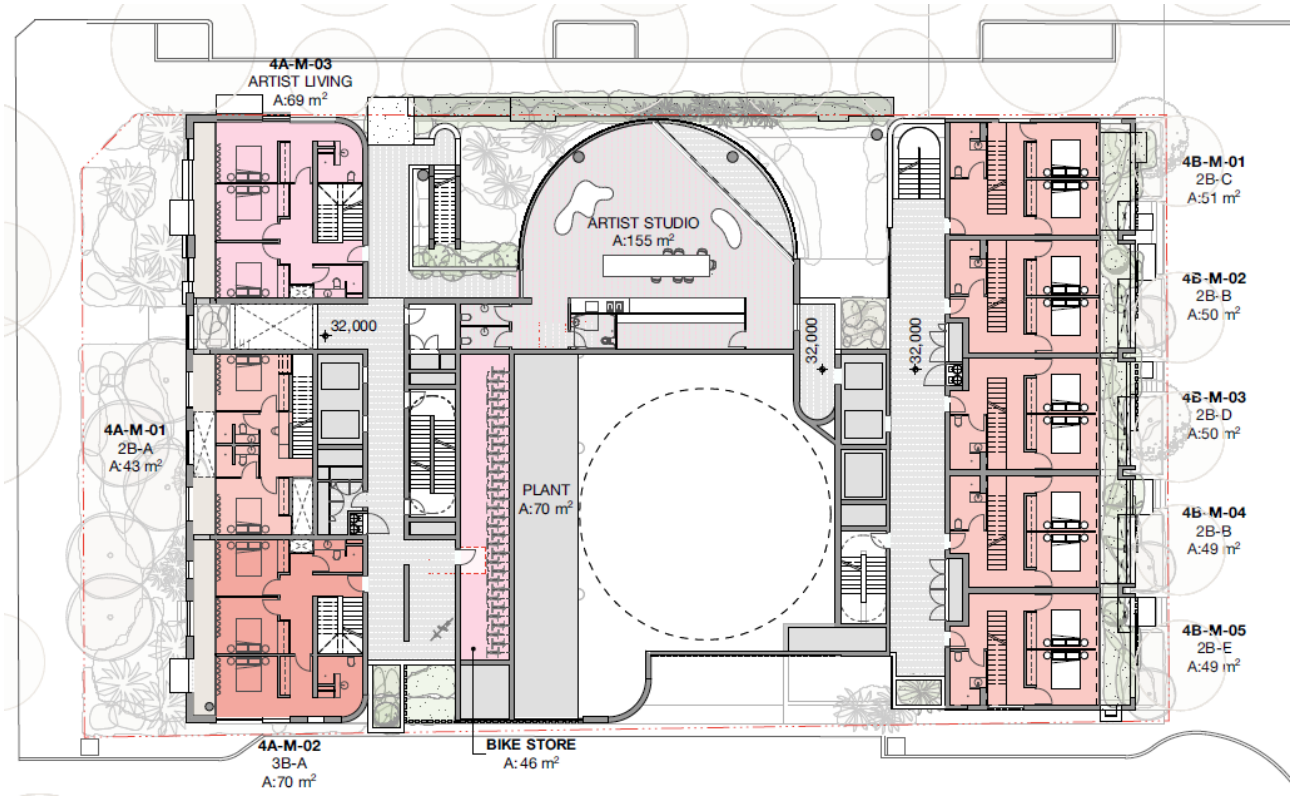


Figure 67 Mezzanine level of Building 4A

Source: Design Team

Residential Uses for Building 4A

Building 4A accommodates BTR apartments including studios, 1 to 3-bedroom apartments and City Starter Studios. The typical floorplate is shown at Figure 68.

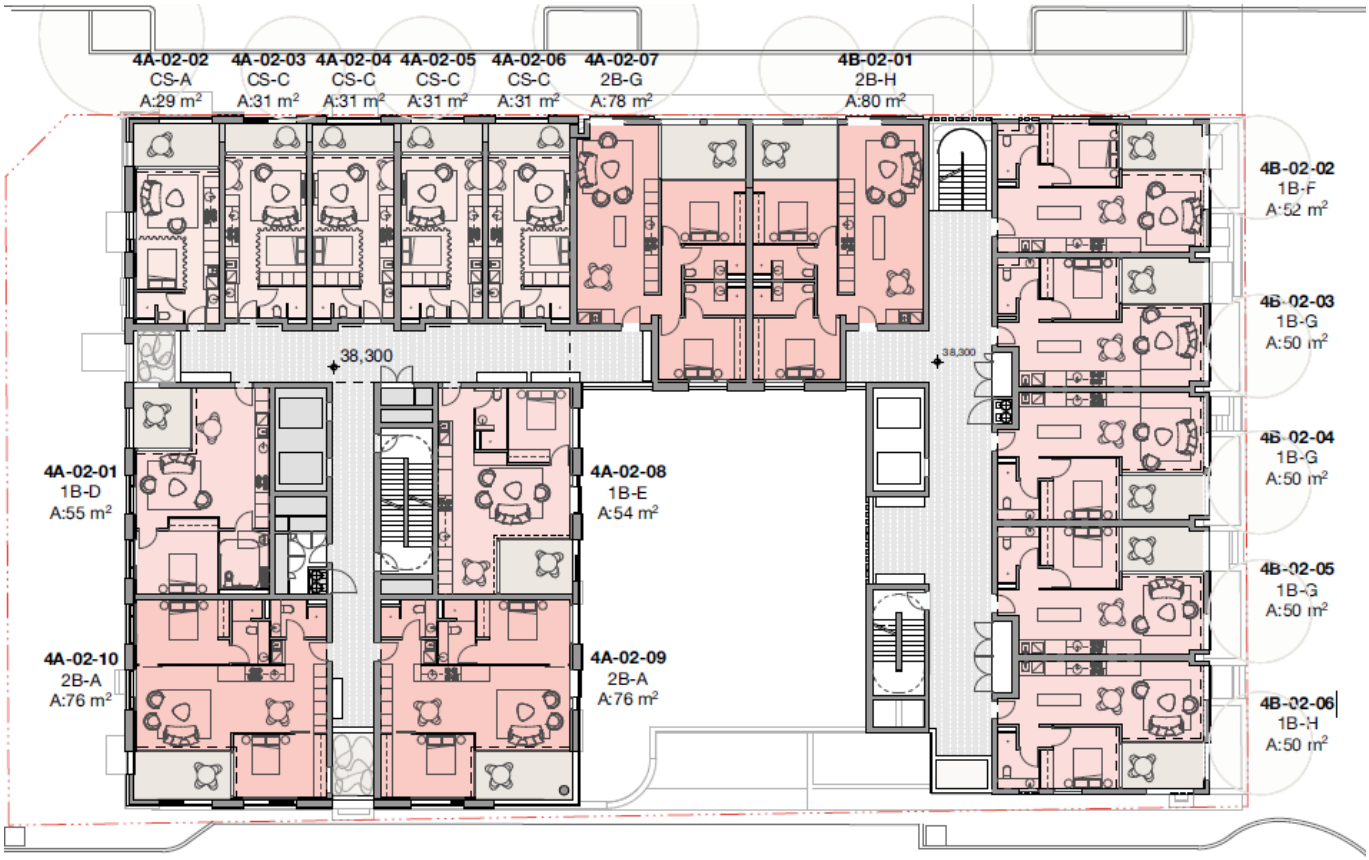


Figure 68 Typical floorplate for Building 4A

Source: Design Team

Communal Spaces for Building 4A

As previously mentioned, Building 4A includes the artist residence and exhibition and community space. Communal open space is provided on level 8 with a landscaped seating area.

Recreational Facility – Indoor (Bathhouse)

Building 4A includes a bathhouse on Level 4, which will be privately operated and function as a recreational facility.

3.10 Diverse Housing

Affordable Housing

As part of the proposed development under the Housing Delivery Authority, 25% of the uplift in gross floor area is allocated for affordable housing. This contribution is in addition to the baseline 3% total floor area contribution requirement outlined in the SLEP 2012 Clause 7.13. The affordable housing component will be managed by a registered Community Housing Provider (CHP) for a minimum period of 15 years (Evolve Housing). This is in addition to a monetary contribution being made under the City of Sydney Affordable Housing Policy of 3% for residential uses and 1% for non-residential uses, which would fund approximately 28 additional dwellings being provided off-site, in-perpetuity.

The on-site affordable housing is consolidated into a single building for ease of management by the CHP, within Building 2A and tower form in Building 3A. This initiative will deliver 73 dwellings in a location that benefits from high accessibility and rich urban amenity. All dwellings will comply with the design and amenity standards set out in the Apartment Design Guide, ensuring quality living environments for future residents.

The proposal also responds to recommendations from the SDRP, which advocated for greater housing diversity within the precinct. In response, the project team has introduced a new compact studio typology (City Starter/City Stayer apartments). These units are designed with efficient layouts that leverage the site's urban advantages and will be included in the Build-to-Rent portfolio managed by Nation. While not classified as co-living under planning definitions, these apartments offer an innovative and affordable housing option that enhances the precinct's diversity and accessibility.

City Starter and City Stayer Apartments

Of the proposed 287 studio apartments, 230 are proposed to be Nation's "City Starter/Stayer" studios, which can be delineated from typical studios in that they do not meet the recommended 35m^2 or higher internal space under the ADG. The smaller apartment size accommodates single people at a more affordable rental price-point, while still providing access to the communal amenities provided across the precinct.

These apartments are proposed to meet an observed need in Coronation's BTR portfolio for the following 2 groups:

- City Starters (under 25 years old): Younger single people who bring life and vibrancy to places. They prefer to be out and about enjoying all the city has to offer rather than staying at home. Their apartment is a launch pad for daily activities, yet they still need and want a considered space that meets all the housing needs without compromise.

  With the rising cost of living and a strong job market, many of these young people are choosing work over university— commencements dropped by over 10% in 2022. That means they're entering the workforce sooner and looking for homes that support their next chapter.
- City Stayers (over 55 years old): Older, single people who actively seek the city lifestyle, community and convenience. They want a city home and the certainty of BTR. This model also helps address social issues such as loneliness. In Sweden, a multigenerational housing project called SällBo brings people aged over 70 together with those aged 18–25 in the same building. Studies show these setups decrease loneliness for both age groups while increasing feelings of safety and connection.

The City Starter/Stayer apartments are located in the following locations:

- Northern frontages of Building 2B.
- Northern frontage of Building 3B.
- Western frontage of the Building 3A tower floorplate.
- Northern frontage of Building 4A.

3.11 Landscaping

Landscape Plans and a Landscape Design Report have been prepared and are provided at Appendix E. The Landscape Design Report outlines the proposed landscaping along the streetscape as well as within the site. The proposed landscaping is a key element of the proposal and provides a strong opportunity to improve the streetscape, provide a range of active and passive open spaces within the site and revegetate the site with endemic species. It is noted that internal links in Parcel 1 and Parcel 4 will be partially privately accessible for BTR residents and it will ensure the operational ease of the amenity of spaces.

The key design drivers informing landscaping at the site include:

- Provision deep soil setback zones along the Danks Street and Young Street frontages, as well as internally to the site.
- Introduction of retail courtyards that will allow for activation and placemaking.
- Provision of a communal garden and residents walk, linking the BTR amenities across all 4 parcels.
- Introduction of 'garden rooms' as places for passive recreation among tenants.

The spatial arrangement of the landscaping concepts is shown at Figure 69. The proposed development also includes rooftop landscaped areas. Refer to the Landscape Plans at Appendix M for further design detail and planting schedules.

The proposal achieves:

- 15% coverage as deep soil.
- 15% canopy coverage including roads (3,162sqm).

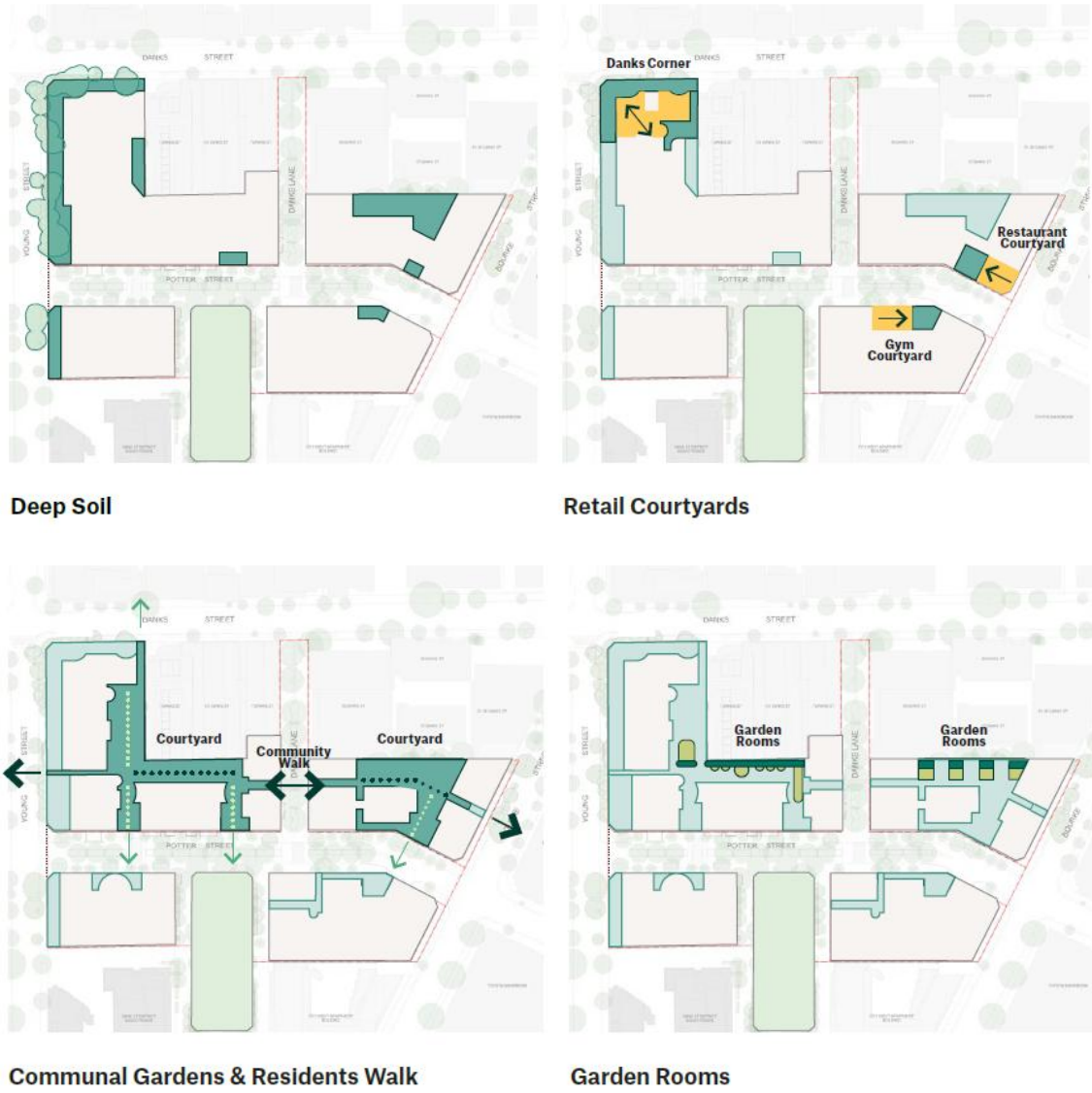


Figure 69 Landscape Design Principles

Source: Design Team

3.12 Public Art

The proposed development will include public art that the on-site artist in the residence program will have an opportunity to contribute to. The key public art opportunities include a freestanding sculpture, artist-led clocktower, artist-led functional works and integrated facades. The public art strategy will integrate with and build upon the existing Danks Street South Precinct Public Art Strategy.

The vision for the public art will be of the perspective of 'Common Ground' which will draw upon inspiration of the Connecting with Country Framework which advocates for design that supports ecological as well as social systems. The public art will seek to nurture both human connection and fauna connections to contribute to the vitality of the place.

The freestanding will be in the central plaza and will serve as a landmark that celebrates Waterloo's identity, inviting connection, dialogue, and joy through locally inspired artistic expression. The clock tower will be transformed into a public landmark through artist-led interventions that celebrate its architecture and engage with themes of time, movement, and place. The functional public artworks integrated into retail courtyards and gardens will create a site-wide narrative, with each piece responding to its unique outdoor setting to enrich the public realm. The integrated façade will use key façade locations across the precinct invite bold, narrative-rich artworks that transform architectural surfaces into vibrant connectors of place, people, and community.

The example public art and location is shown at Figure 70.



Figure 70 Public art samples and location

Source: Design team

3.13 Transport, Vehicle and Site Access

3.13.1 Access

Access for passenger vehicles, motorcycles and scooters is provided from the primary driveway entrances to the site from Bourke Street and Young Street which provides access to Potter Street (the new street provided through the VPA). Entrance to the consolidated basement will be provided from Parcel 1 and 3.

3.13.2 Car Parking

The proposed development will provide a total of 524 parking spaces including 15 visitor and 39 retail spaces plus 6 car-share, 2 car wash, 5 service bays and 2 loading bays. Car parking is provided in the consolidated basement which is broken down by parcel as follows:

- Parcel 1: 228 car parking spaces.
- Parcel 2: 82 car parking spaces.
- Parcel 3: 142 car parking spaces.
- Parcel 4: 57 car parking spaces.

3.13.3 End of Trip

End of trip (EOT) facilities are provided for staff bicycle parking spaces and will include 17 lockers and 2 shower and change cubicles.

3.13.4 Loading and Servicing Facilities

The proposed development will provide 2 at-grade loading docks, consolidating the servicing arrangements for the 4 parcels. One loading dock is provided with access from the new proposed street, which will service Parcels 1 and 3. The second loading dock servicing Parcels 2 and 4 and is accessed from the proposed laneway (currently under construction) on the adjacent Dasco site to the south (noting that this laneway will be dedicated to Council for public access). The loading docks can accommodate a 12.5m Heavy Rigid Vehicle (HRV) and provide a turntable for manoeuvring and front-in entry and exit. A 6.4m Small Rigid Vehicle (SRV) can access the basement car parking areas within the consolidated basement across all parcels.

3.14 Waste Management

The proposed development includes waste management facilities within the consolidated basement and the site with share a waste management strategy across parcels. Waste from Parcels 1 and 4 will be stored in the loading area in the basement of Parcel 1 and Parcels 2 and 3 will be stored in the loading area in the basement of Parcel 3.

Each residential unit will be provided with a storage area capable of holding waste generated and a dual chute system comprising of a waste chute and recycling chute in each building core on each level. Any residential organics waste will be disposed of within a kitchen caddy which will be transferred to the communal food organics bin room in each building core.

Tenancies will be responsible for general waste and recycling waste generated by their retail or commercial tenancies. On the completion of each trading day or as required, nominated staff or contracted cleaners will transport all waste to the retail/commercial waste room and separate into the appropriate bins.

A bulky waste room will be available for the storage of discarded bulky items.

Further detail on the generation, collection, storage, transfer and disposal of waste during both the operation and construction phase of the project is provided in Appendix R and in Section 8.11 of this report.

3.15 Stormwater Management

The proposed stormwater works are outlined in the Integrated Water Management Plan provided at Appendix Y. The stormwater works that are proposed are summarised below.

3.15.1 On Site Detention

Due to the site including a mix of retail and residential land uses, the proposed development will require On Site Detention (OSD) systems on each parcel. The total volume of the combined OSD system will be 225m^3. The proposed stormwater drainage plan is provided at Figure 71.



Figure 71 Proposed OSD system locations and stormwater drainage plan

Source: Stantec

3.15.2 Sediment and Erosion Control During Construction

During the construction stage of the project, sediment and erosion control measures will be installed and maintained until construction is completed. A Sediment and Erosion Control Plan is attached to the Stormwater Management Plan (Appendix Y).

3.15.3 Ongoing Stormwater Management

The following water sensitive urban design treatment initiatives are proposed with 19 Ocean Guard Baskets, 4 10kL Rainwater Tanks across 4 parcels and 24 StormFilter Cartridges across 4 parcels. The roof areas will be captured through a downpipe system and discharged to the proposed below-ground stormwater network. Any surface flows will be captured via a pit and pipe network and be discharged into Council's network in the public domain.

3.16 Ecologically Sustainable Development Infrastructure

A key driver in the detailed design, construction and operation of the proposed development is the achievement of best practice ecologically sustainable development (ESD) principles to minimise the consumption of resources and guide sustainable operation in the future. The ESD Report is provided at Appendix P. The proposed development is targeted to achieve a 5 Star Green Star rating, as well as ensuring general improvements where possible for energy and water consumption, transportation, material selection and emissions.

Sustainability and ESD initiatives for the proposed development include:

- Sufficient exposure to daylight
- Appropriate construction and glazing selection
- Energy efficient air-conditioning systems with control strategy and thermal comfort tuning
- Energy efficient lighting systems
- Rainwater recycle tank
- On-site photovoltaic systems (solar panels)
- High WELS-rate water fixtures

3.17 Staging and Delivery

The proposed early works will be delivered across 2 stages, aligned to the 2 stages associated with the prior Concept DA consent with the City of Sydney. Stage 1 is the western portion of the site, which comprises development parcels 1 and 4. Stage 2 is the eastern portion of the site, which comprises development parcels 2 and 3. Each stage is intended to be associated with a separate Construction Certificate and will be delivered sequentially.

The proposed construction staging for each parcel is provided in Table 20 below. The indicative phasing will be undertaken for each parcel and the Applicant requests that the DPHI consider the staging in drafting conditions of consent.

Table 20 Indicative Project Phasing for Each Parcel

Construction Certificate	Works
1	Structure – Basement including below ground services and ground
2	Structure – Remaining structures and services
3	Façade
4	Fit out
5	Landscaping
6	Public domain works

3.18 Construction Details

A detailed Construction Management Plan (CMP) will be prepared by the appointed contractor prior to the commencement works. The CMP will address the following matters:

- Material management.
- Construction traffic management.
- Health and safety.
- Equipment/materials staging and parking.
- Dust control measures.
- Methods for disposal of demolition waste.

3.19 Non-Residential Uses

A summary of the non-residential uses being sought for approval is provided below.

Retail

Approval is sought for use of all retail tenancies indicated in the Architectural Drawings. Most tenancy are anticipated to be food and beverage tenancies, contributing to the activation and livelihood of the precinct. Tenants will utilise the Complying Development provisions of *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008* to undertake their fit-out works.

The proposed hours of operation for the retail precinct are as follows:

- 7am - 10 pm, 7 days per week.

24-hour Gym

Approval is sought for use of a 24hr gym in the Parcel 3 podium as a *recreation facility (indoor)*. The gym will be operated commercial and allow access to members via a dedicated entrance that is separate to the residential entry. This approach has been implemented in existing Coronation projects to much success.

The gym is proposed to provide 24hrs access to members, 7 days per week. Core hours will be staffed and after-hours will be provided via secure card entry.

Bathhouse

Level 4 of Building 4A is proposed to be a commercially operated bathhouse providing access to members. Approval is sought for the use as a recreation facility (indoor). The proposed hours of operation are as follows:

- 7am - 10 pm, 7 days per week.

3.20 Art Studio

Ground level of Building 4A provides artist-in-residence spaces and an artist and community exhibition space. The exhibition space will host regular events and exhibitions and will be open to the public. The artist studio will form part of the BTR amenity/management by Nation.

3.21 Ongoing Operation and Management

Under the project's proposed BTR model, the development will be owned, operated and managed by Nation in an ongoing manner. An integrated on-site management team will service both the development's residential and non-residential uses, comprising concierge, maintenance, property management, and leading staff members to enable a flexible and tailored management approach.

4.0 Proposed rezoning amendments

The following section outlines the objectives and intended outcomes of this concurrent rezoning request and an explanation of provisions to achieve those outcomes, including relevant mapping. The justification and evaluation of impacts is set out in Section 8.0 and Section 9.0 of this report.

4.1 Objectives and intended outcomes

The key objective of this Chapter is to amend the SLEP 2012 to allow additional height and FSR on the site to accommodate the mixed-use development described in Section 3.0, consistent with the City of Sydney LSPS and Housing Strategy, its existing land zoning, and the broader strategic objectives of the State government to deliver additional housing to alleviate the housing crisis and help meet the NSW Government's target under the National Housing Accord. The intended outcomes of the proposed amendments are as follows:

- Provide much-needed housing in a well-located site within the City of Sydney and contribute to NSW's housing targets under the National Housing Accord 2022 and NSW Housing Targets 2023.
- Enable delivery of diverse, build-to-rent residential apartments with excellent amenity leveraging the site's strategic location.
- Contribute to alleviating the NSW Housing Crisis, in particular by delivering new, fit-for-purpose affordable rental housing.
- Revitalise an underutilised land parcel near Waterloo Metro Station and Green Square Train Station, supporting community and commercial needs by allowing for additional density to deliver more housing.
- Ensure the publicly accessible east-west road and through-site link are provided, enhancing pedestrian connectivity and site permeability, linking to Waterloo Metro Station and Green Square Train Station.
- Contribute to housing diversity in Waterloo with build-to-rent and affordable housing, along with necessary social infrastructure and communal facilities.

4.2 Explanation of provisions

4.2.1 Amendments proposed to the Sydney LEP 2012

The following amendments to the SLEP 2012 are summarised in Table 21 below. These amendments will be reflected in amendments to the Height of Buildings, Floor Space Ratio and Locality and Site Identification maps in the SLEP 2012 respectively.

Table 21 Existing and Proposed SLEP 2012 Controls

Control	Existing SLEP 2012 Control	Proposed SLEP 2012 Control
Clause 4.3 - Height of buildings	Ranges from 3m to 30m. Refer to existing map at Figure 72.	Ranges from 3m to 67m, with localised 125m to accommodate tower along Bourke Street. Refer to proposed height map at Figure 73.
Clause 4.4 - Floor Space Ratio	Blanket 1.5:1 (base mapped). Community infrastructure floor space of 0.5:1 available.	Blanket 3.05:1 (base mapped) No additional floor space above mapped.
Clause 6.43 - Danks Street South Precinct	Within Danks Street South Precinct on the Locality and Site Identification Map	Excise site from Danks Street South Precinct.
Clause 6.14 – Community infrastructure floor space at Green Square	Up to 0.5:1 additional floor space ratio is available at the site for community floor space.	It is proposed to exclude the site from Clause 6.14 as the mapped FSR captures the total FSR required for the proposed development.
Clause 6.21D – Competitive design process	Requires a competitive design process for the site.	Since an alternative design excellence process has been undertaken, Clause 6.21D should not apply to the site. General design excellence clause 6.21C continues to apply.
Clause 7.23 – Large retail development	Currently restricts shops or markets to a size of less than 1,000sqm.	Proposed to not apply to the site. Additional density at the site means it is likely a new supermarket will be required to service the local area.

Amendments to Clause 4.3 - Height of buildings

No amendments to the wording of Clause 4.3 Height of Buildings is proposed. The Height of Building Map is proposed to be amended as provided in the following figures.

