



TO: Department of Planning, Industry and Environment,
Locked Bag 5022,
Parramatta NSW 2124

2 December 2020

Dear Assessment Team,

**REDWatch Submission on the proposed Waterloo Metro Quarter
Over Station Development for development applications SSD-10437
SSD-10438 SSD-10439 SSD-10440 & SSD-10441**

Thank you for the opportunity to comment on these five inter-related DAs. As the areas inter-relate we are lodging our submission across the site for each separate DA.

REDWatch objects to proposed development due to the reduction in the amount of affordable housing being proposed in these DAs. The reduction of affordable housing units from 35 to 24 is a direct result of the developer exercising the option to develop the northern building as commercial rather than residential. The affordable housing is set as a percentage of residential floor space and hence reduces in line with that reduction. It was not preserved at the initial 35 units in the way social housing was locked in at 70.

While REDWatch opposes the development in its current form for this reason. REDWatch supports some of the changes, including the increased focus on commercial space, and the maintenance of the new 70 public housing units. We also wish to comment on other aspects as outlined below in more detail.

However, REDWatch also expresses very serious concerns about the lack of time and other opportunity for residents to comment on these important and complex DAs. REDWatch notes the time of year (being before Christmas), the exhibition being only for minimum required period (28 days) and a lack of printed materials, sufficient communications and access to community rooms for drop in sessions which could have ensured there would be widespread awareness of the latest plans, and a proper time to comment.

About REDWatch: Redfern, Eveleigh, Darlington, Waterloo Watch (REDWatch Inc) is a community group which covers the Sydney suburbs of Redfern Eveleigh Darlington and Waterloo. REDWatch is a not-for-profit resident action group which has been operating for more than fifteen years monitoring government initiatives in our suburbs.

About this submission: This submission relates to the five related Development Applications (DAs) relating to the Waterloo Metro Quarter, namely the four State Significant Development applications (SSDAs) for the 'northern precinct', 'central precinct', 'southern precinct' and basement car park, and the modification to the concept SSDA approval relating to the precinct overall. The content of this submission came from issues raised with REDWatch at an advertised submission workshop and other input from local tenants.

REDWatch has other serious concerns about the DAs. These key concerns include:

- The general scale and density of the development having a major impact on the surrounding community with no adequate plans in place to strengthen or create the new infrastructure new residents and visitors will need.
- The removal of the proposed community centre space with no replacement free or low cost community facilities. The proposed private childcare centre is not an adequate community facility and not in line with a proposed community centre.
- The creation of the station square and other key spaces as a private rather than public space.
- The construction of a new tower with small rooms, shared facilities and little or no internal amenity representing poor quality housing for future tenants (currently proposed for student housing).
- Overshadowing of the limited green space surrounding the development, and assumptions made about future community infrastructure and green space in other areas of the Waterloo precinct that might be developed, where no plans or funding for this have been approved.

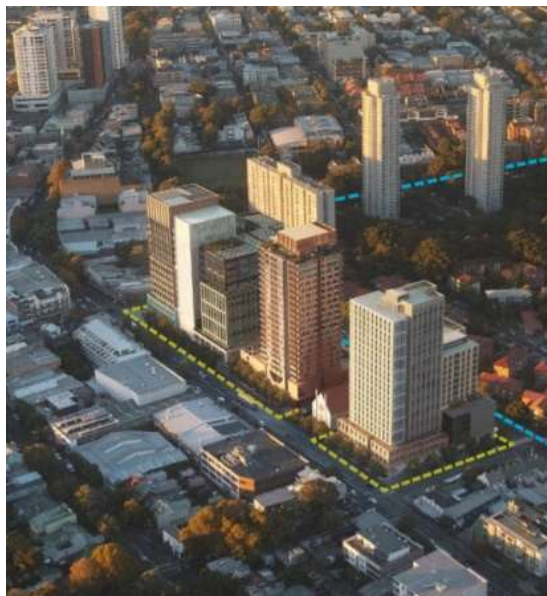


Image of proposed development from the 'Waterloo Metro Quarter, Environmental Impact Statement Overview Booklet' released Nov 2020

Concept OSD DA Amendment SSD-10441 (Changes in building envelopes and resultant decrease in Affordable Housing)

- The concept DA approval provided flexibility for a part of the development to be commercial rather residential but it kept affordable housing at a minimum of 5% rather than lock the affordable housing in at a number (35) in the same way that social housing was locked in.
- The proposal to rearrange the envelope in the northern precinct allows larger floor plates that increase the value of the development. Choosing commercial space decreases, the residential floor space on which affordable housing is then calculated. This again increases the return to the developer. While REDWatch is supportive of the commercial development, we are not supportive of it going ahead at the cost of 11 affordable housing units.
- Approval for the change of commercial envelope should be contingent on commercial the floor space being considered as residential floor space as far as calculating affordable housing and reinstating 35 affordable housing that would have been delivered if the commercial option had not been provided.
- Overshadowing primarily from the northern building means 57.3% of Cope Street Plaza receives 2 hours morning sunlight a day and none after 1pm in mid-winter. This does not make for a good public domain.

Northern Precinct SSD-10440 (Commercial Building)

- As per above we have concerns about overshadowing of public plaza in central precinct by the Northern precinct and the lack of any winter sunlight after 1pm.
- Concerns have been raised with us about congestion of pedestrians on the corner of Raglan/Botany roads may be dangerous for those crossing the street.
- We welcome the reduction in height from 29 to 17 storeys (116m – 90.4m).