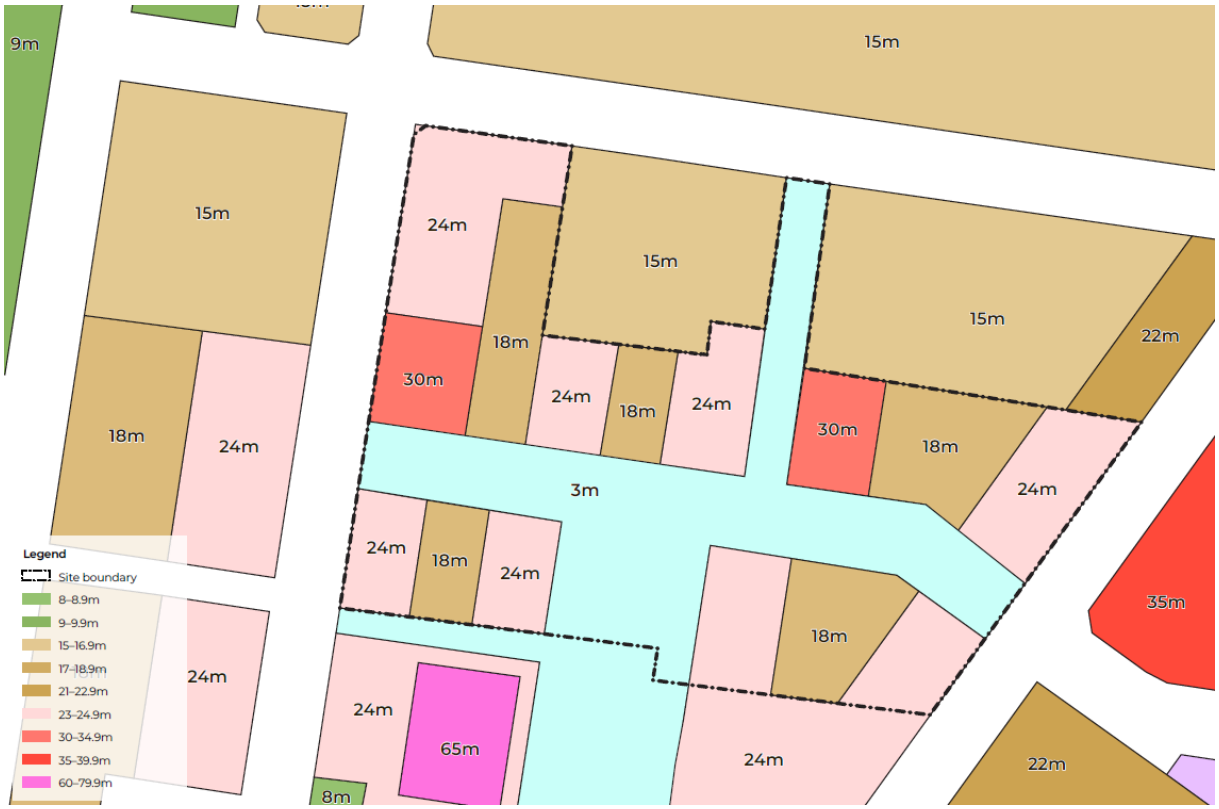


Figure 72 Existing height of buildings map

Source: Ethos Urban

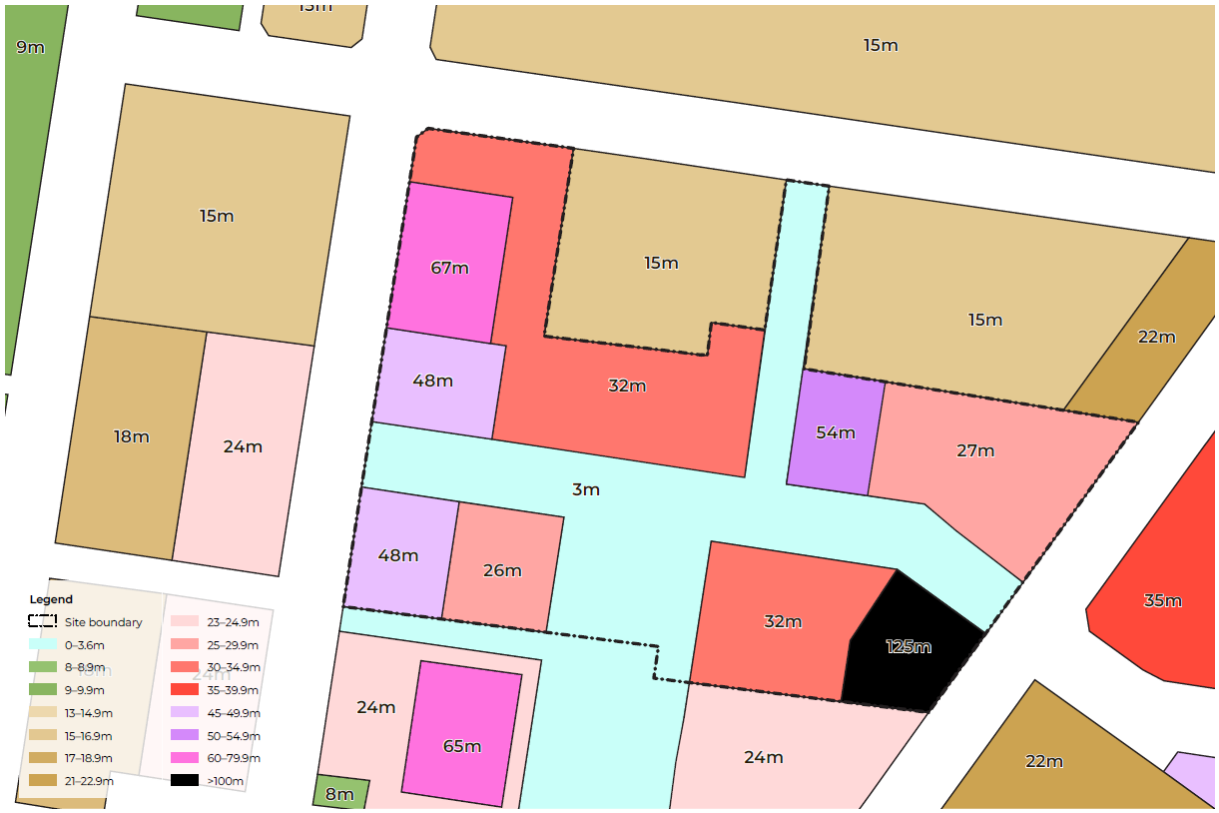


Figure 73 Proposed height of buildings map

Source: Ethos Urban

Amendments to Clause 4.4 - Floor Space Ratio

No amendments to the wording of Clause 4.4 Floor Space Ratio is proposed. The Floor Space Ratio Map is proposed to be amended as provided in the following figures.

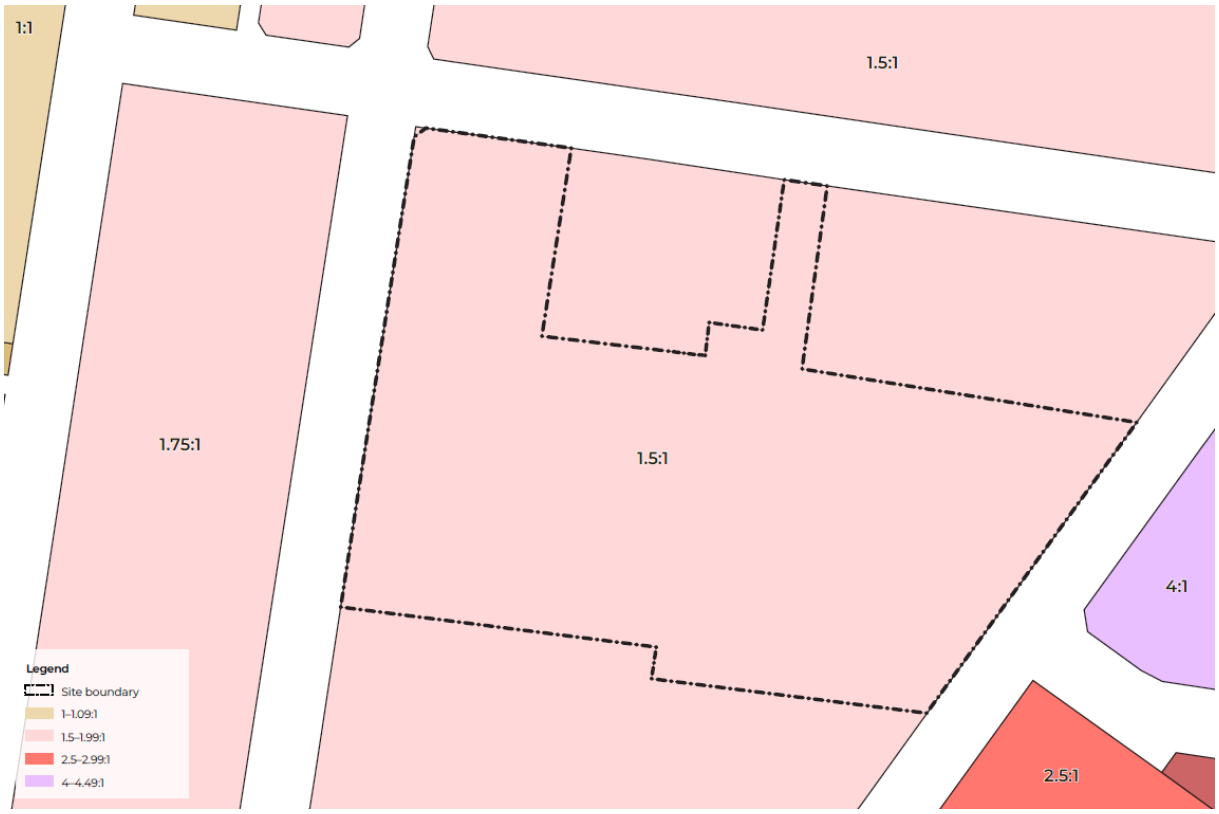


Figure 74 Existing FSR map

Source: Ethos Urban

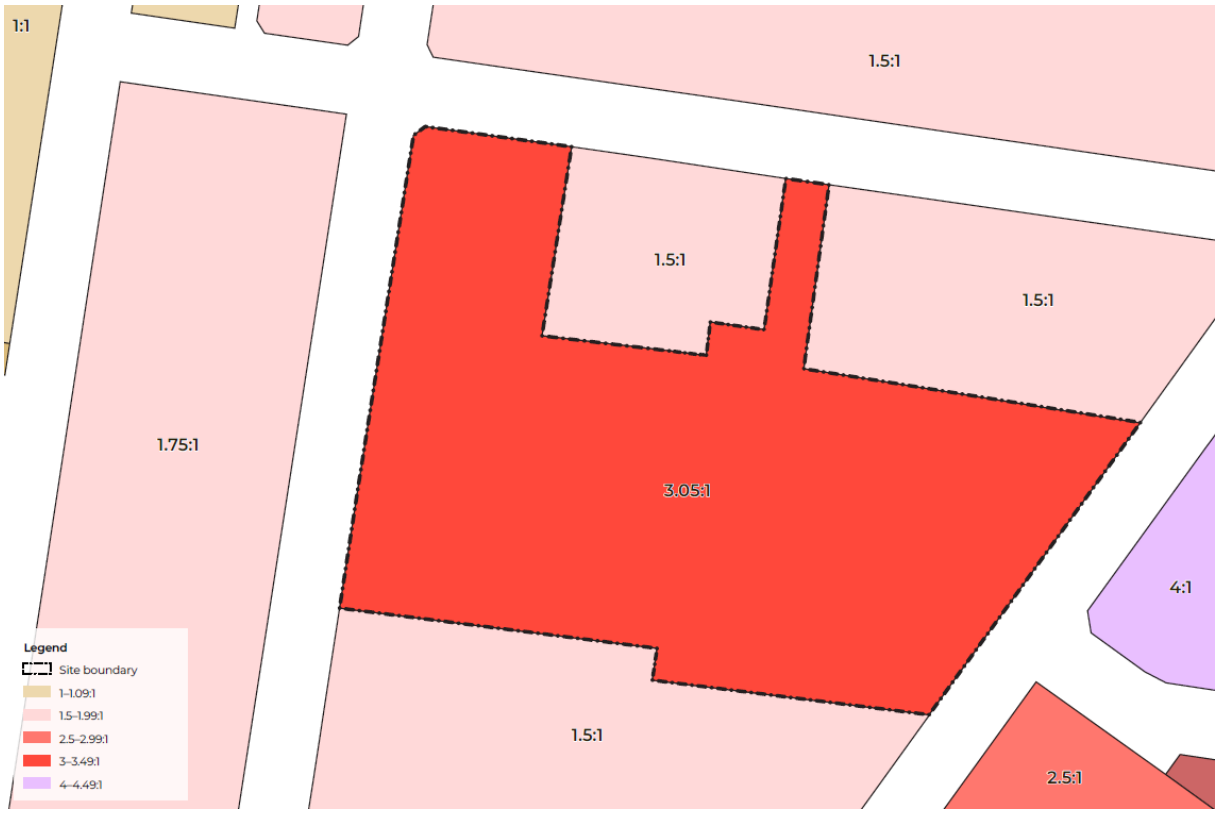


Figure 75 Proposed FSR map

Source: Ethos Urban

Amendments to Clause 6.43 - Danks Street South Precinct

Clause 6.43 provides site specific controls for the Danks Street South Precinct, which is mapped on the Site Locality Map. No amendments to the wording of Clause 6.43 Danks Street South Precinct are proposed. The Site Locality Map is proposed to be amended, including the removal of the site from the Danks Street South Precinct and creation of a new locality titled "207-229 Young Street, 881-885 and 887-893 Bourke Street" over the subject site as described in the image below.



Figure 76 Existing Site Locality Map

Source: Ethos Urban

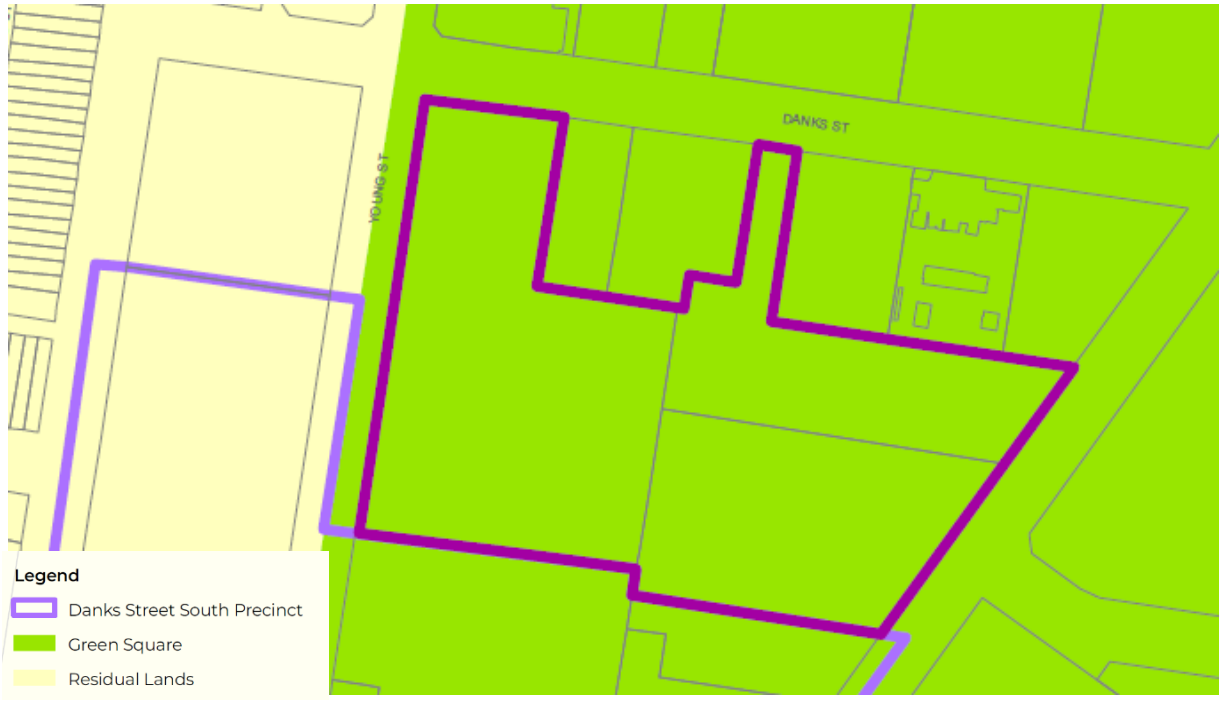


Figure 77 Proposed Site Locality Map

Source: Ethos Urban

Exclusion of Existing Clauses

An additional clause is proposed to be inserted into the Sydney Local Environmental Plan to exclude the site from the following clauses:

- Clause 6.14(4) - Community infrastructure floor space at Green Square
  - Reason: The community infrastructure is established in the VPA and so rather than applying an additional FSR for this (equivalent to 0.5:1), the amended Clause 4.4 will be the governing FSR control.
- Clause 6.21D(3) - Competitive design process
  - Reason: A competitive design process is unreasonable and unnecessary in this instance as a waiver has been granted by the NSW Government Architect and the proposal subject to an alternative design excellence process including review by the State Design Review Panel, consistent with the objectives of the Housing Delivery Authority. The removal of this part of the clause is also consistent with the approach taken by Clause 6.43 Danks Street South Precinct, which excludes the development from accessing additional floor space if demonstrating design excellence.
- Clause 7.23 - Large retail development outside of Green Square Town Centre and other planned centres
  - Reason: The proposed HDA rezoning will result in an uplift in residential density at the site, which is supported with the provision of approximately 4,450m^2 of non-residential GFA contributing to the revitalisation of the Danks Street precinct . As such, it is required to remove the current restriction on market and retail uses in the Restricted Retail Development area for the site.

The suggested new clause is as follows:

6.## 207-229 Young Street, 881-885 and 887-893 Bourke Street

(1) This clause applies to land identified as the "207-229 Young Street, 881-885 and 887-893 Bourke Street" on the Locality and Site Identification Map.

(2) Clause 6.14(4) does not apply to development in the 207-229 Young Street, 881-885 and 887-893 Bourke Street Precinct

(3) Clause 6.21D(3) does not apply to development in the 207-229 Young Street, 881-885 and 887-893 Bourke Street Precinct

(4) Clause 7.23 does not apply to development in the 207-229 Young Street, 881-885 and 887-893 Bourke Street Precinct

4.2.2 Amendments proposed to the Sydney DCP 2012

Section 5 of the Sydney Development Control Plan 2012 provides for specific controls for areas within the City of Sydney LGA. Specifically, Section 5.1 of the DCP applies to the Danks Street South Precinct. As the building footprints are changing, is proposed that the site is excised from Section 5.1 of the Sydney DCP - Danks Street South Precinct. This is to ensure that any future development applications are assessed effectively against the controls prescribed for the site.

Pursuant to Section 2.10 of the Planning Systems SEPP Development Control Plans do not apply to State Significant Development. Nonetheless, the proposed development reasonably complies with the intended outcome of the DCP as described in Section 6.5 below.

5.0 Justification of strategic and site-specific merit

This section outlines the strategic and site-specific justification for the proposed concurrent rezoning to the State Significant Development Application, as described in Section 4.0 above. It has been set out in accordance with the relevant matters for consideration within the 'Local Environmental Plan Making Guideline' prepared by DPHI.

Strategic merit

5.1 Section A – need for the Planning Proposal

Q1. Is the Planning Proposal a result of an endorsed local strategic planning statement, strategic study or report?

The proposed development is consistent with the designation of the Young Street Waterloo site as SSD under the State Significant Declaration Order 2025 (Order) dated 17 February 2025. The Order declares development specified in EOI application 229420 dated 8 January 2025, including development for the purposes of mixed-use development (Build to Rent including affordable housing) with ground floor non-residential uses at 881-885 Bourke Steet, as identified in Schedule 3, is SSD. The Order directly responds to the objectives of the Housing Delivery Authority and National Housing Accord to build new well-located homes to alleviate the housing crisis.

Q2. Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

The proposed development is the best means of achieving the objectives and intended outcomes outlined in Section 4.1 above. In order to achieve renewal of the site and the delivery of the proposed public benefits, the controls under the SLEP 2012 must be amended to facilitate approval of future development at the site.

This concurrent rezoning achieves the intended outcomes for the site and has been in prepared in response to the key criteria prescribed under the HDA process, including the delivery of a greater quantum of housing in highly accessible locations

In preparing this concurrent rezoning, 3 options were considered to facilitate the intended outcomes as set out in Section 2.9. These are listed and discussed below:

- Option 1: Do nothing.
- Option 2: Use of the site for an Alternative Purpose.
- Option 3: Redevelopment in accordance with the Approved Concept Plan.
- Option 4: The proposal.
- Option 4 Variation: The proposal without a consolidated basement.

5.2 Section B – relationship to the strategic planning framework

Q3. Will the Planning Proposal give effect to the objectives and actions of the applicable regional, or district plan or strategy (including any exhibited draft plans or strategies)?

Greater Sydney Region Plan – A Metropolis of Three Cities

The Greater Sydney Region Plan (GSRP) is the overarching strategy for growing and shaping the Greater Sydney Area. It sets a 40-year vision (to 2056) and establishes a 20-year plan to manage growth and change for Greater Sydney in the context of social, economic and environmental matters. The plan was adopted in March 2018 and seeks to reposition Sydney as a metropolis of 3 cities – the western parkland city, central river city, and the eastern harbour city. The Plan provides 10 high level policy directions supported by 40 objectives that inform the District Plans, Local Plans and Planning Proposals which follow in the planning hierarchy.

The development is consistent with the following directions under the Plan, which govern growth and development in Sydney (refer to Table 22).

Table 22 Consistency with GSRP directions

Direction	Consistency of the development with the Direction
A city supported by infrastructure	• The proposal will facilitate urban renewal that will utilise the existing heavy rail infrastructure and the significant investment being undertaken in the area by local and State government (most notably Waterloo Metro Station). • The proposal will contribute to the improvement of the local and district road network through the land acquisition, funding and construction of the through site link and public road.
A city for the people	• The proposal will improve opportunities and the environment for people to walk, cycle and use public transport through improved pedestrian connections, new and upgraded cycling links and urban renewal providing housing and retail a short walk from high frequency public transport.
Housing the city	• The site is ideally located to accommodate 777 new build to rent dwellings within an existing urban renewal area, thereby, increasing supply within a short walk to Redfern Railway Station and Waterloo Metro Station. • The proposed quantum of housing and non-residential floor space will activate the streets and public domain to create a vibrant and successful mixed use precinct. • The rezoning will increase housing diversity by facilitating the provision of apartments in a range of sizes and typologies
A city of great places	• The proposal will transform a large impermeable block into new high-quality streetscapes, well designed public domain and public open space within Waterloo, including the new through site link and road.
A well-connected city	• The proposal will facilitate the delivery of approximately 850 new dwellings and population serving jobs adjacent to high volume bus services and within walking distance of the Redfern Railway Station. This will increase existing public transport patronage, making a material contribution to the achievement of a '30-minute city'.
Jobs and skills for the city	• The proposal will deliver a new and revitalised high quality retail stores, cafes and restaurants, which will retain and generate jobs in these industries and ensure that there is adequate non-residential floorspace consistent with the role and character of the area.
A city in its landscape	• The proposal does not affect any protected biodiversity or remnant or significant vegetation. A Biodiversity Waiver has been prepared (Appendix Q) and is discussed further at Section 3.11. • The landscape plan illustrates that the proposal will significantly increase the urban tree canopy on the site.
An efficient city	• The proposed development is supported by an ESD Report, BASIX and Section J report and has been prepared and submitted as Appendix P and discussed further at Section 3.16. The Statement outlines the proposed sustainability strategies, imperatives and priorities to be incorporated into the future development.

Direction	Consistency of the development with the Direction
A resilient city	• The proposal has sought to minimise exposure to natural hazards by ensuring that future development is not affected by flooding, as detailed in the Flood Impact and Risk Assessment (Appendix U) and as summarised at Section 8.8. • The environmental initiatives implemented through the development will contribute to enhanced environmental outcomes and seek to mitigate impacts related to climate change.

Eastern City District Plan

The District Plan contains the planning priorities and actions for implementing the Regional Plan at a district level. The Regional Plan sets the 20-year vision for the District through 22 'Planning Priorities' that are linked to the Region Plan. The purpose of the District Plan is to support councils in planning for growth and to align the *Local Strategic Planning Statements* (LSPS) with place-based outcomes. The strategic intent of the District Plan is to provide for services, shops, cultural infrastructure, education and transport within close reach of residents. The District Plan acknowledges that the area is growing and changing and that infrastructure and services need to adapt to meet people's changing needs.

The key Planning Priorities under the Eastern City District Plan include the following as identified in Table 23:

Table 23 Consistency with Eastern City District Plan directions

Direction	Consistency of the proposal with the Direction
A city supported by infrastructure	
E1. Planning for a city supported by infrastructure	• The future built form will deliver local population serving retail to meet the everyday needs of the community. The proposed development will form a critical mass of employment generating land uses that will accommodate the needs of the local area, including opportunities for fine grain retail and commercial uses. • The site has good access to a number of nearby open space and recreation facilities enhancing community wellbeing and striving to achieve healthy communities. The opportunity to deliver a through site link will contribute to enhanced social opportunities. The site contributes to the alignment of infrastructure with growth by providing future land uses amongst strong pedestrian and cycle networks connecting Waterloo and the broader CBD.
A city for people	
E4: Fostering healthy, creative, culturally rich, and socially connected communities.	• The proposed development will deliver a healthy, resilient and socially connected community, with 777 build-to-rent residential apartments co-located with significant retail opportunities, residential amenities, and public open space including adjoining park proposed to be delivered to the south of the site. • The proposal will create a generous and well-integrated public domain, featuring public plaza areas and activate retail frontages, designed to encourage social cohesion and a sense of community, establishing a key hub for the area. • The provision for an Artist Studio at the ground floor provides additional opportunities for community cohesion and events.
Housing the city	
E5: Providing housing supply, choice, and affordability with access to jobs, services, and public transport	• This priority emphasises the need for diverse and affordable housing options in proximity to employment hubs, services, and public transportation. It provides urban renewal through infill development to accommodate a growing population while ensuring accessibility and affordability within a high amenity area. • The proposed quantum of housing and non-residential floor space will activate the streets and public domain to create a vibrant and successful mixed-use precinct within close proximity to Waterloo Centre and public transport infrastructure. • The redevelopment of the site to increase affordable housing options presents the opportunity to improve housing diversity through various apartment sizes. The proposed development will enable the delivery of much-needed housing that will assist in alleviating the pressure on the NSW housing crisis.
A city of great places	

Direction	Consistency of the proposal with the Direction
E6: Creating and renewing great places and local centres, and respecting the District's heritage	• The proposal provides for place-based planning and design excellence to enhance local character and heritage. It supports the revitalisation of areas to improve liveability, making them more attractive for residential development. • The proposal will facilitate social cohesion and the celebration of community through the delivery of the new public plaza areas within reach of cycling ways and public transport connections. This will include an active ground plane with the opportunity to support and enhance the local nighttime economy.
A well-connected city	
E10: Delivering integrated land use and transport planning, and a 30-minute city	• The proposed development provides the opportunity for residents to have easy access to jobs, services, and amenities within a 30-minute trip, improving quality of life and reducing congestion. • The site is well located to support the idea of the 30 minute city, connected to a well-integrated transport network, including metro, train, bus, and active transport options which supports a higher-density residential development by making it easier for people to move around efficiently. • The co-locates build-to-rent housing with significant commercial floorspace, helping minimise the need for car trips to other areas.
E11: Growing investment, business opportunities and jobs in strategic centres	• The proposal facilitates retail and food and beverage employers to invest in the site for the benefit of the wider community in terms of employment and multiplier effects. Ongoing retail jobs will be created within the site.
A city in its landscape	
E17: Increasing urban tree canopy cover and delivering Green Grid connections	• The redevelopment of the site will significantly increase vegetation and tree cover within Waterloo, through the delivery of significant new open space and smaller publicly accessible pocket parks. This includes opportunities for deep soil planting.
E18: Delivering high-quality open space	• The proposal incorporates significant communal and public open space, including residential amenities, public park and facilities for future residents typical of a build to rent development, which provides additional opportunities for gatherings and respite.
An efficient city	
E19: Reducing carbon emissions and managing energy, water and waste efficiency	• The proposal delivers an innovative and sustainable building with high water, energy and waste efficiencies that will reduce emissions over time and work towards mitigating climate change. • The development will also support transport demand initiatives by improving walkability and cycling opportunities to achieve the NSW Government's goal of net zero emissions by 2050.

Q4. Is the Planning Proposal consistent with a council LSPS that has been endorsed by the Planning Secretary or GCC, or another endorsed local strategy or strategic plan?

City Plan 2036 Local Strategic Planning Statement

The City of Sydney Local Strategic Planning Statement represents Council's 20-year vision and strategy for the LGA's future direction, was endorsed by Council on 17 February 2020, and contains directions about infrastructure, liveability, productivity, sustainability and governance and implementation. The key planning priorities are identified in Table 24:

Table 24 Consistency with City Plan 2036 Local Strategic Planning Statement

Priority	Consistency of the proposal with the Priority
I1 – Movement for walkable neighbourhoods and a connected city	• The site will contribute to creating the heart of a walkable employment generating precinct where residents, workers and visitors can easily access local retail and food and beverage to meet their needs.

Priority	Consistency of the proposal with the Priority
	• The future built form will include the optimised north-south through site link that will improve connectivity and prioritise pedestrian movements to and through the site. This will contribute to encouraging more active and healthy lifestyles. • The provision of the east-west Potter Street will also provide increased connectivity and block permeability.
I3 - Supporting community wellbeing with social infrastructure	• The proposal utilises the principles of the existing voluntary planning agreement to deliver a variety of public infrastructure items within the site, including an enhanced public realm and increased connectivity. • Further community infrastructure will be provided as part of the build-to-rent model for use of residents including pickleball facilities, office spaces, gyms and general communal open space.
L1 - A creative and socially connected city	• The proposed uses of the site will respond to the social make-up and create a diverse, accessible, safe and appealing place for people of all ages, backgrounds and abilities to encourage a vibrant, healthy lifestyle. • The proposed development will create a place that represents the culture of the community, contributing to the role of Green Square Urban Renewal Precinct by enhancing urban activation and improving walkability, with a superior urban form to establish an emerging retail and commercial centre.
L3 - New homes for a diverse community	• As the site is within the Green Square Urban Renewal Precinct, increased housing density is an appropriate land use given proximity to Waterloo metro station and bus stops, as well as jobs and local services. • Given the size of the site, there is an opportunity to provide build to rent housing that will respond to the changing housing needs of the community. This will include providing a mix of studio, 1, 2 and 3 or more bedrooms to support diverse communities that require diverse apartment sizes to accommodate ageing in place, intergenerational housing and families with children living in apartments.
S2 - Creating better buildings and places to reduce emissions and waste and use water efficiently	• The future built form presents an opportunity to deliver innovative sustainable product that reduces carbon emissions, manages energy, water and waste, working towards the goal of carbon neutral 2050. This is exemplified by Coronation's commitment to design excellence delivered through the SDRP which is intended to create exemplar buildings. Coronation are also committed to achieving high sustainability targets for the future redevelopment, with provisions consistent with the City's Net Zero 2026 Policy. • Waste minimisation and reduction strategies are to be further implemented as identified in Appendix S.

Housing for All: City of Sydney Local Housing Strategy (2020)

Housing for All: City of Sydney's Local Housing Strategy details how the City will meet the housing related priorities in the District Plan. It also establishes the City's priorities, objectives and actions for future housing delivery, guiding the design and development of all forms of housing in the area to 2036. This includes private market housing, social housing, affordable rental housing and non-private housing, such as student accommodation and boarding houses.

The strategy sets a target of 56,000 additional dwellings by 2036. Green Square is identified as a precinct to accommodate majority of this growth through the supply of private dwellings. Further, Green square's affordable rental housing framework requires 3% of residential floor area and 1% of commercial floor area to be provided as affordable rental housing which is determined at the DA stage.

The key planning priorities are identified in Table 25:

Table 25 Consistency with City of Sydney Local Housing Strategy

Priority	Consistency of the proposal with the Priority
H1 - Facilitating more homes in the right locations	• The importance of actively supporting and investing in established and emerging centres is recognised by Council and is supported by the proposal. The site will contribute to delivering 777 build-to-rent housing within the Green Square Urban Renewal Precinct, seeking additional floorspace for housing opportunities.

Priority	Consistency of the proposal with the Priority
H2 – Coordinating housing growth with the delivery of infrastructure	• The site benefits from being located within a reasonable walking catchment to the Green Square train station and the Waterloo Metro station. Frequent bus services also stop within the frontage of the site. Connection to transport, including active transport is enhanced through the provision of a through-site link which is to be embellished above the minimum standards set within the Sydney DCP 2012. • The proposed development will support the success of the Green Square Town Centre by providing residential populations to utilise major recreational and entertainment facilities planned, together with the planned significant new employment floorspace.
H3 - Increasing diversity and choice in housing	• The strategy identifies 91% of residents living in high density apartments in Green Square were born overseas and therefore may indicate a different housing preference, including a greater cultural acceptance of apartment living. • The future built form will accommodate a variety of build-to-rent apartment sizes to accommodate the dominant demographic in the area, ensuring the continued supply of rental housing. • The scheme includes studio, 1, 2 and 3 bedroom apartments, including 2 storey apartments with ground level access. This will support and foster social cohesion where residents will have a sense of belonging, high amenity and convenience.
H4 - Increasing the diversity and number of homes available for lower-income households	• The proposed development includes a provision of 73 affordable housing dwellings, which exceeds 11% of the housing provision. These apartments will be dedicated for families and key workers who would be otherwise be challenged to be able to live in the local area. • The proposal therefore responds to the communities' housing needs and ability accommodate all ages and abilities to ensure housing choice and resilience for everyone.
H7 – Increasing liveability, sustainability and accessibility through high-quality residential design	• The future built form will exhibit design excellence and demonstrate high quality urban design to enhance the enjoyment of homes and public places. This will include increased connectivity through the proposed through site link to increase walking and cycling opportunities. • The SSDA scheme also includes generous greened rooftops which will contribute enhancing people's health and wellbeing. The proposal is designed to accommodate a variety of sustainability features and deliver beyond its required targets for sustainability, energy efficiency and water and waste management.

Sustainable Sydney 2030—2050: Continuing the Vision

Sustainable Sydney 2030—2050 is the vision for a sustainable future of the City of Sydney to 2050. The vision includes strategic directions to guide future development outcomes centred around a 'green', 'global' and 'connected' city. It sets out directions, actions and project ideas to achieve this vision. The key Strategic Directions under the Plan include the following as identified in Table 26:

Table 26 Sustainable Sydney 2030—2050: Continuing the Vision

Strategic Directions	Consistency of the proposal with the Directions
Direction 2 – A leading environmental performer	• The development will reduce greenhouse gas emissions through improved energy efficiency and low carbon energy production for net zero emissions. The future built form will encourage walking and active transportation to prevent unnecessary or lengthy private car trips for access to retail offerings.
Direction 3 – Public places for all	• The proposed development will provide a well-designed public domain, including through site links and adjacent public plaza to support cycling, walking and commuters to and from the site.
Direction 4 – Design excellence and sustainable development	• The future built form will demonstrate design excellence and is designed to provide architectural interest. The site will provide a comfortable, safe and inclusive environment.
Direction 5 – A city for walking, cycling and public transport	• The site will contribute to creating the heart of a walkable neighbourhood precinct where residents, workers and visitors can easily access local retail and food and beverage to meet their needs. • The future built form will include optimised through site link that will improve connectivity and prioritise pedestrian movements to and through the site. This will

Strategic Directions	Consistency of the proposal with the Directions
	contribute to encouraging more active and healthy lifestyles. Cycling is enhanced through provision of end-of-trip facilities to enhance the viability and attractiveness of this mode to access the site.
Direction 10 – Housing for all:	• The proposal will provide a variety of high density residential living options accommodating the build-to-rent market. Various apartment sizes that are accommodating to all abilities will be delivered to support the diverse needs of future apartment dwellers. This will support varying household structures including people ageing in place. The proposed development includes a provision of 73 affordable housing dwellings, which exceeds 11% of the housing provision

Q5. Is the planning proposal consistent with any other applicable State and regional studies or strategies?

NSW Housing Strategy: Housing 2041 (2023)

The NSW Housing Strategy supports the provision of new housing stock in NSW. Within the Strategy, in-fill housing is identified as a housing typology to support the diversity and affordability of the rental market. This proposal will create 777 build-to-rent dwellings that helps to meet the 4 NSW housing system pillars of supply, diversity, affordability and resilience.

National Housing Accord (2022)

The Federal Government announced the National Housing Accord in October 2022, which committed to delivering 1.2 million houses in well-located areas in 5 years starting from July 2024. The Accord lays the groundwork to improving affordability by addressing Australia's housing supply challenges and enabling the delivery of more social and affordable housing. The Housing Accord includes:

- an initial, aspirational national target of delivering a total of 1 million new, well located homes over 5 years from 2024, and
- immediate and longer-term actions for all parties to support the delivery of more affordable homes.

The proposed development is aligned with the National Housing Accord as it seeks to deliver additional build to rent housing in a well-serviced location within the next 5 years. As a HDA application, the proposal will quickly facilitate housing development with the intent to commence building within 1 year of the proposal's achievement of development consent.

NSW Housing Targets (2024)

The NSW Government has recently released 5-year housing completion targets for 43 councils across Greater Sydney, Illawarra-Shoalhaven, Central Coast, Lower Hunter and Greater Newcastle and 1 target for regional NSW.

These targets replace outdated targets reflect NSW's commitment to deliver 377,000 new homes across the state by 2029 under the National Housing Accord. A 5-year target of 18,900 new dwellings has been identified for Sydney LGA, the achievement of which will be assisted by the proposed development's provision of 850 new dwellings.

Future Transport Strategy 2056 (2022)

The Future Transport Strategy 2056 sets the vision and direction for NSW transport investment by providing a comprehensive plan that emphasises the creation of connected 30-minute cities and convenient 15-minute neighbourhoods. It includes a movement and place framework to ensure that transport supports the increased accessibility and reduced travel time for residents whilst enhancing the character of the places and communities. The key guiding principles for future transport that are relevant to the site, include:

- Successful places: The liveability, amenity and economic success of communities and places should be enhanced by transport.
- Accessible services: Transport should enable everyone to get the most out of life, wherever they live and whatever their age, ability or personal circumstances.

The proposal will create a high density mixed-use environment with high amenity and access to services, reinforcing the creation of the 30 minute city and 15 minute neighbourhood as described within the Future Transport Strategy, bolstered by its location close to the Sydney CBD and proximity to Waterloo station.

Active Transport Strategy 2056 (2022)

The Active Transport Strategy supports the NSW Government's Future Transport Strategy 2056 by providing a framework that supports additional walking, bike riding and personal mobility. The Active Transport Strategy's vision aims to double the number of walking and bike riding trips in NSW in 20 years, from 1.5 Billion to 3 Billion. The Strategy aims to support population growth, improve equity of access, and help stabilise traffic in Greater Sydney. The key focus areas that are applicable to the site include:

- Enable 15-minute neighbourhoods: Create walkable and connected 15-minute neighbourhoods across all 6 cities and in regional centres across NSW to increase the percentage of short trips made on foot.
- Deliver connected and continuous cycling networks: Deliver more than 1,000 kilometres of new cycleways and supporting infrastructure for continuous and connected cycling networks across key cities in NSW to increase the number of trips made by bike.
- Provide safer and better precincts and main streets: Help halve fatalities and reduce serious injuries by 30 per cent for pedestrians and bike riders through safer speeds and networks while increasing people walking and riding.

The proposal will provide for increased pedestrian and active transport connectivity by providing through-site links and a new road. This will help break down the block structure and reinforce permeability.

State Infrastructure Strategy 2022-2042 (2022)

The State Infrastructure Strategy 2022-2042 sets the vision of Infrastructure NSW in delivering infrastructure throughout the State over the next 20 years, focussing on aligning investment with sustainable growth. The strategy sets out 9 long-term objectives underpinning the Strategy, including the following that are relevant to the site:

- Service growing communities: Fund and deliver enabling infrastructure to support approved or pending housing supply and a prioritised active transport infrastructure program to support liveability and 15-minute neighbourhoods including a connected metropolitan cycling network for Greater Sydney and major regional centres
- Integrate infrastructure, land use and service planning: Coordinate infrastructure, land use and service planning to meet future housing, employment, industry and community needs.

The site will utilise existing transport infrastructure to integrate a high-density land use with transport. This will enable future planning for Sydney to meet community needs.

Better Placed (2017)

The Government of NSW has established 7 distinct objectives have to define the key deign considerations. Achievement of these objectives from this early stage of the project, through to the detailed design and construction stage will ensure the development will be healthy, responsive, integrated, equitable, and resilient. Table 27 demonstrates how the proposal is consistent with the objectives of the policy.

Table 27 Consistency with the Objectives of GANSW's Better Placed

Objective	Response
Objective 1: Better fit	Of its Place: The commitment to design excellence has devised the optimal urban design arrangement which relates to its surrounds. The proposed massing has limited its impacts to surrounding buildings in terms of privacy and amenity considerations.
	Local / Contextual: The proposed through site links and public plaza has been designed for local use, including considerations of materiality, built form massing and bulk and scale. The development incorporates public open spaces including the central park, which will strengthen the site as an anchor for the wider precinct.
Objective 2: Better performance	Sustainable: The proposal will deliver a high standard of sustainability and ecologically sustainable development across both its residential and non-residential components.
	Durable and adaptable: The proposal has been designed to be resilient to natural hazards including flooding. The development considers materials that are durable.
Objective 3: Better for community	Safe: CPTED considerations have informed the proposed design, with clear sight lines and legible through site links. Pedestrians, cyclists and vehicle entries have all been accommodated within the public realm with safety and amenity in mind.

Objective	Response
Objective 4: Better for people	Comfortable: The public open spaces and through site links encourage people to stay and enjoy each other's company, fostering a sense of community.
	Liveable: The urban design principles for the site place enhanced public spaces and social connectivity of residents, workers and visitors – with a strong focus on active and public transport
Objective 5: Better working	Functional: Access points are well defined and convenient, especially when compared to existing conditions.
	Efficient / Functional: The development's layout is efficient in its arrangement, significantly improving connectivity and permeability in and around the site when compared to existing conditions.
Objective 6: Better value	Creating Value: The provision of a new retail and commercial uses is co-located with significant housing delivery, providing shared value for the local community.
	Adding Value: The proposal delivers well-located infill development providing access to jobs, infrastructure and transport.
Objective 7: Better look and feel	Engaging and Inviting: The proposal incorporates significant communal and public open space, including residential amenities which provides additional opportunities for gatherings and respite

Greener Places (2020)

Greener Places is a Green Infrastructure policy released by the Government Architect NSW in October 2020. It aims to create a healthier, more liveable and sustainable urban environment by improving community access to recreation and exercise, supporting walking and cycling connections, and improving the resilience of urban areas. Greener Places is structured around 4 key principles of Green Infrastructure. Table 28 demonstrates how the proposal is consistent with the objectives of the policy.

Table 28 Consistency with the Objectives of GANSW's Greener Places

Objective	Response
Principle 1: Integration	The proposal integrates significant build-to-rent residential floorspace (777 dwellings) with 7,500m^2 diverse retail and commercial opportunities and significant public open space, delivering a true mixed-use community.
Principle 2: Connectivity	The proposal significantly improves through-site connectivity and permeability, including through delivery of the new east-west street and north-south through site link that is highly activated by building lobbies and commercial opportunities.
Principle 3: Multifunctionality	Public spaces have been designed to be multifunctional and diverse.
Principle 4: Participation	The proposed design layout has been carefully designed to facilitate the accessible access for all members of the community, representing a significant improvement over existing conditions where accessibility is limited.

Q6. Is the Planning Proposal consistent with applicable State Environment Planning Policies?

The State Environmental Planning Policies directly applicable to the Planning Proposal are identified in Table 29

Table 29 Consistency with State Environmental Planning Policies

SEPP	Consistent		N/A	Comment
	Yes	No		
State Environmental Planning Policy (Biodiversity and Conservation) 2021	–	–	✓	Not directly relevant to the proposed LEP amendment

SEPP	Consistent		N/A	Comment
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008	–	–	✓	Not relevant to the proposed LEP amendment. May apply to future development on the site.
State Environmental Planning Policy (Housing) 2021	✓	–	–	The amended controls will facilitate a development that is consistent with the Housing SEPP and its accompanying Apartment Design Guide.
State Environmental Planning Policy (Industry and Employment) 2021	–	–	✓	Not relevant to the proposed LEP amendment.
State Environmental Planning Policy (Planning Systems) 2021	–	–	✓	Not directly relevant to the proposed LEP amendment.
State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021	✓	–	–	No amendments to the Eastern Harbour City SEPP are necessary because of the proposed LEP amendment.
State Environmental Planning Policy (Primary Production) 2021	–	–	✓	Not directly relevant to the proposed LEP amendment.
State Environmental Planning Policy (Resilience and Hazards) 2021	✓	–	–	Demolition and remediation works in accordance with Chapter 4 of the Resilience and Hazards SEPP are being carried out as approved pursuant to the preceding local Concept with first stage of works consent D/2020/45/C. In relation to the proposed main works, a Contamination Statement has been prepared and is found at Appendix K.
State Environmental Planning Policy (Resources and Energy) 2021	–	–	✓	Not relevant to the proposed LEP amendment.
State Environmental Planning Policy (Sustainable Buildings) 2022	✓	–	–	A Section J and BASIX report are provided in Appendix EE in accordance with Chapter 2 and 3 of the Sustainable Buildings SEPP.
State Environmental Planning Policy (Transport and Infrastructure) 2021	✓	–	–	The development has considered the relevant provisions within the Transport and Infrastructure SEPP as outlined in Section 6.0 below.

Q7. Is the Planning Proposal consistent with the applicable Ministerial Directions (Section 9.1 Directions) or key government priority?

The proposal's consistency with applicable Section 9.1 Directions is assessed in Table 30.

Table 30 Assessment of Section 9.1 Directions

Ministerial Direction	Consistent			Comment
	Yes	No	N/A	
Focus area 1: Planning Systems				
1.1 Implementation of Regional Plans	✓	–	–	The Rezoning Report is consistent with the Greater Sydney Regional Plan as discussed above.

Ministerial Direction	Consistent			Comment
1.2 Development of Aboriginal Land Council land	–	–	✓	Not applicable.
1.3 Approval and Referral Requirements	✓	–	–	The proposal is not designated development. It also does not contain provisions requiring concurrence, consultation or referral of a Minister or public authority.
1.4 Site Specific Provisions	✓	–	–	Amendments are proposed to the site-specific provision applying to the site (Clause 6.43) of the SLEP 2012, as discussed in Section 4.2.
1.4A Exclusion of Development Standards from Variation	✓	–	–	The proposed LEP amendment does not propose to exclude any development standards from variation.
Focus area 1: Planning Systems – Place-based				
1.5 Parramatta Road Corridor Urban Transformation Strategy	–	–	✓	Not applicable.
1.6 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan	–	–	✓	Not applicable.
1.7 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	–	–	✓	Not applicable.
1.8 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	–	–	✓	Not applicable.
1.9 Implementation of Glenfield to Macarthur Urban Renewal Corridor	–	–	✓	Not applicable.
1.10 Implementation of Western Sydney Aerotropolis Plan	–	–	✓	Not applicable.
1.11 Implementation of Bayside West Precincts 2036 Plan	–	–	✓	Not applicable.
1.12 Implementation of Planning Principles for the Cooks Cove Precinct	–	–	✓	Not applicable.
1.13 Implementation of St Leonards and Crows Nest 2036 Plan	–	–	✓	Not applicable.
1.14 Implementation of Greater Macarthur 2040	–	–	✓	Not applicable.
1.15 Implementation of the Pyrmont Peninsula Place Strategy	–	–	✓	Not applicable.
1.16 North West Rail Link Corridor Strategy	–	–	✓	Not applicable.
1.17 Implementation of the Bays West Place Strategy	–	–	✓	Not applicable.
1.18 Implementation of the Macquarie Park Innovation Precinct	–	–	✓	Not applicable.
1.19 Implementation of the Westmead Place Strategy	–	–	✓	Not applicable.

Ministerial Direction	Consistent			Comment
1.20 Implementation of the Camellia-Rosehill Place Strategy	–	–	✓	Not applicable.
1.21 Implementation of South West Growth Area Structure Plan	–	–	✓	Not applicable.
1.22 Implementation of the Cherrybrook Station Place Strategy	–	–	✓	Not applicable.
Focus area 2: Design and Place				
Focus area 3: Biodiversity and Conservation				
3.1 Conservation Zones	–	–	✓	Not applicable.
3.2 Heritage Conservation	✓	–	–	The site is not heritage-listed and is not within a heritage conservation area. There are a number of heritage buildings located adjacent to or within the vicinity of the site. The proposed development takes into consideration the heritage items to the immediate south and to the west of the site. The proposed development does not propose works that will adversely impact the significance of the surrounding heritage items, refer to the heritage impact statement provided at Appendix FF.
3.3 Sydney Drinking Water Catchments	–	–	✓	Not applicable.
3.4 Application of C2 and C3 Zones and Environmental Overlays in Far North Coast LEPs	–	–	✓	Not applicable.
3.5 Recreation Vehicle Areas	–	–	✓	Not applicable.
3.6 Strategic Conservation Planning	–	–	✓	Not applicable.
3.7 Public Bushland	–	–	✓	Not applicable.
3.8 Willandra Lakes Region	–	–	✓	Not applicable.
3.9 Sydney Harbour Foreshores and Waterways Area	–	–	✓	Not applicable.
3.10 Water Catchment Protection	–	–	✓	Not applicable.
Focus area 4: Resilience and Hazards				
4.1 Flooding	✓	–	–	The proposed development has been undertaken in accordance with a Flood Impact and Risk Assessment which has determined suitable minimum floor levels based upon the catchment flood study. Refer to Section 8.8.
4.2 Coastal Management	–	–	✓	Not applicable.
4.3 Planning for Bushfire Protection	–	–	✓	The site is not located on mapped bush fire-prone land.
4.4 Remediation of Contaminated Land	✓	–	–	Demolition and remediation works are being carried out as approved pursuant to the preceding local Concept with first stage of works consent D/2020/45/C. In relation to the proposed main works, a Contamination Statement has been prepared and is found at Appendix K. The statement identifies that the remediation (both ongoing and completed) will

Ministerial Direction	Consistent			Comment
				establish the site as suitable for the future residential development
4.5 Acid Sulfate Soils	✓	–	–	The SSD includes a preliminary assessment for Acid Sulfate Soils found in Appendix L. No implications on the site, proposed use or surrounding context are identified.
4.6 Mine Subsidence and Unstable Land	–	–	✓	Not applicable.
Focus area 5: Transport and Infrastructure				
5.1 Integrating Land Use and Transport	✓	–	–	The proposed development is consistent with the guidelines identified within this Direction in that it will • Create additional build-to-rent dwellings proximate to numerous high capacity transport links. • Deliver additional employment opportunities within close walking distance of adjoining dwellings in a highly serviced area. • Deliver improved pedestrian amenity by enabling a new road and through site link, supporting opportunities for walking, cycling and public transport.
5.2 Reserving Land for Public Purposes	✓	–	–	No land is proposed to be acquired by the relevant authorities. Portions of the site are proposed to be dedicated to Council utilising a VPA.
5.3 Development Near Regulated Airports and Defence Airfields	–	–	✓	Not applicable.
5.4 Shooting Ranges	–	–	✓	Not applicable.
5.5 High pressure dangerous goods pipelines	–	–	✓	Not applicable.
Focus area 6: Housing				
6.1 Residential Zones	✓	–	–	This application is a direct response to the designation of the Waterloo site as SSD under the HDA. It directly responds to the objectives of the Housing Delivery Authority and National Housing Accord to build new well-located homes to alleviate the housing crisis. The proposed development will provide for a net increase in floor space ratio which will provide for the opportunity to increase the floor space for residential uses. No change to the existing land zoning is proposed and as such there is no loss of residential floor space resulting from the proposal.
6.2 Caravan Parks and Manufactured Home Estates	–	–	✓	Not applicable.
Focus area 7: Industry and Employment				
7.1 Business and Industrial Zones	✓	–	–	This application ensures that an appropriate quantum of commercial and employment-generating floorspace continues to be delivered within Waterloo, equating to some 7,500m^2 of non-residential floorspace, while acknowledging the site's designation for residential uplift under the HDA. No change to the existing land zoning is proposed and as such there is no loss of non-residential floor space resulting from the proposal.

Ministerial Direction	Consistent			Comment
7.2 Reduction in non-hosted short-term rental accommodation period	–	–	✓	Not applicable.
7.3 Commercial and Retail Development along the Pacific Highway, North Coast	–	–	✓	Not applicable.
Focus area 8: Resources and Energy				
8.1 Mining, Petroleum Production and Extractive Industries	–	–	✓	Not applicable.
Focus area 9: Primary Production				
9.1 Rural Zones	–	–	✓	Not applicable.
9.2 Rural Lands	–	–	✓	Not applicable.
9.3 Oyster Aquaculture	–	–	✓	Not applicable.
9.4 Farmland of State and Regional Significance on the NSW Far North Coast	–	–	✓	Not applicable.

Site-specific merit

5.3 Section C – environmental, social and economic impact

Q8. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

The site is located at a highly urbanised location. The proposed development will not result in any impact on critical habitat or threatened species, populations or ecological communities or their habitats. No change to biodiversity impacts are anticipated compared to Concept DA D/2020/45.

No approvals are required to facilitate the proposed development under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) and *Biodiversity Conservation Act 2016*.

Q9. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

A detailed assessment of the environmental effects because of the proposed development and amended planning controls is identified in Section 7.0. Relevant management measures are identified where appropriate and, on this basis. The assessment has not identified any unacceptable impacts that are likely to result from this rezoning request or future development on the site.

Q10. Has the planning proposal adequately addressed any social and economic effects?

Yes. The economic and social impacts arising from the proposal have been identified and addressed by specialised reports which are assessed at Sections 8.12 and 8.13 below, respectively.

The proposed development will bring positive social outcomes as demonstrated at Section 8.12. It will deliver increased supply and access to housing including affordable housing at a key strategic location, deliver increased provision of residential amenities for an enhanced resident way of life, while maintain appropriate commercial spaces to encourage and support the creative economy. Where negative impacts have been identified, these are largely temporary in nature and can be appropriately mitigated.

The proposed development will also bring positive economic impacts It will support an increase in operational jobs at the site, estimated at 270 direct full-time equivalent (FTE) ongoing jobs in population serving industries. These jobs will support an estimated $34.6 million in direct value added to the economy each year.

5.4 Section D – Infrastructure (Local, State and Commonwealth)

Q11. Is there adequate public infrastructure for the planning proposal?

Yes. The site is provided with strong access to public transport, being close to Sydney Trains and Sydney Metro services at the future Waterloo Station as well as Green Square and Redfern Train stations, as well as frequent bus services along the Bourke Street and Phillip Street.

The redevelopment of the site itself will also deliver public infrastructure usable for the wider community, including a new Artist Studio and a series of public open spaces.

Refer to the Social Infrastructure Assessment prepared by Ethos Urban at Appendix N.

5.5 Section E – State and Commonwealth Interests

Q12. What are the views of state and federal public authorities and government agencies consulted in order to inform the Gateway determination?

Ongoing community and stakeholder consultation has informed the development of the State Significant Development Application to address any initial considerations for the proposal. Both Sydney Water and Transport for NSW have been engaged as part of the SSDA process. An Engagement Report has been prepared in Appendix HH which provides further guidance on engagement with community, public authorities and government agencies.

Where necessary, further consultation with relevant authorities will be undertaken as required in during exhibition and response to submissions phase. State and Commonwealth authorities will have the opportunity to provide comment on the Rezoning Report as part of its formal exhibition.

6.0 Statutory Context

Development approval is sought for the project under the State Significant Development provision of Part 4 of the EP&A Act. The sections below outline the project's key statutory requirements. This section is complemented by a Statutory Compliance Table included at Appendix C that identifies all statutory requirements and where those requirements have been addressed in the EIS.

6.1 Power to Grant Approval

The legislative pathway under which the consent is sought, why the pathway applies, and the relevant consent authority is outlined in Table 31 below.

Table 31 Power to Grant Consent

Matter	Consideration
Declaration of State Significant Development	Development consent will be sought under 'Division 4.7 - Stage Significant Development' of the EP&A Act. Section 4.36(3) of the EP&A Act states that: *The Minister may, by a Ministerial planning order, declare specified development on specified land to be State significant development, but only if the Minister has obtained and made publicly available advice from the Independent Planning Commission about the State or regional planning significance of the development.* The State Significant Development Declaration Order 2025 dated 17 February 2025 declared the site as State Significant Development under the EP&A Act. Part 2 *Declaration of State Significant Development* states the following: *4 Specified development on specified land declared State significant development* *(1) The following development is declared to be State significant development –* *(c) development specified in EOI application 229420 dated 8 January 2025 including development purposes of mixed-use development (Build to Rent including affordable housing) with ground floor non-residential uses at 881 – 885 Bourke Street Waterloo as identified in Schedule 3.* As the proposed development is consistent with the declared development and is therefore SSD.
Consent Authority	Section 4.5 of the EP&A Act stipulate that an application made by a private company the consent authority is the Minister for Planning and Public Spaces (or DPHI as their delegate).

6.2 Permissibility

The permissibility of the proposed development considering the proposed land use/s and land zoning is outlined in Table 32 below.

Table 32 Permissibility

Matter	Consideration
Land Use	This Main Works SSDA seeks consent for the following uses: • Residential Accommodation (Residential Flat Buildings and Shop Top Housing/Mixed-Use). • Retail/Commercial premises. • Recreation facility (indoor).
Land Zoning	The western part of the site is zoned E1 Local Centre and the eastern part of the site is zoned MU1 Mixed Use under the *Sydney Local Environmental Plan 2012*. The proposal is consistent with the objectives of both land use zones.
Permissibility	All proposed land uses are permissible with consent within both the E1 Local Centre zone and the MU1 Mixed Use zone. The proposed early works are associated with the development of the proposed uses.

6.3 Other Approvals

The other legislative approvals required for the Proposal in addition to a development consent under Division 4.7 of the EP&A Act are outlined in Table 33 below.