- Façade of the commercial building has little / no relation to the surrounding heritage area. It is out of scale, and inconsistent with the character and heritage of the area. This is especially the case for the North West corner of the northern precinct building that faces three heritage corner buildings.
- The landscaping improvements are welcomed.

Central Precinct SSD-10439

- Designation of 24 affordable housing units is grossly insufficient given the high demand for social and affordable housing in the local area. At a minimum the actual number of new affordable dwellings proposed (35) in the last version of the plans should be provided.
- The community facility should not be used as a childcare centre but should be a space used by the local community. A childcare centre is not free or public if it is private.
- The Mirvac community room should be managed by an NGO, or otherwise be in public hands and no or low cost. A room is insufficient – the proposal for the community centre or larger space as previously suggested should be included.
- The interest by Sydney Local Health District to locate a mini - Health One on this site should also be considered.
- We continue to be of the view that 24 storeys is too high for this site. It is an overdevelopment of this site.

Southern Precinct SSD-10437

- We applaud that the social housing will be public housing and that it will be NSW Government owned and we welcome the possibility for early delivery of this site.
- The proposed public-private housing mix across the central and southern precincts is supported generally with the exception on the quantity of affordable housing.
- The provision of student housing is opposed by a large portion of the community whom were never consulted in previous consultations about this option.
- The case for the need for student housing is not demonstrated, especially given the number of other new student housing developments in the area.
- Furthermore, the transient nature of students makes it challenging to build a sense of community, which is of an immediate concern to the neighbourhood, which was promised a more balanced mixed and stable community from the Waterloo SSPs.
- Student housing is small, and has limited amenities. That will put more pressure on student to use the surrounding green space, public space and community infrastructure. Like the social housing, the designs for any housing need to include proper space within the building for tenants to enjoy proper amenity.
- Further there is concern that if demand for student housing falls that the student housing may, at a later stage, be changed to boarding housing (a risk of “a boarding house by stealth”) or possibly aged care uses. This will only result in substandard housing. Future boarding house uses should be specifically excluded in conditions.
- Experience with other student housing developments indicate that restrictions on internal activities push festivities outside the building. The developer cannot assume public park next door will provide external amenity as it isn't approved, agreed or solar impact assessed. The developer is responsible for providing amenity through its own site or on contributions to create more public space and community infrastructure nearby for new residents to use.

- The developer or operator should have in place a management plan for dealing with the impacts of their students in nearby public facilities and movement routes between those facilities and the student accommodation if internal amenity is not provided.

Basement Car Park SSD-10438

- The communities' views on the topic of parking is diverse. On the one hand, it is recognised that there should be minimal parking (as proposed in the DA) as the development sits above a Metro station. However, others will argue that the increase in residential and commercial will increase existing problematic parking issues in the area.
- REDWatch believes an appropriate compromise will be to increase parking that is targeted for certain needs. In particular there should be ample space for carers and health professionals assisting clients, sufficient disability and community transport parking to service residential clients or any on site health services etc.
- Parking should ideally be managed separately from the tenancies allowing for better utilisation of parking during working and after work hours. This also allows for retrofitting of charging points or change of use over the life cycle of the building.

Overarching issues relevant for all DAs

- The process of the exhibition has been poor:
 1. Significant changes from concept design from what is being exhibited is different, particularly with regard to student housing where the community has not been consulted.
 2. The exhibition has not been responsive to the needs of the local community to have their voices heard; confusing and onerous submission process and no regard for local residents that may have little/no access to digital devices. No printouts or copies of very complex plans (5 DAs) have been made available. Covid-19 restrictions have resulted in spaces nearby not being open for drop in or information sessions in a community that has low internet access and ability to access and use online facilities.
 3. Short timeframe for comments – 28 days and at the end of the year – means very few residents will be aware of the latest DA and have an opportunity to comment, this is especially so given the withdrawal of paper and drop-in locations used previously in community engagement about the Metro site.
- There continues to be concern about the developments' scale, density and impact on local community.
- Concern about cumulative impact from this development, and the lack of integration of proposed nearby developments. The separation of the Waterloo Metro over station development from the Waterloo Estate re-development means impacts on possible open space and the development to the east is not required and not assessed.
- There is a negative impact on surrounding areas, which is not properly considered. Shadowing over Alexandria Park is improved but still too much overshadowing over public housing and location of a future park.
- Public space is not 'public' but private as it will be managed by Mirvac. It would have the authority to restrict public access. Genuine public space needs to be delivered.

- The amount of affordable housing delivered on the site should not be decreased because of the increase in commercial space. At a minimum to the number of new affordable dwellings should not be below the 35 dwellings included in the previous version of the plans.
- Ensure maximum outcomes for the community. Need to deliver *genuine* community facilities, which meet needs which have been identified by the community.
- Need for affordable retail for surrounding public housing. Important that the local shopping strip, and the connections it fosters in the local community, are not lost.

Thank you for the opportunity to comment on this development.

This submission can be made public.

Disclosure: REDWatch has not donated more than \$1000 to a political party.

For Further Information, contact:

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REDWatch is a residents and friends group covering Redfern Eveleigh Darlington and Waterloo (the same area originally covered by the Redfern Waterloo Authority). REDWatch monitors government activities in the area and seeks to ensure community involvement in all decisions made about the area. More details can be found at www.redwatch.org.au.