Table 33 Other Approvals

<table>
<tr><th>Matter</th><th>Consideration</th></tr>
<tr><td>Approvals not required for SSD</td><td>Section 4.41 of the EP&A Act stipulates that certain authorisations are not required for State significant development. The following legislative approvals would otherwise be required if the Project was not State significant.

<table>
<tr><th>Legislation</th><th>Approval Otherwise Required</th></tr>
<tr><td colspan="2">Legislation that does not apply to State Significant Development</td></tr>
<tr><td>Fisheries Management Act 1994</td><td>No</td></tr>
<tr><td>Heritage Act 1977</td><td>No</td></tr>
<tr><td>National Parks and Wildlife Act 1974</td><td>No</td></tr>
<tr><td>Rural Fires Act 1997</td><td>No</td></tr>
<tr><td>Water Management Act 2000</td><td>Yes</td></tr>
</table></td></tr>
<tr><td>Water Management Act 2000</td><td>Pursuant to section 4.41 of the EP&A Act, SSD is exempt from requirements for a water use approval (section 89), a water management work approval (section 90) or an activity approval (other than an aquifer interference approval) (section 91) of the Water Management Act 2000.
As stated in the Integrated Water Management Report prepared by EI Australia (Appendix Y), temporary dewatering is required during the construction stage, for volumes in excess of the 3ML/yr requirement for a license (36.4ML initially and 12.5ML/yr ongoing). The design of the basement is fully tanked and watertight, so no ongoing operational dewatering is required.
It is noted that the Applicant has consulted with Department of Climate Change, Energy, the Environment and Water (DCEEW) during the preparation of the application. See Section 7.0. The relevant approvals will be sought prior to construction commencing.
If required, a Section 73 Compliance Certificate and approval would be sought as required in accordance with any conditions of consent associated with the Main Works along with any other approvals required from relevant authorities.</td></tr>
<tr><td>Consistent Approvals</td><td>Section 4.42 of the EP&A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out State significant development. The following table lists legislative approvals that are required for the Project and cannot be refused if the Project is approved.
<table>
<tr><th>Act</th><th>Approval Required</th></tr>
<tr><td colspan="2">Legislation that must be applied consistently</td></tr>
<tr><td>Fisheries Management Act 1994</td><td>No</td></tr>
<tr><td>Mine Subsidence Compensation Act 1961</td><td>No</td></tr>
<tr><td>Mining Act 1992</td><td>No</td></tr>
<tr><td>Petroleum (Onshore) Act 1991</td><td>No</td></tr>
<tr><td>Protection of the Environment Operations Act 1997</td><td>No</td></tr>
<tr><td>Roads Act 1993</td><td>Yes</td></tr>
<tr><td>Pipelines Act 1967</td><td>No</td></tr>
</table></td></tr>
<tr><td>Roads Act 1993</td><td>Works will be required in the public road reserve to support the proposed development. A Roads Act approval will be sought prior to these works being undertaken. In accordance with Section 4.42 of the EP&A Act, the Roads Act approval must be consistent with the SSD Consent.</td></tr>
<tr><td>EPBC Approval</td><td>The Environmental Protection and Biodiversity Act 1999 Act (EPBC Act) provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities, and heritage places. These are known as matters of National Environmental Significance. If the proposed development will, or is likely, to impact a matter of National Environmental Significance, then it is required to be referred to the Federal Department of the Environment for assessment to determine if it constitutes a ‘controlled action’ requiring EPBC approval. Presently, a bilateral</td></tr>
</table>

Matter	Consideration
	agreement allows the Commonwealth Minister for the Environment to rely on the NSW environmental assessment process when assessing a controlled action under the EPBC Act. The proposed development is in a highly urbanised area without significant vegetation and therefore is not likely to impact a matter of National Environmental Significance. Therefore, the proposed development is not required to be referred to the Federal Department of the Environment to determine if it constitutes a controlled action and the bilateral agreement applies.

6.4 Pre-Conditions to Exercising the Power to Grant Consent

The pre-conditions to be fulfilled by the consent authority before exercising their power to grant development consent are identified and considered in Table 34 below

Table 34 Pre-Conditions to Exercising the Power to Grant Consent

Matter	Consideration
Biodiversity Conservation Act 2016	In accordance with this Act, an assessment of any State Significant proposal's biodiversity impacts must be undertaken as part of the provision of any SSDA, including the provision of a Biodiversity Development Assessment Report (BDAR) in instances where it is required. Section 7.14 requires the consent authority to take into consideration the likely impact of the proposed development on biodiversity values as assessed in the BDAR. Given the sites location within a historically light industrial area and the absence of native vegetation communities on site, the proposed development is not considered to result in any adverse impacts to biodiversity on the site or within the surrounding area. As such, this SSDA is accompanied by a BDAR Waiver Request prepared by Kingfisher Urban Ecology and Wetlands, and a BDAR Waiver issued by DPHI, which are provided at Appendix Q.
State Environmental Planning Policy (Transport and Infrastructure) 2021	The *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP) aims to facilitate the effective delivery of infrastructure of the State. Bourke Road is a Regional Road (Classified Road). Section 2.48 - Determination of development applications—other development Section 2.48 requires the consent authority to give written notice to the electricity supply authority for the area and take into consideration any response to that notice before granting consent to a development likely to affect an electrical transmission or distribution network. The application will be referred to the relevant utility providers during the assessment. Further discussion on infrastructure and utilities is also provided at Appendix Y. Section 2.119 - Development with frontage to classified road Section 2.119 relates to development on land that adjoins a classified road. This section requires that: *(2) The consent authority must not grant consent to development on land that has a frontage to a classified road unless it is satisfied that—* *(a) where practicable and safe, vehicular access to the land is provided by a road other than the classified road, and* *(b) the safety, efficiency and ongoing operation of the classified road will not be adversely affected by the development as a result of—* *(i) the design of the vehicular access to the land, or* *(ii) the emission of smoke or dust from the development, or* *(iii) the nature, volume or frequency of vehicles using the classified road to gain access to the land, and* *(c) the development is of a type that is not sensitive to traffic noise or vehicle emissions, or is appropriately located and designed, or includes measures, to ameliorate potential traffic noise or vehicle emissions within the site of the development arising from the adjacent classified road.* As discussed further in Section G, access has been designed accordingly to ensure the abovementioned provisions are achieved.
State Environmental Planning Policy (Resilience and Hazards) 2021	The State Environmental Planning Policy (Resilience and Hazards) 2021 (R&H SEPP) aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Section 4.6 stipulates that a consent authority must not consent to the carrying out of development unless:

Matter	Consideration
	• It has considered whether the land is contaminated, and if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out. • If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is suitable that the land will be remediated before the land is used for that purpose. This EIS is accompanied by a Geotechnical Investigation at Appendix J and a Status of Environmental Remediation and Reporting letter at Appendix K prepared by EI Australia which confirms that the site will be made suitable for the proposed future use as a mixed use rental housing precinct.

6.5 Mandatory Matters for Consideration

The matters that the consent authority is required to consider in deciding whether to grant consent to any development application are identified and considered in Table 35 below.

Table 35 Mandatory Matter for Consideration

Legislation	Matters for Consideration
Environmental Planning & Assessment Act 1979	The proposed development is consistent with the objects of the EP&A Act for the following reasons: • The proposal promotes orderly economic use of development as the development will facilitate the delivery of build-to-rent, affordable housing, public parks, public roads and retail development which respond to the changing needs of the Waterloo community. • It allows for additional employment opportunities throughout the construction and operation phases. • It will facilitate ecologically sustainable development. • The proposal has committed to a BASIX energy score of min 61 (Stage 1) & min 63 (Stage 2) and a BASIX water score of min 45 (Stage 1 & Stage 2) and has committed to a thermal comfort level average of min 7 Star NatHERS rating to support ecologically sustainable development. • The proposal is consistent with Division 4.7 of the EP&A Act, particularly for the following reasons: • The development has been declared to have state significance. • The development is not prohibited by an environmental planning instrument. The development has been evaluated and assessed against the relevant heads of consideration under section 4.15(1), as outlined in this table.
Environmental Planning and Assessment Regulation 2021 (EP&A Regulations)	Part 8, Divisions 2 and 5 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulations) sets out procedures which relate to the preparation and submission of EIS. This EIS has been prepared in accordance with Sections 190 and 192 of Division 5 which relate to the form and content of the EIS. Similarly, the EIS has addressed the principles of ecologically sustainable development through the precautionary principle (and other considerations), which assesses the threats of any serious and irreversible environmental damage (refer Section 9.3.2).
State Environmental Planning Policy (Sustainable Buildings) 2022	As detailed in the Sustainability and Resilience Report and the BASIX Assessment Report at Appendix P, the proposal will meet the relevant BASIX requirements. An NCC Section J Report is provided at Appendix EE. An embodied emissions form is also provided with lodgement in accordance with the SEPP.
State Environmental Planning Policy (Housing) 2021	State Environmental Planning Policy (Housing) 2021 (Housing SEPP) applies to the proposal's residential component. The Housing SEPP applies to development for the purpose of mixed-use residential buildings developed with a residential accommodation component which this SSDA proposes. Chapter 3, Part 4 of the Housing SEPP applies to build-to-rent developments. However, the provisions of this section are not applicable to this SSDA, as the SLEP 2012 switches off Part 4 for land in Green Square. Notwithstanding, the State Government has endorsed the flexibility of the build-to-rent provisions for certain

Legislation		Matters for Consideration
		matters, such as the Apartment Design Guide, which are being utilised for this development, as outlined below. Chapter 4 of the Housing SEPP requires the consent authority to refer the development application to the relevant design review panel for advice concerning the design quality of the development and consider: • The design review panel's advice. • The design quality of the development. • The Apartment Design Guide. The proposal exhibits design excellence and is generally consistent with the Housing SEPP and the objectives of the ADG. A Design Verification Statement has been prepared by the registered architects of each practice and is provided at Appendix E.
State Environmental Planning Policy (Sustainable Buildings) 2022		The NSW Government is committed to developing sustainable homes and buildings, as such the Sustainable Buildings SEPP came into effect on 1 October 2023. The Sustainable Buildings SEPP encourages the design and delivery of more sustainable buildings across NSW. It sets sustainability standards for residential and non-residential development and starts the process of measuring and reporting on the embodied emissions of construction materials. The relevant standards of BASIX buildings relate to energy and water use and thermal performance. A Sustainability and Resilience Report is provided at Appendix P and provides a detailed assessment of the relevant standards. A BASIX Assessment Report is provided at Appendix JJ as well as an NCC Section J Report at Appendix EE.
Apartment Design Guide		The proposed development has been developed in accordance with the Apartment Design Guide (ADG) and a detailed analysis of the ADG is provided with the Design Report at Appendix E. Further discussion of the compliance with the ADG is provided at Section 8.2.
Sydney Local Environmental Plan 2012	***Clause 2.3*** *Zone Objectives and Land Use Table*	The site is partially zoned E1 Local Centre and MU1 Mixed Use. Development for shop-top housing and residential flat buildings are permissible in both zones. The proposal is consistent with the E1 Local zone as: • It integrates compatible land uses through the delivery of residential development and retail tenancies which serve the needs of the existing and future Waterloo community. • The proposal provides 4,450sqm to non-residential tenancies to support employment opportunities. • The proposed development incorporates parks, through site links and retail development to ensure it is well activated. • Retail and non-residential uses such as parks and public plazas make up the majority of the site's ground level. • The proposed 2-through site links ensure a development that encourages walking and cycling. The through-site links provide access to the surrounding public transport network. The proposal is consistent with the MU1 Mixed Use zone as: • Incorporates a range of retail and commercial tenancies that generate employment opportunities. • The proposed development provides a diverse ground plane with active uses including retail and commercial ground floor tenancies, public parks and public plazas which work cohesively to support the needs of residents and the broader community. • The proposed development sets a strong precedent for quality public amenities through the walkable and highly active ground plane. • The proposed mix of residential, retail/commercial and recreational land uses support the viability of Waterloo Centre. The proposal successfully integrates suitable land uses in a highly accessible locational that maximises public transport use, walking and cycling.

Legislation		Matters for Consideration
	Clause 4.3 *Height of Building*	The development has a maximum height of 123m. This SSDA seeks to amend the maximum building height for the site to be part 3m, part 26m, part 31m, part 30m, part 46m, part 65m, and part 123m. Refer to Section 4.2 for further detail.
	Clause 4.4 *Floor Space Ratio*	The development has a proposed FSR of 3.05:1. Further discussion is provided in Section 4.2 which includes the amendments proposed to the Sydney LEP 2012.
	Clause 5.10 *Heritage*	The site is not heritage-listed and is not within a heritage conservation area. There are a number of heritage buildings located adjacent to or within the vicinity of the site. The proposed development takes into consideration the heritage items to the immediate south and to the west of the site. The proposed development does not propose works that will adversely impact the significance of the surrounding heritage items.
	Clause 5.21 *Flood Planning*	The site is identified in the Alexandra Canal Catchment Area. A Flood Impact and Risk Assessment (FIRA) has been prepared by Stantec and is found in Appendix U. The FIRA identifies that the site is not affected by the 1% AEP and is mostly flood free during the 1% AEP event with the climate change adjustment. During the PMF, the flood hazard for the site ranges from category H1 to category H5 at the existing site with the category H5 flood hazard being concentrated along the site's western boundary with Young Street. Refer to Section 8.8 for further detail on the flood assessment and analysis.
	Clause 6.14(4)	As identified in Section 4.2, the site is proposed to be excluded from this clause.
	Clause 6.21C **Design Excellence**	The proposed development demonstrates design excellence through a high standard of architectural design, materiality, and detailing appropriate to its urban context. It enhances the public domain via activated street frontages, integrated landscaping, and improved pedestrian permeability. The built form responds sensitively to view corridors, solar access, and privacy considerations. The proposal achieves ecologically sustainable development principles and delivers a coherent urban form that supports amenity, accessibility, and long-term resilience The proposal was shown at 2 SDRP sessions with analysis at Section 7.0 of this EIS.
	Clause 6.21D *Competitive Design Process*	As identified in Section 4.2, the site is proposed to be excluded from this clause. An alternative design excellence process was implemented to ensure design quality of the proposal, which involved review of the proposal by a Design Review Panel of experts twice before lodgement. An Alternate Design Excellence Strategy was prepared for this project as found Appendix MM. The requirements for a competitive design process are deemed unreasonable and unnecessary in this instance as the proposed development has undergone significant amendments to the design following input from the State Design Review Parel. In addition, two major firms (SJB and Bates Smart) and two emerging architects were included as part of the design process facilitating a variety in design outcomes throughout the precinct. The design team presented to the State Design Review Panel on 2 occasions prior to lodgement, and the SDRP commended the design team and acknowledged that many elements of the proposed development were capable of achieving design excellence, provided their commentary is addressed.
	Clause 6.43 *Danks Street South Precinct*	As identified in Section 4.2, the site is proposed to be excluded from this clause.
	Clause 7.5 *Car Parking Residential Flat Buildings, Dual Occupancies and Multi Dwelling Housing*	As detailed in Section G, the proposed number of car parking spaces complies with the maximums prescribed in the SLEP 2012.
	Clause 7.13 *Contribution for purpose of*	The proposed development will deliver a 25% uplift of affordable housing and an additional contribution for the purpose of affordable housing will be made.

Legislation		Matters for Consideration
	affordable housing	The affordable housing proposed within the development will be excluded from the calculation of contributions. A contribution will be imposed via a condition of consent.
	Clause 7.14 *Acid Sulfate Soils*	The site is identified as Class 5 acid sulfate soils. The development does not include works within 500m of adjacent Class 1, 2, 3 or 4 land. As such, an acid sulfate soils management plan is not required. Notwithstanding, an Acid Sulfate Soil Assessment is provided at Appendix L and Soil Salinity Assessment is found at Appendix II.
	Clause 7.*16* *Airspace operations*	The proposed development is located approximately 5.4km northeast of the Sydney Airport aerodrome reference point. The Aviation Report (Appendix W) confirms that any building tower or crane that exceeds 72m AHD at the site will penetrate the OLS and require aviation approval. The proposal exceeds the OLS and therefore approval from the regulatory authority/Sydney Airport is required. The proposal is entirely below the PANS-OPS and RTCC surfaces which cannot be penetrated.
	Clause 7.19 *Demolition must not result in long term adverse visual impact*	Demolition of existing structures on the site has been carried out pursuant to prior City of Sydney approval D/2020/45. Notwithstanding this, pursuant to clause (a)(ii), the site will be comprehensively redeveloped, subject to this SSDA.
	Clause 7.20 *Development requiring or authorising preparation of a development control plan*	Since the project is SSD, development control plans do not apply and therefore the preparation of a DCP under clause 7.20 is not relevant.
	Clause 7.23 *Large retail development outside of Green Square Town Centre and other planned centres*	As identified in Section 4.2, the site is proposed to be excluded from this clause.
	Sydney Development Control Plan 2012	Section 2.10 of the Planning Systems SEPP states that 'Development Control Plans do not apply to State Significant Development'. The City of Sydney DCP 2012 Section 5.9 refers to the site as within Danks Street South. However, the concurrent rezoning seeks to remove the site from the Danks Street South precinct as the proposed building envelopes depart from those envisaged in Section 5.9 of the Sydney DCP. Despite the departures and removal of the site from Section 5.9, the proposed development is generally consistent with the objectives of the Danks Street South Precinct. Other elements of the DCP that remain relevant, such as stormwater and flooding design, have been considered in the environmental assessment presented in this report.

7.0 Stakeholder Engagement

This section describes consultation undertaken and feedback received prior to the lodgement of the EIS for the proposal and engagement to be carried out following lodgement of the EIS. It is supported by a Consultation Outcomes Report that has been prepared by Ethos Urban and is included at Appendix HH.

7.1 Engagement Carried Out

Full consideration has been given to the DPHI Secretary's Environmental Assessment Requirements (SEARs) during the consultation for this project, including observance of the *Undertaking Engagement Guidelines for State Significant Projects* (October 2022).

7.1.1 Identified Stakeholders

A comprehensive list of community members and stakeholders to consult throughout during the preparation of the EIS process was developed through:

- The identification of neighbours who would be impacted by the proposal unless mitigation measures were implemented,
- The identification of stakeholders who would have a particular interest in the proposal,
- The identification of stakeholders who would have information of value to the proposal, for example, Aboriginal groups with cultural knowledge relating to the site.
- Consultation with the DPHI and agencies. This included the agencies that, pursuant to the SEARs the applicant was required to consult with prior to lodgement.

As a result of the above process, a number of stakeholders were identified for consultation, including:

- City of Sydney Council;
- Government Agencies, including:
  - DPHI;
  - Housing Delivery Authority (HDA);
  - Government Architect NSW (through the State Design Review Panel (SDRP));
  - Transport for NSW;
  - Water NSW;
- Service Providers and Public Authorities, including:
  - Ausgrid;
  - Sydney Water;
  - NBN;
- Industry Stakeholders:
  - Industry Networks (Committee for Sydney, Community Housing Industry Association NSW, UDIA);
  - Business Groups and Advocates (South Sydney Business Chamber, Redfern-Waterloo Chamber of Commerce, Business Sydney);
- Immediate neighbours and residents; and
- Surrounding businesses and groups.

7.1.2 Consultation Methods

As detailed in the Consultations Outcomes Report (Appendix GG) of the EIS, a range of consultation methods were used to engage stakeholders. These included activities completed prior to lodgement, through the preparation of the EIS and associated technical studies. The consultation methods are detailed in Table 36 below. In addition to this, the Applicant initiated targeted engagement with relevant Government agencies and services providers.

Table 36 Consultation Methods

Activity	Targeted Stakeholder	Purpose	How Engagement informed the Project
Tools and Collateral			
Project Notification Letter	Local residents and businesses (engagement catchment) Key stakeholders	Letters distributed via letterbox drop to provide information to stakeholders and the community about the project, invite them to attend webinar or contact the team. 2,967 residents and businesses surrounding the site were reached. A copy of this letter and the delivery radius can be found in Appendix A of the Consultations Outcomes Report.	Ensured that key stakeholders and local residents to the site were aware of the project and had the opportunity to learn more about project and provide feedback.
Stakeholder Notification Letter and Emails	Key stakeholders	Letters distributed via email to inform stakeholders about the project and invite to consultation opportunities. 13 stakeholders were reached. A copy of stakeholder letters can be found in the Consultations Outcomes Report.	Ensured that key stakeholders were made aware of the project and had opportunity to provide feedback.
Project Overview Presentation	Local residents and businesses Key stakeholder	Detailed the objectives, vision and key deliverables of the site. Used in webinar and stakeholder briefings. A copy of the presentation can be found in the Consultations Outcomes Report.	Provided visual aids to stakeholders and the community during engagement events and ensured that meaningful feedback could be obtained.
Activities			
Community Information Webinar	Local residents and businesses Key stakeholders	Hosted 1 x 1.5-hour information session for community members to learn about the project, meet the project team, provide feedback on key topics and ask questions. The session received 36 attendees. A feedback summary is provided in the Consultations Outcomes Report.	Provided a welcoming forum for community members to be able to find out more about the project, ask questions and provide feedback.
Stakeholder Briefings/ Meetings	Key stakeholders	Invited key stakeholders to meet with the project team to learn about the project, meet the team, provide feedback and ask questions. 7 stakeholder briefings/meetings were held. A feedback summary is provided in the Consultations Outcomes Report.	Created an open dialogue between the project team and stakeholders to ask questions and provide feedback.
Frontline Engagement	All	Maintained the project 1800 number, email address and enquiry database for stakeholders, and monitored and responded to enquiries up until lodgement. 5 public enquiries have been received as at the time of preparing this report. A feedback summary is provided in the Consultations Outcomes Report.	Provided all stakeholders with a direct point of contact for any enquiries and assisted them in understanding the project.
Reporting			
Consultations Outcomes Report	All	A detailed summary of the activities undertaken, stakeholder and community reached, the feedback provided and how this has been reflected in the SSDA.	Identified key themes of interest by stakeholders and the community to help inform the planning, design and construction process.

This approach follows the *Undertaking Engagement Guidelines for State Significant Projects* (2022) by:

- Engaging with relevant NSW Government agencies, service providers, Council, close neighbours and targeted members of the community who are most likely impacted or interested in the proposal;
- Informing the surrounding community to the site about the proposal and providing opportunities to engage directly with the project team;
- Explaining how community feedback will be considered and documented;
- Providing relevant information in plain English so that potential impacts and implications can be readily understood; and
- Providing channels of communication to gather feedback.

7.1.3 Aboriginal Community Consultation

The Aboriginal and Historical Archaeological Due Diligence Assessment prepared by Curio Projects (Appendix NN) concludes that there is nil-low potential for Aboriginal archaeological resources and Low potential for historical archaeological resources to be present within the site. As a result, they confirm that there is no requirement for an Aboriginal Cultural Heritage Assessment Report or Archaeological Assessment (ACHAR). Notwithstanding this, previous consultation undertaken by the City of Sydney to inform their public domain plan for the wider precinct has informed the Design Team in their approach to the site, which will be addressed in detail with the Main Works SSDA, informed by a Connecting with Country consultant engaged to support that future application.

7.2 Stakeholder Views

The key issues and matters raised by the community and stakeholders during the preparation of the EIS for early works are outlined in Table 38 below. It is noted that there are limited stakeholder views that pertain to the Early Works scope, and only views relevant to the early works are listed below. For a comprehensive summary and analysis of stakeholder views and detailed project response, refer to Appendix GG.

Table 37 Stakeholder Views

Key Issues	Project Response
Proposal and Alternatives Considered	
• Scheme testing including tree retention and consolidation of parking.	Existing trees have been retained where possible, supported by wider landscape breaks and increased deep soil zones relative to the preceding approval to accommodate future tree planting. Parking has been consolidated to reduce visual and physical impact across the site.
• Queries around the shared basement and how consolidated loading will work for the southern sites with deeper lots, vehicular entry to Parcel 1. • The City proposes a similar outcome to Epsom Park (Meriton) where parking is beneath the link and above common property.	The arrangement of excavation proposed in the Early Works SSDA is supported by indicative design drawings of the proposed access arrangement. The indicative arrangement includes loading access to the 2 southern parcels from the new road, and vehicular access to Parcel 1.
Relevant Statutory Issues	
• Outline LEP amendments for concurrent rezoning.	While this matter does not relate to the Early Works SSDA, the planning approach will be design-led, with revised planning controls (including height and FSR) to be formalised through an amendment to SLEP 2012.
Economic, Environmental and Social Impacts	
• Clarification needed on capping and soil containment.	It is noted that the previously approved Stage 1 remediation has been completed with Stage 2 currently underway. A Contamination Report has been prepared to accompany the Main Works SSDA to outline required measures to address contaminated soils, refer Appendix K.

Key Issues	Project Response
• Concerns raised around hydrostatic pressure and design kinks.	The early works excavation and future basement perimeter is informed by separate structural engineering analysis. A Geotechnical Investigation and Groundwater Seepage Analysis has been prepared by EI Australia and is provided at Appendix J.

7.3 State Design Review Panel

The proposed development was presented to the NSW Government Architect's State Design Review Panel (SDRP) on 2 (2) occasions prior to lodgement of the SSDA, on 4 September and 17 October 2024, respectively. During these meetings the team presented the project and strategy for achieving design excellence. A breakdown of the key matters raised by GANSW during both sessions includes:

- Importance of having a clear Connecting and Designing with Country strategy in the built form, landscape and public art.
- Integrated landscape strategy across all communal and public spaces.
- Sun access to the park.
- ADG compliance for all City Starter and City Stayer apartments to ensure all meet or exceed the minimum requirements to offset the smaller size of the apartment.
- Increased deep soil with impermeable paving as far as possible in order to maximum soft landscaping and tree canopy.
- Reduce car parking provision by removing retail parking to increase active and public transport use, deep soil and tree canopy and reduce the impact of the development on local roads.

A detailed response has been prepared by the Design Team at Appendix E.

7.4 DPHI engagement and agencies consulted prior to lodgement

As part of the Industry-Specific Secretary's Environmental Assessment Requirements (SEARs) for Housing, we are required to consult with specific agencies regarding relevant approvals or authorisations under other Acts. Specifically, SEAR 4 states:

If the development would have required an approval or authorisation under another Act but for the application of s4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s4.42 of the EP&A Act, the agency relevant to that approval or authorisation must be consulted.

It was identified by the Applicant that relevant agencies are Department of Climate Change, Energy, the Environment and Water (Water) and Transport for NSW (TfNSW). The response received from each agency is noted in the table below.

The Applicant also met with DPHI on several occasions prior to lodgement of the SSDA. These meetings are also recorded in below. Additional discussion is also provided in the Consultation Outcomes Report (refer Appendix HH).

Table 38 Record of State Government agency and authority meetings and correspondence

Date	Stakeholder/s	Activities	Purpose
26/02/2025	• Department of Planning, Housing and Infrastructure (HDA Assessment Team)	• Online meeting	• To present preliminary massing (subject to Ministerial Order), initial dwelling yield, and required LEP changes.
04/03/2025	• Department of Planning, Housing and Infrastructure (HDA Assessment Team) • Government Architect (GANSW)	• Online meeting	• Discuss intent to pursue an Alternative Design Excellence Strategy and outline LEP amendments for concurrent rezoning.
01/04/2025	• Department of Planning, Housing and Infrastructure (HDA Assessment Team)	• Online meeting	• To provide a general project update and overview of scheme testing to date.

Date	Stakeholder/s	Activities	Purpose
28/04/2025	• Department of Planning, Housing and Infrastructure (HDA Assessment Team)	• Online meeting	• To provide a general project update and overview of scheme testing to date.
20/06/2025	• Department of Climate Change, Energy, the Environment and Water	• Email correspondence	• DCCEEW acknowledged notification and advised that the letter issued satisfies consultation requirements. • It was noted that meeting prior to lodgement is not preferred but should the Applicant have any specific or unique concerns the DPIE Water Assessment team could assist.
20/06/2025	• Transport for NSW	• Phone call	• TfNSW acknowledged notification. • It was confirmed the proposed works are beneath a new, unconstructed local road (connecting Bourke and Young Streets). As this is not a classified road, TfNSW approval under s138 of the Roads Act is not required and instead, it falls under DPHI approval of the SSDA. • Post-lodgement, TfNSW confirmed they will review the Traffic Impact Assessment, particularly in relation to McEvoy Street (a State Road).

7.5 City of Sydney Council

Throughout the design development of the proposal, there has been continuous engagement with the City of Sydney Council. A summary of these engagement activities and the items discussed is provided below in Table 39. Additional discussion is also provided in the Consultation Outcomes Report (refer Appendix HH).

Table 39 Record of City of Sydney Council meetings and correspondence

Date	Activities	Purpose
16/04/2025	• In-person meeting	• Provided project overview and outlined the Draft Alternative Design Excellence Strategy. • Provision of support for consolidated basement. • A full list of matters discussed at this meeting is provided in the Consultation Outcomes Report
26/05/2025	• In-person meeting	• Presented overview of the scheme shown at the SDRP meeting on 14/05/2025. • A full list of matters discussed at this meeting is provided in the Consultation Outcomes Report
11/08/2025	• In person meeting	• Design of the public domain elements, impacts on VPA • Detailed design of the precinct.

7.6 Engagement to be Carried Out

7.6.1 Ongoing stakeholder consultation

The project team remains committed to working with key stakeholders throughout the upcoming public exhibition period to address any issues raised. Further, additional stakeholder consultation will be carried out prior to lodgement of the subsequent Main Works SSDA, and any matters pertinent to the main Works will inform DPHI's assessment of this SSDA.

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

7.6.2 Exhibition and Assessment

Following its submission, the DPHI will exhibit the EIS on the Major Projects NSW website and invite submissions from government agencies and the public. Once the exhibition period is complete, DPHI may require the Applicant to prepare a Submissions Report in response to issues raised. The project team will continue to liaise with DPHI and stakeholders during assessment to address queries that may arise.

8.0 Assessment of Impacts

This section of the report assesses and responds to the environmental impacts of the proposed SSD. It addresses the matters for consideration set out in the SEARs (see Appendix A). The Mitigation Measures proposed to mitigate any environmental impacts are provided at Appendix C and complement the findings of this section.

8.1 Built Form and Urban Design

8.1.1 Bulk and Scale

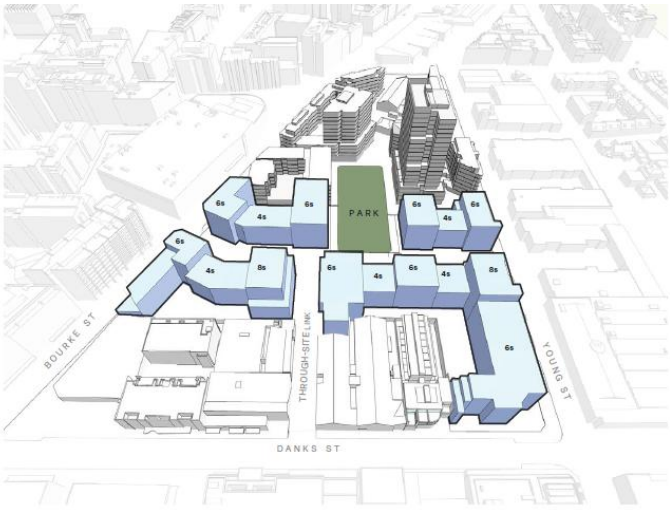
The proposed massing, bulk and scale for the development has been established through the following principles, demonstrated graphically at Figure 78:

1. Retain Concept DA development parcels, footprint and building envelopes.
2. Introduce housing uplift across the site equivalent to a 30% infill affordable housing bonus and 10% additional floor space for design excellence.
3. Redistribute the massing across the site to preserve solar access to the central park.

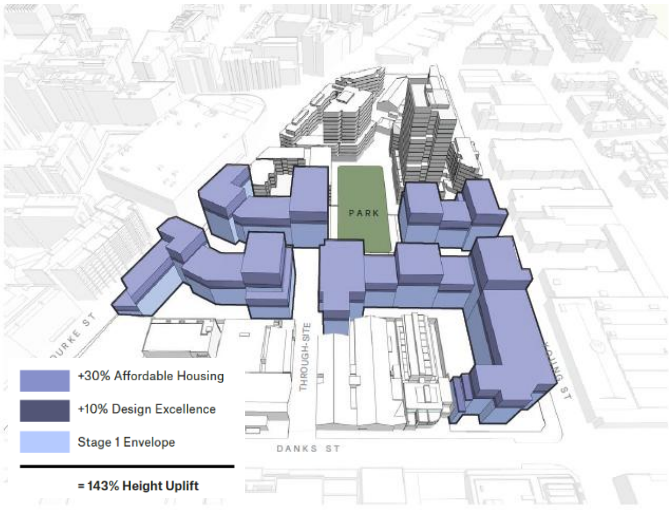
The resulting built form is varied in height across the site, with the taller components pushed out to the east and west of the site, allowing for the lower central elements to provide sunlight to the central park. Street-wall heights of 4-8 storeys were then introduced, to reflect to reference the height of the approved Concept DA and acknowledge the heights of surrounding context, providing a comfortable urban scale along the site frontages.

The massing of the proposal will also preserve solar access to surrounding buildings, including the Tiara apartments along Bourke Street. The height of the Building 2A Tower has been established so as to be commensurate with the existing towers scattered throughout southern Sydney (see below) and to not interference with the airport operation surfaces of PANS-OPS and RTCC.

The overall massing and density of the site is commensurate with the varying bulk and scale of surrounding developments like Victoria Park, Lachlan Precinct and the Waterloo Metro Quarter. The massing and street frontage heights have been set back to minimise the buildings scale and visual impact on the surrounding streets and houses and the articulated massing of Parcel 1 and 3 ensures the tall buildings are integrated into the broader Waterloo area.



Stage 1 Envelope



Height Uplift

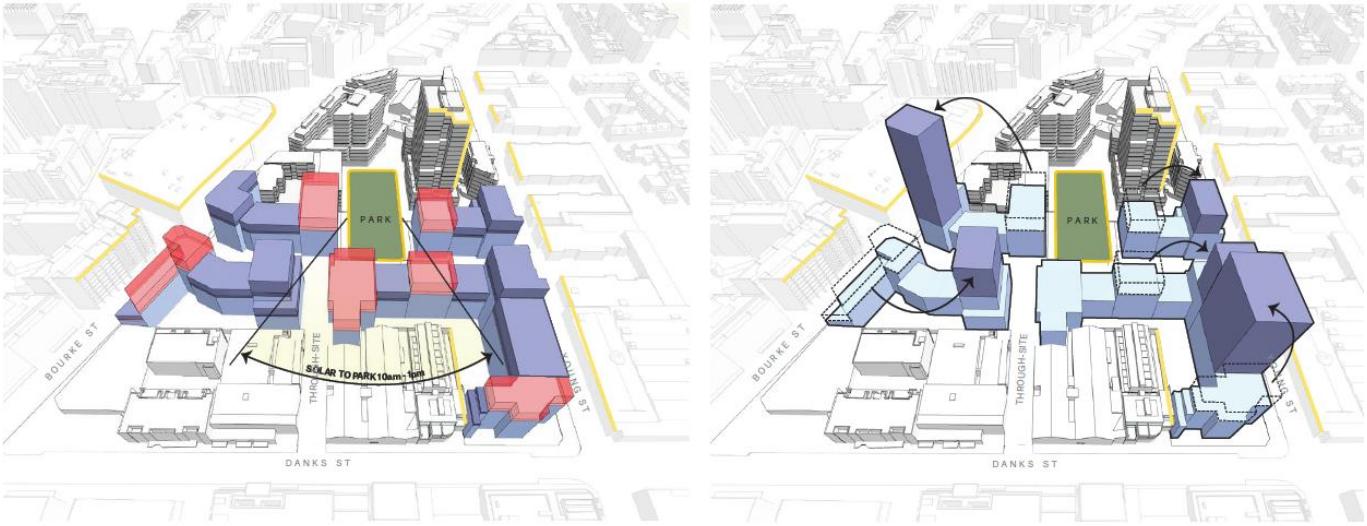


Figure 78 Built form and massing principles for uplift at the site

Source: Design Team

8.1.2 Building Height

The proposed development will have a maximum building height of 152RL (Figure 79), which is confined to a single building (Building 2A). As described in Section 4.0, the proposed development includes the rezoning of the site for a maximum height of 152RL m.

The design of Building 2A has been carefully considered and has been subject to design excellence review by the SDRP. The tower is slender to ensure environmental impacts are mitigated, and is a tower-podium form to provide a more human scale fronting the street. All other buildings at the site are significantly lower than Building 2A and help mediate the massing across the site.

As shown in Figure 80, the proposed development is of a height that is commensurate with the broader existing context and are in keeping with the future context of Waterloo. The broader Southern Sydney area surrounding the site consist of 20-27 storey towers in Lachlan and Victoria Park, 28 storeys in Green Square Town Centre, and up to 33 storeys in Waterloo Metro Quarter and the Waterloo Estate. The urban form of medium density buildings with taller towers of approx. 30-storeys scattered throughout the neighbourhood will be retained and reinforced by the proposed development.

The additional height proposed has been located on 4 key buildings to ensure that amenity is not compromised for existing and future residents, as well as maintaining the solar access to the central park to be delivered under the VPA.

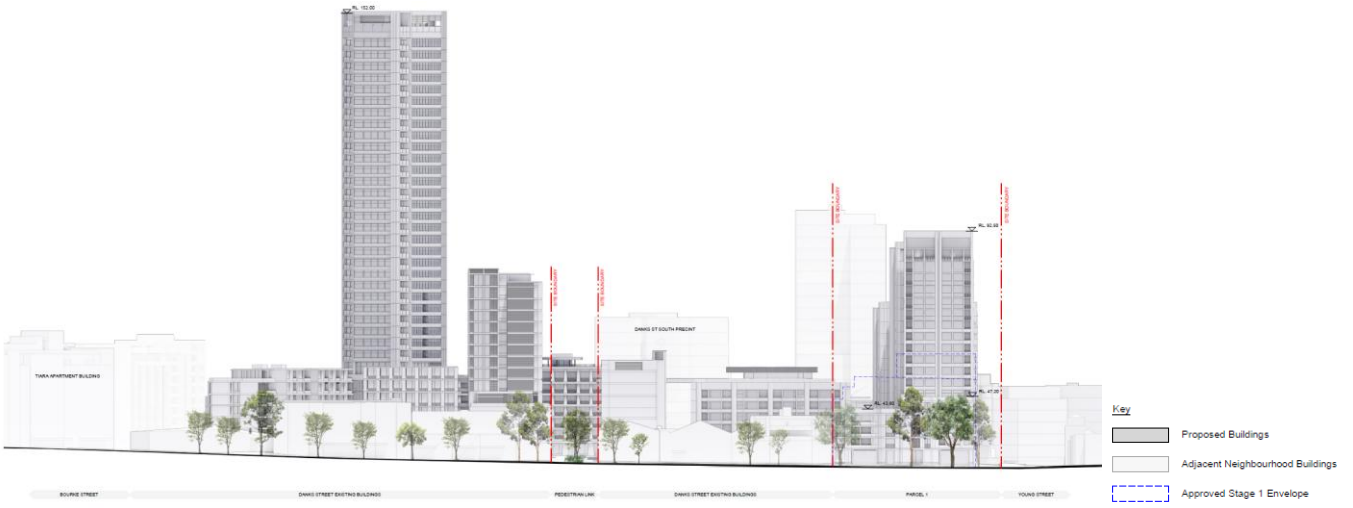


Figure 79 Proposed maximum building height within the context of adjacent buildings

Source: Design Team



Figure 80 Proposed building height within the context of the surrounding area

Source: Design Team

8.1.3 Street Setbacks

As demonstrated in Figure 81 below, acceptable setbacks have been provided to create a better interface between the proposed built form and the surrounding low and mid-rise residential and industrial buildings. The ground floor of Parcels 2 & 3 is setback from Bourke Street by 3m, allowing for more space for pedestrian movement along this busy corridor. The tower components of Parcels 2 & 3 are also setback 3m from the podium section responding to the sensitive receivers in the Tiara Building to the east to have greater solar and amenity access. Level 4 and the rooftops of Parcel 2 are to be setback to create a part indoor/outdoor communal space for residents in the City Starter units and affordable housing units. The setbacks of the proposed internal roads seeks to provide amble pedestrian room for movement while setback ground floor retail spaces are to provide protection from the weather and solar access to public spaces.

Landscaped setbacks with deep soil and significant canopy tree planting are proposed along the Danks Street and Young Street frontages of the site, to ensure the character of these streets is enhanced with additional greening.

Zero setbacks are generally provided to the new street and Danks Lane to promote activation and vibrancy of the precinct.

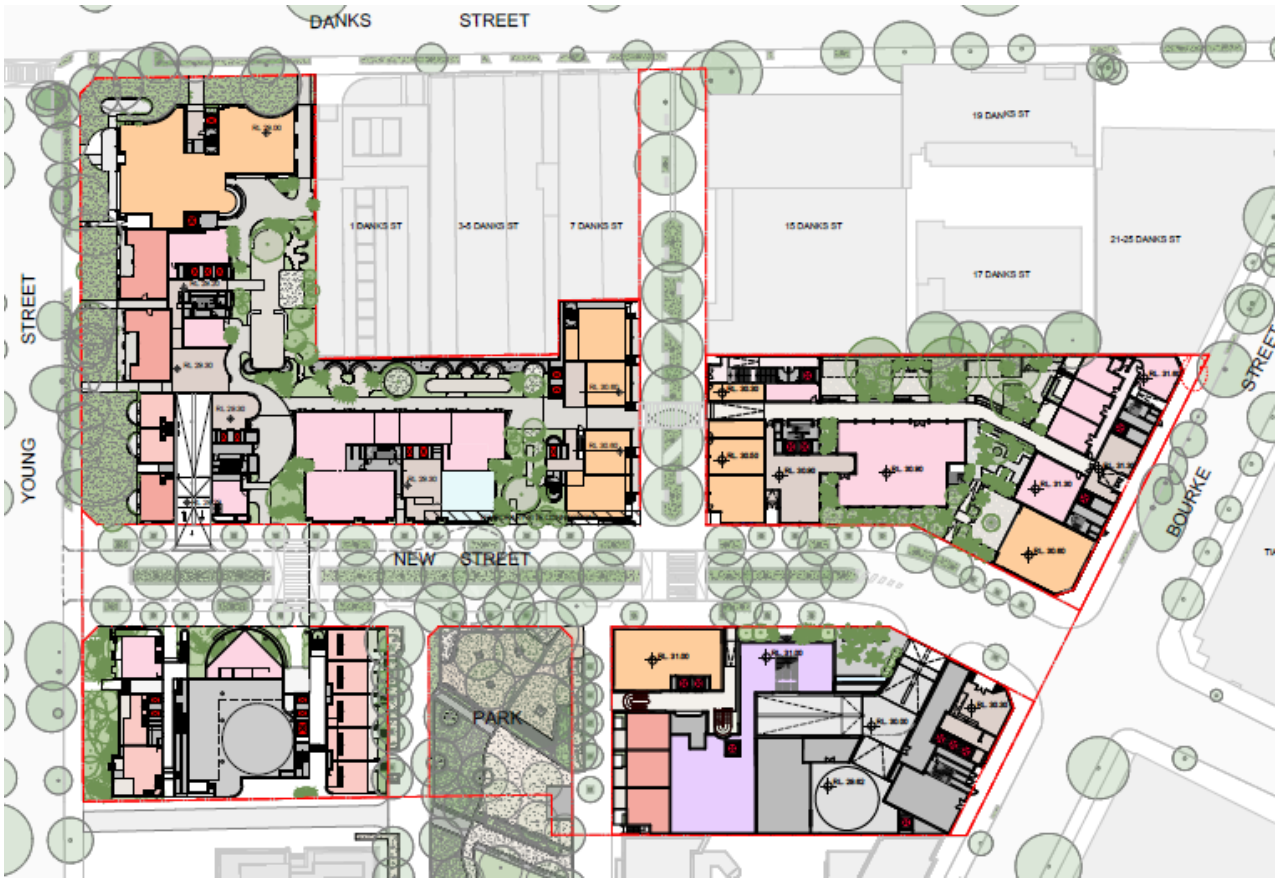


Figure 81 Precinct ground level plan showing street setbacks

Source: Design team

8.1.4 Key Interfaces

Section drawings and details of the key site interfaces and edges are provided in Section 5 of the Design Report. Two key interfaces require particular attention, being the interface of Parcel 1 with the Danks Street warehouse to the north of the site, and the southern interface of Parcel 3 with the recently completed City West Housing development adjoining the site to the south.

Parcel 1 interfaces with the Danks Street warehouse by providing a ground level landscaped area with tall canopy planting providing screening to the existing residential terraces at the adjacent site. The built form of Building 1A is set back significantly from this edge to ensure no adverse visual bulk or privacy impacts arise.

The design of Parcel 3 will integrate with the levels of the outdoor communal courtyard in the adjacent City West Housing Development. As shown in Figure 82, Parcel 3 includes loading dock and ground level adjacent to the City West Housing loading dock, with landscaped rooftop at approximately the same level, then stepping up to another slightly higher landscaped area, before the setback to the residential dwellings above. The dwellings are sufficiently setback so as to not overwhelm the City West Housing development and will provide a cohesive and pleasant outlook from within their courtyard.

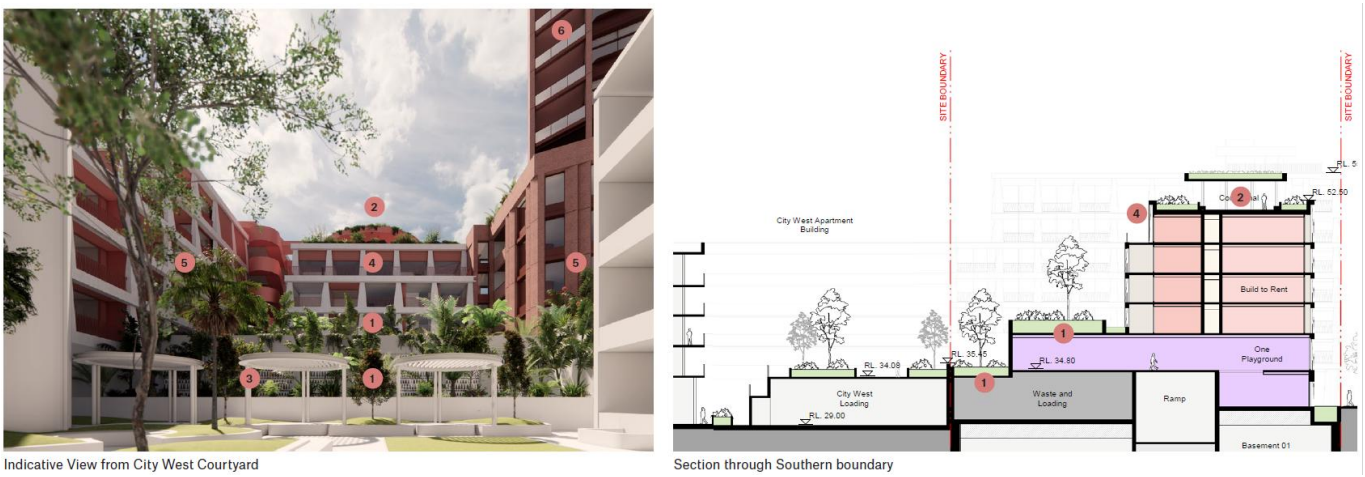


Figure 82 Parcel 3 interface with City West Housing Development to the south

Source: Design Team

8.1.5 Facades and Materiality

The precinct features a unified material palette anchored by a robust masonry base, lending each building a grounded and enduring presence. This foundation supports a cohesive yet adaptable architectural language across the site. Built forms respond to their context through geometry shaped by street conditions, view corridors, and solar orientation. Façade treatments, including varied depths, strategic shading, and a balance of solid and open elements, and enhanced passive environmental performance and residential amenity. Each building presents a tailored architectural expression to its frontage, whether facing a park, street, or laneway, with refined detailing contributing to character and legibility. The overall materiality of the precinct is shown at Figure 83, with more detailed materiality for each parcel shown in Section 3.0 and in the respective Architectural Drawings at Appendix D.



Figure 83 Precinct materiality strategy

Source: Design Team

8.2 Residential Amenity

The proposed development will deliver a high level of residential amenity for its tenants and is generally consistent with the recommendations of Chapter 4 of the Housing SEPP and the objectives of its accompanying Apartment Design Guide. A Design Verification Statement has been prepared by the Design Team and is appended to the Design Report (Appendix E), demonstrating compliance with the Design Objectives of the Housing SEPP.

Coronation has also prepared a Waterloo Housing Diversity Strategy at Appendix DD which sets out the underlying design intent with regards to housing diversity, affordability, and placemaking while delivering a high level of residential amenity to which this section of the report should be read in conjunction with.

8.2.1 Apartment Design Guide and Build-to-Rent Housing

The proposed development provides BTR housing and affordable rental housing, with no strata/build-to-sell housing proposed. This creates a unique opportunity for Coronation to own and manage the entire site, implementing a cohesive precinct-wide offering to tenants. The precinct will be managed by Nation – Coronation's BTR operator (with Evolve Housing responsible for management of the affordable rental housing as a CHP).

This section provides an assessment of residential amenity across the precinct, in terms of the Design Objectives of the ADG and more generally in terms of the broader precinct-wide BTR experience and offering.

The underlying purpose of the ADG is to provide guidance for the development of new apartment buildings, specifically in relation to achieving the design principles set out in the Housing SEPP. Of relevance to the assessment of development applications is Parts 3 and 4 of the ADG. Within these parts are several objectives, some of which contain design criteria and design guidance.

Where provided, design criteria are the first step in ensuring consistency with an objective. Essentially, if a proposal numerically adheres with the criteria, it therefore satisfactorily achieves the objective. There is an acknowledgment in the ADG that rigid numerical controls (the criteria) are not always able to be achieved. As such, a set of design guidance are provided as a starting point for an alternative solution to achieve the objective. The guidance is assessed on merit and importantly are not intended to be an exhaustive list of alternative solutions for achieving consistency with the objective. The ADG reinforces the validity in this method of implementation by stating:

> *'The design criteria set a clear measurable benchmark for how the objective can be practically achieved. If it is not possible to satisfy the design criteria, applications must demonstrate what other design responses are used to achieve the objective and the design guidance be used to assist in this.'*

The (then) Department of Planning and Environment's publication, 'Better Apartment Design Frequently Asked Questions' (June 2015), also reinforces this method of implementation:

> *'It may not be possible in all instances to satisfy the design criteria in the Guide, so it gives designers the flexibility to innovate and demonstrate they will achieve the same result with a different approach.'*

Furthermore, Section 75 of Chapter 2, Part 4 of the Housing SEPP states that the consent authority must be flexible in applying the design criteria set out in the Apartment Design Guide when determining a development application for build-to-rent. The Section states as follows:

> *In determining an application for the modification of a development consent or a development application for the carrying out of development to which this section applies, the consent authority must—*
>
> *(a) be flexible in applying the design criteria set out in the Apartment Design Guide, including, in particular, the design criteria set out in Part 4, items 4E, 4G and 4K, and*
>
> *(b) in its consideration of the objectives set out in the Apartment Design Guide, Part 4, consider the following—*
>
> *(i) the amenities proposed to be provided to tenants residing in the building through common spaces and shared facilities and services,*
>
> *(ii) whether the configuration and variety of dwellings in the building will provide adequate options to prospective tenants in relation to the size and layout of the dwellings,*
>
> *(iii) whether tenants residing in the building will be able to relocate to other dwellings in the building that will better accommodate their housing requirements if their requirements change.*

The (then) Department of Planning and Environment's 'Build-to-rent housing and flexible design fact sheet' (April 2023) further states that additional ADG matters under items 4A (Solar and daylight access), 4D (Apartment size and layout) and 4F (Common circulation spaces) may also be subject flexibility as long as a high level of amenity continues to be delivered.

This is in recognition that, for build-to-rent housing, an acceptable amenity proposition can be provided through alternative means (not just strict compliance with the Design Criteria in the ADG) such as shared communal facilities, open spaces, etc. tailored towards the requirements of its target demographic, being mostly university

students, young adults and young families, who are more likely to use communal facilities and open space to socialise, co-work, or do other activities, and less likely to utilise private spaces within apartments.

The proposed development seeks to provide a holistic approach to residential amenity across the site, for all its future tenants. It is acknowledged that there are numerical inconsistencies with ADG Design Criteria for some metrics (apartment size, private open space, solar access/cross ventilation, apartment storage), however these are offset by the significant communal amenity proposition across the site in the form of communal facilities, open space and integrated land-uses delivered for the project truly above and beyond ADG requirements, facilitating, on balance, an appropriate amenity outcome for the site tailored towards the build-to-rent market demographic.

8.2.2 Communal Space and Residential Amenities

Communal spaces are provided throughout the site, both internally within the proposed buildings and also externally within landscaped communal open spaces. A detailed breakdown of the uses of each parcel and building is included at Section 3.0. The overall communal space offering at the site provides a selection of sub-spaces with varying uses, to allow for simultaneous use by multiple groups. The communal facilities will be available to all residents of the precinct. The proposed total communal space is approximately 2,450m^2 (GFA) of communal indoor amenity and 5,020m^2 of communal open spaces at ground, podium and rooftop levels (total 7,470m^2 GFA). This represents 34.7% of the total site area and is well in excess of the ADG recommended 25%, in acknowledgement of the precinct-wide BTR approach to providing residential amenity. By delivering such a high percentage of communal space for residents, the apartment sizes and mix is justified. Specifically, City Starter apartments are considered adequate due to the access to residential amenities within the development.

Internally, the residents will have access to a variety of communal spaces that include shared living spaces, such as lounge areas, co-working areas, private work pods, and communal dining rooms. Additionally, a variety of ancillary, bookable spaces such as the private dining room, children's play space, cinema, music room, bike store and other flexible use spaces. Majority of the ground floor of Parcels 1 and 2 that does not front the street is provided as communal residential amenity (refer to Figure 85 and Figure 86). These spaces will be privately accessible at ground level for BTR amenities, however, there will be publicly accessible areas at ground level around the boundaries of the site such as Danks Street corner.

Beyond the ground floor open space, the precinct will utilise rooftop spaces for residential use with the proposed development delivering 2 rooftop pools, access to pickleball courts and general outdoor areas for activities and barbeque spaces.

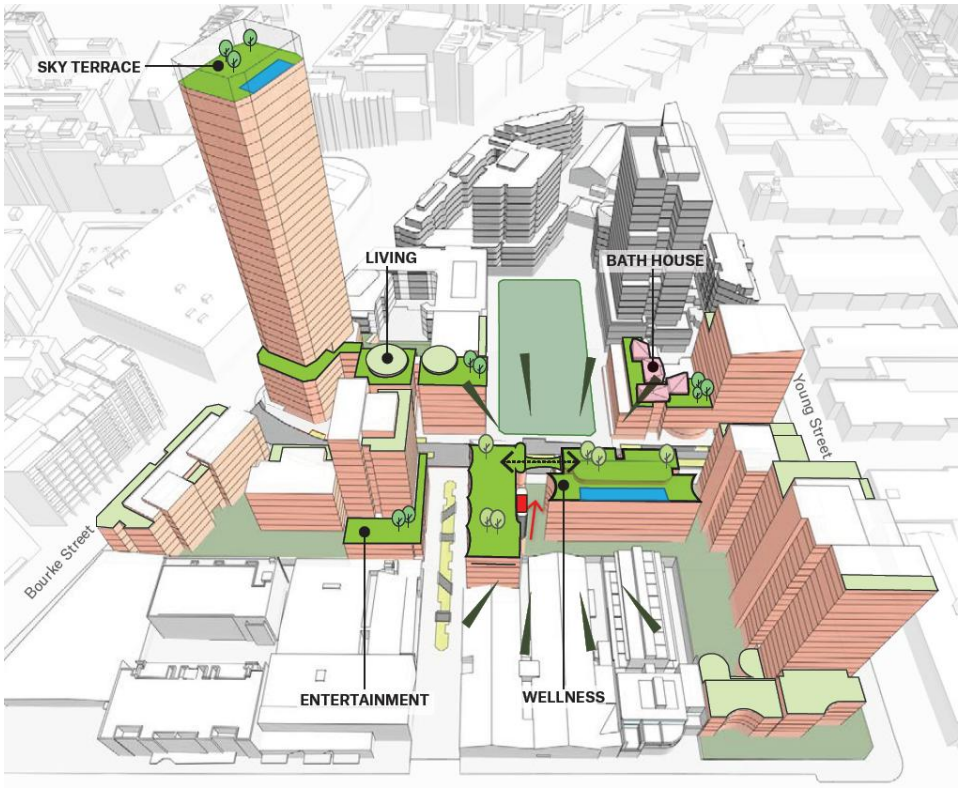


Figure 84 Rooftop communal amenity for the precinct

Source: Design Team

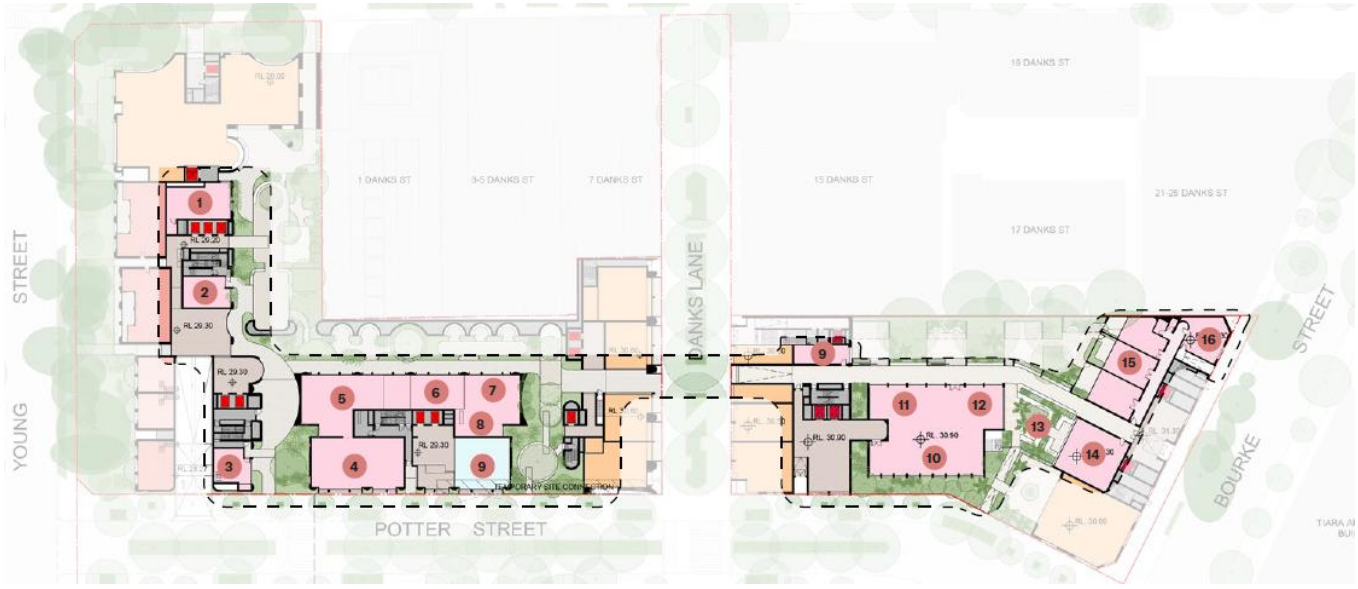


Key

1. Young St residents walk link
2. Retail courtyard
3. Deep soil buffer
4. Community garden
5. Performance
6. Lounge
7. Gardenrooms
8. Lobby arrival
9. Potter St gardens
10. Laneway lobby ink
11. Laneway lobby link
12. Garden rooms, lounge, BBQ
13. Deep soil buffer
14. Private dining
15. Meet and greet
16. Restaurant courtyard

Figure 85 Ground level communal landscape areas

Source: Design Team



Key

1. Play
2. Music
3. Bike Store
4. Co-Working
5. Lounge
6. Private Dining
7. Bar
8. Cinema
9. Office
10. Private Working
11. Co-Working
12. Lounge
13. Living
14. Residents Lounge
15. Private Dining
16. Bikes

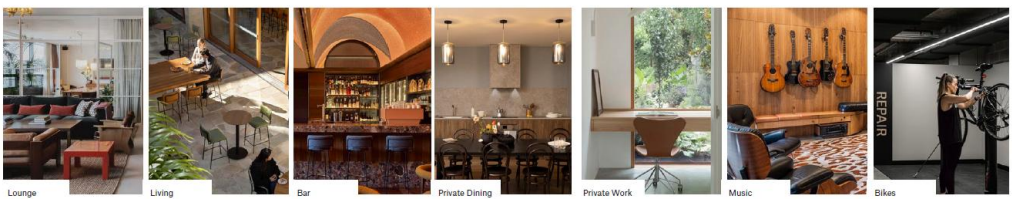


Figure 86 Ground level internal communal amenities

Source: Design Team

8.2.3 Solar Access and Cross Ventilation

Precinct-wide compliance with the ADG Design Criteria for solar access and natural cross ventilation is achieved:

- 628 out to 850 (74%) of all apartments receive at least 2 hours of direct sunlight between 9am – 3pm mid-winter. This is more than the 70% recommendation and therefore compliant.
- 51 out of 850 (6%) of all apartments are south facing units with no direct sunlight between 9am – 3pm midwinter. This is less than the maximum 15% recommendation and therefore compliant.
- 359 out of 535 (67%) of all apartments under Level 9 are naturally cross ventilated which is more than the 60% requirement and therefore compliant.

The proposal meets the minimum solar access and cross ventilation requirements, and these models can be seen in Appendix E. Additionally, the proposal meets a high level of compliance at an individual building assessment.

8.2.4 City Starter and City Stayer Apartments

The proposed development provides a total of 287 studio apartments. Of these, 230 are to be "City Starter/Stayer" studios, which can be delineated from "regular" studios in that they do not meet the recommended 35m^2 or higher internal space under the ADG. Such an approach is consistent with the (then) Department of Planning and Environment's 'Build-to-rent housing and flexible design fact sheet' (April 2023) which states that flexibility with regards to apartment size and layout for build-to-rent housing may be appropriate as long as it can be demonstrated that "*all necessary furniture can fit while still allowing plenty of space for residents to move about*." The need for diverse housing forms, such as co-living, was recommended after the first SDRP and this has since been adopted in the form of a BTR product.

Coronation has prepared a Waterloo Housing Diversity Strategy at Appendix DD which sets out the underlying design intent behind the City Starter/Stayer studios. City Starter apartments are typically for single people under 25 years old, who will be attracted by the vibrancy of the precinct. City Stayer apartments are typically older residents above 55 years old, who are single and require security of tenure but want to live in a vibrant and accessible central location (refer to Figure 87). Both these apartment types will benefit from cheaper rent when compared to a standard ADG sized studio, due to the compact size. But both benefit from the broader communal facilities being provided across the site.

The smaller size of these studios is offset by the extensive communal residential amenities readily accessible for these buildings. The extensive communal amenities include both indoor and outdoor areas such the sky terrace with pool located on the rooftop of Building 3A. As the City Starter/Stayer apartments are smaller, the proposed development will offer significant communal facilities within the buildings that the apartments are located. The City Starter/Stayer units are provided as a furnished offering to ensure efficient use of the space. The proposed total communal space is approximately 2,450m^2 (GFA) of communal indoor amenity and 5,020m^2 of communal open spaces at ground, podium and rooftop levels (total 7,470m^2 GFA) which represents 34.7% of the total site area. Refer to Figure 87 which shows a typical layout.

Importantly, the non-City Starter studios, as well as all 1-bedroom, 2-bedroom, and 3-bedroom dwellings, will continue to meet ADG size recommendations, ensuring that housing diversity is provided across the site.

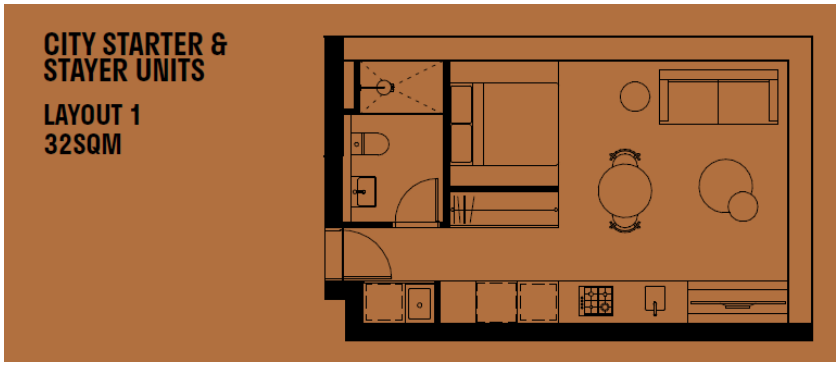




Figure 87 Typical City Starter and City Stayer layouts

Source: Coronation

8.2.5 Private Open Space

A majority of apartments have dedicated private open space that meets the minimum size requirements of the ADG. A small number of apartments either do not have private open space or have space below the minimum ADG area. Where City Starter apartments do not have balconies, amenity is offered through operable facades that maximise ventilation and a sense of indoor-outdoor living. Further, these apartments all have access to the following rooftop communal open spaces:

- Building 1c/1d will be centred around an active lifestyle with a rooftop wellness facility offering a serene escape with a pool, lounge, gym, and pickleball court, all set against stunning city views. It's a perfect blend of relaxation and active living in the open air.
- Building 2b will be entertainment centred with a vibrant social terrace featuring an outdoor heated lounge including a bar and fireplace, an open-air cinema, dedicated podcast and music rooms, plus game rooms, all designed for creativity, relaxation, and connection.
- Building 3a and 3b will be centred around Barbeque, living and sky terrace pool space, nestled in a lush landscape, the lower circular BBQ and dining area offers a relaxed setting for outdoor gatherings. Above, the tower rooftop features a serene wellness retreat with a pool, sauna, shower, and plunge, all framed by panoramic views.
- Building 4a will be focussed on the bathhouse offering a serene escape with sculptural sky views, featuring magnesium pools, infrared saunas, a steam room, plunge, massage spaces, and a calming tearoom. The bathhouse will be leased as commercial space to a third-party operator.

As described above, the development provides 7,470sqm of communal indoor and outdoor amenities. Over the 230 City Starter/Stayer apartments, if each were to have 4sqm of private open space, this represents a total of 920sqm of private outdoor space. Noting that the development provides approximately 2,000sqm in excess of the ADG minimum 25% communal space, this more than offsets the amount of private open space not being provided to the City Starter/Stayer apartments and results in an overall high level of amenity for tenants.

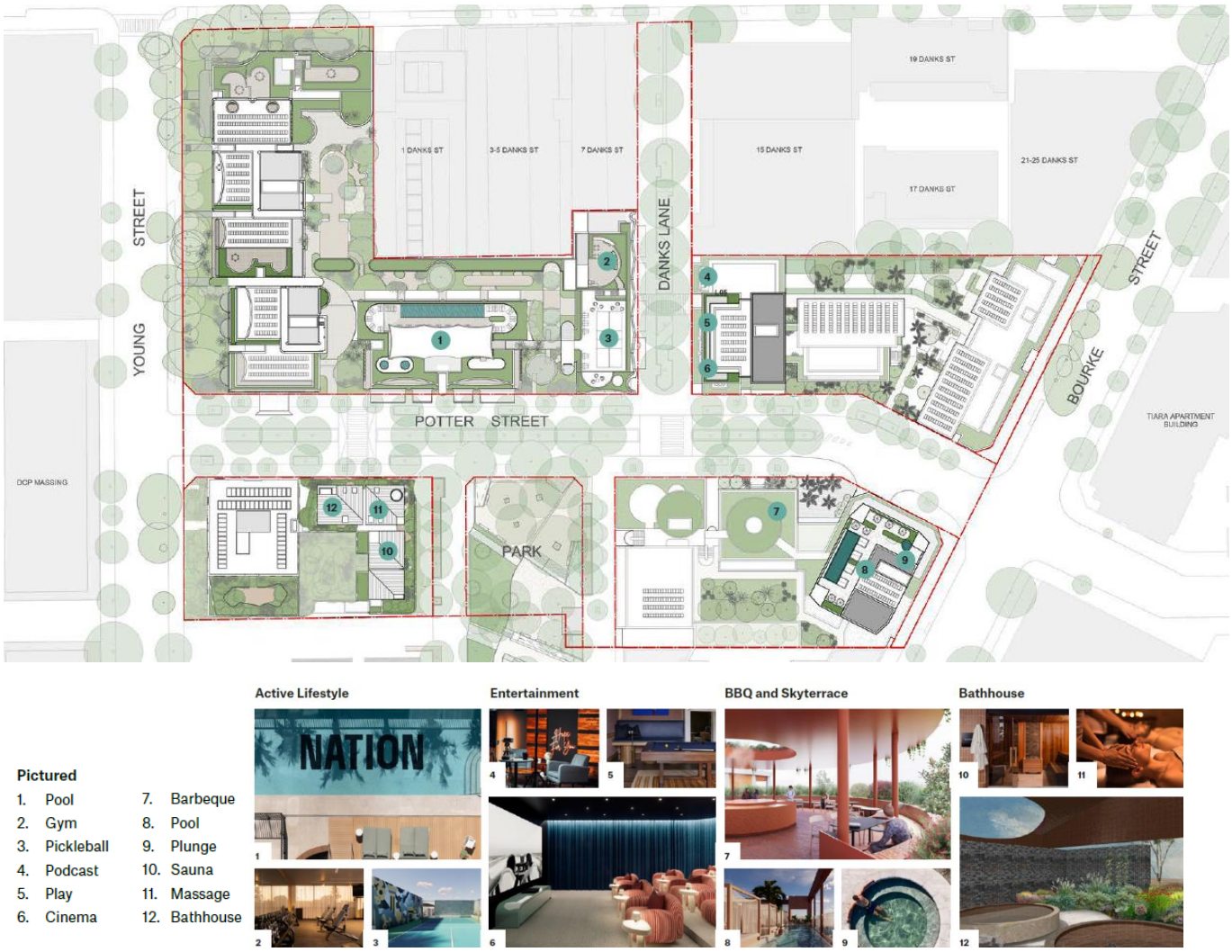


Figure 88 Precinct Rooftop Plan

Source: Design Team

8.2.6 Adaptable and Accessible Apartments

The proposal will provide a blended approach to adaptable and accessible apartments to cater to the needs of many with mobility needs. The proposed quantum of adaptable and accessible apartments is as follows:

- 5% of apartments will be adaptable in accordance with AS4299 Adaptable Housing requirements.
- 5% of apartments will meet Liveable Housing Design Guidelines - Silver Performance Level requirements.
- 5% of apartments will achieve LHDG Platinum Performance Level.

This approach better caters to the needs of the population as a whole. Providing adaptable and nonadaptable apartments is a binary approach, where an apartment is either catered to someone able-bodied, or adapted for someone with a severe disability or mobility impairment. Providing a blend of adaptable and LHA rated apartments means that the development would cater for families, those with temporary injuries or minor mobility impairments, adults aging in place, as well as people with a more severe disability or mobility impairment – instead of the more binary adaptable versus non-adaptable approach. Further, the single-ownership and BTR model means that apartments can be converted back in an ongoing manner, as needed to meet the needs of the tenants at any given point in time.

8.2.7 Visual Privacy and Separation

The precinct has been designed to achieve adequate building separations and visual privacy between dwellings. Building separation is provided in Drawing WL-AR-SSDA-PR-0101 at Appendix D. Acknowledging that the development is a dense, urban living precinct, there are some building separations which do not fully comply with the recommended ADG minimum requirements. In these scenarios, apartments have been designed skilfully and are oriented away from other habitable rooms in apartments of other buildings, to prevent overlooking and resolve visual privacy issues.

8.3 Overshadowing

Central Park

A key underlying principle of the proposed development is to maximise the opportunity for solar access to the central park.

The proposed development complies with the Danks Street South DCP controls, which require a minimum of 50% of the park receives 4hrs or more sunlight, mid-winter. Following feedback from the SDRP, modelling has been undertaken with the City's concept design for the park.. A comparison of the solar access to the park between the approved building envelopes and the proposed development is shown at **Figure 89**. The proposed development will ensure 52% of the park receives at least 4hrs sunlight mid-winter. 70% of the park will receive greater than 3hrs sunlight, and 87% of the park receives more than 2hrs sunlight. It is also noted that most of the deep soil and landscaped areas are located to the south of the park where the maximum solar access is located. Therefore, the proposal ensures that the requirement of 50% is exceeded while ensuring a more even distribution of solar amenity across the site (particularly to the south).

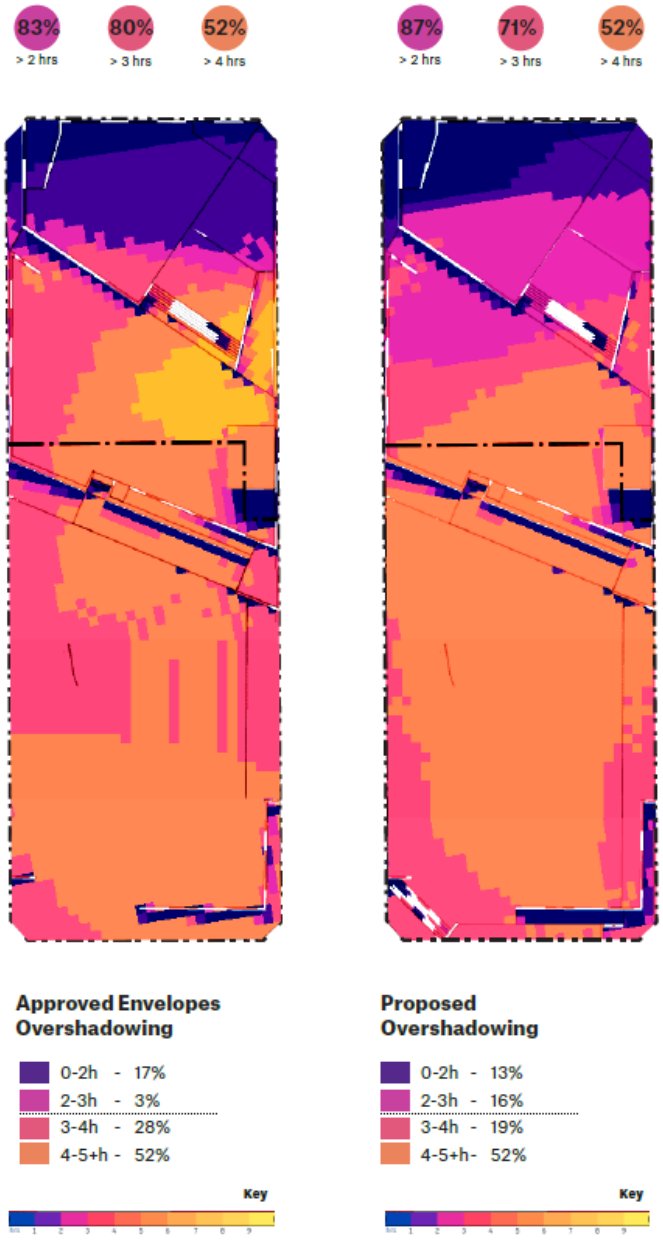


Figure 89 Solar Analysis for Proposed Park

Source: Design Team

Overshadowing to Surrounding Sites

This EIS is accompanied by shadow diagrams prepared by the Design Team and included at Appendix D. The analysis includes illustrates overshadowing from the proposed development on adjoining properties against the ADG Objective 3B-2. The methodology included demonstration that overshadowing of existing, approved and planned apartments overshadowing impacts are minimised during mid-winter as per the City of Sydney's 'Minimising overshadowing of neighbouring apartments – Documentation Guide'. The analysis was comprised of measuring compliance, maintaining compliance or an allowable reduction of solar access.

Refer to Table 40 for a summary of the outcomes of the overshadowing impacts for the respective sites. Refer to the Architectural Design Report and Appendix D for further information. A more detailed analysis of key sites is explored beyond the table throughout this section.

The impact of all buildings, except Building 3A, are largely contained within the development site between 11am and 2pm in the winter solstice. Building 3A will overshadow 824 Bourke Street, which is a commercial car dealership tenancy and therefore not protected. Due to the slender tower built form, the impact to 824 Bourke Street is limited to only small portions between 12pm and 3pm during the winter solstice, with the most significant impact at 3pm. Refer to Figure 91 which identifies the extent of overshadowing at the winter solstice.

Additionally, the proposed development will create overshadowing impacts to the industrial estate to the west on Young Street between 9am and 11am. However, it is noted, that between 9am and 10am, the approved concept DA envelope would also have had overshadowing impacts to the west. Refer to Figure 92 which identifies the extent of overshadowing to the industrial estate to the west at the winter solstice.

It is noted that the proposed development will create improved solar access to some areas within the development site and beyond the development site as a result of the updated envelope. This is specifically seen in the park provided with the development, the communal open space on Parcel 1, and small improvements across the City West Housing site to the south. Refer to the Architectural Design Report for further information (Appendix E). Communal Open Space

The public and communal open spaces are substantial in area and offer premium recreational spaces for future residents and the community. A minimum of 50% of the principal useable communal open space (PUCOS) achieves direct sun on June 21 for a minimum of 2 hours between 9am and 3pm.



Figure 90 Surrounding properties assessed for overshadowing impacts (refer to Table 40)

Source: Design Team

Table 40 Summary of overshadowing impacts to the surrounding properties

Property	ID to Figure 90	Existing Solar Access	Compliance	Comment
1 Warehouse (Danks Street)	1	N/A	Complies with Council policy	As a result of the proposed development, 2 units will have improved solar access comparted to the existing concept DA, 1 unit will have reduced solar access, but not more than 20% reduction of time) and 4 units will have reduced solar access compared to existing condition for more than 20% of time. It is noted that existing west facing units currently don't achieve a minimum of 2 hours solar access. Overall compliance is achieved, and the proposed solar access is greatly improved compared to the approved envelope.
Tiara (Bourke Street)	2	52%	Complies with Council policy	As a result of the proposal, all dwellings fronting Bourke Street maintain 2 hours solar access other than 3 dwellings on Level 1 that are impacted by less than 20%.
City West Housing (Bourke Street)	3	70%	Compliance maintained	Solar access is maintained to all ADG compliant dwellings on north and west frontages.
Toyota Showroom (Bourke Street)	4	N/A	Future development potential maintained	Future development on the Potter Street frontage is able to be developed in the future with regards to overshadowing and solar access compliance. The Bourke Street frontage has also retained 2 hours solar access and has also retained its future development potential.
DASCO Precinct (all buildings)	5, 6, 7	70%	Precinct compliance maintained	An analysis of the DA and s4.55 conditions for the DASCO site has been undertaken to understand the wider precinct's compliance for 70% solar access. It is anticipated that overall, a total of 12.9 units under the DA will be impacted, now receiving less than 2 hours solar and 3 units under the S4.55 will receive less than 2 hours. Overall, 70.9% precinct compliance in maintained.
Young Street DCP	8	N/A	Complies for future development	An assessment against the Young Street DCP has identified no additional impact to the approved envelope. Additionally, the western façade has the potential to achieve compliant solar access for future developments with no reliance on the eastern façade.

Source: Design Team and Ethos Urban



Figure 91 Overshadowing to 824 Bourke Street to the south-east

Source: Design Team



Figure 92 Overshadowing to industrial estate to the west

Source: Design Team

City West Housing

The City West Housing site at 895 Bourke Street, Waterloo, to the south of the site will experience overshadowing between 9am and 12pm, with the most significant impact between 9am and 11am. As shown in the sun-eye views at Figure 93, City West Housing will experience overshadowing the central and eastern portion of the development, however, the extent of which is additional overshadowing for the proposed development

(compared to the approved concept envelope) is proportionate and will still allow for residents of City West Housing to obtain sunlight between 1pm and 3pm (Figure 92) . In some cases, there is improved solar access for areas that were previously overshadowed by the approved envelope and are no longer overshadowed by the proposed development. Ultimately, the tower has been designed to be of a slender built form to reduce the impacts to surrounding developments.



Figure 93 Sun eye diagrams between 9am and 11am at midwinter

Source: Design Team

8.4 Wind Impacts

A Pedestrian Wind Environment Study (Wind Study) (Appendix X) has been prepared by Windtech. The Wind Study sets out the methodology, criteria, results and discussion of wind tunnel modelling undertaken for the proposed development. The wind tunnel modelling was conducted using a detailed scale model of the proposed development as shown on the Architectural Drawings (Appendix X).

The results of the study indicate that wind conditions for the majority of trafficable outdoor locations within and around the development will be suitable for their intended uses. However, some areas will experience strong winds which will exceed the relevant criteria for comfort. The following recommendations will be incorporated into the design of the project moving forward to ensure appropriate wind conditions are experienced:

- Retention of the proposed densely foliated evergreen trees along the connecting corridor between Danks Street and Potter Street, along Potter Street itself, and at the corner of Danks Street and Young Street. These trees should have a minimum height of 3m and a minimum canopy width of 3m.
- Retention of the proposed 2.4m high impermeable screen at the outdoor seating area located at the eastern end of the Potter Street.
- Inclusion of densely foliating evergreen trees with a height of 3-4m and a canopy width of 3m at the communal park located south of Potter Street.
- Inclusion of awnings with a minimum depth of 2.5m along the connecting corridor between Danks Street and Potter Street, at the corner of Danks Street and Young Street, and at the communal area located in the north-western part of the site.
- Inclusion of 1m high planter boxes with 0.5-1m high densely foliated vegetation at the communal area located in the north-western part of the site.

With the inclusion of these treatments to the final design, it is expected that wind conditions for all outdoor trafficable areas within and around the development will be suitable for their intended uses.

8.5 Visual Impact

8.5.1 Visual Impact Assessment

A Visual Impact Assessment (VIA) has been produced by Ethos Urban and is located at Appendix F. The VIA has made an assessment against the relevant planning controls and has conducted a detailed analysis of the visual impact the proposed development will have on 6 key sensitive receivers in the public domain. A map of these viewpoints has been provided in Figure 94 below. It is noted that any change from the site's current status to support the type and nature of development prevailing in this part of Green Square and planned for this part of the Danks Street Precinct will inherently represent a major change over a wide area and as such have a dominant magnitude of visual impact. An assessment of the most significant visual catchments along Bourke, Danks and Young Street has been provided below.



Figure 94 Location of Viewpoints assessed

Source: Virtual Ideas

Viewpoint 1: Danks Street and Young Street

The sensitivity of viewpoint 1 is considered to be low to medium as the location is removed from any key activity area, is separated from any HCAs and taller buildings are already visible in this catchment. The viewpoint does not particularly feature a high number of people and the views will be primarily seen by local residents travelling along Danks and Young Street. The proposal is considered to represent a major change over wide area that is ongoing and irreversible. As such the proposal is considered to have a dominant magnitude of change. Overall, the proposal is considered to have a moderate to high significance of visual impact.



Figure 95 Viewpoint 1: Existing (left) versus the proposed development (right), as viewed from Danks and Young Street looking southeast

Source: Virtual Ideas

Viewpoint 2: Bourke Street

The sensitivity of Viewpoint 2 is considered to be low as this location is already characterised by taller buildings, is separated from HCAs and is not recognised by any planning framework as being a significant view. The viewpoint will be seen primarily by travellers moving along Bourke Street as this road supports high volumes of car and bus traffic. The proposal is considered to represent a major change over a restricted area that is ongoing and irreversible. Overall, the proposal is considered to have a low significance of visual impact. While the height of the taller tower on parcel 3 is visible, this rating is primarily due to its lower sensitivity to the nature of change proposed. Most of the proposal being blocked by planned development in the midground on Bourke Street, and the slender profile of the tower covering a geographically restricted part of the view.

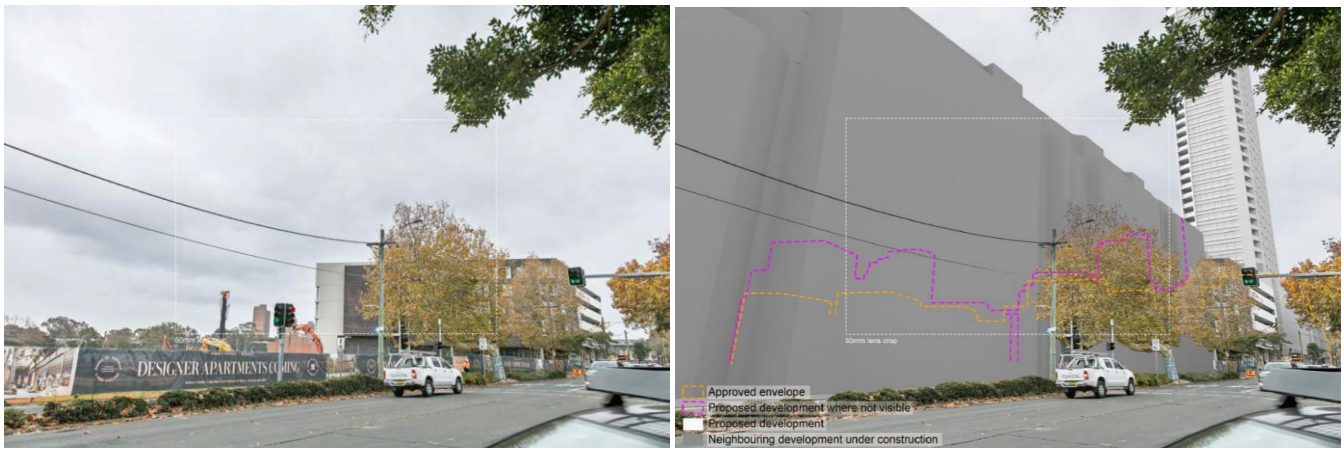


Figure 96 Viewpoint 2: Existing (left) versus the proposed development (right), as viewed from Bourke Street looking northwest

Source: Virtual Ideas

Viewpoint 6: Corner of Bourke Street and Danks Street

The sensitivity of Viewpoint 6 is to be considered low to medium as taller buildings are already visible and not in close proximity to any HCA. The majority of people viewing the proposal will be local residents or the public travelling along Bourke and Danks Street. The site will have high traffic volumes as Bourke Street is a major thoroughfare for private vehicles and busses. The proposal is considered to represent a major change over a restricted area that is ongoing and irreversible. As such the proposal is considered to have a considerable magnitude of change.



Figure 97 Viewpoint 6: Existing (left) versus the proposed development (right), as viewed from Bourke and Danks Street looking southwest

Source: Virtual Ideas

8.5.2 Proposal Specific Visual Impact Grounds

It is the conclusion of the VIA that the proposal can be supported on the following visual impact grounds:

- Is responsive to its strategic context, including being consistent with Greater Sydney's prevailing centres urban form, and strengthens the polycentric urban form of this part of the Eastern Economic Corridor, and Green Square

- Is responsive to its local context, including locating greatest height away from HCAs and adjoining Bourke Street as a key road and public transport
- Is consistent with the existing and emerging prevailing visual character of this part of Green Square dominated by larger scale, higher rise, residential focussed mixed-use buildings, and finer grain visual elements such as being built to adjoining street alignments
- Does not impact designated important public view corridors, will demarcate the important Bourke Street and Danks Street corner as part of the northern gateway visual sequence into Green Square, and will enhance the termination of the Potter Street visual axis
- Has a height and bulk compatible with nearby and other buildings in Green Square, with the taller tower having a height aligned with that emerging in Sydney's growth areas in response to the housing crisis and a well-proportioned, vertically emphasised, slender form
- Enhanced the amenity of the area generally, and specifically the public domain through measures such as a permeable network of public spaces, deep soil plantings, active and high-quality street frontages, street walls that mediate the visual impact of taller buildings, well separated buildings, and an overall distinct, varied but visually cohesive composition
- Exhibits design excellence, including through tangible reference to the site and areas former industrial character through materiality and colour.

8.5.3 View loss and Sharing

The Visual Impact Assessment (VIA) acknowledges that some elevated properties to the south and east may currently enjoy views across the site, including partial views of the Sydney CBD skyline. Given the site's location in the rapidly evolving Green Square area, a high level of change to these views is expected, with some features (like the skyline) potentially being partially or fully obstructed.

The proposal, however, incorporates deliberate design measures to manage impacts. These include maintaining the approved location of the public park, locating taller buildings around the site's edges, situating the tallest tower next to a non-residential commercial building, and adopting a slender tower form that allows views around it compared to a bulkier design.

As a result, some key sightlines, such as from the approved southern tower and upper levels of buildings in the Lachlan Precinct, are likely to be retained. Beyond visual impact, the scheme also performs well against other amenity benchmarks, including solar access to public open space, wind safety and comfort, and the Apartment Design Guide's internal amenity standards, reinforcing the acceptability of the proposed scale.

8.6 Traffic and Parking

A Traffic Impact Assessment has been prepared by Genesis Traffic and is attached at Appendix G. The report addresses anticipated traffic generation and parking impacts of the proposed development.

8.6.1 Parking Provision

Section 6 of the Traffic Impact Assessment addresses the adequacy of the proposed parking provisions as discussed at Section 3.14 above. The Housing SEPP 2021 establishes non-discretionary car parking standards for build-to-rent and affordable housing developments. However, under Clause 1.9 of the Sydney LEP, these provisions do not strictly apply to the site. Accordingly, the Sydney LEP prescribes the applicable maximum parking rates which are outlined in Table 41 below.

Table 41 Maximum Car Parking Rate and Spaces

Land Use	Element	Maximum Parking Rate	Unit/GFA	Requirement
Residential Flat Buildings (Category C)	Studio (inc. City Starter)	0.3 space(s) per dwelling	287 unit(s)	86
	1-Bed	0.5 space(s) per dwelling	308 unit(s)	154
	2-Bed	0.9 space(s) per dwelling	218 unit(s)	196
	3 or More Bed	1.2 space(s) per dwelling plus;	37 unit(s)	44

Land Use	Element	Maximum Parking Rate	Unit/GFA	Requirement
	Each dwelling (up to 30)	0.2 space(s) per dwelling	30 unit(s)	6
	Each dwelling (more than 30 and up to 70)	0.125 space(s) per dwelling	40 unit(s)	5
	Each dwelling (more than 70)	0.067 space(s) per dwelling	780 unit(s)	52
Residential Total				543 Residential Spaces
Retail (Category F)		1.0 space(s) per 50m2 GFA	4,136m^2 GFA	83
Grand Total				626 Spaces

The report confirms that:

- The residential component of SSD 80441462 complies with the relevant parking requirements set out in the City of Sydney LEP. When applied to the proposed unit mix, a maximum of 543 residential spaces is required. The proposal provides for 470 spaces, well below of this maximum.
- The proposed 4,136m^2 of retail GFA requires a maximum of 83 spaces when assessed against the Sydney LEP draft rates. The proposal seeks to include 29 retail spaces well below the maximum retail car parking rate.
- The proposal provides for 62 non-residential spaces, including 15 visitor, 39 retail, 6 car share and 2 car wash spaces. The total proposed parking onsite is 532 spaces which is well below the total maximum car parking rate of 626 spaces.

Accessible Parking

5% of carparking spaces associated with the residential development will be provided as accessible spaces accordance with AS2890.6 requirements for accessible off-street parking. As the site will be held in single ownership, Coronation can allocate accessible parking spaces to tenants on an as-needed basis. The accessible parking will not be tied to a strata plan like it would in a standard build-to-sell development and therefore the proposed approach is considered appropriate. A DDA Report has been provided (Appendix AA) which will provide 5% accessibility ready BTR strategy with the respective accessible parking spaces.

8.6.2 Traffic Generation

Section 8 of the Traffic Impact Assessment addresses anticipated impacts of SSD 80441462 on the surrounding road network. The applicable trip generation rates for high-density residential apartment blocks in this precinct are guided by the rates published in the Dank Street South Precinct Master Plan Transport Assessment (People Trans, 2017). The relevant trip rates are as follows:

Residential

- 0.14 vehicle trips per hour (vtph) per car space during the weekday AM peak hour
- 0.1 vehicle trips per hour (vtph) per car space during the weekday PM peak hour
- 0.21 vehicle trips per hour (vtph) per car space during the weekend peak hour

Commercial

- 1.95 vehicle trips per hour (vtph) per 100m2 GFA during the weekday AM peak hour
- 1.3 vehicle trips per hour (vtph) per 100m2 GFA during the weekday PM peak hour
- 0.1 vehicle trips per hour (vtph) per 100m2 GFA during the weekend peak hour

Retail

- 1.7 vehicle trips per hour (vtph) per 100m2 GFA during the weekday AM peak hour
- 3.4 vehicle trips per hour (vtph) per 100m2 GFA during the weekday PM peak hour
- 3.8 vehicle trips per hour (vtph) per 100m2 GFA during the weekend peak hour

In summary, the report finds that the proposed development would result in less anticipated vehicular trips when compared to the approved 2017 Dank Street South Precinct Master Plan Transport Assessment: this is due to post-COVID changes in behaviour that reflect reduced on-site traffic from food delivery services (Uber Eats, Deliveroo etc). From this, a reduction of 20% to retail-related traffic has been applied to the assessment of traffic

generation modelling compared to the 2017 study. The implementation of conservative trip rates to the development have been applied to the peak hour traffic generation table below.

Table 42 Traffic Generation During Peak Hours

Component	Weekday AM	Weekday PM	Weekend Midday
Residential	72	51	108
Commercial	82	143	160
Total	154	194	268

Source: Genesis Traffic

SIDRA modelling shows the intersection of Bourke and Lachlan Street currently operates beyond capacity under traffic demands (AM and Weekend peaks). It is recommended that the relevant authority (TfNSW and City of Sydney) investigates potential mitigations or upgrades to accommodate the anticipated traffic growth in the local area.

The proposal is expected to affect the traffic flows at the intersection at Bourke and Lachlan Street, resulting in a decline from Level of Service (LOS) B to LOS F in the PM peak. The intersection of Bourke and Potter Street will also decline from LOS A to LOS D in the PM peak and in the weekend peak.

The assessment finds that the primary limiting factor is the presence of approximately 20 on-street parking spaces along Bourke Street between Lachlan and Potter Street. It is therefore considered appropriate for Council to investigate the removal of these spaces, or the introduction of part-time restrictions, to facilitate more efficient traffic flows during peak periods. A diagram of the existing Bourke on street parking is shown in Figure 98 below.



Figure 98 Existing On-Street Parking on Bourke Street

Source: Genesis Traffic

8.6.3 Construction Traffic Management

A Construction Traffic Management Plan (CTMP) has also been prepared by Genesis Traffic and is attached to the Traffic Impact Assessment. The CTMP outlines proposed access arrangements, construction vehicle routes, potential disruptions, and mitigation measures to ensure safe and efficient traffic management throughout the construction period for both Stages 1 and 2 of 881-885 Bourke Street, Waterloo.

The anticipated peak heavy vehicle movements associated with the various phases of the early works will occur during the piling works, bulk excavation works and bracing works phases over a 16-week period. During this period, the anticipated peak daily truck movements is 30 trips. When distributed evenly across a typical 11-hour workday, this equates to an average traffic generation outcome of some 3 to 4 vehicle movements per hour. Traffic generation of this order of magnitude is not significant in the local context and is significantly lower than the post-occupation traffic outcome. On this basis, the assessment finds the proposed construction works would not generate a level of traffic activity that would be adverse to the surrounding road network.

8.7 Noise and Vibration

A Noise and Vibration Impact Assessment (NVIA) has been prepared by Acoustic Logic and is provided at Appendix H. The report assesses the potential noise and vibration impacts of the proposed development, during both its construction and operational phases. The report confirms the proposed development is supportable from an acoustic perspective, with its findings summarised in the below subsections.

Construction Noise

Section 9 of the NVIA discusses anticipated construction noise and vibration impacts of the development. The NVIA identifies the NSW Government's *Interim Construction Noise Guideline* and consider the anticipated impacts to be acoustically acceptable subject to the following recommendations (but not limited to):

- Construction is to be undertaken in accordance with the hours of construction specified in the consent.
- Select the quietest plant/activity available (or retrofit acoustic treatment to the plant such as residential class mufflers) to minimise any risk of exceeding the recommended construction noise levels.
- If any residual exceedances, investigate the use of additional barriers to screen the affected receivers. Barriers should be constructed (or otherwise provided using site sheds, hoardings, etc) along the eastern and western boundary of the site. The barriers should be generally imperforate and constructed of plywood, or other similar material. It is noted it may not be practical to install a barrier to the site access gate to the site.
- If any remaining residual significant exceedances, investigate time restrictions (e.g. avoiding loud early morning works at the residences) and respite periods and notify affected receivers when works likely to exceed the recommended construction noise levels is likely to occur.
- As much as practical, use of quieter excavation methods should be adopted such as ripping, and slow pressure and speed of boring drill if ground conditions permit.
- Excavation is to be conducted through the use of an excavator with a bucket where feasible as this would be the quietest excavation method. Ripping techniques should also be adopted when operating close to structures in the event that vibration management levels are exceeded.
- Concrete pump trucks should generally be located as far as possible from the western boundary (residential receivers) of the site or within the bounds of the site.
- Vibration monitoring is recommended at the western and eastern boundaries of receivers during the following activities: Jackhammering, Excavator mounted hammering, Hydraulic hammering, and Piling.
- Precise monitoring locations are to be determined during installation and monitors are to be moved periodically where feasible to align with the progress of works so that the monitor location represents the worst affected locations.
- Time scheduling works to minimise amenity impacts

Operational Noise

Section 6 of the NVIA sets out the anticipated acoustic impacts during the operational phase of the development. The findings of the NVIA assessment are as follows:

- Although mechanical plant and equipment details are not yet known (as is typical at DA stage), a review of the proposed design indicates that it would be possible and practical to treat all mechanical equipment such that the relevant noise levels are achieved.
- An assessment of the loading dock is anticipated to generally comply with the predicted noise trigger levels (PTNLs) in relation to truck movements and the associated accessories such as a pallet jack associated with the loading dock. The impact is considered acceptable.
- An assessment of food and drinks premises was undertaken with the assumed operating hours of 7am to 10pm. Subject to compliance with the relative legislative requirements (including NSW Liquor and Gaming) will assume that there is an acceptable impact to noise receivers. Mitigation measures will be in place to ensure compliance.

- An assessment of retail premises was undertaken and identifies that any additional mechanical plant installed by tenants of retail premises will require additional reviews from a suitably qualified acoustic consultant. With suitable mitigation measures, retail premises are expected to comply with the established noise emissions criteria.
- An assessment of the gym proposed on Level 6 of Building 1 was undertaken with the assumption of 24/7 operating hours. It is not expected that the reverberant noise levels within the space will be significantly high and the building envelope will sufficiently attenuate noise emission to surrounding land uses.
- An assessment of communal outdoor areas was undertaken and while there is no quantitative criteria for outdoor communal spaces in residential development, design features have been incorporated into the design to limit the impact on noise receivers. These include the distribution across parcels, size and landscaping of communal areas, location of outdoor communal areas to be shielding by buildings and additional setbacks.

Road Traffic Noise

Section 7 of the NVIA identifies that the predicted increase in traffic volumes on surrounding roads as a result of the proposal is less than 50% of the existing traffic volumes. Therefore, the traffic noise levels are predicted to be no more than 1.5dB on any road and predicted to comply with the relevant criteria.

Internal Noise Intrusion

Section 8 of the NVIA identifies that the site is adjacent to a road corridor that requires assessment of the internal noise requirements of the site. The NVIA concludes that subject to the implementation of mitigation measures such as glazed windows and doors and acoustic upgrades to light-weight walls and ventilation requirements, the internal noise intrusion is considered acceptable.

8.8 Flooding

A Flood Impact and Risk Assessment (FIRA) has been prepared by Stantec and is included at Appendix U. It identifies the existing flood behaviour in the locality and assesses if the Proposal complies with the relevant flood controls, identifying any items to be resolved during the detailed design.

This flood assessment, undertaken using a detailed 2-dimensional (2D) hydraulic model in TUFLOW, evaluated flood behaviour under both existing and post-development conditions across a range of design storm events. To account for climate change, a 30% increase in rainfall intensity was applied to the 1% AEP event, consistent with the methodology outlined in the Council's adopted Flood Study.

The modelling results indicate that the proposed development will have minimal impact on flood behaviour off-site, with changes in flood levels and extents being acceptable. The site is generally flood free during the 1% AEP event both with and without climate change, and flood impacts within the site during the PMF are acceptable as safe evacuation routes are available. Ultimately, the proposed development complies with the general flood requirements from the DCP.

The proposed development is not anticipated to impact flooding in or around the site during the 1% AEP event, and flood levels are unchanged except in a small area to the east of the site where levels increase by 70 mm. The small area of increased level is concentrated to the road verge and flood hazard remains category H1 – generally safe for people, vehicles and buildings, making this impact negligible. On the contrary, the proposed development causes flood levels to decrease by 115 mm at the intersection between the proposed eastern access road and Bourke Street. The now wet areas at the northwest boundary of the site and at the proposed eastern access road are category H1 flood hazard and have no negative impact. See Figure 99 below for the proposed development during the 1% AEP event.

The proposed development complies with the required flood planning levels as shown at Figure 101 and the FIRA at Appendix U.

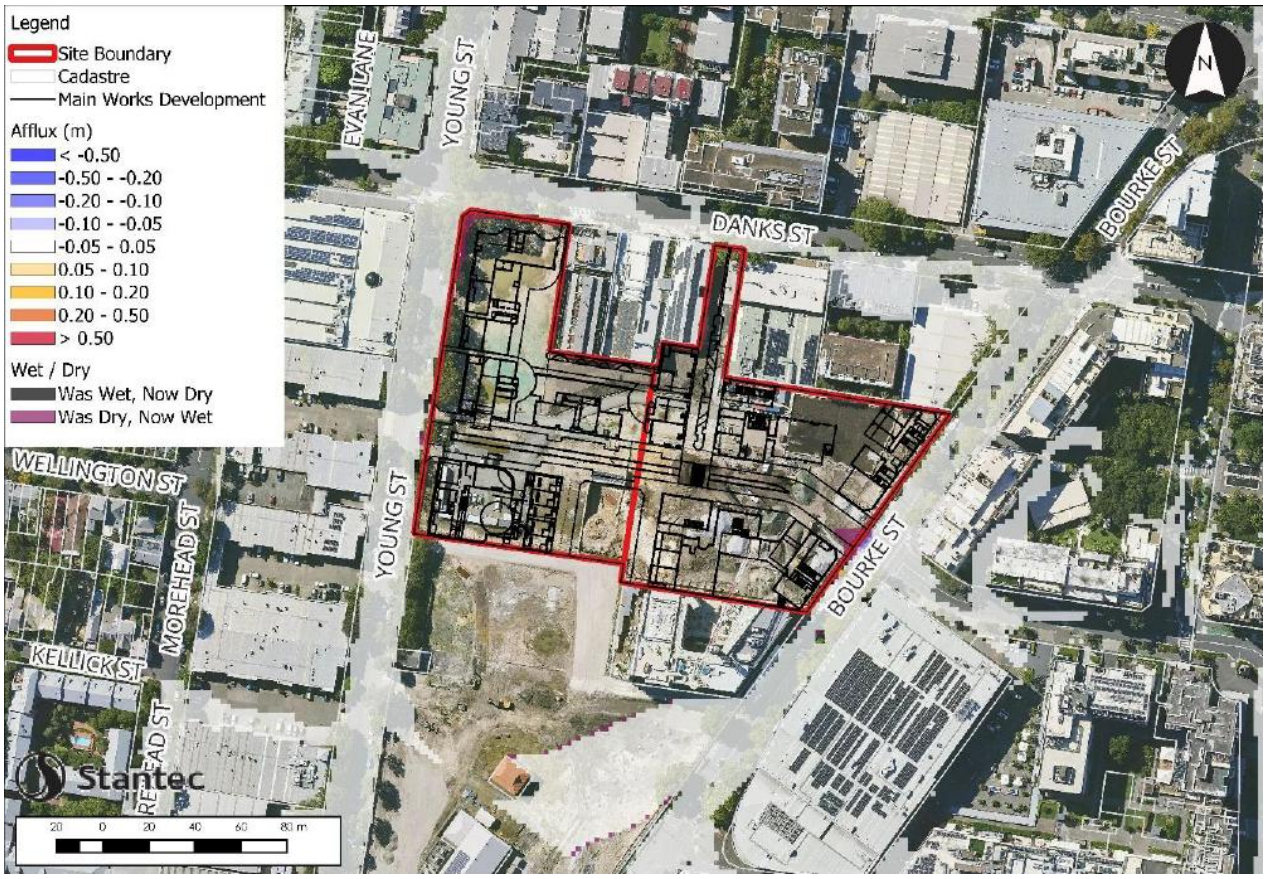


Figure 99 Flood impact associated with the proposed development during the 1% AEP eventS

Source: Stantec

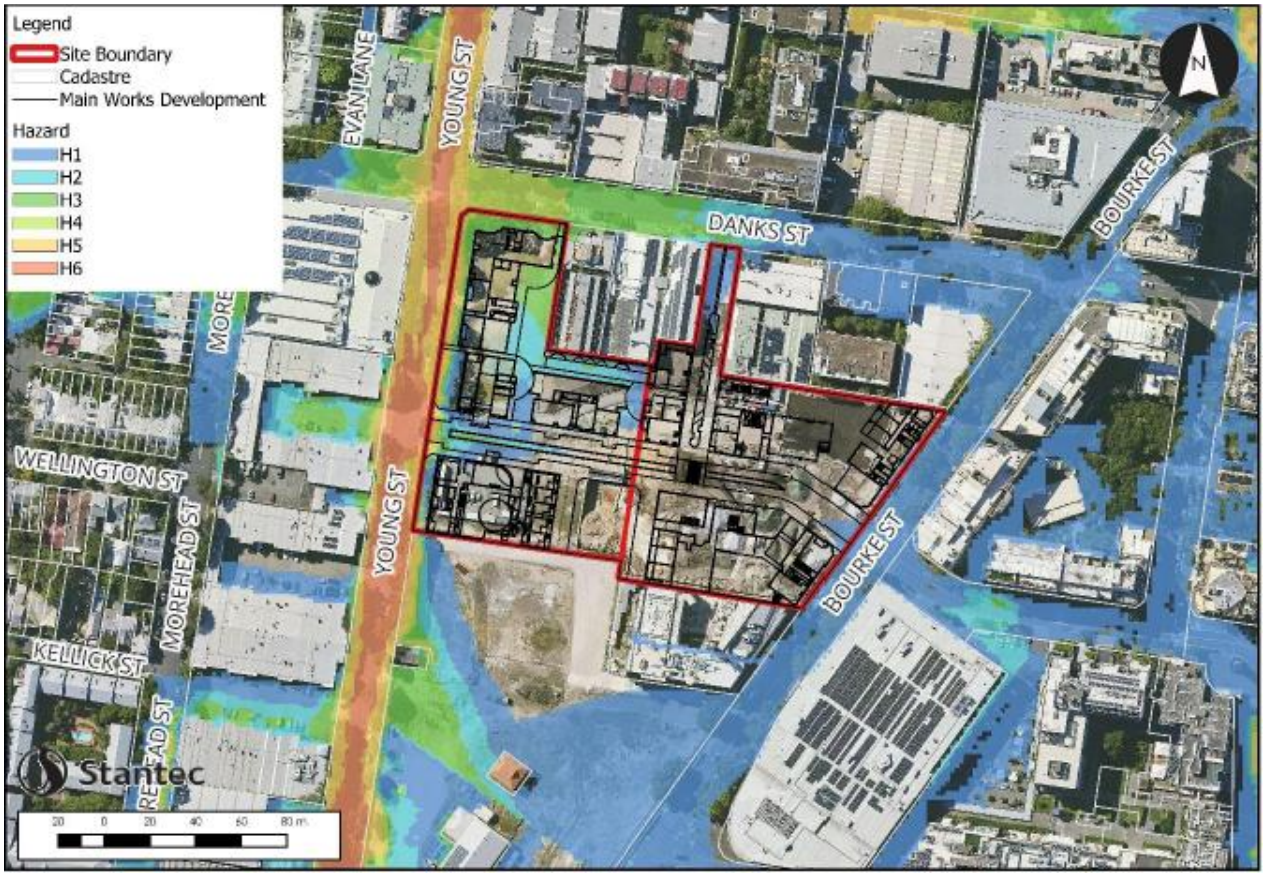


Figure 100 Flood impact associated with the proposed development during the PMF

Source: Stantec

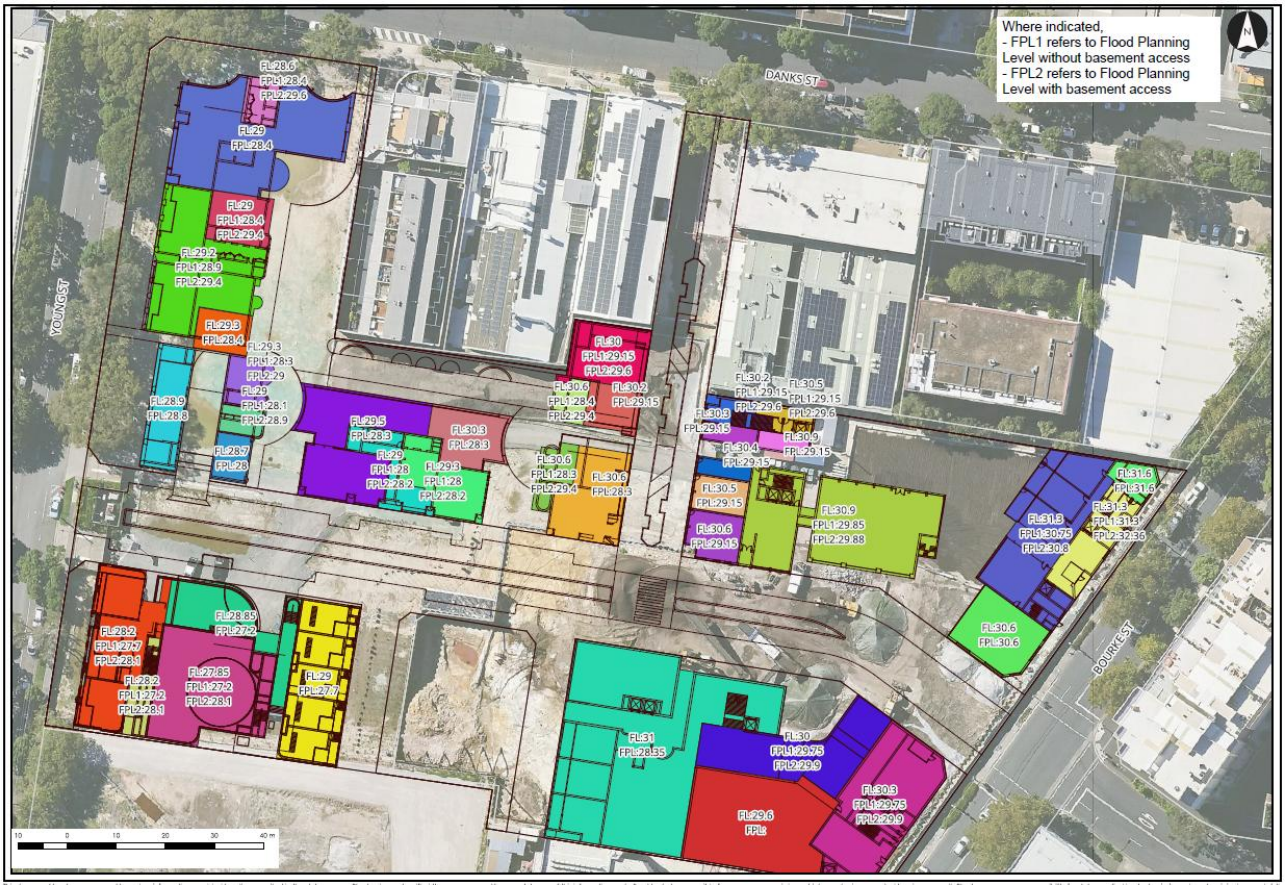


Figure 101 Site layout plan showing flood planning levels are met

Source: Stantec

8.9 Ground and Water Conditions

8.9.1 Geotechnical

A Geotechnical Investigation has been prepared by EI Australia and is included at Appendix J. The Geotechnical Investigation responds to the potential impacts on soil resources and related infrastructure including soil erosion, salinity and acid sulfate soils. The investigation included 12 boreholes auger drilled

Table 43 Summary of Geotechnical Model

Rock Unit/Classification	Description
Unit 1 –Fill	Sandy gravel and clayey sand fill up to 0.5m.
Unit 2a – Marine Soil	Fine to medium grained sand, very loos becoming medium dense between 0.5m and 4.5m.
Unit 2b – Residual Soil	Medium to high plasticity silty clay with traves of ironstone gravels between 1.5m and 10m.
Unit 3 – Class V Sandstone	Low strength and distinctly weathered sandstone between 6.6m and 12m.
Unit 4- Class IV Sandstone	Fresh sandstone with occasional bands of medium to high strength between 6.8m to 12.4m.
Unit 5 – Class III Sandstone	Fresh sandstone of medium to heigh strength sandstone between 9m and 11m.

Source: EI Australia

The Geotechnical Investigation has concluded that the proposed development is suitable from a geotechnical perspective and will not result in unacceptable impact, subject to implementation of the geotechnical advice provided at Section 4 of the Geotechnical Investigation (Appendix J). Additionally, it is noted that additional testing will be required to be undertaken within the Stage 2 area. Specific mitigation measures are contained within the Mitigation Measures at Appendix C.

8.9.2 Surface and Groundwater

A Hydrogeological Report, including an assessment of Groundwater Seepage and Dewatering has been undertaken by EI Australia and is provided at Appendix I.

To mitigate any groundwater seepage effects, an impermeable shoring wall will be implemented. The shoring wall should be socketed into a low-permeability stratum to reduce the potential for groundwater ingress into the excavation area.

Based on the analysis findings, the predicted groundwater drawdown behind the shoring wall surrounding the basement boundary is generally less than 1m, with a localised maximum drawdown of up to 4m observed between Parcel 3 and 4. The resulting ground settlements outside the site boundary due to the proposed dewatering are estimated to be less than 6mm. This level of settlement is considered to pose a negligible risk in terms of the category risk due to dewatering.

The shoring wall should be socketed into a low-permeability stratum to reduce the potential for groundwater ingress into the excavation area.

Based on the findings of the assessment, the following conclusions were made:

- The predicted groundwater take during the construction phase is approximately:
  - 36.4ML from initial dewatering of pore water within excavated materials and
  - 12.5ML from groundwater seepage through the basement footprint.
- The predicated groundwater drawdown behind the shoring wall surrounding the basement boundary is generally less than 1m, with localised areas of up to 4m observed between Parcels 3 and 4.
- The ground settlements resulting from the predicted groundwater drawdowns outside the site boundary are estimated to be less than 6mm. This level of settlement is considered to pose a negligible risk category for damage resulting from the ground settlement dur to dewatering.

Subject to the implementation of mitigation measures relating to excavation, foundations and dewatering, it is considered that the proposed development can be geotechnically viable. The recommended mitigation measures are summarised in Appendix C.

8.9.3 Acid Sulfate Soils

A Soil Salinity Assessment has been prepared by EI Australia (Appendix II). The site is located in an area of 'no known occurrence' of acid sulfate soils and it is concluded that the potential for saline soils to be on the site is very low and the preparation of a salinity management plan is not required.

8.10 Water Cycle Management

An Integrated Water Management Report has been prepared by Stantec and is located at Appendix Y.

Civil Services

The civil scope for proposed stormwater drainage shall comprise the in-ground pit and pipe network external to the building and external overland flow paths. For stormwater drainage associated with suspended slabs and roof drainage, refer to the Hydraulic Engineer's design documentation.

Stormwater Drainage

Roof areas shall be captured via a downpipe system and discharged to the proposed below-ground stormwater network. Surface flows shall be captured via a pit and pipe network and shall eventually discharge into Council's network in public domain. The DRAINS model has been prepared to confirm that the proposed stormwater pit and pipe network is adequately sized to capture and convey the 5% AEP storm. Overland flow paths have been adequately sized to convey the 1% AEP storm flows safely across the site in a north-westerly direction. The OSD design for an AEP 1% event in each parcel is shown in Table 44 below.

Table 44 OSD Design for AEP 1% across each Parcel

Parcel	Minimum OSD Volume Required by Sydney Water (m^3)	Maximum PSD Required by Sydney Water (m^3/s)	OSD Post-Development Discharge (m^3/s)	Bypass (m^3/s)	Total Post-Development Discharge (m^3/s)	Minimum OSD Volume Required (m^3)
Parcel 1	98	0.236	0.225	0.000	0.225	98
Parcel 2	50	0.119	0.111	0.000	0.111	50
Parcel 3	45	0.109	0.109	0.000	0.109	45
Parcel 4	32	0.075	0.070	0.000	0.070	32

Source: Stantec

Water Sensitive Urban Design

City of Sydney Council's Development Control Plan (2012) has set serviceability requirements for the stormwater conveyance network such that minor flows are conveyed through piped drainage, and major flows are discharged via controlled overland flow. These requirements are outlined below:

- Where the development site area exceeds 1000m2, a stormwater quality assessment must be undertaken to demonstrate that the development will achieve the post-development pollutant load standards specified below:
- Reduce the baseline annual pollutant load for litter and vegetation larger than 5mm (gross pollutants (GP)) by 90%;
- Reduce the baseline annual pollutant load for total suspended solids (TSS) by 85%;
- Reduce the baseline annual pollutant load for total phosphorus (TP) by 65%, and;
- Reduce the baseline annual pollutant load for total nitrogen (TN) by 45%.
- The stormwater quality assessment is to include the following:
- Modelling of pollutant load standards with an industry-standard water quality model;
- The design of WSUD measures used to achieve the post-development pollutant load standard, and;
- Maintenance schedules of any proposed WSUD measure that requires maintenance or full replacement.
- The stormwater quality assessment is to include the following:
- Filtration basket inserts in stormwater pits;
- Filtration cartridges in stormwater manholes/OSD tanks;
- Biofiltration basins;
- Rainwater Tanks.

Stormwater Network Maintenance Schedule

In order to ensure the ongoing effective operation of the stormwater network and water quality treatment devices, the devices must be maintained in accordance with manufacturer recommendations/requirements and general best practice. Table 45 below summaries the various stormwater network components that must be maintained throughout the operational phase of the development.

Table 45 Stormwater Component Maintenance Schedule

Use 'Table Heading' type style	
Pit and Pipe Network	A general inspection of the stormwater pit network is to be undertaken every 6 (6) months and after major storm events. The general inspection involves visual inspection inside pits, removal and disposal of larger gross pollutants within pits in accordance with waste disposal regulations to prevent blockages, and minimal rectification works as required. Inspection of general pits can coincide with inspection and maintenance of water quality pit inlets (if applicable).
OSD Tanks	A general inspection of the OSD tank is to be undertaken at a minimum every 6 (6) months and after major storm events. The general inspection involves visual inspection inside the tank, condition of components such as orifice plates and

Use 'Table Heading' type style	
	valves, removal and disposal of larger gross pollutants within pits in accordance with waste disposal regulations to prevent blockages, and minimal rectification works as required. Inspection of general pits can coincide with inspection and maintenance of water quality pit inlets (if applicable). It is expected that the tanks are hosed out and cleaned on an annual basis to ensure required performance can be achieved.
Water Quality Treatment Devices	A general inspection of the filtration cartridges located in a Stormfilter chamber within the OSD tank, is to be undertaken every 6 (6) months and after major storm events or a hazardous material spill. The general inspection involves visual inspection of the Stormfilter cartridges and chamber, removal and disposal of larger gross pollutants from the device in accordance with waste disposal regulations to prevent blockages, and minimal rectification works as required. Cartridges are also to be checked to ensure they are all firmly connected to the connectors.
Civil Structures	A general inspection of civil structures such as retaining wall and road subsoil and associate drainage across a site should be undertaken annually. The general inspection involves visual inspection, with identified defects assessed by applicable qualified engineers

Erosion and Sediment Control

Landcom's "Managing Urban Stormwater – Soils and Construction" (the Blue Book) is the NSW standard for erosion and sediment control, with City of Sydney Council requiring compliance in their technical manual. During early works, standard measures such as perimeter silt fences, kerb inlet protection, vehicle shakedown devices, and diversion swales will be implemented in line with the Blue Book, Australian Rainfall and Runoff 2019, and best practice engineering.

8.11 Waste Management

8.11.1 Construction Waste Management

The Construction Waste Management Plans have been prepared by Elephants Foot Consulting where they are located at Appendix R. The report draws on a range of guidance materials at the local, state, and federal levels, relevant to construction waste management. The key references include:

- City of Sydney Council: 'Guidelines for Waste Management in New Developments 2018'
- *Construction and Demolition Waste Guide – Recycling and Re-use Across the Supply Chain* (Australian Government, Department of Sustainability, Environment, Water, Population and Communities, November 2014)
- NSW Waste Avoidance and Resource Recovery (WARR) Strategy 2014–2021
- NSW Waste and Sustainable Materials Strategy 2041 (WaSM 2041)
- NSW Waste Classification Guidelines (2014)
- Australia's National Waste Policy (2018)

All stakeholders are responsible for managing their environmental performance and complying with all relevant legislation. The Construction Contractor will have primary responsibility for implementing this WMP. However, all site personnel must ensure they comply with the plan and associated environmental requirements at all times. Where feasible, an Environmental Management Representative (EMR) should be appointed to support implementation and monitor compliance.

Construction Waste

The estimated volumes of construction waste by material stream have been presented in Table 46 below.

Table 46 Construction Waste Volumes and Management

Material	Volume (m^3)	Mass (t)	Recovery %	Diverted (t)
Green Waste	116	35	95%	33

Material	Volume (m^3)	Mass (t)	Recovery %	Diverted (t)
Bricks	1048	1676	90%	1509
Tiles	87	157	90%	141
Concrete	2110	5064	95%	4811
Timber	538	323	80%	258
Plasterboard	233	116	30%	35
Metals	7028	56228	98%	55103
Asbestos	44	44	0%	0
Residual Waste	87	26	10%	3
Other Waste	1499	749	20%	150

Source: Elephants Foot Consulting

Based on Elephants Foots calculations, 96% of construction waste is expected to be diverted from landfill, exceeding the NSW WARR Strategy target of 80%. The results show that most construction waste streams can be effectively reused or recycled, ensuring that landfill disposal is limited to residual materials and supporting the achievement of high diversion rates. The disposal pathways for the waste streams expected during the construction phase of the project are been outlined in Table 47 below.

Table 47 Construction Waste Disposal Pathways

Material	Reuse On Site	Recycled	Landfilled	Comments
Excavation Material	Yes	Yes	No	Clean spoil reused as backfill or sent as clean fill
Green Waste	Yes	Yes	No	Mulch/compost
Bricks	Possible	Yes	Residual	Crushed to aggregates
Tiles	No	Yes	Residual	Crushed to aggregates
Concrete	Possible	Yes	Minimal	Crushed for road base/aggregate
Timber	Possible	Yes	Yes	Untreated timber recyclable; treated to landfill
Plasterboard	No	Yes	Residual	Specialised gypsum recycling
Metals	No	Yes	No	Scrap metal recovery
Asbestos	No	No	Yes	Licensed disposal only
Residual Waste	No	Limited	Yes	Unrecyclable mixed waste
Other Waste	Yes	Yes	Yes	Depends on material type

All staff during the construction phase of the development must follow the site-specific operational measures outlined in the CWMP that will outline the waste management procedures including the removal of waste products, the selection and ordering if materials, opportunities for waste avoidance and general site procedures.

The frequency of waste removal from site will be determined by the volume of materials deposited into the dedicated skip bins. Skip bins will be monitored on a daily basis by the site Manager to ensure they do not overflow. If skip bins are reaching capacity, removal and replacement should be organised for within 24 hours.

All waste collection for construction works will be conducted between approved hours as per Council requirements (typically between 7am and 7pm Monday to Friday, and between 7am and 1pm on Saturdays). All waste generated on site will be transported to an approved and appropriately licensed resource recovery facility and/or landfill site. A location of where the skip bins will be location during the construction phase is identified in Appendix S.

8.11.2 Operational Waste Management

Methodology

The Operational Waste Management Plans have been prepared by Elephants Foot Consulting where they are located at Appendix S. The Operational WMP addresses the waste management aspects associated with the local, state, and national requirements for the proposed development. It adopts waste generation rates from the City of Sydney's *Guidelines for Waste Management in New Developments 2018* and Sydney DCP 2012 to calculate the number of general waste and recycling bins required for the residential and retail uses. Better Practice Guide for Resource Recovery in Residential Developments (NSW EPA, 2019) has been referenced to calculate the total number of bins for the residential and mixed-use buildings across the 4 parcels.

Operational Waste

Separate waste storage rooms are provided for each use, as demonstrated within the Architectural Drawings (Appendix D). The Operational Waste Management Plan at Appendix S provides additional details of how waste from the various uses will be managed via the common loading docks across the east and west parcels.

Each residential unit will be provided with a storage area capable of holding separate receptacles for general waste, recycling and food organics. This is typically located within kitchen areas beneath the workbench. This space should be sized to accommodate 40L receptacles (minimum) to account for 2 days' worth of general waste, recycling and 20L for food organics storage.

The general waste will discharge from the chute into 1100L bins on linear tracks and the recycling will discharge into 1100L bins on linear tracks in the Chute Discharge Rooms located in basement 1. The building manager will monitor bin capacities under the dual chute systems and exchange full bins with empty bins on the track systems when required.

A private waste contractor using an SRV will be engaged to service the retail general waste and recycling bins as per an agreed collection schedule. This report assumes that general waste, recycling and food organics are collected 3 times weekly. On the day of service, a private waste collection vehicle will enter the site from Bourke Street and park in the loading bay on the basement level of parcel 1. The waste collection staff will collect the bins from the Retail/Commercial Bin Room. Once the bins are serviced, the collection vehicle will exit the site onto Bourke Street in a forward direction. The breakdown of each parcels retail and commercial collections are outlined in Table 48 below.

Table 48 Commercial and Retail Bin Collection Summary

Waste	Parcel 1 & 4	Parcel 2 & 3
General Waste	2 x 1100L bins collected 3 x weekly	2 x 1100L bins collected 3 x weekly
Recycling	6 x 1100L bins collected 3 x weekly	8 x 1100L bins collected 3 x weekly
Food Waste	5 x 240L bins collected 3 x weekly	5 x 240L bins collected 3 x weekly

8.12 Social Impact

A Social Impact Assessment Scoping Study has been prepared by Ethos Urban to assess potential social impacts and to determine whether a comprehensive SIA is required as part of SSD-80441462 (Appendix T).

The methodology undertaken for informing the assessment of preliminary social impacts included site analysis including a site visit, review of previous engagement outcomes undertaken for the Concept DA (D/2020/45) undertaken between 19 February and 19 March 2021, review of consultation undertaken by Ethos Urban in June 2025 for the project, high level demographic analysis and analysis of relevant policy and identification of potential impacted communities.

A range of both positive and negative social impacts are likely to be experienced by impacted communities because of the project.

The Social Impact Assessment Scoping Study finds positive social impacts related to the increased supply of housing, increased provision of residential amenities, new retail offerings and enhanced opportunities for construction employment pathways. It also found some negative social impacts related to the increase in density and height and population uplift which could result in pressure on infrastructure and services and construction related impacts. In relation to this last social impact, the Scoping Study notes that comments were raised during the community engagement process around pressures on social infrastructure. In response to this and the

expected residential population uplift, the Scoping Study recommends that a Social Infrastructure Assessment is undertaken to understand the pressures on local infrastructure such as schools, health and local open space.

Besides this matter, the Scoping Study finds that other social impacts can be mitigated and therefore a comprehensive SIA is not required.

8.13 Adequacy of Surrounding Social Infrastructure

An analysis of the adequacy of surrounding social infrastructure has been undertaken by Ethos Urban (Appendix N) following feedback raised during community consultation on concerns regarding local infrastructure demands generated by the proposal. The assessment finds that the proposed development is unlikely to generate demand for any additional community infrastructure or open space, due to the following reasons:

- The BTR development type (with high proportion of studio and 1-bedroom apartments) which will predominately attract young couples and singles and a low proportion of family households. This influences the low demand on infrastructure like childcare and schools.
- Relatively small on-site population when considering future population for Green Square City South and the established location of Waterloo. This means that existing community facilities and open space can absorb demand (if any) of the future population on-site.
- On-site provision of open space and communal facilities including 2 public parks and other on-site residential amenities like co-working spaces, a pickle ball court, lounge areas, music and podcast studios and a cinema.

8.14 Economic Impact

The economic impact of the proposed development has been considered at a local and regional level and outlines the market demand and opportunity for proposed uses at the site. The project will deliver approximately 850 dwellings, including build-to-rent (BTR), affordable housing, and city starter apartments, alongside retail and public domain improvements. The assessment considers both short-term and long-term economic impacts at the local and metropolitan levels.

Construction Phase Impacts

The construction phase is expected to generate significant economic activity through capital investment, employment, and procurement. The project will support hundreds of direct jobs in construction, engineering, and project management, as well as indirect employment in supply chains, logistics, and local services. This will contribute to economic stimulation within the Waterloo precinct and surrounding areas.

Operational Impacts

The following economic impacts and benefits are anticipated:

- Residential:
  - There is a significant market need for residential dwellings in the City of Sydney to assist in meeting the demands of the National Housing Accord and targets for housing in Sydney. Sydney is currently experiencing a housing supply shortage, particularly in the rental sector. The proposed development is in an area that is expected to experience extreme growth and is undergoing mass growth and development surrounded by approved and constructed high density housing.
  - The inclusion of BTR and affordable housing stock will help alleviate pressure on the rental market by increasing availability and diversity of housing options. BTR developments offer professionally managed, long-term rental accommodation, improving tenant stability and housing quality. Affordable housing and city starter apartments will support key workers and young residents, enhancing workforce retention in central Sydney.
- Retail and Local Economy Activation:
  - The development includes approximately 4,450m^2 of non-residential GFA, which will activate the ground plane and contribute to the revitalisation of the Danks Street precinct. This retail offering will attract foot traffic, support small businesses, and create ongoing employment opportunities. The integration of public domain improvements, including a through-site link and open space, will enhance pedestrian connectivity and encourage community engagement with local commerce.
- Long-Term Economic Resilience
  - Institutional ownership of BTR housing contributes to a more stable rental market, reducing volatility and improving tenant outcomes. This supports broader economic productivity by enabling residents to live closer to employment hubs and reducing commuting costs. The development aligns with NSW

Government objectives to expand BTR housing and improve access to affordable living in strategic urban locations.

- Public benefit Contributions and the VPA
  - The proposed development includes land dedication and public benefit under the VPA which will support local infrastructure, community facilities, and public services, enhancing the economic sustainability of the precinct and reducing future public expenditure.

The proposed development will deliver substantial economic benefits through job creation, housing supply enhancement, retail activation, and long-term market stability. It represents a strategic investment in inclusive urban renewal and supports the economic growth objectives of the City of Sydney and the NSW Government.

8.15 Assessment of Other Impacts

An assessment of the other impacts of the development have been undertaken by the relevant specialist consultants and other issues have been assessed as required in Table 17.

Table 49 Other Issues

SEARs	Issue	Assessment
21	Aboriginal Cultural Heritage	The Aboriginal and Historical Archaeological Due Diligence Assessment prepared by Curio Projects (Appendix NN) concludes that there is nil-low potential for Aboriginal archaeological resources and Low potential for historical archaeological resources to be present within the site. As a result, they confirm that there is no requirement for an Aboriginal Cultural Heritage Assessment Report or Archaeological Assessment. Notwithstanding this, previous consultation undertaken by the City of Sydney to inform their public domain plan for the wider precinct has informed the Design Team in their approach to the site which has been informed by a Connecting with Country Framework (Appendix GG).
22	Environmental Heritage	The proposal will result in minor to neutral impacts on the surrounding heritage items and conservation areas. This is due to the physical separation between the site and heritage assets, the prior disturbance of the site, and the incorporation of sensitive built form design which includes stepped podium forms, landscaped setbacks, and the use of materials and colour palate along with architectural articulation that can respond appropriately to the surrounding built form and streetscape character and which will not detract from or dominate significant view lines. The proposal aligns with the anticipated future urban context of the area and offers opportunities to enhance public appreciation and connectivity to nearby heritage items. Accordingly, the development is able to be compatible with the surrounding heritage context.
13	Contamination and Remediation	A contamination and remediation study were conducted in October 2024 for Stage 1 early works on the site. The plans found the site was suitable for basement excavation works for residential purposes. Stage 2 works do not seek to make any changes to the approved contamination and remediation plans and will work in accordance with these approved plans. Please refer to the letter prepared by EI Australia confirming that the site is suitable to the proposed development as found in Appendix K.
16	Biodiversity	The proposed development is in a highly urbanised area without significant vegetation and therefore is not likely to impact a matter of National Environmental Significance. Therefore, the proposed development is not required to be referred to the Federal Department of the Environment to determine if it constitutes a controlled action and the bilateral agreement applies. A BDAR Waiver has been prepared and is provided at Appendix Q.
20	Bushfire	The development is not located on mapped bush fire prone land and a bush/grass fire threat is not identified on or adjoining the site. As such, a Bush Fire Assessment detailing bush fire protection measures and compliance with Planning for Bush Fire Protection is not required for this SSDA.
24	Hazards and Risks	The Applicant has undertaken a Dial Before You Did (DBYD) analysis and advise that there are no items that warrant a hazards assessment to be undertaken.
15	Ecologically Sustainable Development	An Ecologically Sustainable Development report has been prepared by JHA Services and is located at Appendix P. It provides an assessment of the Proposal against the applicable sustainability requirements and targets, identifying the strategies proposed to be implemented and demonstrating compliance. It is supported by NatHERS and BASIX Certification and Section J Assessment also prepared by Efficient Living and included at Appendix EE.

SEARs	Issue	Assessment
N/A	BCA	The BCA Report confirms that the proposed development is capable of complying subject to the implementation of mitigation measures.
N/A	Accessibility	A DDA report confirms that the proposed development is capable of complying subject to the implementation of mitigation measures.
N/A	Aviation Impacts	The Aviation Report confirms that the Building 3A tower exceeds the Obstacle Limitation Surface and therefore requires approval from Sydney Airport and/or the Civil Aviation Safety Authority. Building 3A is below the height of the PANS-OPS and RTCC surfaces which cannot be penetrated.

9.0 Project Justification

In general, investment in major projects can only be justified if the benefits of doing so exceed the costs. Such an assessment must consider all costs and benefits, and not simply those that can be easily quantified. This means that the decision on whether a project can proceed or not needs to be made in the full knowledge of its effects, both positive and negative, whether those impacts can be quantified or not.

The proposed development involves consent for a residential development comprising of 9 residential flat buildings and the delivery of build-to-rent dwellings, affordable housing and City Starter apartments, as outlined in Section 3.0. The assessment must, therefore, focus on the identification and appraisal of the effects of the proposed change over the site's existing condition.

In considering the justification of the proposed development and in reference to Section 4.15 of the EP&A Act which specifies matters for consideration a consent authority must consider in determining a development application, the following matters have considered:

- Design of the proposed development, including actions taken to avoid or minimise the impact of the proposed development while still achieving the objectives of the project.
- Consistency with the strategic context.
- Consistency with the statutory requirements.
- The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.
- The suitability of the site for the development.
- The public interest.

9.1 Design of the Proposed Development

The alternatives considered and actions taken to avoid or minimise the impacts of the proposed development have been set out in the preceding sections of this EIS. The proposed mitigation measures are set out in Appendix C of this EIS. Subject to the implementation of these mitigation measures, in addition to the considered and thoughtful design response, it is considered that any potential impacts of the proposed development will be managed effectively and/or are minimal and acceptable.

9.2 Consistency with the Strategic Context

The strategic context for the proposal for the proposal has been discussed at Section 3.0 of this EIS, and the proposed development is considered to be consistent with the relevant strategic context. The proposal is consistent with the National Housing Accord and aims to deliver a greater amount and choice of new homes, including affordable homes. Additionally, the proposed development is consistent with the strategic planning framework including the Region Plan, District Plan and LSPS, this housing is provided in a well located area within existing urban areas that is in particular well served by public transport.

9.3 Consistency with the Statutory Requirements

The relevant statutory requirements have been discussed in Section 6.0 and assessed in Appendix C.

Specifically, this EIS has addressed all of the matters specified in the issued SEARs dated 5 March 2025 (refer to Appendix A) and Section 190 and 192 of the EP&A Regulation (refer to Appendix C).

9.3.1 Consistency with the Objects of the Act

The Proposal is consistent with the relevant Objects of the Act as listed under Section 1.3 of the EP&A Act and will not result in any unjust or significant environmental impact. Specifically, the Proposal is consistent with the Objects of the Act for the following reasons:

- It promotes the delivery of diverse housing in the form of build to rent, affordable housing and city starter housing to accommodate the growing population of Sydney LGA and Greater Sydney more broadly. It will positively contribute to housing supply and affordability.
- It promotes the orderly and economic use of land by redeveloping a underutilised site that is currently below its development potential and provides housing in an accessible location.

- ESD principles are embedded through a range of design and operation initiatives.
- The proposed development will not result in any adverse impacts to threatened species or ecological communities and this has been demonstrated through the obtainment of a BDAR Waiver.
- It will generate employment opportunities during the construction and operational phases.
- The proposal has engaged with the NSW SDRP to develop a scheme which achieves good design and amenity outcomes.
- It incorporates good design and amenity of the built environment, as demonstrated in the assessment section of this report.
- The proposal does not adversely impact Aboriginal cultural heritage. Designing with Country and Connecting with Country has informed the proposal to ensure it is built into and celebrated within the proposal.
- The project team has undertaken consultation and feedback with all relevant stakeholders (Section 7.0).
- The site is suitable for the proposed development and is in the public interest.

9.3.2 Principles of Ecologically Sustainable Development

Section 193 of the EP&A Regulation outlines 4 (4) principles of ecologically sustainable development to be considered in assessing a project. They are:

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

An analysis of these principles is provided in the following sections.

Precautionary Principle

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

The proposal is being designed in accordance with a wide range of ESD goals that pertain to the design, construction, and operational stages. The development team will ensure that the building minimises the impact on the environment in the areas of energy, water, and materials. The design will incorporate energy efficiency-favoured passive design features to minimise severe or irreversible environmental damage.

In addition to the above, an *Environmental Pre-screening Checklist* has been undertaken to include the assessment of natural and urban hazards (e.g., storms, heat waves, bushfires, extreme storms, and other weather events). Increasing resilience to natural hazards has been considered in the development so that associated costs are budgeted.

Intergenerational Equity

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

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

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

Conservation of biological diversity and ecological integrity

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

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

Improved valuation, pricing and incentive mechanisms

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

9.4 Likely Impacts of Development

Having regard to the natural environment, built environment and economic and social impacts of the proposed development, the likely impacts of development are considered acceptable as outlined in the following sections.

Additionally, the proposed mitigation measures detailed within Section 8.0 and Appendix E outlined mitigation and management measures that will minimise the impact of the proposed development.

Natural and Built Environment

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

All relevant environmental impacts are addressed within Section 8.0, and determined to be acceptable subject to implementation of the proposed mitigation measures set out at Appendix C.

Social and Economic

An assessment of the likely social impacts of the project has been undertaken in the Social Impact Assessment at Appendix T, prepared in accordance with DPHI's *Social Impact Assessment Guidelines 2021*. The assessment confirms that the proposal has the following positive social impacts:

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

Any negative social impacts arising from the development, including cumulative construction impacts and cumulative demand on social infrastructure can l be appropriately mitigated through the proposed mitigation measures set out at Appendix C.

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

9.5 Suitability of the site

Having regard to the characteristics of the site and its immediate surrounding context, the proposed development is suitable for the site for the following reasons:

- The site is located within the MU1 Mixed Use Zone and E1 Local Centre.
- The proposed development will allow for the development of a dilapidated and currently underutilised site.
- The site is located within Waterloo and the City of Sydney which has a prevailing medium and high-rise built form that will continue to evolve over time as redevelopment occurs across the City of Sydney and the proposed development is consistent with that typology and also responds to the lower density character which surrounds the site through the careful placement of built form across the site and design of the podiums.
- All necessary utility services are readily available to the proposal, and are capable of accommodating any additional demand that may be associated with the residential uplift proposed for the site.

- The size and dimensions of the site are suitable for the scale of the proposed development and can accommodate large building heights without adversely impacting the surround area.
- The site is proximate to a range of high-frequency public transport options, including buses along Elizabeth Street and Bourke Street and Green Square State and Waterloo Station.
- The proposal is sympathetic to surrounding existing residential premises, surrounding heritage items and the broader context of Waterloo and the Danks Street Precinct.

9.6 Public Interest

Having regard to the public interest, the proposed development is in the public interest for the following reasons:

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

10.0 Conclusion

This Environmental Impact and Rezoning Statement has been prepared to consider the natural environment, built environment and social and economic impacts of the proposed mixed-use housing development at 881-885 Bourke Street, Waterloo, under the NSW Governments Housing Delivery Authority accelerated planning pathway to meet the National Housing Accord.

The Report has addressed the issues outlined in the SEARs (Appendix A) and accords with section 190 and 192 of the EP&A Regulation.

Having regard to environmental and economic and social considerations, including the principles of ecologically sustainable development, the carrying out of the project is justified for the following reasons:

- The proposed development will not result in adverse environmental impacts, with appropriate mitigation measures that will minimise any potential impact.
- The proposal will provide significant, diverse residential supply at the site (including 777 BTR and 73 affordable housing apartments) proximate to a range of employment opportunities in the southern fringe of inner Sydney. This will contribute directly to the objectives of the HDA and the National Housing Accord.
- The proposed development is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including the SLEP 2012 (where it is not proposed to be amended). Where not compliant, amendments to the SLEP 2012 are proposed and justified to accommodate the development.
- Direct employment opportunities will be created during the construction and operational phases of the proposal.
- The proposed development provides improved amenity by revitalising a currently underutilised property for significant housing supply. Further, the large size and scale of the site in single ownership makes it appropriate to accommodate a high-density development while mediating taller built form to integrate with the surrounding area.
- The proposed development is suitable for the site and in the public interest.

Given the merits described above, and the significant benefits associated with the proposed development, it is requested that the application be approved.